



Wycombe District Local Plan (Regulation 19) Publication version

Topic Paper 1: The Strategy

October 2017

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1.0 Introduction

- 1.1 This Topic Paper is one of a series of topic papers to accompany the Wycombe District Local Plan (Regulation 19) Publication Version (October 2017). Topic papers explain how the strategy has developed and the information, evidence and feedback that has informed the choices made in formulating the policies and also set out what we foresee as the key issues and how these have been resolved.
- 1.2 This topic paper explains the development of the Plan's overall strategy, including its overall vision and objectives. As such it draws on the other Topic Papers on more specific topics.

2.0 Policy Context

National Planning Policy

- 2.1 There are many elements of the NPPF that influence the development of plan strategies and this section does not seek to set all of those out. However at the heart of national policy in the NPPF is a presumption in favour of sustainable development. For plan making this means:
 - local planning authorities should positively seek opportunities to meet the development needs of their area
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole
 - specific policies in this Framework indicate development should be restricted ('Footnote 9').

'Footnote 9' states: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural

Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

2.2 In the context of Wycombe District the existence of very significant areas of 'Footnote 9' constraints is a key factor in the development of the strategy for the District.

2.3 Ultimately the Plan is assessed on whether it has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and the test of soundness (NPPF paragraph 182), namely:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

2.4 The Plan-making Section of the NPPF (paragraphs 150 – 182) set out in more detail the approach to be taken to preparing local plans including at paragraph 156 ensuring that the Local Plan sets out the strategic priorities for the area. This and other Topic Papers set out how those main strategic priorities are addressed in the Plan.

- 2.5 In relation to the Duty to Cooperate, a separate draft Duty to Cooperate report¹ sets out how the Council has complied with the Duty. Given that the Duty is about jointly addressed strategic issues across authorities and with key agencies, this and other Topic Papers draw on that report.
- 2.6 The first two tests of soundness are specifically concerned with the Plan's strategy, namely:
- Positively prepared – seeking to meet objectively assessed development requirements and where reasonable unmet requirements;
- Justified – the most appropriate strategy when considered against the reasonable alternatives.
- 2.7 The Sustainability Appraisal² and the associated evidence base goes through a detailed process of seeking to identify sites to meet objectively assessed development requirements and considering all the reasonable alternatives in terms of both the overall level of development but also the different spatial/locational options.
- 2.8 An important element of the development of the strategy is the approach to dealing with NPPF para 14 'Footnote 9' constraints. In relation to flood risk, there is a clearly prescribed process for addressing this issue and the Water Environment Topic Paper explains the approach taken in more detail. Similarly in relation to the most important biodiversity sites, namely the internationally significant Special Areas of Conservation (SACs), the Habitat Regulations Assessment Screening report (September 2017) considers these and whether the emerging strategy is likely to have significant effects.
- 2.9 However by far the most extensive areas of 'Footnote 9' constraints in the District are the Green Belt and AONB – the Green Belt is 48% of the District, the AONB 71%. The NPPF is clear that once established Green Belt boundaries should only be altered in exceptional circumstances,

¹ Wycombe District Council and the Duty to Cooperate – Draft Report (September 2017)

² Sustainability Appraisal of the Publication (Regulation 19) Draft of the Wycombe District Local Plan. SA Report (September 2017)

through the preparation or review of the Local Plan (para 83). Great weight should be given to conserving landscape and scenic beauty of the AONB (para 115) and permission should be refused for major developments in the AONB except in exceptional circumstances and where it can be demonstrated they are in the public interest (para 116).

Emerging National Policy

2.10 The Housing White Paper published by Government in February 2017 consulted on various possible changes to national policy and guidance, and this was followed in September 2017 by a further consultation on a new methodology for calculating objectively assessed housing need and a number of other proposals³. The latter consultation, in relation to the proposed new methodology for calculating objectively assessed housing need sets out transitional arrangements – paragraph 55 of the consultation document states:

“If a local plan is currently at examination or will be submitted for examination on or before 31st March 2018 or before the revised Framework is published (whichever is later), it should continue to be examined and rely on evidence prepared using the current method.”

2.11 As set out in the latest Local Development Scheme⁴, the Council intends to submit its plan by the 31st March 2018 and will therefore base its objectively assessed housing need on the current OAN methodology in the PPG as applied in the Bucks HEDNA.

2.12 In relation to other possible changes proposed by the Government in both the February and September consultations, the Government have indicated that a new NPPF will be published in Spring 2018. It is not clear at this point in time whether this will be a draft or final version of the NPPF. The Council clearly cannot know the outcome of those consultations and what the final form of Government policy will be when the Plan is submitted for examination. As such the Plan is proposed and

³ Planning for the right homes in the right places: consultation proposals (DCLG, September 2017)

⁴ Wycombe Local Development Scheme (August 2017)

Published on the basis of the current NPPF. The evidence and other Topic Papers may refer to these Government proposals and how the Council's proposals may relate to emerging national policy, but the basis of the Plan is current national policy.

Planning Practice Guidance

2.13 Extensive elements of the PPG are relevant to plan making and the different topic papers highlight the key sections. The overarching Local Plans section of the PPG highlights the procedural elements of the Plan making process. At this stage, key elements are compliance with Regulation 18, the Duty to Cooperate, and tests of soundness. In this respect the Council have produced 3 documents that demonstrate compliance:

- The draft Statement of Consultation (September 2017) – this will be updated prior to submission of the Plan to take account of the consultation at the Regulation 19 stage;
- The draft Duty to Cooperate report (September 2017) – this will be updated prior to submission of the Plan to take account of ongoing engagement with Duty to Cooperate bodies;
- The Soundness Assessment Report (September 2017).

Local Plan Context

Current elements of the Development Plan

2.14 The current Wycombe District Local Plan (saved policies) was adopted in 2004 and all its policies will be replaced by the new Local Plan.

2.15 The Wycombe Core Strategy (2008) was prepared and adopted in conformity with the regional spatial strategy, the South East Plan. Whilst planning for growth, the scale of housing planned recognised the major constraints of the District and also followed the South East Plan strategy of limited growth in the north of the District. All the policies in the Core Strategy will be replaced by the new Local Plan.

- 2.16 The Delivery and Site Allocations Plan was adopted in 2013, having been submitted and examined after the publication of the NPPF. It focuses on town centre proposals and some development management policies. With some limited exceptions the Delivery and Site Allocations Plan will remain in force and sit alongside the new Local Plan as part of the Development Plan going forward. It is not necessary to re-visit its provisions in most instances and indeed key proposals such as the High Wycombe Town Centre Master Plan proposals are already being implemented.
- 2.17 There is one 'made' neighbourhood development plan (Bledlow-cum - Saunderton) and four other plans at various stages of preparation.

Other Local Strategy

- 2.18 The early stages of the preparation of the new Local Plan were undertaken alongside the update to the Wycombe Community Strategy⁵ prepared by the Wycombe Partnership⁶. The Strategy sets the long term vision and outcomes for the District by 2031. It sets the overarching vision that:

*Wycombe District will be economically strong and **the** place to live, work and visit.*

- 2.19 It identifies 5 themes that are developed within the Strategy for the different partners and their associated strategies to take forward, recognising that there are number of links to spatial planning. The themes are:

Thriving Economy
Sustainable Environment
Safe Communities
Health and Wellbeing
Community Involvement

⁵ Wycombe Community Strategy - 2013

⁶ ie the local strategic partnership drawing together key public sector, business and voluntary groups in the District

2.20 The Local Plan draws on the spatial elements of these in developing the objectives for the Plan.

Wider Strategic Context

2.21 The Local Plan has been developed within a wider strategic context. Paragraph 1.18 of the Publication Draft Local Plan identifies a number of these namely:

- 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, including a focus on improved connectivity and town centre regeneration.
- The Buckinghamshire Infrastructure Investment Plan – aiming to support growth in the county through new infrastructure provision;
- HS2 – which cuts through the very northern tip of the District;
- East West rail project – which will improve rail links from Princes Risborough to Aylesbury and provide a new direct connection on to Milton Keynes;
- Crossrail – improving connections to central London from Maidenhead
- Buckinghamshire Local Transport Plan 4 – which identifies a number of strategic transport issues affecting the District, including the poor north/south road links across the county;
- 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.
- The Bucks Health and Wellbeing Strategy

2.22 In addition 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 the how north south road connectivity issues might be addressed in the future, with implications for the District as Local Transport Plan 4 rightly identifies north south connectivity as a key issue. The proposed 3rd runway at Heathrow will also have wider implications that could also impact on the District.

- 2.23 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 into this Plan and are matters that would need to be addressed at a future Plan review. The Housing White Paper anticipated more regular plan reviews, at least every 5 years.

3.0 Local Context and Challenges

- 3.1 Section 2 of the Publication Draft Local Plan sets out the main challenges for the Plan and these can be summarised as:

- Delivering homes – the objectively assessed need (OAN) for housing in the District is 13,200 homes (2013-33) or 660 per year – this compares with the current Core Strategy target of just over 400 per year. The Housing Topic Paper explains how the OAN has been derived and how the different options have been assessed to try to meet that need;
- Providing land for jobs and supporting town centres – forecasts suggest there will be growth of 7,650 full time equivalent jobs (5,000 B use class) but these forecasts have to be considered alongside the other factors, including market considerations. The Economic Topic Paper explains how these challenges are being addressed.
- Infrastructure – mitigating the impact of development, particularly on the transport network, but also other forms of infrastructure. The Infrastructure and Transport Topic Papers expand on these issues.
- Sense of Place – ensuring that provision of the above achieves the desired ‘sense of place’ and contributes to health and wellbeing.

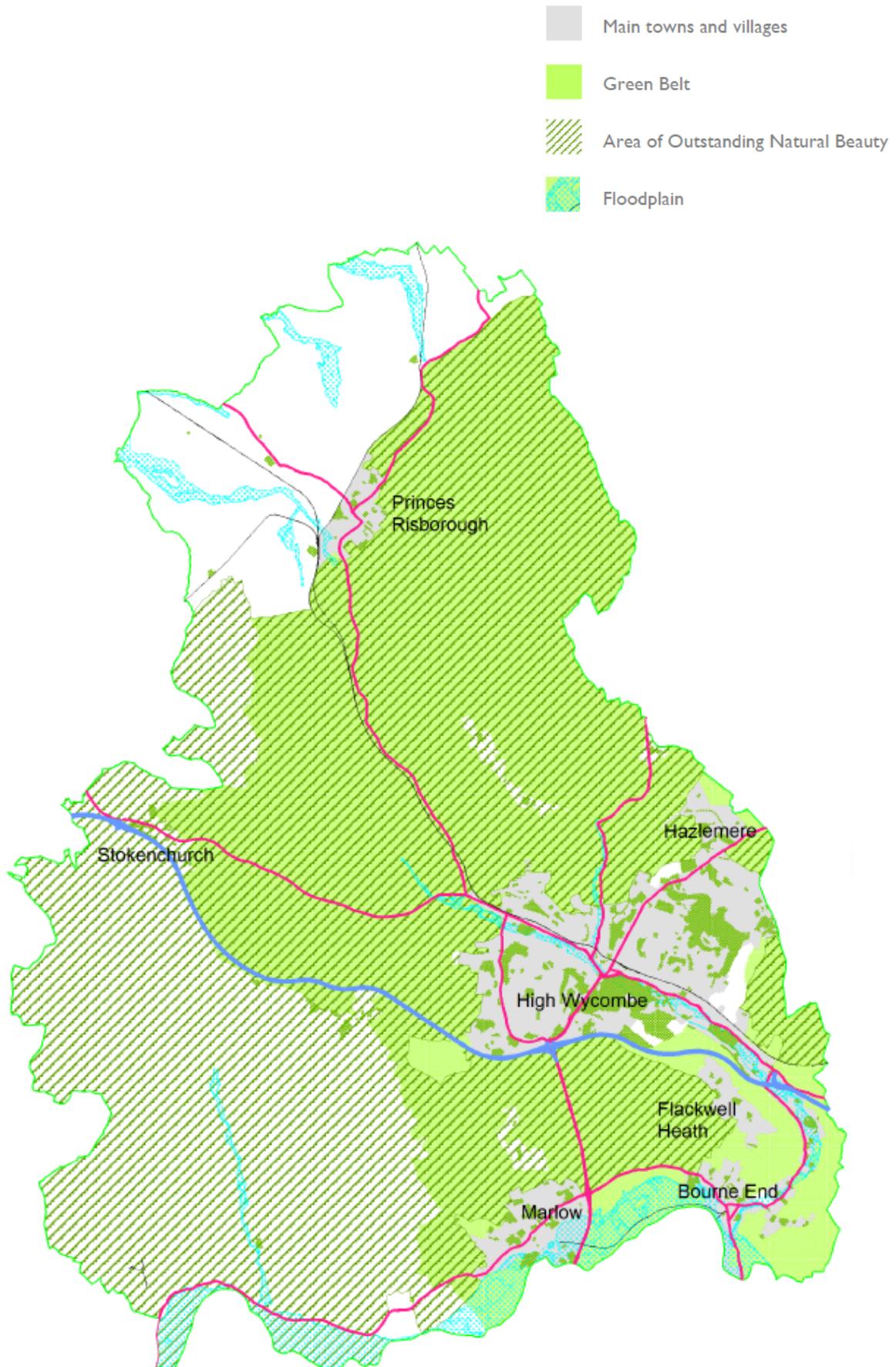
3.2 Informing decisions on meeting the needs identified above are the environmental and planning constraints of the District. 77% of the District consists of the national constraints of the Area of Outstanding Natural Beauty (AONB), Green Belt, and Sites of Special Scientific Interest (SSSI)⁷, all of which are NPPF para 14 'Footnote 9' constraints. This places Wycombe District in the top 10% of authorities nationally in terms of the extent of these constraints⁸. There are additional environmental constraints to these three key constraints highlighted by the Government – the Sustainability Appraisal Scoping report⁹ highlights these but they include additional NPPF 'Footnote 9' constraints such as significant areas of flood risk and heritage assets. Some of the key constraints are identified in Figure 1 overleaf.

⁷ Figure published by DCLG alongside the housing OAN consultation – Planning for the right homes in the right places: consultation proposals (September 2017).

⁸ 26th equal out of 329 authorities in England – based on the data published by DCLG alongside the Planning for the right homes in the right places: consultation proposals (September 2017).

⁹ See for example Table 3, page 16 of the Sustainability Appraisal/Strategic Environmental Assessment: The Wycombe District Local Plan: Scoping Report (October 2013)

Figure 1: Principal Constraints



4.0 How did the strategy evolve?

- 4.1 From the early stages of evidence gathering in 2013 leading to the Options consultation in February 2014 it became apparent that the preparation of this Plan would present major challenges – the Options consultation called it “The Big Challenge” Plan. This was because the need for homes and jobs was high and much higher than in previous plans, whilst the same extensive planning and environmental constraints applied to the District together with ongoing pressures on infrastructure.
- 4.2 The preparation of the Plan to determine the most appropriate and sustainable development strategy for the District for the next 15 years has involved a thorough testing of the options and ultimately the preparation of a Plan that has involved:
- The development of an extensive but proportionate evidence base, that is available alongside the publication version of the Plan;
 - An ongoing process of Sustainability Appraisal at key stages of plan preparation to test options, drawing on the latest evidence, and brought together in the Sustainability Appraisal of the Publication (Regulation 19) Draft of the Plan (September 2017).
 - Extensive community engagement, often on challenging and difficult issues – the Draft Statement of Consultation (September 2017) explains the consultation undertaken and how that has helped to shape the Plan;
 - Active engagement with Duty to Cooperate bodies to address strategic issues, with significant outcomes achieved and wide ranging agreement – the Draft Duty to Cooperate report (September 2017) provides the detail on this.
- 4.3 The different topic papers explain the evolution of the strategy and approach on those different issues and this topic paper does not seek to

replicate them in detail. The Sustainability Appraisal of the Plan¹⁰ summarises the main stages of Plan preparation up to finalising the Publication Version of the Plan, including the different stages of sustainability appraisal. These stages can be summarised as:

- Phase 1 - End 2012 – 2013 Early issues consultation and early evidence work.
- Phase 2 – Feb – Mar 2014 – Options consultation including initial sustainability appraisal.
- Phase 3 – May 2014 – Jun 2016 - Development of the evidence base and engagement on specific areas of work, including consultation on the draft Princes Risborough Town Plan and Sustainability Appraisal.
- Phase 4 – Jun – Aug 2016 – consultation on a draft Plan and draft Sustainability Appraisal report.
- Phase 5 – refinement of the evidence and preparation of the Publication (Regulation 19) version of the Plan, and its associated Sustainability Appraisal.

4.4 Chapter 4 of the Sustainability Appraisal sets out the range of options considered during the plan preparation process, why those options were selected and, in some cases, rejected. Those options have been informed by an evolving evidence base which involved extensive joint working with other authorities and agencies under the Duty to Cooperate, particularly those authorities in the Bucks Housing Market Area. The individual topic papers and associated evidence reports, together with the Duty to Cooperate report, explain the nature of that joint working and the key outcomes. Critically this involved joint working within the HMA on the Housing and Economic Development Needs Assessment (HEDNA) and updates to it.

4.5 One of the key areas where the evidence has evolved has been in the assessment of the scale of development needs. Early work published in

¹⁰ Sustainability Appraisal of the Regulation 19 Publication Local Plan (September 2017), Table 2 page7.

2014 based on the draft Wycombe Strategic Housing Market Assessment (2014) and the Wycombe Economy Study and Employment Land Review (2014) included several scenarios for the scale of growth required in relation to homes and jobs. However more recent and up to date work has resulted in a single figure and not a range.

- 4.6 The process has involved testing of different spatial options for growth, initially in the 2014 Options Consultation and accompanying initial Sustainability Appraisal. Some of those options were expressed at a high level and were followed up by more detailed evidence work to inform the potential scale and scope of that option. The options tested related to both different sources/types of land, and different geographical locations. The reality was and is, that a number of different sources of land supply and locational options would be required to address the scale of need arising from the emerging work, particularly the HEDNA work.
- 4.7 Key areas of more detailed evidence work following the initial options consultation to inform the spatial options and overall capacity of the District included:
- Evidence to assess the most appropriate scale of growth at Princes Risborough and its associated infrastructure requirements;
 - Green Belt review;
 - Assessment of sites in the AONB;
 - Commercial sites assessments;
 - Settlement Hierarchy Study;
 - Review of scope for development at Kimble and Longwick;
 - Various studies considering infrastructure requirements including transport assessment work and water quality studies;
 - Strategic Flood Risk Assessment
- 4.8 The process has rightly been challenged as we have gone along, both through public and stakeholder feedback and through the Duty to

Cooperate. This has led to reviewing options and assessments, including:

- The scope for more major development at Saunderton – subsequently rejected;
- Reviewing the Green Belt;
- Reviewing site options in the AONB;
- The scope for development at Great and Little Kimble – some growth is now proposed there in the Plan, the detail to be set out in a neighbourhood plan;
- A more general review of the housing land supply following the response to the draft Plan consultation (Jun – Aug 2016).

4.9 The Consultation Statement sets out in more detail how the Council has responded to the key issues raised at various stages of the plan preparation process.

4.10 The development of the evidence base and ongoing engagement has also been accompanied by ongoing dialogue through the Duty to Cooperate. This commenced at the beginning of the plan preparation process but was particularly focused following the Options Consultation in early 2014. Following the joint working between the Bucks authorities to determine the key geographical building blocks, namely the Housing Market Area (HMA) and Functional Economic Market Area (FEMA), a range of joint working, agreeing methodologies, and sharing and critiquing emerging evidence particularly where it was relevant to the determination of the capacity of authorities and distribution of development across the HMA/FEMA was undertaken. Key joint working across the HMA included:

- HMA/FEMA study;
- Housing and Economic Development Needs Assessment (HEDNA) and updates;
- Housing and Economic Land Availability Assessment (HELAA) methodology

- Green Belt Part 1 assessment
- Gypsy and Traveller Needs Assessments
- Traffic modelling

4.11 Similarly the Council has worked closely with other bodies and agencies under the Duty to Co-operate on key strategic issues. This has often involved sharing of study methodologies and drafting findings to agree the outputs from the work.

4.12 Ultimately the Duty to Co-operate has been outcome focused and key outcomes are summarised in the next section of this paper, with the detail set out in the Duty to Cooperate report.

5.0 The Strategy

The Plan Objectives

5.1 The overall vision is established by the Sustainable Community Strategy and it is for the plan to develop these into spatial objectives for the development plan. The Plan sets out 8 strategic objectives and our ambitions to achieve those objectives. In addition, principles are identified for the main places in the District to show how the district wide objectives would be implemented locally (these are set out in section 5 of the Plan).

5.2 The 8 strategic objectives are:

1. Cherish the Chilterns
2. Strengthen the Sense of Place
3. Foster economic growth
4. Improve strategic connectivity
5. Facilitate local infrastructure
6. Deliver housing
7. Champion town centres
8. Mitigate Climate Change

- 5.3 The focus of these strategic objectives draws heavily on the key challenges facing the District set out in section 2 of the Plan. They recognise the District's distinct location in the Chilterns AONB, its strategic connectivity strengths and weaknesses and the desire to work with partners to address these, and the Plan's role in mitigating the impacts of climate change. It not surprisingly highlights the importance of delivering housing and fostering economic growth within the Wycombe context, but also the critical importance of both place making and local infrastructure delivery to ensure that growth is genuinely sustainable in the local context.
- 5.4 Whilst it is possible to derive more strategic objectives, the 8 set out in the plan address the local strategic priorities. Alongside applying the core planning principles set out in para 17 of the NPPF these can deliver the environmental, social and economic aspects of sustainable development for the District.
- 5.5 Delivery of the strategic objectives and the principles for places in the District are essential to securing sustainable development in the local context - that is why they are both incorporated into Policy in the form of Policy CP1.
- 5.6 The other Core Policies in the Plan (section 4 of the Plan) are directly linked to delivering the Strategic Objectives. They explain:
- Where development should go
 - What development will be delivered
 - How development will be delivered
- 5.7 The Core Policies together with other relevant policies in the Plan and the Delivery and Site Allocations Plan set out and address the strategic priorities for the area set out in paragraph 156 of the NPPF.

The Development Strategy

5.8 The final development strategy, both the overall scale of growth planned for, and its broad spatial distribution, is a bringing together of several key factors:

- The need for development – housing, economic development and infrastructure. This is the starting point;
- The environmental and planning constraints of the District, including extensive NPPF para 14 'Footnote 9' constraints;
- The infrastructure constraints of the District, often themselves constrained due to the environmental constraints;
- Market considerations – the deliverability of the required development;
- The broad sustainability of locations for development in terms of their services and facilities – as summarised in the Settlement Hierarchy.

Overall Scale of Growth

5.9 In the context of a District that is 48% Green Belt and 71% AONB, in relation to the overall scale of growth planned, the Sustainability Appraisal and detailed evidence has tested a range of options to meet the overall objectively assessed housing need but it is considered that the impact of meeting the full need would not be sustainable. Impacts identified in meeting the full need include greater impacts on biodiversity, landscape, the historic environment, natural resources and traffic.

5.10 More specifically it is likely that there would be a greater impact on the Chilterns AONB as a result of development of more sites within or in close proximity to it (or sites developed at a higher density) – contrary to one of the Plan objectives and to national policy that require authorities to attach great weight to conserving its landscape and scenic beauty. Meeting the OAN would also result in increased travel time and congestion, particularly in locations where there are already significant

congestion problems and where it may be more difficult to mitigate those impacts (eg High Wycombe and Bourne End).

- 5.11 Meeting the full housing OAN is also likely to require the release of significant additional Green Belt land over and above that proposed in the Publication Version of the Local Plan. As discussed in the Housing Topic Paper this would result in an unacceptable impact on the Green Belt and the purposes for including land in the Green Belt. The exceptional circumstances required by paragraph 83 of the NPPF to release this additional land from the Green Belt do not exist.
- 5.12 In relation to market considerations, whilst the housing market is strong in Wycombe District and, as the Housing Topic Paper and HELAA highlight, the housing distribution in the Plan both by location and site size support strong housing delivery, there are still certain constraints to delivery. The key one affecting the overall scale of growth capable of being accommodated in the District is the scale of housing growth capable of being delivered at Princes Risborough as part of the major urban extension. Evidence suggests¹¹ that, factoring in reasonable lead in times for the significant infrastructure requirements to support the growth of the town, and healthy build rates having regard to national benchmarks, there would still be around 600 dwellings to complete in Princes Risborough beyond the end of the Plan period.
- 5.13 In relation to economic development, market factors are a stronger influence on the overall scale of economic development proposed. Key factors include that:
- Unlike housing, modern B use development has more specific locational requirements, requiring more accessible locations either in or around town centres, or well-located to the strategic road network. This restricts the choice of locations and sites that may be deliverable;

¹¹ Housing Delivery Study for Buckinghamshire (Wessex Economics) August 2017, pages 30-35

- As the Economic Topic Paper and the HEDNA Addendum explain there is a mismatch between the employment forecasts and how the market is operating, particularly in terms of B1a office development, suggesting that there could well be a take up issue if the Plan allocates large amounts of new employment land, particularly for offices, and/or affect the take up of existing commitments and vacant property.
- 5.14 Once the other environmental and planning constraints are overlain with the market constraints and weaknesses this provides a significant limitation on the scope for major economic development growth in the District.
- 5.15 In relation to retail/town centre development, the Economic Topic Paper explains that proposals for main town centre uses including retail are addressed primarily in the Delivery and Site Allocations Plan that will sit alongside the new Local Plan. It notes that the Council has explored, in line with NPPF para 23, options for expanding the town centre but there is only limited additional scope – this Plan identifies only one site allocation opportunity in High Wycombe Town Centre in addition to those included in the Delivery and Site Allocations Plan. The priority need is met up to 2023 and most need is met up to 2028, and the forecasts are less reliable beyond this point.
- 5.16 The scale of growth required brings with it pressures on infrastructure, most notably on the transport network but other infrastructure too. The Transport Topic Paper and the Infrastructure Topic Paper explain how these infrastructure considerations have been addressed as part of preparing the plan and the emerging strategy.
- 5.17 In relation to transport the Transport Topic Paper notes that the environmental constraints also limit the ability to shape the strategy around the transport network. However it also notes that, as set out in this Topic Paper that most development is concentrated around the most sustainable settlements and that appropriate mitigation measures

are proposed as a result of transport testing. Environmental constraints that limit the scale of growth in the District also place limits on the ability to provide substantial new infrastructure in many locations too.

- 5.18 More strategic deficiencies are not necessarily capable of being resolved though the Plan, certainly on its own, but the Plan sets objectives to improve connectivity and is working with key partners to address those deficiencies. These include:
- access to High Wycombe from the M40;
 - the A404 south of High Wycombe including the Westhorpe junction at Marlow and the Bisham junction (in the Royal Borough of Windsor and Maidenhead);
 - north south connectivity in Bucks, including both rail and road connections.
- 5.19 The Infrastructure Delivery Plan identifies a wide range of mitigation measures to support growth – many of these represent relatively local, but important, interventions and are reflected in individual site policies in the Plan to ensure development delivers those necessary infrastructure improvements. A wider strategic infrastructure constraint to growth is the capacity of the sewage treatment works both at Little Marlow (which serves most of the District) and Princes Risborough. Both have limited capacity and the Water and Infrastructure Topic Papers and associated evidence explain how they can be acceptably expanded to facilitate further growth.
- 5.20 Overall however it should be noted that Bucks County Council, as a key infrastructure provider, have agreed that the scale and distribution of growth in the Plan is feasible and that the Infrastructure Delivery Plan provides a sound basis for taking the Plan forward.¹²

¹² See Memorandum of Understanding between Wycombe District Council and Bucks County Council (September 2017)

5.21 Overall when piecing together the different factors, and having explored all the reasonable alternatives, the Plan falls short of meeting all its development needs by 2,275 dwellings and around 10ha of employment land. Meeting those needs in full would:

- Involve development where NPPF para 14 'Footnote 9' indicates that development should be restricted – in the Wycombe District context these include sites protected under the Habitats Directive (SACs), Sites of Special Scientific Interest, Green Belt, Area of Outstanding Natural Beauty, designated heritage assets, and locations at risk of flooding. Collectively these areas cover at least 77% of the District.
- Involve development where the adverse impacts of development significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole,

5.22 In terms of the interrelationship between the scale of housing growth and economic development, the Plan is not meeting the full housing OAN or the full Oxford Economics economic forecasts. The HEDNA market signals uplift assessment makes clear that the 20% uplift applied in Wycombe District relates to affordability related market signals and not to balancing housing and employment growth, the uplift for which would be less than the 20% applied when applying the full employment implications of the Oxford Economics forecast. The fact that the Oxford Economic forecasts are not being met in full in the Plan means that any uplift for balancing housing and employment growth would be even less. Indeed the Labour Supply Led economic forecast set out in the HEDNA Addendum¹³, which factors in below OAN levels of housing in the District, results in a somewhat reduced level of demand for B use employment floorspace and land. Other forecast scenarios for employment land result in lower employment land requirements.

¹³ September 2017

Addressing Unmet Need

5.23 As the evolution of the housing and economic strategies has explained, it was clear early on that the constraints of the District set alongside the emerging development needs of the District meant that there was going to be a major challenge in meeting those needs in full. Through the Duty to Cooperate work focusing on the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) authorities joint commissioning of evidence (see section 4 above) and sharing and testing of respective housing and employment land supply positions resulted in an agreed position across the HMA and FEMA on unmet needs and distribution. On housing in particular this was an iterative process as new evidence came forward to inform the emerging overall position. Thus, there were four Memorandums of Understanding in which the position evolved:

1. August 2015 – between all the Bucks authorities and the Bucks Thames Valley LEP which agreed to the principle of unmet needs from Chiltern, South Bucks and Wycombe Districts being accommodated in Aylesbury Vale, but not agreeing the quanta;
2. December 2016 – agreement between Wycombe District Council and Aylesbury Vale District Council that Aylesbury Vale would accommodate 1,700 dwellings from Wycombe District;
3. July 2017 – agreement between the Bucks district councils and Bucks Thames Valley LEP on the scale of unmet housing need that will be accommodated in Aylesbury Vale District, including Wycombe's unmet housing need of 2,275 dwellings. It also agreed the approach to employment land needs.
4. September 2017 – agreement between Bucks County Council and Wycombe District Council endorsing the Wycombe District elements of the July 2017 MoU in terms of unmet housing need and spatial distribution.

5.24 Thus whilst the testing of the options and alternatives concluded that the Housing OAN could not be accommodated within the District, the

July 2017 MoU agrees that Wycombe's unmet need can be accommodated within the HMA and the needs of the HMA as a whole can be accommodated within the HMA. In relation to employment land, there is sufficient employment land proposed and committed across the FEMA, taking account of potential losses, to meet the Oxford Economics forecasts, but there is a mismatch of potential supply with the forecasts between the sectors reflecting the market intelligence highlighted in the HEDNA Addendum.

- 5.25 The overall picture across the HMA/FEMA is one of unmet needs for housing and employment land in the south of the county balanced out by additional provision of both in the north of the county – ie Aylesbury Vale.

Spatial Strategy

- 5.26 The Publication Version of the Local Plan (para 4.9) explains that the spatial strategy is driven by the interconnected locally distinct characteristics of the District:
- Our location: in the Chilterns Area of Outstanding Natural Beauty, and within the metropolitan Green Belt
 - Our connections: M40 and rail to London and A404 to the Thames Valley, and the need for better connections to the South East Midlands
 - Our settlements, the facilities they provide and the infrastructure constraints and opportunities that exist: High Wycombe, the three other major settlements of Marlow, Princes Risborough and Bourne End, and the scatter of villages.
- 5.27 Table 1 sets out the proposed distribution of housing and economic development in the Publication version of the Plan based on the different tiers in the Settlement Hierarchy. In summary:

- By far the highest level of housing growth and new employment land and other forms of economic development are focused in the High Wycombe urban area;
- Tier 1 and Tier 2 settlements are proposed to accommodate around 9,500 homes, over 85% of all the housing growth and most of the economic development;
- Tiers 3 and below, effectively the main rural areas and villages accommodating around 1,400 homes or just under 15% of the housing growth;
- The towns with the highest levels of housing growth are the areas where the main new employment land allocations are proposed – High Wycombe and Princes Risborough.

Table 1 Comparison of Scale of Housing and Economic Development for Main Settlements and Settlement Tiers.

Settlement & Tier in Hierarchy	Population¹⁴	Proposed Housing	Proposed Economic Development
Tier 1 High Wycombe urban area	105,298	6,341 dwellings ¹⁵ 58% of the District housing target.	81,000 sq m of B use class in allocations ¹⁶ – 73% of District total. Regeneration of Cressex Business Park Main focus for retail – 14,200 sq m in retail allocations ¹⁷ Major existing employment land and retail commitments
Tier 2 Marlow	14,325	345 dwellings 3% of the District housing target.	No new B use class employment land or retail allocations Regeneration of Globe Park
Tier 2 Bourne End and Wooburn	6,890	798 dwellings 7% of the District housing target	No new B use class employment land allocations or retail allocations.
Tier 2 Princes Risborough	7,961	2,047 dwellings ¹⁸ (within plan period) 19% of the District housing target	22,500 sq m B use class employment – 20% of District total. 2,300 sq m retail allocations.
Tiers 3 and 4	20,935	949 dwellings 9% of the District housing target	7,500 sq m B use class employment – 7% of the District total. No retail allocations.
Tiers 5 and 6 and rural areas	12,417	447 dwellings 4% of the District housing target	No new B use class employment land allocations or retail allocations.

¹⁴ Source: Wycombe Settlement Hierarchy Study (Sept 2017) based on 2011 Census data

¹⁵ Source: Wycombe HELAA, page 56, table 21

¹⁶ Source: Wycombe HELAA (September 2017) page 66, Table 27, – includes both allocations in the Local Plan and in the Delivery and Site Allocations Plan. Excludes planning permissions at base date of 1.4.16.

¹⁷ Source: Wycombe HELAA (September 2017) page 73, Table 32.

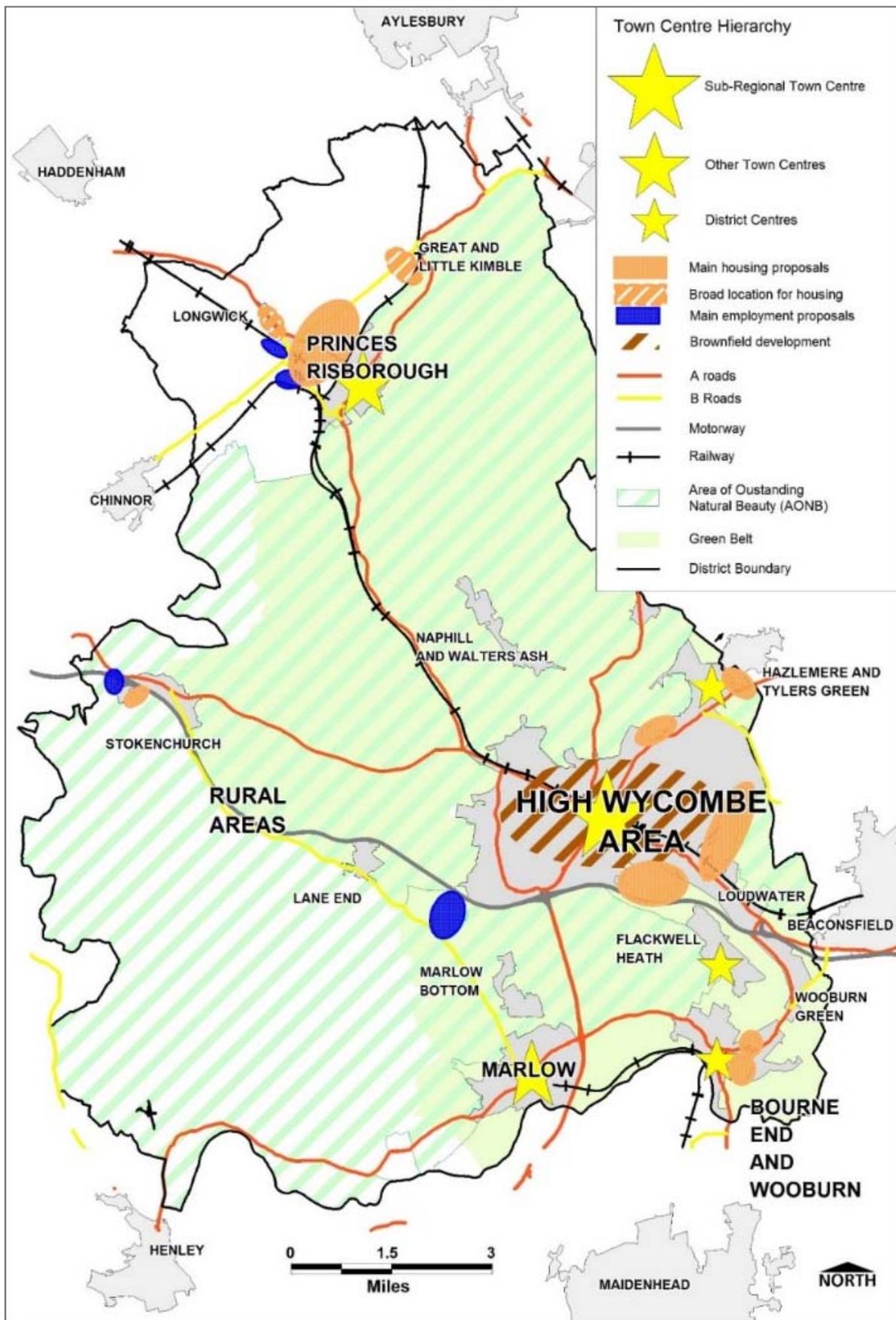
¹⁸ A further 599 dwellings anticipated beyond the end of the plan period (April 2033 onwards)

- 5.28 The spatial distribution of development is illustrated in the Plan and this is re-produced in Figure 2. Policy CP2 of the Plan explains the overall spatial strategy and Policy CP3 explains in more detail the implications for settlements across the District – the settlement strategy. Policy CP4 provides more detail on the spatial distribution of housing and Policy CP5 similarly explains the broad distribution in relation to employment land.
- 5.29 This distribution and the reasons for it are considered in more detail below:

High Wycombe

- 5.30 The town is entirely surrounded by Green Belt and by AONB on most sides. Nevertheless, the Plan proposes housing growth amounting to just under 60% of the housing growth for the District, and nearly three quarters of new B use class employment floorspace, and the vast majority of new retail growth. This is consistent with it having by far the largest employment base, services, facilities and public transport provision.
- 5.31 High Wycombe suffers from the most severe traffic congestion in the District and the ability to introduce larger scale interventions to address some of these issues are significantly restricted by topographical and landscape constraints in particular.

Figure 2 Spatial Strategy



- 5.32 Thus, whilst the scale of growth for the town is very significant, the Plan does not propose very large scale urban expansion of the town, due to Green Belt and AONB limitations. These constraints would also limit the ability to provide large scale transport interventions necessary to support higher levels of growth. Furthermore much of the housing growth that is proposed relates either to making best use of previously developed land or development of the reserve sites from the Core Strategy (ie effectively already committed).
- 5.33 Additional employment land is proposed, and the main proposals involve releasing land from the Green Belt, having been assessed in the Green Belt review process. This will help to provide a range and choice of sites for business, as well as offsetting ongoing employment land losses in the town.
- 5.34 High Wycombe is also the focus for most retail development with most sites allocated through the current Delivery and Site Allocations Plan. However a combination of a lack of suitable or deliverable town centre/edge of centre sites, the impact on employment land supply if employment sites were identified for retail, and the implications for the Green Belt and AONB of developing beyond the edge of the town mean that retail forecasts cannot be met at the back end of the Plan period (see the Economic Topic Paper for more detail). Focusing on the delivery of the range of town centre sites that are allocated and enabling the take up of vacant units in the town centre is considered the most appropriate approach and the one that is most supportive of the town centre and consistent with the Plan's objectives.

Princes Risborough

- 5.35 The town has seen little growth in recent decades, and until 2013 the strategic planning context has sought only limited growth in this part of the District.¹⁹ The Plan now proposes a major expansion of the town.

¹⁹ See the South East Plan (2009) – revoked on 2013.

- 5.36 The town is located at the north western extent of the Green Belt and the AONB both of which come up to the edge of the urban area on its eastern side. There are Special Areas of Conservation in close proximity to the east of the town as well. As the Princes Risborough Topic Paper explains, the choice regarding the direction of growth is limited by these constraints to an expansion to the west/north west of the town where these constraints do not exist.
- 5.37 There are a range of factors that have shaped the proposed scale and form of growth of the town, set out more fully in the Princes Risborough Topic Paper. These include landscape sensitivity including the potential impact on the setting of the Chilterns AONB (particularly sensitive given the fact that Princes Risborough sits under the Chilterns escarpment with extensive views across the vale), the importance of avoiding coalescence with nearby settlements, and ensuring good and sustainable access to local services and facilities, notably the town centre and main railway station. Alongside this sits the need to be able to deliver infrastructure improvements, and in particular a new relief road, to address the impact of the development. Focusing development to the west of the town also focuses development on an area crossed by several railway lines – this means that a new relief road in whatever form is particularly expensive and complex to deliver.
- 5.38 The scale of growth for the town is very significant, ultimately expanding the town by about three quarters in terms of its housing stock. It represents just under 20% of the total housing target of the Plan within the plan period, and a similar proportion of the new B use class employment floor space allocations. However the complexity of multiple landownerships and major infrastructure delivery mean it will take some time for the main housing area to deliver significant housing, and even with the prospect of strong build rates from multiple developers it can be expected that some 600 homes out of around 2,350 in the main

expansion area will come forward after the end of the plan period in 2033.²⁰

- 5.39 Princes Risborough benefits from good public transport links, including good rail access to London and Oxford, and has a good range of local services and facilities. This, combined with the relative lack of higher order planning and environmental constraints, means that it represents a good opportunity for major growth. Its location on the edge of the Chilterns is still sensitive and unconstrained growth needs to be avoided and would be harmful.
- 5.40 Whilst there are infrastructure constraints in the town, including the road network in the town centre, the lack of higher order constraints to the west means that there are opportunities to introduce major transport (and other) infrastructure improvements, albeit it at a relatively high cost due to the need to cross/improve crossings of railway lines. The Plan proposes additional employment growth to accompany the housing growth, but the scale proposed recognises that the key commercial drivers are not particularly strong at Princes Risborough meaning that future employment allocation is more suited to fulfilling localised demand.²¹ The good bus and rail links, however, ensure sustainable travel choices for commuters.
- 5.41 Some may question why not accommodate more growth at Princes Risborough to help get closer to meeting the housing OAN? Notwithstanding the fact that allocating a larger main expansion area may not result in much additional delivery before 2033 due to both lead in times and build rates, further expansion of the town is likely to result in more harmful impacts, not least in terms of landscape, coalescence and accessibility.

²⁰ See Housing Delivery Study for Buckinghamshire (August 2017) – pages 30-35

²¹ Commercial Sites Assessment

Bourne End

- 5.42 The Plan proposes around 800 homes at Bourne End over the lifetime of the Plan. Historically Bourne End has seen relatively limited amounts of new development as it is surrounded by the Green Belt. The town is not surrounded by the AONB, but there are flood risk areas associated with the River Thames and the River Wye.
- 5.43 In addition to development within the built up area, the Slate Meadow reserve site is also proposed to come forward for residential development, albeit its capacity is limited by flood risk issues and a statutory village green. The Green Belt review has identified the opportunity for a major Green Belt release at Hollands Farm, the site being first identified for further consideration as part of the countywide Part 1 Green Belt assessment.
- 5.44 Concerns have been expressed about the sustainability credentials of Bourne End to accommodate additional growth, and in particular challenging the Settlement Hierarchy's classification of Bourne End and Wooburn as a Tier 2 settlement when historically, in the Wycombe Core Strategy, Bourne End is included under the Rural Settlements and Rural Areas policy and separate from the towns of Princes Risborough and Marlow.²² It has also been noted that the final Settlement Hierarchy report removes the employment indicator and that Bourne End and Wooburn are separate villages and should not be classified together.
- 5.45 Bourne End and Wooburn are separate communities but physically they are joined by development – they are not separated by continuous open land/Green Belt. For this reason they have been considered together for planning purposes.
- 5.46 The Council would accept that Bourne End and Wooburn are not on the scale of Marlow and to a lesser extent Princes Risborough in terms of the scale and extent of services and facilities. However it has all the key

²² See Policy CS7, Wycombe Core Strategy, 2008

services, good public transport and all but one of the higher tier services including a secondary school (it does not have an indoor sports centre/leisure centre). Although the employment measure included in the original Settlement Hierarchy (2016) has been excluded from the final Settlement Hierarchy report because of the unreliability of the measure used, the data set out in Appendix 1 indicates that Bourne End's employment base is on a par with Princes Risborough, if not slightly stronger. Tier 3 settlements such as Stokenchurch and Flackwell Heath do not have as many higher tier services (both lack a secondary school) and possess a significantly weaker employment base.

- 5.47 Notwithstanding the precise classification in the Settlement Hierarchy, Bourne End, with or without the facilities in Wooburn, is considered to be a sustainable place for growth. It is acknowledged that the Plan proposes a significant increase in the size of the settlement, although proportionately this is not on the scale of growth at Princes Risborough and Longwick for example. The Plan does not propose new employment land at Bourne End but the employment base is relatively strong and so the focus is on housing delivery. New convenience retail development has also been provided in Bourne End in recent years.
- 5.48 The transport assessment work recognises the constraints on the local road network and the additional impact of development. Mitigation measures, including a new link road through the Hollands Farm site, are proposed that help to provide some relief on local roads and in the centre of Bourne End, whilst recognising that there is still a constraint at Cookham Bridge.
- 5.49 A range of other sites have been assessed and rejected, particularly due to the unacceptable harm to the Green Belt, but also for other reasons. Further development in and around Bourne End would add further traffic, adding to journey times.

Marlow

- 5.50 Marlow is the second largest town in the District with a strong economic base and vibrant town centre, albeit that the Globe Park business park has been suffering from significant vacancy levels in recent years. Although the preparation of the Plan has considered different options for housing and employment growth at Marlow, the town is particularly heavily constrained by Green Belt, AONB and the Thames floodplain. Larger scale development is likely to either constitute “major development in the AONB” for which the Council considers that there are not exceptional circumstances for permitting, harmful to the Green Belt, or infringing on areas of high flood risk.
- 5.51 Consideration was given to whether land should be released from the Green Belt at Westhorpe, to the east of the Marlow Bypass (A404) for a new business park. Commercially this is an attractive location. However, as the Employment Topic Paper and HEDNA addendum explain, market intelligence suggest a lack of demand for offices and the risk that existing commitments and current vacancies (including on Globe Park) could be undermined by significant new employment land provision. The Plan focuses on the regeneration of Globe Park and the Council has been working with Highways England, Bucks County Council, Bucks Thames Valley LEP and the local BIDco²³ to improve access into Globe Park and improve parking provision in the business park – as highlighted by Policy MR7 of the Plan. Notwithstanding the harmful impact on the Green Belt of releasing land at Westhorpe, this regeneration approach is considered to be more sustainable.
- 5.52 The resulting spatial strategy therefore only delivers a limited amount of housing at Marlow, much of which is already committed or provided, and no new employment land but aims to secure the take up of vacant floorspace for employment purposes.

²³ Business Improvement District

Rural Areas – Tiers 3 and below

- 5.53 The rural areas are heavily constrained by planning and environmental constraints, not least Green Belt and AONB. Nevertheless, it is right to consider the scope for growth in the rural area, not just to help meet development needs but also to sustain rural communities.
- 5.54 The Settlement Hierarchy indicates that there are a number of villages that have a reasonable level of services and facilities where development could sustainably take place, namely tier 3 and 4 settlements. However, as with the higher tier settlements, the distribution of development does not necessarily follow the position of a settlement in the hierarchy due to the planning and environmental constraints.
- 5.55 Thus 460 dwellings in total are proposed at the tier 4 settlements of Longwick and Great and Little Kimble – amounting to nearly half of the housing proposed in all Tier 3 and 4 settlements. This is a reflection of their location outside of the key Green Belt and AONB areas.
- 5.56 Overall the Plan proposes twice as much development in Tier 3 and 4 settlements than in Tiers 5 and below, and the rural areas overall contribute a significant 13% to the overall housing land supply. Other options have been explored in the rural areas but landscape impact, including major development in the AONB, and harm to the Green Belt are key reasons for why further growth is not proposed.
- 5.57 Outside of the Green Belt and AONB, as noted above Longwick and Great and Little Kimble are already proposed to receive substantial growth relative to the size of the villages, and their relative lack of services and facilities as Tier 4 settlements combined at Great and Little Kimble with landscape impacts mean further growth is not appropriate in these locations.
- 5.58 The rural areas are not generally locations where larger scale business development wants to locate from a commercial perspective.

Commercial advice indicated that Stokenchurch (a Tier 3 settlement), located at junction 5 on the M40, provided the commercially most attractive location in the rural areas for new business development and the Plan proposes a new site there which is of a scale that does not constitute “major development” in the AONB.

6.0 Conclusions

- 6.1 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 aside 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 where policies in the NPPF indicate development should be restricted.
- 6.2 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. It has also undertaken considerable engagement with stakeholders and the wider community on the options, shared the emerging evidence base and shared the Council’s emerging position in the form of a consultation on a draft Plan prior to agreeing the Publication Version (Regulation 19) of the Plan.
- 6.3 Despite this process, the Council has concluded that it cannot meet all of its needs within the District without allowing development in locations where paragraph 14 ‘Footnote 9’ requires development to be restricted, or without there being adverse impacts that significantly and demonstrably outweigh the benefits. The level of housing proposed, however, represents a significant increase in the level of housing provision in the District compared with the previous Wycombe Core Strategy and will significantly boost the supply of housing in the District.

- 6.4 The Council has worked collaboratively with Duty to Cooperate bodies on strategic issues and has secured clear outcomes from that process. Critically, there has been close joint working between the authorities in the Buckinghamshire Housing Market Area and agreements are 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.
- 6.5 The spatial distribution of development in the Plan is a function of a number of factors. Fundamentally it concentrates both new housing and economic development in the most sustainable locations, whilst taking careful account of the District's constraints.

Appendix 1 Employee Estimates for the Top 4 Tiers in the Settlement Hierarchy

The Table below sets out workplace based estimates of employees in each of the settlements in the top 4 tiers of the settlement hierarchy, to provide an indication of employment levels in each settlement. The data is sourced from the Business Register and Employment Survey (BRES). The figures are estimates both because they are based on a sample survey and also because the data set does not match entirely with the geographical area of the settlements in the hierarchy. The explanatory notes below explain this further. The estimates do however give a good overall indication of the scale of employment in each settlement.

Settlement	Employees (approx.)
Tier 1	
High Wycombe (including Downley, Hazlemere/Widmer End/Tylers Green, Penn, Holmer Green, Loudwater and Wooburn Green)	55,995
Tier 2	
Marlow	12,250
Bourne End/Wooburn (including Well End, Cores End and Abbotsbrook)	5,300
Princes Risborough (including Monks Risborough and Whiteleaf)	4,625
Tier 3	
Stokenchurch	1,575
Marlow Bottom	1,050
Flackwell Heath	1,075
Lane End	700
Naphill/Walter's Ash	500
Tier 4	
Hughenden Valley	1,100
Great Kingshill (including Heath End*)	650
Great and Little Kimble	600
West Wycombe	350
Longwick	350
Lacey Green/Loosely Row	225
Other areas of District	655
District Total	87,000

Data: NOMIS – UK business register and employment survey (BRES): provisional results 2016, revised results 2015.

Explanatory Notes

The above table provides an approximate calculation of employees (including working owners) of businesses over the 2015/2016 year. This is calculated through a small sample survey, to which the data is used to calculate employees on a larger scale. In terms of geographic coverage, the data uses Census Lower Super Output Areas (LSOAs) across Wycombe District and some small areas of Chiltern District. As the LSOAs do not correspond to settlement areas, the data has been calculated on a 'best-fit' approach. For example, the LSOA for Great and Little Kimble includes all land to the northern boundary of the District – this includes small hamlets counted in Tiers 5 and 6 of the hierarchy, but these have been associated with the larger settlement of Great and Little Kimble for the purposes of these calculations.

For LSOAs that straddle two adjoining Tiers 1-4 settlements, the data has been associated with the settlement to which the majority of the LSOA sits in. For example: The LSOA covering part of Hughenden Valley also covers a small area of Naphill/Walter's Ash, however as the majority area this data has been counted for the former. As many of the LSOAs cover large geographic areas it has not been possible to calculate the employment figures for individual Tier 5-6 settlements, this is to avoid double-counting data for the larger settlements. The District Total figures have been included to provide a sense of scale.

About this dataset:

The Business Register and Employment Survey (BRES) is the official source of employee and employment estimates by detailed geography and industry. BRES is a sample survey. For the 2016 survey period, approximately 80,000 businesses were sampled for Great Britain. More information on how this data was collected can be found here:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/qmis/businessregisteremploymentsurveybresqmi>

In 2015, Office for National Statistics (ONS) made a strategic decision to include business units with a single Pay As You Earn (PAYE) code for which no Value Added Tax (VAT) data are available. Prior to 2015, such units were excluded from the sampling frame and therefore not estimated for in ONS outputs.

The survey collects employment information from businesses across the whole of the Great Britain economy for each site that they operate. The employment data in BRES is the number of employees added to the number of working owners (for example, sole proprietors and partners). However, BRES does not cover the very small businesses neither registered for VAT nor PAYE, which make up a small part of the economy.

Since BRES is based on a sample of businesses, it can be affected by sampling variability. In particular, the quality of the estimates may deteriorate for smaller geographies and this should be taken into account when making inferences about the figures. Quality measures accompany the BRES datasets on our website.