



Wycombe District Local Plan and the Duty to Cooperate Report

March 2018



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Executive Summary and Conclusions

This report summarises the main strategic issues identified through the Council's collaborative working under the Duty to Cooperate, the main actions undertaken and the main outcomes secured. It deliberately does not seek to set out a very detailed account of all the collaborative working but focuses on the key outcomes, many of which arise from the joint preparation or commissioning of the evidence base that informs the Plan.

Amongst those key outcomes are:

- The identification of the housing market area (HMA) and functional economic market area (FEMA) as the basis for the areas of closest joint working/collaboration;
- Agreement amongst the HMA authorities on the scale of the objectively assessed need for housing across the HMA and joint approaches to determining housing land supply/capacity;
- Agreement on the level of unmet housing need in Wycombe, Chiltern and South Bucks Districts, and agreement on this being accommodated within the Vale of Aylesbury Local Plan, i.e. within the housing market area.;
- Clarity that no other authority is asking WDC to accommodate unmet bricks and mortar housing or economic needs;
- Confirmation that one other authority is asking WDC if there is scope to accommodate unmet gypsy and traveller housing needs;
- Agreement on the need for employment land and approaches to addressing that, including recognition that there will be some redistribution of employment land requirements from Wycombe, Chiltern and South Bucks to Aylesbury Vale.
- Close joint working on transport modelling and the identification of mitigation measures, with the Buckinghamshire authorities, particularly Buckinghamshire County Council. Also wider cross boundary (Bucks/Oxfordshire) agreement on future transport working arrangements;
- Agreement with Buckinghamshire County Council that the infrastructure delivery plan forms a sound basis for taking the plan forward, including the spatial distribution of growth;
- Close joint working on key technical evidence with the relevant agencies/organisations to address potential environmental impacts, with a range of agreed outputs that have helped shape the overall strategy of the Plan, proposed site allocations and the detailed policies.

Signed Memoranda of Understanding are set out in Appendix 1 of this report, whilst key correspondence including agreed areas of joint working, confirmation of no strategic issues and satisfaction that the duty has been met, are included in

Appendix 2. Appendix 3 contains confirmation from the Buckinghamshire and Milton Keynes Natural Environment Partnership (NEP) that WDC have met the duty along with a schedule of possible amendments to DM34 that the Council has no objection to and which BMKNEP have agreed would overcome their concerns on soundness. Appendix 4 relates to an ongoing area of work on the Habitats Regulations Assessment in relation to Royal Borough of Windsor and Maidenhead. A detailed audit trail and correspondence with the Environment Agency have been included under Appendix 5.

The Council considers that it has actively and on an ongoing basis cooperated with the relevant bodies on strategic issues under the Duty to Cooperate and secured wide ranging outcomes as a result of that process. As such the Council considers that it has complied with the Duty to Cooperate.

1. Introduction

- 1.1 This report provides an overview of how the Council has met its obligations under the 'duty-to-cooperate' as required by the Localism Act 2011 and the National Planning Policy Framework.
- 1.2 The evidence and processes summarised in this report have helped inform the preparation of the publication version of the Wycombe District Local Plan and its subsequent submission. The Wycombe District Local Plan sets out the long term vision for the District, identifying where new homes, jobs and infrastructure will be provided for the plan period up to 2033.
- 1.3 Since late 2012 significant work has been carried out to inform the Local Plan. Several stages of consultation have been undertaken with the public and key stakeholders to inform the preparation of this plan. These include:
 - Launch event (Winter 2012)
 - Community Conversations (2013)
 - Issues and Options (February 2014)
 - Reserve sites – liaison groups (October 2014 – present)
 - Regulation 18 consultation for Princes Risborough Area Action Plan (November 2015)
 - Draft Princes Risborough Town Plan (February 2016)
 - Draft Wycombe District Local Plan (June 2016)
- 1.4 The Plan was then formally published for its Regulation 19 consultation in October 2017.
- 1.5 The duty to cooperate is a legal requirement of plan-making and its primary purpose is to help achieve positive and effective local plans in relation to matters of wider importance. Meeting our obligations under the duty-to-cooperate is an important part of plan-making and also forms part of the 'tests of soundness' as set out in the National Planning Policy Framework (NPPF)¹.
- 1.6 The planning authorities to which the duty most directly applies to Wycombe District Council are listed below:
 - Buckinghamshire County Council
 - Aylesbury Vale District Council
 - Chiltern District Council
 - South Bucks District Council

¹ National Planning Policy Framework (NPPF) Paragraph 179-181

1.7 Other authorities that the Council has engaged with under the Duty to Cooperate are:

- South Oxfordshire District Council
- Oxfordshire County Council
- West Berkshire District Council
- Slough Borough Council
- Reading Borough Council
- Bracknell Forest Council
- Wokingham Borough Council
- London Borough of Hillingdon
- Central Bedfordshire Council
- Cherwell District Council
- Dacorum Borough Council
- Hart District Council
- Milton Keynes Council
- Oxford City Council
- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- Rushmoor Borough Council
- South Northamptonshire Council
- Surrey Heath Borough Council
- Three Rivers District Council
- Vale of White Horse District Council

1.8 The statutory bodies identified in Part 2 of the Town & County Planning (Local Planning) (England) regulations 2012 (as amended) include:

- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- The Homes and Communities Agency
- Aylesbury Clinical Commissioning Group
- Chiltern Clinical Commissioning Group
- Office of Rail and Road
- The Mayor of London
- Transport for London
- Marine Management Organisation
- Highways England
- Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)
- Buckinghamshire and Milton Keynes Natural Environment Partnership (BMKNEP)

1.9 This report is divided into the following sections:

- Policy context
- Identified Strategic Issues Statements
- Ensuring the duty has been met with all identified bodies

1.10 This report is structured to outline how the duty to cooperate has been met on a strategic issue by strategic issue basis, rather than focusing on individual organisations. The final section of the report does, however, show that all relevant statutory bodies have been sufficiently engaged with and outcomes have been identified throughout the process. This is demonstrated by the

agreed Memoranda of Understanding set out in Appendix 1, and key correspondence with relevant bodies and agencies set out in Appendix 2. More detailed engagement with the Buckinghamshire Milton Keynes Natural Environment Partnership, the Royal Borough of Windsor and Maidenhead, and the Environment Agency in Appendices 3-5 respectively.

- 1.11 This report does not seek to reproduce all the relevant correspondence in relation to duty-to-cooperate bodies but summarises the processes undertaken and the outcomes achieved. Memorandums of Understanding and other key documents that summarise key outcomes are appended to this report.

2. Statutory and Policy Context

2.1 The duty-to-cooperate was introduced by the Localism Act 2011, which amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to effectively engage and maximise effectiveness of plan preparation with regard to strategic cross-boundary measures.²

2.2 The Localism Act states that the duty-to-cooperate:

- Relates to a 'strategic matter' defined as sustainable development or use of land that has or would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
- Requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' in the preparation of development plan documents, and
- Requires councils to consider joint approaches to plan-making.³

National Planning Policy Framework (2012)

2.3 The NPPF gives guidance on the types of strategic matters where the duty-to-cooperate may apply, such as:

- Homes and jobs
- Provision of retail, leisure and commercial development
- Provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy
- Provision of health, security, community and cultural infrastructure
- Climate change mitigation and adaptation
- Conservation and enhancement of natural and historic environment⁴

2.4 The NPPF gives guidance on the types of strategic matters where the duty-to-cooperate may apply, such as:

In addition to demonstrating that the plan has been prepared in accordance with the duty-to-cooperate, local authorities must demonstrate

² Localism Act Section 110 (1)

³ Localism Act Section 110 (3)

⁴ NPPF paragraph 156

how joint working has influenced policy outcomes within the plan in order for the plan to be found sound at examination⁵

2.5 The NPPF sets out the tests of soundness which will be used in examination; two of these tests, whilst not formally a requirement of the duty to cooperate, relate to the duty-to-cooperate:

- ‘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 whilst achieving sustainable development, and
- ‘Effective’ – the plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic priorities.⁶

National Planning Practice Guidance (2014)

2.6 The National Planning Policy Guidance was launched in March 2014 with the intention of making all planning guidance available in one place in a clear and easy-to-use form.⁷

2.7 It states that Local Planning Authorities must demonstrate how they have complied with the duty. If a Local Planning Authority cannot demonstrate that it has complied with the duty then the local plan will not be able to proceed further in examination.⁸ The NPPG expands on the extent to which Local Planning Authorities should cooperate. The duty to cooperate is not a ‘duty to agree’, but must demonstrate that planning authorities have made every effort to seek necessary agreements and cooperation over strategic planning matters prior to submitting the plan for examination.⁹

2.8 Should another authority or organisation subject to the Duty not cooperate on strategic cross-boundary issues it must be demonstrated with comprehensive and robust evidence of the efforts that have been made to cooperate and any outcomes achieved. This does not necessarily mean that the plan will fail examination.¹⁰

2.9 In terms of what actions constitute effective cooperation under the duty-to-cooperate the Guidance states that as it depends on local needs, there is no

⁵ NPPF paragraph 181

⁶ NPPF paragraph 182

⁷ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁸ PPG DtC paragraph 001 ref ID 9-001-20140306

⁹ PPG DtC paragraph 003 ref ID 9-003-20140306

¹⁰ PPG DtC paragraph 003 ref ID 9-003-20140306

definitive list of actions that constitute effective cooperation. Cooperation should 'produce effective policies on cross boundary strategic matters.'¹¹ Some of these actions include:

- Joint research and evidence to define scope of the Local Plan
- Assessing policy impacts
- Assembling the necessary material to support policy choices
- Assessments of land availability, Flood Risk assessments, Water cycle studies, etc.¹²

2.10 Section 33A of the 2004 Act requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Planning authorities are required to consider whether to prepare local planning policies jointly under section 28 of the 2004 Act.

2.11 Where Local Planning authorities are at different stages of local plan preparation, the NPPG advises that the respective Local Planning Authorities should try to enter into formal agreements, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. The key element is that there is sufficient certainty through the agreements that an effective strategy will be in place for strategic matters when the plans are adopted.¹³

Other relevant plans and strategies

2.12 Relevant plans by the identified neighbouring authorities have been reviewed as part of the local plan process. Where these plans have raised strategic issues, these have been identified in the individual strategic issue sheets.

The Council's approach to compliance with the Duty to Cooperate

2.13 The Duty to Cooperate has been an ongoing process since the launch of the Wycombe District Local Plan in late 2012. This has been to ensure efficient and productive dialogue with neighbouring authorities as well as the statutory bodies.

2.14 The early stages of the process focused on the initial identification of strategic issues, as well as early approaches of all Duty to Cooperate bodies. This involved casting the net wide early on in terms of authorities contacted, as demonstrated in the consultation on the extent of the Housing Market Area. Indeed the definition of the Housing Market Area (HMA) and the Functional

¹¹ PPG DtC paragraph 011 Ref ID 9-011-20140306

¹² PPG DtC paragraph 011 Ref ID 9-011-20140306

¹³ PPG DtC paragraph 017 ref ID 9-017-20140306

Economic Market Area (FEMA) early on was critical to defining the most critical working relationships in terms of other local authorities. As set out in the strategic issues section the HMA and FEMA were identified on a best fit basis to consist of Buckinghamshire. With the Buckinghamshire authorities and the Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) there has been particularly close liaison and joint working through the Bucks Planning Group¹⁴. This has involved regular meetings at both officer and member level. The work includes joint commissioning of work and studies, and working through strategic issues. The Bucks Planning Group has also been the vehicle for initiating wider discussions with other Duty to Cooperate bodies, for example on issues surrounding health, natural environment, etc.

- 2.15 There has been proactive engagement with other authorities and grouping of authorities on strategic issues, such as seeking to agree the scope of evidence work, sharing and discussing findings, and identifying policy solutions to issues. In addition there has been regular contact through formal emerging consultation stages with all identified Duty to Cooperate bodies.
- 2.16 The outcome of this has been to seek to agree outcomes with relevant authorities and bodies in the form of Memorandum of Understandings, correspondence exchanges, and confirm areas of agreement and positions on key issues.

¹⁴ The Bucks Planning Group involves representatives from Wycombe District Council (WDC), Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), and the Bucks Thames Valley Local Enterprise Partnership (BTVLEP). Other organisations are invited to meetings, and this has included the Bucks Natural Environment Partnership.

3. Identified Strategic Issue Statements

3.1 The Strategic Planning Issues Statements are set out below covering the following topic areas:

- Housing Market Area/Functional Economic Market Area
- Objectively Assessed Housing Needs
- Housing supply and unmet housing needs
- Employment
- Transport
- Health
- General Infrastructure
- Travellers and Travelling Showpeople
- Heritage and historic environment
- Green Belt
- Chilterns AONB
- Green Infrastructure/Biodiversity
- Flood risk/Water quality

3.2 These strategic issues have been identified as strategic priorities during the production of the Wycombe District Local Plan in line with the National Planning Policy Framework.¹⁵ A strategic matter as set out by the Localism Act 2011 includes sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with strategic infrastructure.¹⁶ Whilst the NPPF sets out the expected matters to be addressed through the duty to cooperate, the above list has been adapted to the specific local strategic matters relating to the Wycombe District Local Plan.

3.3 Each of the strategic issues is structured as follows:

- Defining the issue
- Outlining the evidence used to develop the plan's strategic policies
- Listing the strategic partners engaged and involved in the issue
- Outlining necessary actions, evidence, involvement with strategic partners over the issue
- Noting the outcomes of the actions in relation to strategic policy, and any unresolved issues
- Outlining the ongoing cooperation necessary to manage strategic issue

3.4 Wycombe District Council is a **strategic partner on all these issues**, so this is not repeated in each section.

¹⁵ NPPF para 156

¹⁶ PPG DtC Paragraph: 013 Reference ID: 9-013-20140306, Localism Act Section 110(4)

3.5 Commonly used abbreviations include:

WDC – Wycombe District Council

AVDC – Aylesbury Vale District Council

BCC – Buckinghamshire County Council

CDC – Chiltern District Council

SBDC – South Bucks District Council

BTVLEP – Buckinghamshire Thames Valley Local Enterprise Partnership

BMKNEP/NEP – Buckinghamshire Milton Keynes Natural Environment Partnership

HMA – Housing Market Area

FEMA – Functional Economic Market Area

1. Strategic Planning Issues Statement - Defining the Housing Market Area and Functional Economic Market Area (HMA/ FEMA)

<p>1. Strategic Planning issue</p>
<p>To ensure that the Housing Market Area and Functional Economic Market Area reflect functional linkages between places where people live and work.</p> <p>To ensure that the evidence based on housing and employment need is collected in a consistent way across the whole HMA/ FEMA.</p> <p>To establish a ‘best fit’ geography for HMAs and FEMAs based on Local Plan areas.</p>
<p>2. Evidence base</p>
<ul style="list-style-type: none"> • Housing Market Area and Functional Economic Market Areas in Buckinghamshire, March 2015 • Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015 • Housing Market Area and Functional Economic Market Area Note – the Impact of a Joint Plan for Chiltern and South Bucks, January 2016 • Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Updating the Evidence, June 2016
<p>3. Strategic Partners</p>
<p>Opinion Research Services (ORS) and Atkins were jointly commissioned by the four District Councils in Buckinghamshire (Aylesbury Vale, Chiltern, South Bucks and Wycombe) to identify Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) for the county and surrounding areas.</p> <p>A full list of stakeholders that were invited to engage with the project is set out in the table at the end of this section.</p>
<p>4. Actions</p>
<p>Action: The Method Statement drawn up for undertaking this project was circulated to the stakeholders set out in Table 1 at the end of this section in September 2014.</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Stakeholders had an opportunity from the outset to influence how the work was undertaken. The original Method Statement is set out in Appendix E of the Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015 and the comments received on it included in Appendix F.

- The methodology was subsequently finalised.

Date: September to November 2014

Action: A workshop was held by the consultants setting out the emerging findings from the project. All of the stakeholders set out at Table 1 were invited to attend the workshop. Table 1 at the end of this section indicates which stakeholders attended the workshop.

Partners: Strategic Partners set out above.

Outcome:

- Stakeholders received a copy of the emerging findings from the consultants and had the opportunity to attend a workshop to have the findings explained to them and to ask questions about the approach that has been taken to the work.
- Appendix I of Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015 sets out the responses to the emerging findings and the consultant's response to the issues raised.

Date: 29th September 2014 workshop/ comments received from stakeholders on the emerging findings between September and November 2014.

Action: A meeting was held between the district councils in Buckinghamshire and the Royal Borough of Windsor and Maidenhead and Slough Borough Council to discuss the HMA/ FEMA on 16th January 2015

Partners: Aylesbury Vale District Council, Chiltern District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Bucks District Council.

Outcome:

- Agreed that on balance the Central Buckinghamshire HMA/ FEMA comprises Aylesbury Vale District Council, Chiltern District Council and Wycombe District Council and that South Bucks District Council falls within the Berkshire HMA.
- Opportunity to comment on the Consultation Draft of the ORS/ Atkins findings.
- Meeting to be arranged by South Bucks with the Greater London Authority to discuss the approach to London HMA and cross-boundary issues.

Date: 16th January 2015

Action: The report of findings Consultation Draft was sent out to the Stakeholders set out in Table 1 for comments. Responses received are listed in Appendix J of the Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015.

Partners: Strategic Partners set out at Table 1.

Outcome:

- Opportunity to comment on the Consultation Draft of the document.
- Comments were received and considered (see aforementioned Appendix J to the final report)

Date: February 2015

Action: Following the decision by South Bucks and Chiltern District Councils to produce a Joint Local Plan for the two District Council areas, in November 2015, an update was commissioned of the above Study from the consultants. This was shared with the stakeholders listed in Table 1 below and the feedback received was considered as part of the report.

Partners: Strategic Partners set out at Table 1.

Outcome:

- A note was produced in January 2016 which suggested that on balance the consultants considered that a “best fit” housing market geography based on Local Plan areas was the most appropriate approach; and the most pragmatically appropriate “best fit” for Chiltern and South Bucks as a single, combined area is as part of the Central Buckinghamshire housing market area: i.e. an area that comprises the local authorities of Aylesbury Vale, Chiltern, South Bucks and Wycombe.
- As the same functional area was identified for the HMA and FEMA, the recommended “best fit” for the FEMA would also be based on the same four local authority areas.

Date : January 2016

Action: An Update of the above Study was commissioned from ORS/ Atkins in order to take account of updated data from the 2011 Census.

Partners: Strategic Partners set out in Table 1.

Outcome:

- An updated report was produced. This showed that the extent of the Central Buckinghamshire functional HMA has extended further into Aylesbury Vale with the majority of the remainder of the district covered by the Milton Keynes functional HMA. Whilst there are other functional HMAs covering parts of Aylesbury Vale (including Banbury, Luton, Oxford and South West Hertfordshire), these areas are all sparsely populated.
- The Wycombe district continues to fall entirely within the Central Buckinghamshire functional HMA as does the vast majority of Chiltern district; whilst the conclusions for South Bucks district remain largely unchanged, with the population divided between Central Buckinghamshire and Reading and Slough functional HMAs.
- The updated Central Buckinghamshire functional Housing Market Area (HMA) extends into South Oxfordshire to some extent; however, it is a sparsely populated area and Thame still falls within the Oxford functional

HMA. Similarly, the area extends into a small part of Dacorum, but this area is also sparsely populated.

As the update did not fundamentally change the overall conclusions on the HMA/FEMA this update was not widely consulted on.

Date : June 2016

5. Outcomes from strategic working

The result of the strategic cooperation was an agreed Housing Market Area that all four District Councils in Buckinghamshire, Buckinghamshire County Council and the Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) agreed. This led to a consistent approach across the whole of the HMA/ FEMA on a range of joint working initiatives. This includes a Housing and Economic Development Needs Assessment (HEDNA) drawn up for the whole of Buckinghamshire (excluding Milton Keynes); a consistent methodology agreed for the Housing and Economic Land Availability Assessment (HELAA) and work on reviewing the Green Belt within Buckinghamshire (see other sections of the Strategic Planning Issues Statements).

The HMA/ FEMA work formed the geographic basis for an initial MoU (August 2015) between the authorities of Wycombe, Aylesbury Vale, Chiltern and South Bucks Districts, the Thames Valley Local Economic Partnership and Buckinghamshire Council covering the distribution of housing, employment and retail needs within the area.

One issue that remains unresolved relates to the inclusion of South Bucks within the HMA/ FEMA. As set out above, the initial HMA/ FEMA Study concluded that the South Bucks District was more closely aligned with the Reading and Slough HMA and not the Central Buckinghamshire HMA.

As is set out above, the reason that South Bucks was included within the Buckinghamshire HMA was because a decision had been taken in November 2015 to prepare a joint Local Plan between South Bucks and Chiltern Districts. The consultants ORS/ Atkins clearly state in their June 2016 report that “These “best fit” groupings do not change the actual geography of the functional housing market areas that have been identified – they simply provide a pragmatic arrangement for the purposes of establishing the evidence required, as suggested by the CLG advice note and reaffirmed by the PAS technical advice note.

From a Wycombe District perspective, there is no dispute with partners that Wycombe falls within the Buckinghamshire Housing Market Area.

The outcomes of the strategic working may be summarised as follows:

- Agreement between the four Buckinghamshire Districts and the Buckinghamshire Thames Valley Local Enterprise Partnership in the Bucks wide MOU (13 July 2017) that on a best fit basis to plan areas the Bucks HMA and FEMA consists of Aylesbury Vale, Chiltern, South Bucks and Wycombe Districts.

- Similar agreement with Buckinghamshire County Council on the extent of the HMA and FEMA on a best fit basis – MOU dated 25 September 2017.
- Agreement with Royal Borough of Windsor and Maidenhead (RBWM) that RBWM and WDC are in separate but adjoining housing market areas (see MOU between WDC and RBWM dated 13 February 2017)
- Signed MoU with South Oxfordshire dated 6 September 2017 also agreeing the same.
- Agreement with Slough Borough Council that Wycombe District and Slough Borough lie in separate but adjoining Housing Market Areas and Functional Economic Market Areas based on a best fit on either local authority or plan areas. Also that the Bucks HMA and FEMA updated evidence report (June 2016) shows that Wycombe District is in a separate but adjoining functional HMA and FEMA to Slough Borough – the signed MoU from March 2018 is included in Appendix 1 of this report.
- No adverse comments/representations from any local authorities on the definition of the Bucks HMA and FEMA at the Regulation 19 consultation stage.

6. Ongoing cooperation

The main ongoing issue in relation to the Housing Market Area relates to the issue of whether South Bucks should, on a best fit basis be considered to be part of the Bucks or Berks housing market area and indeed the nature of the Berks housing market area. There are existing mechanisms to consider these issues. Within Bucks this is through the Bucks Planning Group, but there are also inter-authority meetings that take place at officer and, as appropriate, member level with other authorities. Recently these have tended to focus on Slough Borough Council, South Bucks District Council, Buckinghamshire County Council and Wycombe District Council.

In January 2018 a joint bid by Royal Borough of Windsor and Maidenhead, Slough Borough Council, Chiltern District Council and South Bucks District Council was submitted to CLG for funding from the Planning Delivery Fund (Joint Working Fund) for a joint sub-regional growth study including reviewing the issue of the geography. The bid was successful. When the study takes place WDC will be consulted on this work and provide appropriate input to it.

Table 1 - List of stakeholders invited to participate in the HMA/FEMA project

Organisation	Representative	Attended Workshop	Follow-up Discussion
Bedford Borough Council	Carolyn Barnes	●	●
Bracknell Forest Council	Charlie Fulcher	●	
	Max Baker		●
	Sue Scott		●
Buckinghamshire County Council	John Rippon		
Bucks and Thames Valley LEP	Jim Sims		
	Richard Harrington		
	Paul McKim		●
Central Bedfordshire Council	Simon Andrews		
Cherwell District Council	Adrian Colwell		●
Chiltern Rail	Thomas Painter		●
Dacorum Borough Council	John Chapman	●	
	Laura Wood	●	
Greater London Authority	John Lett		
	James Gleeson		
	Jorn Peters		●
Hertfordshire County Council	Paul Donovan		
London Borough of Hillingdon	James Gleave		
Luton Borough Council	Kevin Owen		●
Milton Keynes Council	Bob Wilson	●	
Oxford City Council	Adrian Roche		
Reading Borough Council	Kiaran Roughan		
Royal Borough of Windsor and Maidenhead	Ian Bellinger	●	●
	Jennifer Heaton	●	●
Runnymede Borough Council	Babatunde Adebutu		●
	Georgina Pacey		●
	Richard Ford		
Slough Borough Council	Pippa Hopkins	●	
	Paul Stimpson	●	●
South Northamptonshire Council	Andy Darcy		
South Oxfordshire District Council	Peter Canavan	●	
Spelthorne Borough Council	John Brooks		
	John Devonshire	●	●
Three Rivers District Council	David Holmes	●	
	Claire May		
Watford Borough Council	Vicky Owen		
	Catriona Ramsay		
West Berkshire Council	Caroline Peddie		
West Northants (Joint Planning Unit)	Colin Staves		●
Wokingham Borough Council	John Spurling		
	Rebecca Bird	●	

2. Strategic Planning Issues Statement - Objectively Assessed Housing Need

1. Strategic Planning issue
To determine the objectively assessed housing need for the Housing Market Area and for the individual constituent local authorities to underpin the plan making.
2. Evidence base
<ul style="list-style-type: none"> • Central Buckinghamshire Housing and Economic Development Needs Assessment – Consultation Draft (Oct 2015) • Buckinghamshire Housing and Economic Development Needs Assessment – Consultation Draft (Jan 2016) • Buckinghamshire Housing and Economic Development Needs Assessment Update (Dec 2016) • Buckinghamshire Housing and Economic Development Needs Assessment Addendum (Sept 2017)
3. Strategic Partners
<p>Aylesbury Vale District Council (AVDC) Chiltern District Council (CDC) South Bucks District Council (SBDC) Buckinghamshire County Council (BCC) Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)</p> <p>This work was overseen by the Bucks Planning Group, a Cabinet Member level group involving all of the above authorities/organisations. A steering group consistent of the District Councils, BCC and the BTVLEP.</p> <p>In addition a wide range of other partners/stakeholders have been engaged in the work, including all neighbouring authorities and some authorities beyond immediate neighbours.</p>
4. Actions
Action: Prior to the joint commissioning of the HEDNA in 2015, at the outset of the Local Plan preparation process WDC discussed with the other Buckinghamshire authorities the scope for the preparation of a joint Buckinghamshire Strategic Housing Market Area (SHMA).

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

Outcome:

- There was not support at this stage for a joint SHMA due to where other authorities were at in their plan making processes. WDC therefore commissioned its own SHMA to try to make progress with its new Local Plan.

Date: December 2012

Action: ORS commissioned to prepare draft Wycombe SHMA including defining housing market area.

Partners: Wide consultation on the draft report as part of the Wycombe Local Plan Options Consultation, Feb 2014.

Outcome:

- Feedback received on draft SHMA but recognition of need for wider review, initially of the extent of the Housing Market Area, in the light of the decisions on local plans nationally, including the Vale of Aylesbury Plan (2014).
- Resulted in Housing Market Area/Functional Economic Market Area assessment work, issues set out elsewhere in this report.

Date: Spring 2013 - Spring 2014

Action: Following on from the process of identifying the Housing Market Area (see separate strategic issues statement above) ORS and Atkins were jointly commissioned by the Bucks Districts to undertake a Housing and Economic Development Needs Assessment. A steering group was also established involving the Bucks Districts, the County Council and BTVLEP. The first stage involved consultation with stakeholders on the methodology including all adjoining local authorities and some beyond.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP).

In addition the following authorities were consulted on the methodology – Cherwell District Council, West Northamptonshire Council (Joint Planning Unit), South Northamptonshire Council, Milton Keynes Council, Central Bedfordshire Council, Bedford Borough Council, Luton Borough Council, Dacorum Borough Council, Three Rivers District Council, Watford Borough Council, South Bucks District Council, Runnymede Borough Council, Slough Borough Council, Royal Borough of Windsor and Maidenhead, Bracknell Forest Council, Wokingham Borough Council, West Berkshire Council,

Reading Borough Council, South Oxfordshire District Council and Oxford City Council.

Outcome: Methodology for the HEDNA finalised, having regard to the outcome of the engagement with partners/stakeholders

Date: April/ May 2015

Action: Undertaking the needs assessment to determine the draft OAN and consulting on draft findings. This was initially a Central Bucks HEDNA Consultation Draft (i.e. excluding South Bucks) (October 2015), but following the decision of South Bucks and Chiltern to prepare a joint plan (November 2015) and the subsequent adjustment to the Housing Market Area, a Bucks HEDNA Consultation Draft was published. Further scrutiny of this draft report took place as part of consultation on the draft Wycombe Local Plan (Jun-Aug 2016).

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Wide consultation with wider group of partners (Oct 2015) and further scrutiny as part of the consultation on the Draft Local Plan (June 2016).

Outcomes:

- A draft assessment of objectively assessed housing need agreed at a technical level between the Bucks District Councils;
- Inputs provided by a number of authorities and other partners into the assessment that could be taken into account in finalising the assessment;
- London Mayor welcomed the approach to assessing needs set out in the draft HEDNA.

Date : October 2015 – Summer 2016

Actions: Update to HEDNA jointly commissioned to take account of new demographic data, comments on consultation draft HEDNA reviewed and comments taken into account, with responses set out in the Final HEDNA Update report appendices (Dec 2016), and HEDNA update finalised and published.

Partners: Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) – process overseen by Bucks Planning Group.

Outcomes:

- An up to date assessment of the objectively assessed need for housing agreed at a technical level across the Bucks districts, taking account as appropriate feedback from consultation on the draft HEDNA.

Date: Summer 2016 – Dec 2016

Actions: Joint commissioning of a HEDNA Addendum (see also employment issues section) – to correct an error and to clarify the position in relation to affordable housing need; Engagement with the BTVLEP Board on final position and securing political agreement to the final housing OAN across the housing market area by means of a Bucks wide MOU.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP).

Outcome: An MOU between AVDC, CDC, SBDC, WDC and BTVLEP agreeing the objectively assessed need figures for the HMA and each District – July 2017. Figures also agreed by BCC.

Date: April to Sept 2017

5. Outcomes from strategic working

The outcomes of the strategic working may be summarised as follows:

- Agreement of the Buckinghamshire authorities and the Buckinghamshire Thames Valley LEP to the objectively assessed housing needs for each district in the HMA and for the HMA as a whole; (as set out in respective MOUs/SOCGs) – see in particular the Bucks wide MOU dated 13 July 2018 and the WDC/BCC MOU dated 25 September 2017;
- Wider sharing with other authorities/stakeholders of the housing OAN position and addressing of technical issues where appropriate;
- Approach to assessing housing needs welcomed by the Mayor of London.

These key outcomes, together with the position reached on housing supply/unmet needs (see separate section of the report below) have formed the underpinning basis for the Plan, notably the establishment of a clear and evidence led housing target for the District set out in the Core Policies of the Plan.

6. Ongoing cooperation

This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group. However it should be noted that the Government's methodology for assessing the housing OAN is likely to change in 2018 and it is WDC's intention to submit its plan for examination by 31st March 2018 and hence have the Plan

examined on the basis of the current OAN methodology and hence the agreed position on the OAN. The implications of the Government's new methodology for OAN calculation is therefore a matter for Plan review.

3. Strategic Planning Issues Statement - Housing Supply and Unmet Housing Needs

<p>1. Strategic Planning issue</p>
<p>To assess the housing supply of the District, consider whether that meets the identified objectively assessed need for housing and consider, if necessary, how unmet housing needs might be addressed.</p>
<p>2. Evidence base</p>
<ul style="list-style-type: none"> • Joint HELAA methodology (Central Buckinghamshire Housing and Economic Land Availability Assessment Methodology, May 2015) • Wycombe Draft HELAA (November 2015) • WDC Response to Aylesbury Vale Review of Housing Capacity (November 2016) • Housing Delivery Study for Buckinghamshire (August 2017) • Wycombe HELAA (September 2017)
<p>3. Strategic Partners</p>
<p>Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) - working through the Bucks Planners Group.</p> <p>Wider stakeholder and public engagement through consultations at key plan preparation stages and on draft HELAA at times and one to one engagement as appropriate.</p>
<p>4. Actions</p>
<p>Action : Following an earlier call for sites, initial identification and consultation on potential housing supply and potential strategic and site options to help meet identified housing need at the time, as part of Wycombe Local Plan Options consultation document (Feb 2014).</p> <p>Partners: Wide ranging sharing of position, including with all Duty to Cooperate bodies, as well as the public.</p> <p>Outcome:</p> <ul style="list-style-type: none"> • A wide range of inputs into the consideration of housing land supply • Early awareness of a potential shortfall of housing supply against the early understand of housing need. <p>Date : Spring 2014</p>
<p>Action: Preparation and agreement of a joint methodology for district level Housing and Economic Land Availability Assessments.</p>

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP), Environment Agency, Natural England, Historic England (formerly known as English Heritage).

Outcome:

- Agreed HELAA methodology between WDC, AVDC and CDC, May 2015 as a common basis for preparing HELAAs in each authority/plan area.
- In November 2015 CDC and SBDC made the decision to produce a joint Local Plan, subsequently at this stage South Bucks were included in the joint HELAA methodology.

Date: May 2015

Action : Discussions amongst the Buckinghamshire authorities and BTVLEP about the approach and programme for joint working, potential for unmet housing needs and the principles for addressing it.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Outcome:

Joint MOU (August 2015) (see Appendix 1) agreed between AVDC, BCC, CDC, WDC and BTVLEP which:

- Established the principle that housing need should be met first within each individual district and then if that is not possible across the housing market area, and only if needs could not be met in the HMA would areas outside of the HMA be considered;
- Recognised that there was likely to be unmet housing needs in Wycombe and Chiltern Districts, and that the resulting unmet need would be addressed in the Vale of Aylesbury Local Plan;
- Agreed to joint working on housing supply/capacity assessment with the aim to try to agree supply/capacity – this included acting as critical friends to each other on HELAAs and recognising there may need to be further capacity work, including on Green Belt review part 2 assessments.

Date: August 2015, MOU updated in Feb 2016 to include South Bucks District Council.

Action: Undertaking detailed work to consider the most appropriate scale of growth at Princes Risborough.

Partners: Buckinghamshire County Council – highway, education authority, lead local flood authority and other services including Adult Social Care,

BTVLEP, Environment Agency, Natural England, Historic England, Princes Risborough Steering Group - elected members from all tiers of local government, plus local residents' association, representatives of business and sport in the town, the local secondary school including pupils, and the Risborough Area Partnership, various other stakeholders –for workshops those listed above, plus the Aylesbury Clinical Commissioning Groups, local GP surgery and Thames Water.

Outcomes:

- A “preferred option” set out in the draft Princes Risborough Town Plan of up to 2,000 – 2,500 homes
- Feedback from a range of bodies and the public on the scale of growth for further consideration, including from a range of Duty to Cooperate bodies.

Date:

- Work undertaken from early 2014 culminating in consultation on the draft Princes Risborough Town Plan, Feb-Mar 2016

Action: Preparation of draft HELAA, sharing draft HELAA with Bucks districts first for comment as part of critical friend role.

Partners: **Partners:** Aylesbury Vale District Council (AVDC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

Outcome:

- Feedback received from AVDC and CDC/SBDC. Resulted in clarification on a number of methodology points, including windfall and density assumptions. Agreement that the methodology had been followed.

Date: November 2015

Action : Consultation on draft Wycombe District Local Plan (Jun 2016), feeding in ongoing work on the HELAA following the consultation on the draft, the outcomes from the Green Belt Part 2 assessment and other studies.

Partners: This was an extensive consultation involving all Duty to Co-operate bodies, other stakeholders and the public.

Outcome:

- The feedback from the consultation was extensive and wide ranging – from local public opposition to the scale of housing growth proposed and individual sites, to concern from some authorities about the scale of unmet housing need and how it would be addressed.
- A detailed review/critique of the Council's housing land supply position at the time was submitted by Aylesbury Vale District Council expressing concern about the scale of the identified unmet need.

Date: Jun – Aug 2016

Action: Scrutiny and review of the housing land supply position in response to the critique submitted by Aylesbury Vale District Council – this was undertaken with AVDC and also shared with CDC/SBDC, including a joint workshop.

Partners: Partners: Aylesbury Vale District Council (AVDC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

Outcome:

- A formal response (Nov 2016) by WDC to AVDC on the issues raised in the critique, including a review and update of the housing land supply position. This identified a housing capacity of 11,200 homes against a revised housing OAN of 12,900.
- An MOU (Dec 2016) (see Appendix 1) signed between AVDC and WDC agreeing that based on the currently available evidence the unmet need was 1,700 and that this would be accommodated in the Vale of Aylesbury Local Plan.

Date: Sept – Dec 2016

Action : Review of the unmet housing needs position with other neighbouring authorities outside of the Bucks Housing Market Area, notably Royal Borough of Windsor and Maidenhead (RBWM) South Oxfordshire (S Oxon), Mayor of London and Slough Borough Council (SBC).

Although not an adjoining authority, clarification was sought from Slough Borough Council (SBC) on the issue of unmet housing needs. SBC had not responded to the consultation on the draft Wycombe Local Plan (Jun 2016) but had undertaken an options consultation on their Local Plan identifying significant unmet housing need and different options for how it might be met. WDC shared in Dec 2016 its position on housing land supply/capacity following completion of the review process with AVDC and indicated to SBC that it had no capacity to accommodate unmet housing needs from SBC. More recent assurances have also been provided to SBC about how unmet affordable housing arising in the south of Bucks will be addressed in Aylesbury Vale (see Bucks-wide MOU, July 2017 below). The above actions in relation to SBC have involved various meetings and e mail exchanges often also involving BCC and SBDC.

On 6th December 2017 Slough Borough Council Planning Committee agreed a report that recommended not to object to the Wycombe Local Plan publication version and indicated that an MOU could be signed which will include an agreement that neither Council is able to take any of the others unmet needs. On 16 March 2018 WDC and Slough Borough Council signed an MOU which included such provisions. Slough Borough Council did not submit any representations on the publication version of the Local Plan.

From engagement with the other Berkshire authorities it is clear that the majority of Berkshire authorities are not asking Wycombe to accommodate any unmet housing or development needs. In late February 2018 Reading Borough Council approached WDC and other local authorities within a 10km radius of their boundary, requesting if there is any scope to accommodate some or all of their unmet need for gypsy and traveller pitches.

The Mayor of London confirmed that he had no outstanding strategic issues with regard to the Local Plan in September 2017. In December 2017 the draft London Plan was published indicating that it would meet virtually all of its housing need within London for the first 10 years of the Plan period and that it was not requesting authorities outside of London to meet those needs, unless they were willing partners.

Partners: Royal Borough of Windsor and Maidenhead, South Oxfordshire, Slough Borough Council, South Bucks District Council, Buckinghamshire County Council, Oxfordshire County Council, Reading Borough Council, Mayor of London.

Outcome:

- RBWM – an MOU was agreed (February 2017) (See Appendix 1) between RBWM and WDC which agreed that neither authority was asking the other authority to accommodate unmet housing needs
- SODC – an MOU was agreed (Sept 2017) (See Appendix 1) which agreed that neither authority was asking the other authority to accommodate unmet housing needs
- Mayor of London - Confirmation has been received indicating that the Mayor has no outstanding strategic issues/concerns.
- The Council has received no requests from neighbouring authorities outside of the Bucks HMA to accommodate unmet housing needs.
- SBC – An MOU was agreed (March 2018) which agreed that neither authority was asking the other authority to accommodate unmet housing needs.

Date: September 2016 – February 2018

Action : Bucks Districts jointly commissioned the Housing Delivery Study for Buckinghamshire to assess the overall market capacity for housing in Aylesbury Vale and to consider likely lead in times and build rates for certain strategic sites in Chiltern, South Bucks and Wycombe Districts.

Outputs from the study and further sharing of respective housing supply/capacity positions between the Bucks Districts to determine likely scale of unmet housing need.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Outcome:

- An agreed Housing Delivery report including the likely level of housing delivery within the plan period at the proposed Princes Risborough Expansion Area.
- A Bucks wide MOU was agreed (July 2017) by AVDC, CDC, SBDC, WDC and BTVLEP which agreed the housing capacity/distribution across the Bucks HMA including the level of unmet housing need to be accommodated in the Vale of Aylesbury Local Plan. For Wycombe District it indicates a capacity of 10,925 dwellings and unmet need of 2,275. The unmet need figure for Wycombe has also been agreed by BCC. A subsequent bilateral MOU between WDC and AVDC dated 17 January 2018 maintains this position.
- The MOU also sets out the approach to accommodating unmet affordable housing need in the Vale of Aylesbury Local Plan.
- Final Wycombe HELAA published (Sept 2017), incorporating the findings of the Housing Delivery Study.

Date: Jan – Sept 2017

5. Outcomes from strategic working

The main outcomes are:

- Agreement between the Bucks districts and BTVLEP on the housing capacities and scale of unmet need for the 4 Bucks districts and agreed scale of unmet housing need in Wycombe, Chiltern and South Bucks districts, and agreement that the Vale of Aylesbury Local Plan should accommodate that unmet need;
- Agreement from BCC on the scale of unmet need in Wycombe District
- Agreement on the approach to be taken to accommodate unmet affordable housing need within the HMA;
- No authority outside of the Bucks HMA has requested that Wycombe District accommodates unmet brick and mortar housing or economic need from them. One authority (Reading BC) has asked if there is scope to accommodate some unmet gypsy & traveller housing need.

6. Ongoing cooperation

This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group. The Bucks wide MOU (July 2017) indicates that the Bucks districts and BTVLEP will work cooperatively regarding issues of deliverability to ensure delivery of new housing and to share monitoring data on housing delivery at least annually to ensure up to date information is available across the 'best fit' Housing Market Area.

The Council will participate in the sub-regional growth study as appropriate undertaken by the Royal Borough of Windsor and Maidenhead, Slough, Chiltern and South Bucks Districts (see Housing Market Area strategic issues section above).

The Council is also involved in joint strategic planning work as part of the Oxford - Milton Keynes - Cambridge Growth Arc, in the light of the National Infrastructure Commission report on the arc in November 2017. In February 2018 the Council's Cabinet agreed to support the establishment of a Central Growth Board as the principal means of governance for strategic decisions about transport, infrastructure and housing investment proposals in the central area of the Cambridge–Milton Keynes-Oxford corridor.

4. Strategic Planning Issues Statement Economy (including retail)

<p>1. Strategic Planning issue</p> <p>To seek to meet the needs of businesses, retail and employment to 2033 for the District and work with other authorities and the BTVLEP to consider how needs can be met across the Bucks FEMA.</p> <p>To secure a broad balance of uses and to assist to reduce the need to travel for employment needs.</p>
<p>2. Evidence base</p> <ul style="list-style-type: none"> • Report by Peter Brett Associates, Wycombe District Economy Study and Employment Land Review (and Appendices), January 2014 • Short Term Employment Land Review, WDC Cabinet Report, 21st September 2015 • Wycombe Commercial Assessment, Boyer, February 2016 • Various versions of the Housing and Economic Development Assessment document were produced in order to take account of new data and also the decision to produce a Joint Local Plan for Chiltern and South Bucks District Councils all of which identified OAN for employment within them. These documents are identified separately in the Housing Objectively Assessed Need Strategic Issues Statement above and so are not repeated here. • Buckinghamshire HEDNA Addendum, ORS and Atkins, September 2017 • Wycombe Town Centres and Retail Study 2016 Update, Nathaniel Lichfield and Partners, 23 May 2016. • Wycombe Town Centres and Retail Study 2014 Update, Nathaniel Lichfield and Partners, 9 February 2014. • Wycombe Town Centres and Retail Study: 2017 Addendum, Lichfields (formerly Nathaniel Lichfield and Partners), 15 March 2017
<p>3. Strategic Partners</p> <p>Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)</p> <p>There was consultation with other partners, particularly other local authorities, as part of the process, notably in relation to the draft HEDNA, as well as wider consultation with stakeholders as part of more formal consultations stages on the Plan (e.g. options consultation 2016, draft plan 2016).</p>
<p>4. Actions</p> <p>Action: Commissioning and preparation of an Economic Study and Employment Land Review. This included a stakeholder workshop with local businesses and agents invited.</p>

Partners: Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP), Bucks Business First, engagement with the commercial property market and local businesses.

Outcome: Provided early economic scenarios and property market information to inform Local Plan options consultation.

Provided employment land review to inform future decisions on site allocations.

Date: 2013

Stakeholder workshop – June 2013

Report published Jan 2014 to inform Feb 2014 options consultation.

Action:

Following joint working on defining the Functional Economic Market Area (FEMA) (see separate strategic issues statement above) a Housing and Economic Development Needs Assessment (HEDNA) was commissioned to assess the economic development needs of the FEMA.

Part of this work involved an economic workshop as part of the sharing of the initial findings of the HEDNA work. A summary of the key points from this Workshop is available in the HEDNA Appendices document (Appendix B). It also included contacting agents by telephone to discuss in more detail the economic market in Buckinghamshire. Details of which agents contributed to this work are set out in Appendix A to the HEDNA.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Outcome: This collaboration allowed a more considered and robust approach to be adopted across the Functional Economic Market Area and ensured that WDC had taken a wide range of views into consideration in reaching our conclusions.

Date:

Workshop – May 2015.

Draft HEDNA – October 2015, update to include South Bucks District Council Jan 2016.

Action: As part of the consultation on the Consultation Draft Local Plan (June 2016) the evidence documents, including the draft HEDNA, the Economic Study & Employment Land Review (2014) and Retail Studies (2016), were also made available for comment. The draft HEDNA had also been subject to an earlier consultation on the draft report, commencing in October 2015.

The issues raised in relation to the HEDNA for all of the District Council's in the Bucks HMA/ FEMA were then amalgamated together and a response

given to them by the consultants. This Response to Consultation paper has been included in the HEDNA Appendices as Appendix G.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

The draft Plan and related evidence was made available to all Duty to Cooperate bodies, stakeholders and the public.

Outcome: A final HEDNA, informed by consultation responses from partners/stakeholders including responses from some Duty to Cooperate bodies.

Date: Dec 2016 - final HEDNA.

Actions: Preparation of joint information on a common basis of employment land supply information (B use classes) across the FEMA, including a common basis for estimating potential employment land losses.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Outcomes: A jointly agreed spreadsheet of employment land supply for the 3 local plan areas in Bucks to inform policy decisions on how employment land needs might be met across the FEMA.

Date: Initial work in Spring/Summer 2016. Main work in 2017. Spreadsheet agreed July 2017 and incorporated into Bucks HEDNA Addendum Sept 2017 (see below).

Actions:

The Buckinghamshire districts commissioned further economic forecasts, sought further views of the commercial property market through the Bucks Thames Valley LEP and brought this work together with the joint employment land supply work undertaken between the Buckinghamshire Districts (see above).

The strategic policy implications of this work were discussed by the Bucks Planning Group.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Outcomes:

An agreed Buckinghamshire HEDNA Addendum (September 2017).
An agreed Memorandum of Understanding between Wycombe District Council, Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Bucks Thames Valley LEP (see Appendix 1) setting out agreement on the broad approach on employment land. This included recognition of:

- The shortage of employment land in the three southern Districts including Wycombe District;
- The need for a flexible approach to employment land allocations;
- That broadly there is sufficient employment land across the FEMA for economic growth, but this involves an element of re-distribution of employment land provision from the three southern Districts to Aylesbury Vale district to take account of constraints;
- Agreement amongst the Bucks Districts and BTVLEP that retail issues are essentially a more localised issue due to the nature of retail catchments and it is not appropriate to “export” retail needs to other authorities.

Date – July 2017

5. Outcomes from strategic working

- Agreement on economic forecasts and the approach to addressing economic needs in respective plans, including recognition that shortfalls in employment land in the southern districts could be accommodated in Aylesbury Vale – detail is set out in the HEDNA Addendum and the overall approach agreed in Bucks wide MOU between AVDC, CDC, SBDC, WDC and BTVLEP, July 2017. BCC also accept this position whilst considering this is a matter primarily for the Districts.
- An approach that ensures that sufficient employment land (for B uses) is available across the FEMA to meet forecast demand for the plan period.
- Agreement amongst the Bucks Districts and BTVLEP that retail issues are essentially a more localised issue due to the nature of retail catchments and it is not appropriate to “export” retail needs to other authorities.

These outcomes have fed directly into the strategic approach and detailed policies in the draft Local Plan employment and retail sections.

6. Ongoing cooperation

This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group.

Going forward, economic development issues will be considered as part of the Oxford – Milton Keynes – Cambridge Growth Arc strategic planning referred to above that the Council will be involved in. The Council will also engage with the Bucks Thames Valley LEP and other relevant local authorities in the preparation of a regional Industrial Strategy.

Strategic Planning Issues Statement - Transport

1. Strategic Planning issue
<ul style="list-style-type: none">• Identify the transport impacts of growth proposed in the District in the context of the wider growth for Buckinghamshire and any existing or proposed strategic transport projects• To assess and agree appropriate transport interventions with relevant agencies and agree the means by which these are to be delivered• To assess the overall impacts of the options for distribution of growth across the Bucks Housing Market Area, and test the effectiveness of options for strategic transport interventions in Wycombe District.• To identify any cross-border effects of traffic growth relating to planned growth scenarios for the Bucks HMA, in the context of proposed growth in Wycombe District.• To assess the impacts of proposed Local Plan sites within the Wycombe District on the transport network, and test the effectiveness of local transport interventions.• To assess the impacts of a range of expansion scenarios at Princes Risborough.• To assess the options for major transport intervention at Princes Risborough.• Agreement over, and delivery of, preferred transport interventions.
2. Evidence base
<ul style="list-style-type: none">• Buckinghamshire countywide Local Plan modelling report (phase 1) , July 2016• Buckinghamshire countywide Local Plan modelling report (phase 2), March 2017• Buckinghamshire countywide Local Plan modelling report (phase 3), August 2017• Wycombe Local Plan sites modelling, May 2017• Princes Risborough area transport study and associated documents, January 2014• Princes Risborough transport study – stage 1 option assessment report, February 2016• Princes Risborough parking review, February 2016• Princes Risborough bus viability, July 2016• Princes Risborough Tesco roundabout note, February 2016• Princes Risborough relief road feasibility study, April 2016• Princes Risborough sequencing modelling, February 2017?• Princes Risborough final scenario forecasting assessment, February 2017• Princes Risborough southern options and feasibility update, September 2017• Princes Risborough underpass feasibility, May 2017

<ul style="list-style-type: none"> • Highways Development Management advice from Buckinghamshire County Council.
<p>3. Strategic Partners</p>
<p>Buckinghamshire County Council (BCC) Buckinghamshire Thames Valley LEP (BTVLEP) Aylesbury Vale District Council (AVDC) Chiltern District Council (CDC) South Bucks District Council (SBDC) South Oxfordshire District Council (SODC) Highways England Network Rail Oxfordshire County Council (OCC) Chiltern Rail</p>
<p>4. Actions</p>
<p>Action: Undertaking countywide transport modelling. Using countywide transport model.</p> <p>Partners: the 5 authorities of Buckinghamshire: WDC, ADVC, CDC, SBDC and BCC</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Cross-boundary impacts of growth identified, and strategic mitigations assessed. <p>Date: This work started in March 2016. Phase 1 was reported in June 2016, Phase 2 in March 2017 and a third phase completed in August 2017</p>
<p>Action : Undertaking more detailed “Wycombe sites modelling”</p> <p>Partners: Buckinghamshire County Council</p> <p>Outcome: Impacts of Wycombe sites identified, and effectiveness of local mitigations. Joint WDC / BCC technical workshops were held to develop a list of likely mitigations to test.</p> <p>Date: This work started in September 2016 and completed in May 2017.</p>
<p>Action : Princes Risborough transport studies, Options Assessment Report (OAR) and sequencing modelling</p> <p>Partners : BCC and BTVLEP</p> <p>Outcome:</p>

<ul style="list-style-type: none">Proposed broad transport mitigation packages for each of the scenarios and examined two options for major road infrastructure in the context of the 2500 home expansion at a high level. <p>Date: February 2016</p>
<p>Action : Highway feasibility work</p> <p>Partners: Buckinghamshire County Council</p> <p>Outcome:</p> <ul style="list-style-type: none">Provided a concept alignment for Option 15b/11b from the Options Assessment report. <p>Date: February 2016</p>
<p>Action : Princes Risborough Bus viability study</p> <p>Partners: Buckinghamshire County Council</p> <p>Outcome:</p> <ul style="list-style-type: none">Examined options for creating a bus service with a reasonable chance of long-term commercial viability to serve the development.Concluded that there was a viable option for a bus service with a level of frequency which would encourage habits of sustainable travel. <p>Date : July 2016</p>
<p>Action : Princes Risborough Parking review</p> <p>Partners: Buckinghamshire County Council</p> <p>Outcome:</p> <ul style="list-style-type: none">Made a recommendation on the number of parking spaces that should be planned for over the plan period. <p>Date: July 2016</p>
<p>Action: Princes Risborough underpass feasibility</p> <p>Partners: Buckinghamshire County Council</p> <p>Outcome:</p> <ul style="list-style-type: none">Developed a concept design and associated costs for delivering an underpass under the Princes Risborough to Aylesbury railway line between the expansion area and Wades Park.Used to inform discussions with Network Rail to agree a Memorandum of Understanding with them on the delivery of changes to the railway asset.

<p>Date: May 2017</p>
<p>Action : Princes Risborough feasibility review including southern option appraisal</p> <p>Partners: Buckinghamshire County Council, Network Rail.</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Reviewed the February 2016 feasibility work, making minor changes to the alignment and assessing different options for the southern end of the route. • Used to inform discussions with Network Rail to agree a Memorandum of Understanding with them on the delivery of changes to the railway asset. <p>Date: September 2017</p>
<p>Action: Transport Development Management advice - Lists of proposed sites were shared with Transport DM at BCC for comment on location, means of access etc.</p> <p>Partners: Buckinghamshire County Council</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Comments received were taken into account in overall site assessment and to inform development principles for individual sites. <p>Date: Ongoing through the plan process but two major tranches of sites sent and commented on during January 2017 and April 2016.</p>
<p>Action : Consideration of the outputs of the various areas of joint working and its implications for policy through:</p> <ul style="list-style-type: none"> - Bucks Planning Group - Joint members' meetings - Wycombe Strategy Board (WDC/BCC senior officer meetings) - Officer transport update meetings and workshops. <p>Partners : Other Buckinghamshire Districts, Buckinghamshire County Council, Buckinghamshire Thames Valley Local Enterprise Partnership</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Ongoing discussion and resolution of issues at Member, senior officer and technical levels; commissioning of joint studies; <p>Date : Throughout plan preparation period</p>
<p>Action : Participation in East West Rail Project</p> <p>Partners : Network Rail / East West Rail Alliance</p>

<p>Outcome: Active participation in technical work, public engagement and review of designs and EIA scoping</p> <p>Date : 2014 - 2017</p>
<p>Action : Access to Wycombe – Work to assess the most appropriate option to improve access to High Wycombe from the M40</p> <p>Partners : Highways England, Buckinghamshire County Council</p> <p>Outcome: Joint working to identify best option and form basis of bid for funds from Highways England RIS2 (Road Investment Strategy Round 2) – bids not yet submitted.</p> <p>Date : 2015 - ongoing</p>
<p>Action : A404 studies including Bisham and Westhorpe junctions</p> <p>Partners : Highways England, Buckinghamshire County Council, Buckinghamshire Thames Valley Local Enterprise Partnership</p> <p>Outcome: Joint working to assess options to alleviate northbound queuing at Westhorpe Junction and access and egress to the adjacent Globe Park on the A404 forming the basis of a bid for Highway’s England HGF Project to improve the operation of the Westhorpe junction.</p> <p>Date : 2015 – ongoing</p>
<p>Action : Transport model comments</p> <p>Partners : Highways England, Buckinghamshire County Council</p> <p>Outcome: An agreed position between Highways England and Buckinghamshire County Council regarding Highways England’s comments on Buckinghamshire’s transport model. It was agreed that at this stage the evidence produced provides sufficient evidence and that no further updates, review or amendments are required for local plan purposes. ¹⁷</p> <p>Date : May 2017</p>
<p>5. Outcomes from strategic working</p>
<p>An agreed county-wide evidence base for traffic impacts, common to the four Local Planning Authorities and the County Highway Authority in Buckinghamshire.</p>

¹⁷ Spreadsheet and email confirming position supplied, see ‘key correspondence’

Strategic impacts and strategic transport interventions identified and agreed with BCC, including at Princes Risborough:

- That the Option 11b “through route” represents the most appropriate alternative for new road infrastructure to support the growth of the town set out in the Local Plan, having regard to all relevant objectives including deliverability/viability and the strategic context;
- That the viability appraisal (March 2017) and its assumptions provides a robust and proportionate assessment of the current viability position at this time;
- That the viability assumptions do not assume any capital input from the BCC capital programme.

Active and positive discussions with relevant sections of Network Rail to agree a Memorandum of Understanding on the delivery of necessary changes to the railway asset at Princes Risborough.

Cross-border traffic flows have been used to inform discussions with neighbouring authorities such as South Oxfordshire District Council / Oxfordshire County Council on potential cross-border traffic impacts.

Principles of individual sites informed by local transport testing, leading to development requirements for transport mitigations and interventions which have been agreed with BCC as the local highway authority.

WDC and Highways England have agreed that there are no issues with the impact of growth on the strategic road network.

6. Ongoing cooperation

Through active and positive discussions with relevant bodies, WDC has achieved Memoranda of Understanding / Statements of Common Ground on strategic transport issues with the following:

- Buckinghamshire County Council (BCC)
- Network Rail

A multi-authority agreement including AVDC, BCC, SODC and OCC Relevant MoUs/SoCGs set out arrangements for the establishment of joint delivery teams for key projects, and necessary monitoring arrangements.

- Discussions with Highways England are usually undertaken jointly with BCC and the BTVLEP, using a consistent team of personnel across the authorities.
- WDC and BCC will work closely together alongside their partners on finding solutions to improve transport connectivity between the Thames Valley and the South East Midlands, through Buckinghamshire;
- WDC and BCC will work closely and collaboratively together in the future to ensure the delivery of infrastructure to support the urban expansion of the Princes Risborough, including working together on bids for funding that may assist with the forward funding or grant funding of infrastructure at Princes Risborough.
- WDC will work closely with Highways England and BCC on the next round of strategic road investment decisions (RIS2).

- WDC are working closely with partners on the Oxford – Milton Keynes – Cambridge Growth Arc, including on the route of the proposed Expressway.

Ongoing discussions with BCC take place through a number of forums: regular joint Cabinet Member meetings; regular senior officer meetings; technical level meetings and workshops; and through the wider Bucks Planning Policy Officer Group and Bucks Planning Group.

5. Strategic Planning Issues Statement - Health

<p>1. Strategic Planning issue</p> <p>Overall the issue is to identify the primary health impacts of growth proposed in the District and to assess and agree appropriate interventions and agree the means by which these are to be delivered.</p>
<p>2. Evidence base</p> <p>Responses and engagement by NHS Property Services and Chiltern CCG since 2013 taking account of growth scenarios put forward by Wycombe District Council.</p> <p>The Council have also developed policies to ensure improved green infrastructure, open space and opportunities for active travel. These improvements can make a significant contribution to physical and mental health, and hence overall wellbeing of residents.</p>
<p>3. Strategic Partners</p> <p>NHS Property Services NHS England Chiltern Clinical Commissioning Group Aylesbury Clinical Commissioning Group</p>
<p>4. Actions</p> <p>Action: On 16/9/2013 Wycombe District Council contacted all infrastructure and service providers with information regarding the new Local Plan and potential development allocations and growth targets. Officers met with representatives from the NHS Property Services in November 2013 to collaborate further on the information supplied and their response. This led to a formal response by NHS England on 21 November 2013.</p> <p>Partners: NHS Property Services / NHS England</p> <p>Outcome:</p> <ul style="list-style-type: none"> The response from the NHS to the emerging growth proposals set out by Wycombe District Council fed into a supporting document for the Local Plan Options Consultation in January 2014 which set out the initial feedback from infrastructure providers on the Local Plan growth options. The response set out that growth options would generate the need for an additional 9 to 13 GPs and extra capacity at existing premises. It was noted that as the Local Plan process was to move forward further work would be undertaken to ascertain which GP surgeries should and could be expanded to cater for the preferred growth options. <p>Date: September to November 2013</p>

<p>Action : Presentation by Chiltern Clinical Commissioning Group at Infrastructure Roundtable</p> <p>Partners: Chiltern Clinical Commissioning Group</p> <p>Outcome:</p> <ul style="list-style-type: none">• The presentation from the CCG to the Infrastructure Roundtable (a stakeholder group considering the infrastructure issues arising from the release of the Core Strategy reserve sites) was very beneficial in helping Members and other stakeholder understand the challenges for primary health provision and the impacts of growth. The responses by the CCG were fed into the Reserve Sites IDP which set out clear requirements for health provision from the sites. <p>Date : November 2015 to June 2016</p>
<p>Action : Consultation on the draft Local Plan and CCG consultation response</p> <p>Partners: Chiltern Clinical Commissioning Group</p> <p>Outcome:</p> <ul style="list-style-type: none">• The CCG set out updated information on primary health care needs in the District which has been used to update the latest version of the IDP and in CIL spending decision by the Council. <p>Date: June to November 2016</p>
<p>Action : Consultation on CIL R123 List and CIL strategic allocations</p> <p>Partners: Chiltern and Aylesbury Clinical Commissioning Groups</p> <p>Outcome:</p> <ul style="list-style-type: none">• After consultation with the CCG, health projects were added to a revised CIL Regulation 123 list published in June 2016• Cabinet report agreeing 5% of CIL for health and allocation of CIL funding at March 2018 Cabinet to enable the CCG to part fund projects to meet the needs from new growth in Wycombe. <p>Date: August 2016 to March 2018</p>

Action: Meeting with Aylesbury Vale Clinical Commissioning Group and Princes Risborough practices to clarify need and establish possibility of existing practices re-locating onto the proposed Princes Risborough expansion area.

Partners: Aylesbury Vale Clinical Commissioning Group; Princes Risborough Town Council; Wellington House Surgery; Cross Keys Surgery

Outcome:

- An updated position statement was received from the CCG who advised that the two existing GP surgery premises in Princes Risborough could accommodate extra capacity for additional population growth (estimated to be approx. 6,500 people) through modification of their existing premises although practices have raised the issue of convenient parking close to the existing surgery premises and the need for public transport links with the proposed development area. Although neither practice is currently looking to co-locate into a single GP facility, Wellington House Practice indicated their willingness to explore re-locating their entire practice to a new facility within the new development in the medium term.

Date: 28 March 2017

5. Outcomes from strategic working

The results of this strategic working have been to establish the projects required to meet GP practice needs from the growth proposed in the new Local Plan. Wycombe District Council has also agreed the allocation of 5% of CIL funding annually to assist the CCG to deliver projects to meet increased need.

The potential relocation of the Wellington House surgery to the expansion area in Princes Risborough will be further explored throughout the Plan period with the CCG, Town Council and surgery partners. The concept plan for the expansion area will include a proposed location for a potential new facility subject to further work through the Plan period.

6. Ongoing cooperation

The strategic issues will be managed on an ongoing basis through ongoing liaison between the Council and the CCGs in relation to the housing trajectory in the Plan and the schemes being brought forward by the CCG particularly being part funded by CIL. There will also be ongoing liaison and meetings over the potential for relocation of the Wellington House surgery to the Princes Risborough expansion area.

6. Strategic Planning Issues – General Infrastructure

1. Strategic Planning issue
Overall, the issue is to identify the infrastructure impacts of growth proposed in the District and to assess and agree appropriate interventions and agree the means by which these are to be delivered.
2. Evidence base
Various transport modelling including Buckinghamshire countywide Local Plan modelling, Wycombe Local Plan sites modelling, various Princes Risborough modelling reports and transport assessments (see Transport Strategic Planning statement for details). Responses and engagement by service and infrastructure providers since 2013 taking account of growth scenarios put forward by Wycombe District Council.
3. Strategic Partners
Buckinghamshire County Council (BCC) Thames Water Chiltern Clinical Commissioning Group Aylesbury Clinical Commissioning Group Wycombe District Council Community Services Thames Valley Police Bucks & MK Fire South Central Ambulance
4. Actions
Action: On the 16/9/2013 WDC contacted all infrastructure and service providers with information regarding the new Local Plan and potential development allocations and growth targets. Partners : NHS, Thames Water, Buckinghamshire County Council Outcome: <ul style="list-style-type: none"> • The response from the service and infrastructure to the growth proposals set out by WDC fed into a supporting document for the Local Plan Options Consultation in January 2014 which set out the initial feedback from infrastructure providers on the Local Plan growth options. • It was noted that as the Local Plan process was to move forward further work would be undertaken to ascertain more exact infrastructure requirements for the preferred growth options. Date: September to November 2013

Action : Reserve Sites Infrastructure Roundtable – consultation with infrastructure providers to feed into the preparation of the Reserve Sites Infrastructure Delivery Plan (IDP)

Partners: Various infrastructure providers.

Outcome:

- The responses from providers were fed into the Reserve Sites IDP which set out clear requirements for the sites proposed to be released for development at that time.

Date : January 2015 to June 2016

Action: Consultation on the draft Local Plan and draft Infrastructure Delivery Plan - consultation responses received from infrastructure providers.

Partners: Various infrastructure providers including Buckinghamshire County Council, as well as wider stakeholder and public input.

Outcome:

- Used to update the latest version of the IDP and in CIL spending decision by the Council.

Date: June to November 2016

Action : Consultation on CIL Regulation 123 List and CIL strategic allocations

Partners: Various infrastructure providers

Outcome:

- Cabinet report agreeing broad CIL allocations.

Date: August 2016 to March 2017

Action: Preparation of final Infrastructure Delivery Plan in the light of emerging final development strategy for the Plan and sharing final draft IDP with infrastructure providers as appropriate.

Partners: Buckinghamshire County Council, other infrastructure providers as appropriate.

Outcomes;

Final Infrastructure Delivery Plan published.

Agreement from Buckinghamshire County Council that:

- Based on work to date the scale of growth and broad distribution in the plan is feasible in light of the existing infrastructure, and as such BCC do not have any in principle objections to the scale of growth and broad distribution across the District;

- That the Infrastructure Delivery Plan provides a sound basis for taking the plan forward;

Date: December 2016 – sharing revised development scenario. April 2017 sharing revised IDP.

5. Outcomes from strategic working

The result of the strategic working on infrastructure issues since 2013 was to create a comprehensive evidence for the infrastructure needs and mitigation measures necessary to support the growth outlined in the Local Plan.

This includes strategic and local transport intervention, utilities, school places, open spaces and green infrastructure.

Because of the constrained nature of District, it has had limited influence on the scale or location of growth as these have been more substantially influenced by higher-order constraints such as the Green Belt and the Chilterns AONB, and overall Sustainability Appraisal. The process has resulted in agreement with the County Council that the IDP process provides a sound basis for taking the plan forward, including in relation to the spatial distribution of development.

The detailed work with providers and agreement on requirements and mitigation measures has fed directly into site specific policy requirements.

6. Ongoing cooperation

Ongoing discussions with BCC take place through a number of forums: regular joint Cabinet Member meetings; regular senior officer meetings; technical level meetings and workshops; and through the wider Bucks Planning Policy Officer Group and Bucks Planning Group.

7. Strategic Planning Issues Statement – Travellers and Travelling Showpeople Accommodation

<p>1. Strategic Planning issue</p>
<p>To ensure that adequate numbers of pitches for Travellers are provided throughout the Buckinghamshire HMA. To provide a level of joined-up thinking in the approach to meeting the needs of the travelling community and those who do not meet the current legal definition of a traveller. To ensure that the evidence base for these decisions is robust and consistent across the Buckinghamshire Districts.</p>
<p>2. Evidence base</p> <ul style="list-style-type: none"> • Buckinghamshire Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment, August 2013 • Buckinghamshire Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment 2013: 2014 Update, October 2014 • Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, Final Report, September 2017 • Meeting the needs of travellers: Background Paper, June 2016 • Buckinghamshire Memorandum of Understanding between Aylesbury Vale District Council, Wycombe District Council, Chiltern District Council, South Bucks District Council, and Buckinghamshire Thames Valley Local Enterprise Partnership, July 2017
<p>3. Strategic Partners</p>
<p>Buckinghamshire Housing Market Area Authorities Aylesbury Vale District Council Chiltern District Council South Bucks District Council</p> <p>Wider area Local Authorities Bracknell Forest Council Dacorum Borough Council London Borough of Hillingdon Reading Borough Council Royal Borough of Windsor and Maidenhead South Oxfordshire District Council Three Rivers District Council Wokingham Borough Council</p>
<p>4. Actions</p>
<p>Action: Joint preparation of an accommodation needs assessment for the Buckinghamshire housing market area to understand the needs of Travellers and Travelling Showpeople in Buckinghamshire until 2023. The output of the</p>

assessment will inform the need which should be accommodated in emerging Local Plans.

Partners : Aylesbury Vale District Council (AVDC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

Outcome:

- The Buckinghamshire Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment was published in August 2013 and incorporated into the evidence base to support the Local Plan options consultation in February 2014.
- The report identified the pitch requirements for travellers and travelling showpeople for the period 2013-2023 in the district.

Date : August 2013

Action: Joint preparation of an update to the 2013 accommodation needs assessment to reflect changes in circumstances and to consider new information not available at the time of the publication of the original report, as well as extending the assessment to understand the needs of Travellers in Buckinghamshire to 2028.

Partners : Aylesbury Vale District Council (AVDC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

Outcome:

- The output of this update informed the refinement and revision of Local Plan policies.
- The update report was published in October 2014 and added to the evidence base for the draft Wycombe District Local Plan.
- The report reaffirmed the identified pitch requirements for travellers and travelling showpeople for the district over the period 2013-2028.

Date : October 2014

Action: Joint preparation of an updated Gypsy and Traveller Accommodation Needs Assessment to take into account changes in the law set out in the government's new Planning Policy for Traveller Sites, and to gain an understanding of how this might affect the amount of need which should be accommodated in emerging Local Plans.

Partners : Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council

Outcome:

- An updated report applying the new definition for Travellers set out in the Planning Policy for Traveller Sites and identified requirement for the period 2016 – 2033 (in the case of Wycombe District).

Date : May 2017

Action : The signing of a Buckinghamshire Countywide Memorandum of Understanding (MOU)

Partners : Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Buckinghamshire Thames Valley Local Enterprise Partnership

Outcome :

- The Countywide MOU agreed the needs figures as set out in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017) for each signatory Local Authority.
- It also agreed that no Buckinghamshire local authority would ask another Buckinghamshire authority to accommodate any traveller needs (including travelling showpeople).

Date : July 2017

Action : The signing of a Memorandum of Understanding (MOU) with the Royal Borough of Windsor and Maidenhead

Partners : Royal Borough of Windsor and Maidenhead

Outcome :

- The MOU affirmed that WDC and RBWM would meet their needs within their own local authority areas, and that they were not asking the other to accommodate any traveller or travelling showpeople needs.

Date : February 2017

Action : The signing of a Memorandum of Understanding (MOU) with South Oxfordshire District Council

Partners : South Oxfordshire District Council

Outcome :

- The MOU affirmed that WDC and SODC would meet their housing needs within their own local authority areas, and that they were not asking the other to accommodate any unmet needs. This includes traveller or travelling showpeople needs.

Date : September 2017

Action : The signing of a Memorandum of Understanding (MOU) with Aylesbury Vale District Council

Partners : Aylesbury Vale District Council

Outcome :

- The MOU affirmed that WDC and AVDC would meet their needs within their own local authority areas, and that they were not asking the other to accommodate any traveller or travelling showpeople needs.

Date : January 2018

Action: Inviting comments from neighbouring authorities on the draft policies for Gypsies and Travellers. Engagement of wider area local authorities to feed in to the production of Accommodation Needs Assessments. Engagement with authorities in the wider area in response to invitations to comment on their own draft policies.

Partners : Wokingham Borough Council, Bracknell District Council, Royal Windsor and Maidenhead, Three Rivers, Dacorum, Hillingdon, South Oxfordshire, Reading Borough Council

Outcome:

- The comments of our partners were considered and where necessary actioned or incorporated into the further redrafting of the Local Plan. In many cases authorities in the wider area had no issues to raise, but requested to be kept informed. All wider area authorities are consulted at each stage of plan preparation, and proactively as the plan and evidence base developed where necessary and appropriate.

Date : Ongoing from 2013

Action: A request was received from Reading Borough Council in late February 2018, enquiring about the scope of accepting some or all of their unmet gypsy and traveller pitch provision needs. This request was sent to all local authorities whose areas lay within 10km of Reading Borough.

Partners: Reading Borough Council

Outcome:

- Reading's request was considered; however it is considered that it would be more appropriate for any unmet needs to be met as near as possible to where they originate, a position originally put forward in our previous response to Reading's assessment their gypsy and traveller needs. Additionally, it is considered that the area of Wycombe district nearest to Reading Borough would be unsuitable for traveller accommodation owing to it being wholly within the AONB, and lacking in settlements that could accept a traveller site in line with national planning policy.
- The matter is ongoing, as Reading's deadline for all consulted local authorities to respond is 15 March 2018.

Date: Ongoing from February 2018

5. Outcomes from strategic working

The result of the strategic cooperation has been the production of a shared evidence base document in respect of meeting our obligation to Gypsies and Travellers, the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), drawn up for the whole of the Bucks HMA and derived from a consistent methodology.

The GTAA informs the approach taken in policy DM26, and advises the Council's strategy for future needs and consequently the future delivery of

traveller pitches, as well as providing evidence for the levels of need for those who do not fit the current legal definition of a traveller as set out in the PPTS, which is also reflected in the wording of policy DM26.

The outcomes of strategic working may be summarised as follows:

- The creation of a consistent evidence base across the housing market area for the assessment of Travellers and Travelling Showpeople need, derived from a consistent methodology
- An informed approach has been adopted based on the evidence with regards to meeting our local needs
- Agreement of the level of Travellers and Travelling Showpeople needs for Buckinghamshire.
- Agreement that no Buckinghamshire Authority will ask any other Buckinghamshire Authority to meet any of Travellers and Travelling Showpeople needs.

6. Ongoing cooperation

Future updates to the needs assessment are expected to be prepared in conjunction with neighbouring authorities to ensure strategic matters of importance are addressed consistently. WDC will continue to work with Aylesbury Vale District Council, Chiltern District Council, and South Bucks District Council, and other authorities as appropriate, to ensure the accommodation needs of travellers and travelling show people are planned for appropriately throughout the duration of this Local Plan, and beyond.

Discussions are ongoing with Reading Borough regarding their unmet needs.

8. Strategic Planning Issues Statement - Heritage and the Historic Environment

1. Strategic Planning issue
To ensure that the historic environment and heritage assets (both designated and undesignated) are given appropriate weight in the Local Plan.
2. Evidence base
Historic England Guidance to Local Authorities on Local Plans Bucks and Milton Keynes Historic Landscape Characterisation, 2006 Buckinghamshire Historic Towns Project High Wycombe, Princes Risborough, and Marlow studies, 2008-12
3. Strategic Partners
Historic England (formerly English Heritage)
4. Actions
<p>Action: Production of the revised Alscot conservation area appraisal, which was revised specifically to form a part of the evidence base for the Princes Risborough expansion.</p> <p>Partners: Historic England</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Historic England provided valuable input into the draft conservation area appraisal, particularly in respect of several areas where there were questions regarding what might constitute the proper approach. • Their comments were taken into account when finalising the conservation area appraisal and making it a robust document for use as a material consideration in determining planning applications in the area, as well as forming a part of the wider plan evidence base. <p>Date: November 2016</p>
<p>Action: Development of specific heritage / historic environment policies following on from the 2016 consultation on the draft Local Plan for the Wycombe District. The policies will help to guide planning applications concerning heritage assets in the Wycombe District and set out the Council's approach to the historic environment.</p> <p>Partners: Historic England</p> <p>Outcome:</p> <ul style="list-style-type: none"> • The new policies were shared with Historic England in advance of finalising the new Local Plan for the Wycombe District, and Historic England submitted their comments on the policies.

- These comments were taken into account to produce a sound and robust policy approach to the historic environment which fully satisfies the government’s requirements as outlined in the NPPF.

Date: March 2017

Action: Further development of specific heritage / historic environment policies. The policies for the historic environment developed and refined following the previous action above were shared with Historic England to further refine them prior to publication.

Partners: Historic England

Outcome:

- Historic England provided further comments on the draft policies, recommending adjustments to provide a set of policies which meet our obligations to the Historic Environment set out in the National Planning Policy Framework.

Date: July 2017

5. Outcomes from strategic working

The cooperation of Historic England in the Alscot conservation area appraisal has helped to strengthen the wording of the document both as guidance to the character of the area and to shape development within the conservation area, and also as a piece of evidence for the Local Plan’s evidence base. Lessons learned as a result of the strategic working will also help to inform the drafting of future conservation area appraisal documents.

The strategic work undertaken with Historic England in the development of the Local Plan heritage policies CP11 and DM31 has helped to refine the policies into a more robustly worded form which helps to meet Government requirements for policies guiding and shaping the historic environment.

The outcomes of the strategic working may be summarised as follows:

- The establishment of a robust evidence base for heritage and the historic environment.
- The creation and refinement of a set of heritage policies to guide any development of heritage assets or the historic environment in Wycombe district.

6. Ongoing cooperation

How will the strategic issues be managed on an ongoing basis? What are the mechanisms/structures being used to do this? How will this be monitored?

The input of Historic England and other relevant partners will be sought when bringing forward future policies or evidence base documents concerning the historic environment (such as supplementary planning documents and conservation area appraisals).

9. Strategic Planning Issues Statement - Green Belt Review

<p>1. Strategic Planning issue</p>
<p>Ensuring that our approach to potential Green Belt allocations (Part 1 and Part 2) is</p> <ol style="list-style-type: none"> a. Consistent with national policy and guidance, b. Supported by proportionate evidence, c. Capable of supporting an overall appropriate development strategy for the District
<p>2. Evidence base</p>
<p>This is an issue that relies on primary assessment of sites and options following a bespoke methodology designed to reflect national policy and guidance. The assessment is in 2 parts.</p> <p>Part 1 is a comprehensive countywide assessment of the whole Buckinghamshire Green Belt. This work was undertaken by Arup and jointly commissioned by the 5 Bucks Councils.</p> <p>Part 2 was undertaken by Wycombe District Council officers, supported by a critical friend review undertaken by Arup. Site assessments within Part 2 are supported by professional advice with regards to landscape, transport, environmental health, and others (as appropriate to each site).</p> <p>No other relevant background evidence has been identified.</p>
<p>3. Strategic Partners</p>
<p>Buckinghamshire County Council Aylesbury Vale District Council Chiltern District Council South Bucks District Council</p>
<p>4. Actions</p>
<p>Action : Commissioned a county wide strategic assessment of the Buckinghamshire Green Belt</p> <p>Partners: Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Buckinghamshire County Council</p> <p>Outcome: The Green Belt Part 1 Assessment Report (March 2016) (Arup) which identifies a number of areas of weaker Green Belt land for further consideration and the basis of a methodology for each local planning authority to conclude their own area assessments.</p>

Date: January 2015. Part 1 report published Mar 2016.

Action: Joint working on a methodology for local planning authority area 'Part Two' Green Belt assessments, including preparation of a draft Part 2 methodology.

Partners: Aylesbury Vale District Council, Buckinghamshire County Council, Chiltern District Council, South Bucks District Council

Outcome: Although different LPA timelines have prevented the formal adoption of a joint methodology these discussions have helped inform and refine our approach (including e.g. appointment of Arup to provide a critical friend review of the 'Part Two').

Date : March 2016

Action: Consultation on draft outcomes of the Wycombe District Council 'Part Two' Green Belt assessment as part of the consultation on the draft Local Plan.

Partners: Aylesbury Vale District Council, Buckinghamshire County Council, Chiltern District Council, South Bucks District Council
Wide stakeholder and public consultation.

Outcome: Feedback from partners/stakeholders and the public has helped to refine the assessment of sites and resulted in changes to proposed sites for release from the Green Belt.

Date: Consultation in June 2016.

Action: Co-ordination around the assessment of cross-boundary sites

Partners: Chiltern District Council

Outcome: Feedback from partners has helped to refine the assessment of sites.

Date: June 2016

Action: Liaison with Buckinghamshire County Council on proposed Green Belt release sites including additional sites proposed following the June 2016 consultation.

Partners: Buckinghamshire County Council.

Outcome: Agreement between Wycombe District Council and Buckinghamshire County Council:

- That the principle of releasing land from the Green Belt to contribute to meeting assessed needs is agreed in Wycombe District, having tested all the reasonable alternatives elsewhere in the District;

- That there are no strategic concerns about the Plan's approach to Green Belt land release in Wycombe District.

5. Outcomes from strategic working

The main outcomes are:

- A robust shared approach across the HMA to reviewing Green Belt sites. A Bucks wide MOU was agreed (July 2017) by AVDC, CDC, SBDC, WDC and BTVLEP which agreed the Green Belt review process overall, including the methodology and outcomes of the Part 1 assessment work, and also agreed the WDC housing capacity figures, which were based in part on the outcomes of the Green Belt review.
- Qualitative improvements to the WDC 'Part Two' assessment
- Co-ordination of approach on cross boundary sites
- Allocations in the draft Local Plan that flow from this.

6. Ongoing cooperation

This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group.

Ongoing liaison with CDC and SBDC regarding their Strategic Green Belt review which is intended to inform their Green Belt assessment process.

10. Strategic Planning Issues Statement - Chilterns AONB

<p>1. Strategic Planning issue</p>
<p>Ensuring that our approach to potential AONB allocations is</p> <ul style="list-style-type: none"> • Consistent with national policy and guidance, including in particular the approach to major development in the AONB set out at NPPF 116 • Has due regard to the legal duty under S85 of the CROW Act (and any other relevant statutory duties) • Reflects a shared understanding across the Chilterns AONB area of the two points above, • Supported by proportionate evidence, • Capable of supporting an overall appropriate development strategy for the District
<p>2. Evidence base</p>
<p>This is an issue that relies on primary assessment of sites and options following a bespoke methodology designed to reflect national policy and guidance.</p> <p>The assessment was undertaken by Wycombe District Council officers. The assessment includes a landscape capacity assessment for the main higher tier AONB villages (Lane End and Stokenchurch). Individual site assessments are supported by professional advice with regards to landscape, transport, environmental health, and others (as appropriate to each site).</p> <p>No other relevant background evidence has been identified.</p>
<p>3. Strategic Partners</p>
<p>Buckinghamshire County Council Aylesbury Vale District Council Chiltern District Council South Bucks District Council South Oxfordshire District Council Natural England Chilterns Conservation Board (CCB)</p> <p>Notes: Whilst the CCB is not a DtC body, they are a key strategic partner with regards to planning in the AONB. South Oxfordshire District Council is noted here as they are the other main AONB local planning authority in the Chilterns (with WDC and CDC)</p>
<p>4. Actions</p>

Action : Consultation on the methodology for the AONB Site Assessment Report

Partners: As set out above.

Outcome: Agreement that this process should be based around landscape capacity.

Date: January 2016

Action: Consultation on draft outcomes of the AONB Site Assessment Report as part of the consultation on the draft Local Plan.

Partners: As set out above.

Outcome: Agreement to refine the methodology for classifying major development in the AONB and to extend the focus of the report to include potential AONB allocations identified and assessed through the Green Belt assessment.

Date: June 2016

Action : Post-consultation review of the methodology for classifying major development in the AONB and the approach to considering whether there are exceptional circumstances for major development in the AONB (i.e. in NPPF para 116).

Partners : Chilterns Conservation Board, Buckinghamshire County Council, Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Natural England

Outcomes:

- Agreement on an assessment framework.
- Agreement on most WDC site specific outcomes
- Agreement that in applying NPPF para 116 within the context of the Housing Market Area, allocations for major development would not be justified. This subsequently incorporated into MOUs with CDC/SBDC and with AVDC.

Date: September 2016

Action: Co-ordination around the assessment of cross-boundary sites.

Partners: Chilterns Conservation Board, Chiltern District Council

Outcome: Agreed approach with Chiltern District Council (see Memorandum of Understanding between WDC and CDC in Appendix 1).

Date: Spring 2017

5. Outcomes from strategic working

The main outcomes are

- Refinements to the WDC Site Assessment, including better co-ordination across with the Green Belt review.
- Agreement with key partners on the approach to assessing whether sites would constitute major development in the AONB
- Agreement with the other Bucks Districts that in the Bucks Housing Market Area context there are not exceptional circumstances for major development in the AONB.
- Agreement on site specific cross-boundary issues with CDC.
- A Bucks wide MOU was agreed (July 2017) by AVDC, CDC, SBDC, WDC and BTVLEP which agreed the WDC housing capacity figures, which were based in part on the outcomes of the WDC AONB Site Assessment.
- Allocations in the draft Local Plan that flow from this.

6. Ongoing cooperation

This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group (LPA led) and through the Chilterns Forum (CCB-led).

11. Strategic Planning Issues Statement - Green Infrastructure and Biodiversity

<p>1. Strategic Planning issue</p> <ul style="list-style-type: none"> • Links between Countywide Green Infrastructure Planning and the local plan • Provision of appropriate policies for ensuring a net gain in biodiversity • Ensuring that the plan is compliant with the Habitats Directive, establishing whether the growth proposed amounts to Likely Significant Effects on internationally significant biodiversity sites.
<p>2. Evidence base</p> <ul style="list-style-type: none"> • Buckinghamshire Green Infrastructure Delivery Plan 2013 • NEP biodiversity offsetting strategy • WDC Tree canopy cover assessment report (March 2016) • Habitats Regulations Assessment screening report of the Princes Risborough Town Plan – February 2016 (superseded) • Habitats Regulations Assessment screening report of the Wycombe District Local Plan, September 2017 • South Oxfordshire Local Plan - Habitats Regulations Assessment Report – January 2018
<p>3. Strategic Partners</p> <p>Natural England Local Nature Partnership – Buckinghamshire and Milton Keynes NEP (BMKNEP) Buckinghamshire County Council Chiltern District Council South Bucks District Council Royal Borough of Windsor and Maidenhead South Oxfordshire District Council</p>
<p>4. Actions</p> <p>Action: Joint working on new Local Plan policies to embed these issues. NB: there are existing policies in the retained Delivery and Site Allocations Plan which already address some aspects of GI and biodiversity.</p> <p>Partners: Buckinghamshire and Milton Keynes Natural Environment Partnership (BMKNEP)</p>

Outcome: Agreement on some draft policy content (albeit some aspirations from BMKNEP for additional content not met). The unmet aspirations mainly relate to the differing timescales for a review of the Countywide GI mapping versus the new local plan timetable. The new local plan does commit to continuing to work with the NEP to develop the Countywide GI Mapping over time.

Discussions with BMKNEP have continued through 2018 to date around the soundness and effectiveness of Policy DM34 and the clarity of the requirements for a net gain in biodiversity. These discussions have concluded with a schedule of possible amendments to DM34 that the Council has no objection to and which BMKNEP have agreed would overcome their concerns on soundness. (Appendix 3.) (Their other reservations as set out in their representation to the publication version of the plan are unaffected by this discussion.) They have also subsequently confirmed that WDC have met the Duty (Appendix 3).

Appendix 3 sets out confirmation from the NEP that the duty has been met alongside a schedule of possible amendments to the plan which forms

Date: July 2016 onwards.

Wycombe District Council is an active member/partner in the Natural Environment Partnership and there is ongoing active involvement at both officer and member level at Countywide level including through Planning Group and Bucks Planning Policy Officers Group.

Action : Habitats Regulations Assessment (HRA) Screening Report

To ensure that the Plan does not have a likely significant effect on any Special Areas of Conservation in or around the District, alone or in combinations with other plans and projects, a Habitats Regulations Assessment Screening Report was produced as part of the Princes Risborough draft AAP initially (February 2016 - superseded), and later as part of Local Plan evidence base on the overall Wycombe District Local Plan (September 2017).

Key actions were:

- Early engagement with Natural England to assess the scope and geographical extent of the HRA, and the key issues to be considered by WDC.
- Discussions were held with Natural England in relation to assessing air pollution effects at certain Special Areas for Conservation (SAC), including preparation and sharing of evidence in relation to nitrogen deposition/nitrogen oxides by generating additional outputs from traffic modelling work.

Discussions were held with Natural England and South Bucks District Council in relation to Burnham Beeches SAC as both districts raised the question of likely significant effects in relation to recreational impacts.

During the Regulation 19 consultation, the City of London Corporation (who owns most of Burnham Beeches) raised issues in relation to the plan's impact at Burnham Beeches in terms of air pollution. WDC went back to Natural England to confirm whether this changed their position.

On 31st January 2018 Royal Borough of Windsor and Maidenhead submitted their plan for examination. Their supporting evidence was updated for submission with a Habitats Regulation and Air Quality Assessment update which the Council became aware of mid-February. This update concluded that there might be likely significant effects in relation to a small part of Bisham Woods (part of Chilterns Beechwoods SAC) in relation to nitrogen deposition. WDC asked AECOM to review the RBWM work (see Appendix 4) and recommend a way forward.

WDC met with RBWM regarding the above issue on 7 March 2017, provided comments on RBWM's 2018 assessment, and discussed sharing a brief for further work to be undertaken by AECOM on behalf of WDC to examine the issue further.

WDC also contacted SODC on 5 March 2018 with regards to the Aston Rowant SAC and were made aware of a more recent assessment by SODC that indicates that there are not likely significant effects on the SAC. There is ongoing dialogue on this assessment.

There has been ongoing dialogue between WDC and SBDC/CDC regarding Burnham Beeches SAC to ascertain how they are undertaking in-combination assessments in relation to air pollution.

Partners: Natural England, Chiltern District Council, South Bucks District Council, Royal Borough of Windsor and Maidenhead, South Oxfordshire District Council

Outcomes:

- Main issues identified with Natural England early on were water quality, air pollution and recreational pressures.
- HRA screening report agreed with Natural England (August 2017) concludes that the growth planned in the Local Plan will not have a likely significant effect on the SACs.
 - Recreational effects on Burnham Beeches are mitigated through alternative recreational opportunities in the District, set out in the plan through open space requirements, and through the Little Marlow Country Park policy.
- Following the Regulation 19 stage, Natural England confirmed that their advice on the scope of the HRA and the findings still stood (January 2018).

- Following the issue raised in relation to Bisham Woods in March 2018
 - Natural England confirmed that they are still satisfied with our HRA (March 2018)
 - WDC has shared with RBWM comments from consultants (see appendix 4) and the brief for further work, and has committed to share any outputs when they become available.
- Further work is being undertaken at Burnham Beeches to confirm that the traffic impacts from the Wycombe plan are de minimis
- Ongoing dialogue continues with SODC regarding Aston Rowant

Date: early 2016 – March 2018

5. Outcomes from strategic working

The main outcomes are:

- Positive progress towards a Memorandum of Understanding on strategic issues with Natural England, Buckinghamshire and Milton Keynes Nature Environment Partnership, Buckinghamshire County Council and South Bucks District Council
- Draft Local Plan policies which promote biodiversity/GI issues and address the issue of mitigation of additional recreational pressure on Burnham Beeches.
- The HRA screening report concludes that the growth proposed in the local plan alone or in combination with other plans and projects will not have a likely significant effect on the SACs in relation to water quality, recreation or air pollution. Natural England have confirmed that they are satisfied with the HRA findings.

6. Ongoing cooperation

In relation to Green Infrastructure and biodiversity, the Council will continue to liaise with the NEP and Buckinghamshire County Council to monitor progress across the District and identify strategic opportunities for biodiversity gain that can be implemented.

In relation to Habitats, the Council will continue to liaise with Chiltern District Council / South Bucks District Council and Natural England with regards to Burnham Beeches, and will monitor development within a 5 km buffer from Burnham Beeches SAC to ensure that the recreational pressure on the SAC does not worsen. The Council will also through its policies in the Development Plan ensure greater accessibility of the Little Marlow Lakes Country Park as an alternative recreational area (policy RUR6 Little Marlow Lakes and policy BE2 Hollands Farm). The Council will also continue to liaise with appropriate neighbouring authorities on in-combination effects of traffic related air pollution.

12. Strategic Planning Issues statement - Flood Risk / Water Quality/ Water Supply

<p>1. Strategic Planning issue</p> <ul style="list-style-type: none"> • To ensure that the Plan deals with Flood Risk from all sources both in terms of strategic policies and site allocations. • To ensure that the Plan will not result in Water Framework Directive objectives deterioration at both Princes Risborough and Little Marlow Sewage Treatment Works and that there is sufficient environmental capacity in the receiving watercourses of Horsenden Stream, River Thames and River Wye. • To ensure that the Plan has a district-wide policy for the protection of water quality. • To ensure that opportunities for strategic water supply are safeguarded if required and that the plan contributes to mitigating the overall regional water stress issue.
<p>2. Evidence base</p> <ul style="list-style-type: none"> • SFRA level 1 Update – November 2014 – Jacobs • SFRA level 2 – September 2017 – Jacobs • Sequential Test report – September 2017 – Wycombe District Council • Draft Princes Risborough Wastewater Treatment Works Assessments – February 2016 - AMEC • Princes Risborough and Little Marlow Wastewater Treatment Works Assessments – Final December 2016 – updated May 2017 - AMEC • Sustainability Appraisal –September 2017 – Wycombe District Council • Buckinghamshire Surface Water Management Plan November 2011 • Buckinghamshire Local Flood Risk Management Strategy (2013) • Princes Risborough Flood Risk Mapping – Princes Risborough Groundwater Flooding Phase 1 – March 2017 - Jacobs for Buckinghamshire County Council • Thames River Basin Management Plan (February 2016) • EA draft guidance on Water Cycle Studies – 2009 • EA guidance on Water Cycle Studies – October 2016 • National Planning Practice Guidance – Flood Risk and Coastal Change • National Planning Practice Guidance – Water Supply, Wastewater and Water Quality • National Planning Policy Framework
<p>3. Strategic Partners</p> <p>Environment Agency</p> <ul style="list-style-type: none"> • Partnership and Strategic Overview and Area Sustainable Places teams • Flood Management • Integrated Environment Planning team <p>Buckinghamshire County Council as Lead Local Flood Authority Thames Water</p>

Aylesbury Vale District Council
South Oxfordshire District Council
Chiltern District Council
South Bucks District Council

4. Actions

Action: FLOOD RISK – Strategic Flood Risk Assessment Level 1 Update

Partners: Environment Agency, Buckinghamshire County Council

Outcome: Initial update to the Level 1 SFRA in relation to the risk of flooding from all sources across the District, definition of Wycombe Critical Drainage Areas, high level assessment of impact of climate change, and recommendations for protecting against flooding, reducing risks where possible

Date: November 2014

Action: FLOOD RISK - Climate change and Strategic Flood Risk Assessment level 2

- February 2016 DEFRA published new climate change allowances
- Ongoing discussions with the Environment Agency and Buckinghamshire County Council on how to assess proposed allocated sites in taking a sequential approach to development, including in relation to climate change.
- Discussed approach with the EA to assess the implications of new allowances for site allocations through a level 2 SFRA (rather than update the level 1 SFRA) including to inform where appropriate the requirements of the exception's test. This was to ensure that the sequential test (including where necessary the exception's test) could take account of climate change.
- Agreed brief for SFRA level 2 and approach to sequential test with the EA in August 2016.
- Council commissioned Jacobs to undertake a modelling of climate change allowances for the fluvial 1 in 100 AEP event at River Wye, Hughenden Stream and river Thames to ensure sound allocations.
- Brief included climate change modelling and where no modelling of the 1 in 100 AEP was available, Jacobs made assumptions taking account local topography and surface water flow paths.

Partners: Environment Agency, Buckinghamshire County Council, Strategic Flood Management Board

Outcome:

- SFRA level 2 draft produced - March 2017
- SFRA level 2 final version produced incorporating EA, BCC and WDC comments - September 2017

- Identification of impacts of climate change for fluvial flood risk (where modelling available) in line with new national guidance (DEFRA published new allowances in February 2016) and assessment of impacts considering local topography and intersecting surface water flows (where no modelling available)
- Up-to-date assessment of other sources of flood risk including risk of groundwater emergence
- Identification of the need for a Strategic Drainage Study for the Princes Risborough expansion
- Modelling concerns raised by EA responded to by a hydraulic modelling technical note produced by Jacobs (August 2017)
- WDC decision not to further update model using new EA survey data for the Wye due to local plan timetable
- EA raise concerns about modelling and specific sites deliverability at Reg 19 consultation stage
- EA retracted comments on a number of sites identified in the Reg. 19 consultation response following meeting in December 2017.
- There has been further ongoing dialogue with the EA between December 2017 and March 2018
- WDC wrote again to the EA early in March 2018. The EA responded by email on 15 March to confirm that the EA can agree that WDC have worked with them and tried to address their soundness comments and concerns for the Wycombe District Local Plan. Therefore for areas within the EA's remit, as set out in WDC's letter dated 1 March 2018, the EA can say that the Duty to Cooperate has been met. See appendix 2 for key correspondence.

Date: March 2018

Outstanding issue

Modelling validity and a number of SFRA conclusions

Ongoing discussions in relation to the SFRA level 2 and modelling

More details on cooperation with the EA on climate change modelling and the SFRA level 2 are included in an audit trail at Appendix 5.

Action : FLOOD RISK – Assessing the risk of flood in allocating sites in the Local Plan, including climate change allowances, through undertaking the Sequential Test and Exception Test

Partners : Environment Agency, Buckinghamshire County Council

Outcome:

- Confirmation that existing designated employment sites where there are no development proposals are not sequentially tested
- Completion of the Sequential and Exception Test for local plan allocation purposes.

Dates: September 2017

Action: WATER QUALITY – Defining the need for a Water Cycle Study

Partners: Environment Agency, Thames Water

Outcomes:

- Agreement that a full Water Cycle Study was not required
- Commissioning of the Princes Risborough Wastewater Treatment Works assessment to assess whether the growth proposed at Princes Risborough would affect the environmental capacity of the receiving waterbody and prevent it achieving its Water Framework Directive targets.

Date: Meeting with the EA and Thames Water in August 2015;
Commissioning of Study in October 2015.

Action – WATER QUALITY – Princes Risborough Wastewater Treatment Works Assessment

A study focused on ascertaining the environmental capacity of the receiving waterbody and the ability of the PR STW to deal with the growth proposed without adverse impacts on WFD objectives was necessary.

A brief was written by WDC and shared for agreement with Thames Water and the Environment Agency; AMEC Foster Wheeler was appointed to conduct the study.

The consultants were also asked as part of the brief to model odour nuisance and ascertain the odour buffer necessary to be had at Princes Risborough in relation to the major expansion of the town proposed in the then draft Town Plan.

Partners: Environment Agency, Thames Water

Outcomes:

- Confirmation that the growth proposed in the Princes Risborough town plan will not have a significant effect on the receiving waterbody nor prevent the waterbody to achieve WFD objectives
- Confirmation in relation to Phosphates that the inability to reach good ecological status is due to permit required being already beyond best available technology and is therefore not attributable to growth. The growth cannot be impeded on that basis.
- Modelling and assessment of odour buffer required around the Sewage Treatment Works which has fed into Princes Risborough Expansion Concept Plan.

Date: February 2016

Action: WATER QUALITY – update to the Princes Risborough Wastewater Treatment Works Assessment to assess further modelling scenario (50% deterioration in final effluent)

Partners: Environment Agency, Thames Water, AMEC (consultants)

Outcomes:

- Confirmation that there could be significant impact on the environmental capacity of the watercourse if the final effluent quality deteriorated significantly (assuming a 50% deterioration in effluent quality) or operated to its permits limits instead of current performance (set before WFD). If these scenario were to be more likely, growth figures may need to be revised.
- Confirmation from Thames Water that they will continue to operate to current performance, and with planned upgrades can maintain effluent quality.
- Conclusion that the growth will not have a detrimental impact on water quality

Date: Following EA comments in Spring 2016, update to report was finalised in July 2016. Final confirmation from Thames Water in May 2017.

Action: WATER QUALITY – Little Marlow Wastewater Treatment Works Assessment

In August 2016 the EA stated that WDC had yet to demonstrate that there is sufficient environmental capacity in the River Thames and River Wye as a result of growth; WDC had discussed with Thames Water whether they thought there would be sufficient capacity at the works and Thames Water had issued a positive response, but this only addressed the infrastructure capacity at the works, and not the environmental capacity of the receiving water bodies.

Partners: Environment Agency, Thames Water, AMEC (consultants)

Outcomes:

- Identification of the need for a similar exercise to that undertaken at Princes Risborough Wastewater treatment work, and agreement to update the initial report.
- Agreement that the scope of the study could only be concerned with the growth proposed in the local plan and that any growth from an adjacent District falling within the same catchment should be assessed separately.
- Update to the report having undertaken a water quality assessment of the Little Marlow Sewage Treatment Works to ensure that the planned growth in the STW catchment would not have an impact on WFD objectives, both at the Wye and Thames.
- Confirmation that there could be significant impact on the environmental capacity of the watercourse if the final effluent quality deteriorated significantly (assuming a 50% deterioration in effluent

<p>quality) or operated to its permits limits instead of current performance (set before WFD). If these scenario were to be more likely, growth figures may need to be revised.</p> <ul style="list-style-type: none">• Confirmation from Thames Water that they will continue to operate to current performance, and with planned upgrades can maintain effluent quality.• Conclusion that the growth will not have a detrimental impact on water quality <p>Date: Final report May 2017.</p>
<p>Action : WATER SUPPLY – Strategic infrastructure - Upper Thames Reservoir – Chinnor Site in the Local Plan</p> <p>Discussions around the need to safeguard land for a Reservoir near Chinnor, as an alternative site for water supply provision.</p> <p>Partners : Thames Water, Aylesbury Vale District Council, South Oxfordshire District Council</p> <p>Outcome:</p> <ul style="list-style-type: none">• Confirmation by Thames Water that this option was no longer required, and didn't need to be safeguarded in the District Council's respective plans. <p>Date : May 2017</p>
<p>Action : WATER SUPPLY – Development of a Development Management policy on water efficiency standards</p> <p>Partners : Thames Water, Environment Agency</p> <p>Outcome:</p> <ul style="list-style-type: none">• Confirmation from Thames Water that the District is in an area of severe water stress and identification as a result of a clear local need for higher water efficiency standards than that set in the building regulations.• Requirement in the plan for all new developments to meet higher water efficiency standard of 110 litres per person per day.• Support from Environment Agency <p>Date: August 2016</p>
<p>Action : LOCAL PLAN POLICIES – Development of flood risk and water quality development management policies for the Local Plan</p> <p>The Environment Agency and Buckinghamshire County Council were consulted in Winter 2013 and in February 2014 on the issues they thought the plan ought to address. It was deemed necessary to replace the flood risk policy to take into account of latest guidance and to replace the water quality policy.</p>

The new policies were shared with The Environment Agency and Buckinghamshire County Council in advance of finalising the new Local Plan for the Wycombe District, and they submitted their comments on the policies.

Partners : Environment Agency, Buckinghamshire County Council

Outcome:

- EA and BCC comments were taken into account to produce a sound and robust policy approach to managing flood risk and protecting water quality in line with the NPPF and NPPG.

Date : September 2017

5. Outcomes from strategic working

As a result of strategic cooperation between the strategic partners, the scope of relevant studies necessary to inform the plan's policies were successfully identified and the studies were completed on time to inform the quantum and the sequential location of development.

The SFRA level 2 and Sequential Test report have informed the location of development taking account of all risks of flooding and where applicable other sustainability requirements, and give an understanding of climate change effects onto the sites. This ensures that the allocations in the plan are robust and provides guidance for developers for future site specific flood risk assessments.

The Princes Risborough and Little Marlow Wastewater Treatment Works Assessments report showed that the growth proposed in the Local Plan will not result in a deterioration of water quality at the Horsenden Stream and river Wye and Thames respectively. The EA has agreed with the conclusions of the report, provided that Thames Water is confident that they can maintain the effluent quality and not cause a 50% deterioration nor operate to their more generous permit limits. Thames Water has confirmed that they are confident they can maintain the works performance in the foreseeable future and that they will not operate to their more generous permit limits / will be able to maintain current effluent quality with upgrades.

Clarity was reached with partners on the lack of a need for a new reservoir.

Development management policies have been developed with the Environment Agency and the Lead Local Flood authority.

- Policy DM38 sets out requirements to protect the District's water quality and supply, notably the Chalk Aquifer and Groundwater Source Protection Zones.
- Policy DM39 sets out requirements in relation to managing flood risk and providing Sustainable Drainage Systems.
- Policy DM41 policy has also been developed to introduce higher water efficiency standards as the area is under severe water stress.

6. Ongoing cooperation

The strategic issues have been managed by undertaking studies which have given a sound justification for making decisions in relation to allocations and DM policies in the plan.

WDC has undertaken active and positive discussions with relevant bodies to achieve outcomes and capture these in Memoranda of Understanding on strategic issues.

- BCC has signed an MoU confirming WDC have met the Duty
- EA saying they have worked with WDC and will continue to work with WDC on the local plan

The ongoing cooperation will continue with partners as part of other work they are themselves undertaking such as the groundwater and drainage studies at Princes Risborough being undertaken by BCC, or the revision to the EA's river models planned for the next 5 years, or Thames Water Asset Management Plan for 2020-2025.

4. Ensuring the duty has been met with all identified bodies

4.1 The Strategic Issues Statements above identify the key partners involved in progressing those strategic issues. Other Duty to Cooperate bodies may have been involved in some of those strategic issues to a lesser extent and all have been consulted at the main consultation stages on the Plan where emerging evidence and proposals have been shared.

4.2 All duty-to-cooperate bodies who have less direct involvement in the above strategic planning issues it was considered necessary to contact these authorities/organisations to ensure that all possible strategic issues were identified and addressed. The approach to contacting these bodies is outlined below:

- For bodies who had previously responded to consultations – confirmation that the authority/organisation had no strategic issues which needed to be addressed in the preparation of the Wycombe District Local Plan
- For bodies who had not responded to any consultations since the launch of the WDLP – outlining the work which has been done so far, asking for any strategic issues which need to be raised, ensuring correct contact information is available.
- Bodies who were not involved or less directly involved in the outlined strategic issues but may have strategic interests in potential plan proposals – these authorities/organisations were written to outlining specific aspects of the plan that may be of interest. Once acknowledged, confirmation was sought whether the authority/organisation had any strategic issue which needed to be addressed.

4.3 The following organisations confirmed that there were no strategic issues which needed to be addressed or no comments to make in the production of the Wycombe District Local Plan:

- Central Bedfordshire Council
- Cherwell District Council
- Dacorum Borough Council
- Hart District Council
- London Borough of Hillingdon
- Milton Keynes Council
- Reading Borough Council
- Runnymede Borough Council
- Rushmoor Borough Council
- South Northamptonshire Council
- Surrey Heath Borough Council
- Three Rivers District Council
- Vale of White Horse
- West Berkshire Council
- Civil Aviation Authority
- Oxford City Council
- Bracknell Forest Council
- Wokingham Borough Council

NB – The Marine Management Organisation have expressed in an earlier consultation that no further engagement is needed regarding the Wycombe District Local Plan.

4.4 The following Memoranda of Understanding have been signed by the following authorities:

- Aylesbury Vale District Council (3 Bucks wide agreements and two bilateral agreements with WDC)
- Chiltern District Council (3 Bucks wide agreements and separate agreement with South Bucks and WDC)
- South Bucks District Council (3 Bucks wide agreements and a separate agreement with Chiltern and WDC)
- Royal Borough of Windsor and Maidenhead (bilateral with WDC)
- South Oxfordshire District Council¹⁸ (bilateral with WDC)
- Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) (3 Bucks wide agreements)
- Buckinghamshire County Council
- Network Rail
- Slough Borough Council
- Multi-way agreement between WDC, AVDC, SODC, BCC and OCC

4.5 In the absence of a signed Memorandum of Understanding or a Statement of Common Ground the Council has sought agreement that Wycombe District Council have met the duty to co-operate with the following organisations:

- Mayor of London – has confirmed that the points raised in their earlier consultation response (August 2016) have been addressed and that there are no outstanding or additional strategic matters they would like to raise
- Highways England – Have responded that there are no duty to co-operate issues and that on the information to date, no significant issues in relation to the SRN have been identified.
- Natural England – Have received acknowledgement of our joint-working and have confirmed that WDC have met the duty to cooperate. Legal compliance was raised again in their Reg 19 response but clarification was sought and obtained that their comments only related to test of soundness.
- Buckinghamshire and Milton Keynes Natural Environment Partnership (BMKNEP) – Discussions with BMKNEP have continued through 2018 to date around the soundness and effectiveness of Policy DM34 and the clarity of the

¹⁸ The MoU was signed at officer level

requirements for a net gain in biodiversity. These discussions have concluded with a schedule of possible amendments to DM34 that the Council has no objection to and which BMKNEP have agreed would overcome their concerns on soundness, this is outlined in Appendix 3. Their other reservations as set out in their representation to the publication version of the plan are unaffected by this discussion. They have also subsequently confirmed that WDC have met the Duty as included in Appendix 2 and 3.

- Environment Agency – Have received acknowledgement that WDC have met the duty to cooperate and have worked together extensively.
- Historic England – Have received confirmation that WDC have met our obligations under the duty to cooperate and acknowledged that WDC and HE shall continue to work together to do so.

Copies of this correspondence have been included in Appendix 2.

4.6 Despite numerous attempts to contact, WDC have received no response from the authorities/organisations below:

- Homes and Communities Agency¹⁹
- Office of Road and Rail

¹⁹ Although there has been extensive joint working with the ATLAS team on the proposed expansion at Princes Risborough and on a successful Housing and Infrastructure Bid.

4.7 To effectively illustrate the current position in relation to the authorities and organisations the Council has been in discussion with Table 2 below sets out a summary of outcomes.

Table 2 - Summary of Current Position and Outcomes with Duty to Cooperate Bodies

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
<p>Aylesbury Vale District Council</p>	<p>AONB, Flood risk/ Water quality/Water supply, Green Belt Review, Housing supply and unmet need, Objectively assessed need, Transport, G&T, HMA/FEMA</p>	<p>Several MOU's signed plan making process. Most recent are the Bucks wide MOU (July 2017) and the WDC/AVDC bilateral (January 2018). These include:</p> <ul style="list-style-type: none"> HMA/FEMA Housing Need/Unmet housing need Economy/employment land Green Belt Major Development in the AONB Travellers Transport Infrastructure Flood risk <p>Key outcomes include agreement on level of unmet housing need Aylesbury Vale will accommodate from Wycombe, approach to employment land across the market area, agreement of Green Belt review process and approach to major development in the AONB.</p> <p>Agreement to form multi-authority project team (i.e. AVDC, South Oxfordshire and Oxfordshire County Council and Bucks CC) to progress any cross-border impacts. These to be assessed/addressed in the course of preparing more</p>

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
		detailed planning guidance or through the development management process
Bracknell Forest Council	Travellers, HMA/FEMA definition	Confirmed that there are no strategic issues to be dealt with, no submissions and no objections submitted at Regulation 19 stage.
Buckinghamshire - County Council	AONB, Flood risk/ Water quality/Water supply, Green Belt Review, Housing supply and unmet need, Infrastructure, Objectively assessed need, HMA/FEMA, Transport, Green infrastructure and biodiversity	<p>Signed MOU (September 2017). Key outcomes include agreement on spatial distribution and its implications for infrastructure planning, agreement that there are no strategic objections to proposed Green Belt releases, that the relief road solution at Princes Risborough is the most appropriate alternative, and that there has been effective joint working on flood risk issues.</p> <p>Agreement to form multi-authority project team (i.e. AVDC, South Oxfordshire and Oxfordshire County Council and Bucks CC) to progress any cross-border impacts. These to be assessed/addressed in the course of preparing more detailed planning guidance or through the development management process.</p>
Central Bedfordshire Council	HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Cherwell District Council	HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Chiltern District Council	AONB Flood risk/ Water quality/Water supply, Green	Several Bucks wide MOU's signed during the plan

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
	<p>Belt Review, Housing supply and unmet need, Objectively assessed need, Transport, Travellers, Green infrastructure and biodiversity</p>	<p>making process. Most recent, July 2017 includes: MoU signed for: Housing Need/Unmet housing need HMA/FEMA</p> <p>Green Belt Travellers Transport Infrastructure Flood risk</p> <p>Key outcomes include agreement on level of unmet housing need across the HMA including Wycombe District, approach to employment land across the market area, and agreement of Green Belt review process.</p> <p>MoU between Chiltern, South Bucks and Wycombe District Councils in September 2017 addresses the issue of sites that straddle the district boundary in the Hazlemere/Holmer Green area.</p> <p>Ongoing discussions on Habitats work including clarification on their work and sharing potential work WDC may do.</p>
Dacorum Borough Council	Travellers, HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Hart Council	N/A	Confirmed that there are no strategic issues to be dealt with.

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
London Borough of Hillingdon	Travellers, HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Milton Keynes Council	HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Oxford City Council	HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Oxfordshire County Council	Transport	Agreement to form multi-authority project team (i.e. AVDC, South Oxfordshire and Oxfordshire County Council and Bucks CC) to progress any cross-border impacts. These to be assessed/addressed in the course of preparing more detailed planning guidance or through the development management process.
Reading Borough Council	HMA/FEMA	Initially confirmed that there are no strategic issues to be dealt with. On 21 February 2018 Reading contacted all local authorities within 10km of their boundary requesting if there was any scope to accommodate their unmet need for gypsy and traveller pitch provision. WDC replied indicating that they could not assist.
Royal Borough of Windsor and Maidenhead	Housing supply and unmet need, Travellers, HMA/FEMA, Green infrastructure and biodiversity	<p>MoU Signed for: HMA/FEMA Housing Needs/Unmet housing need HEDNA Green Belt Travellers Transport Flood risk</p> <p>Key outcomes include agreement that the authorities are in different</p>

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
		<p>housing market areas and that neither authority is asking the other to meet any of their needs.</p> <p>Ongoing discussions on Habitats work including clarification on their work and sharing potential work WDC may do.</p>
Runnymede Borough Council	HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Rushmoor Borough Council	N/A	Confirmed that there are no strategic issues to be dealt with.
Slough Borough Council	Housing supply and unmet need, HMA/FEMA work, Economy/employment land	MOU signed 16 March 2018. Agrees neither authority is asking the other to accommodate unmet needs. Agrees WDC have complied with the Duty to Cooperate.
South Bucks District Council	AONB, Flood risk/ Water quality/Water supply, Green Belt Review, Housing supply and unmet need, Objectively assessed need, Transport, Travellers, Green infrastructure and biodiversity	<p>Several Bucks wide MOU's signed during the plan making process. Most recent, July 2017 includes: MoU signed for:</p> <ul style="list-style-type: none"> Housing Need/Unmet housing need HMA/FEMA Green Belt Travellers Transport Infrastructure Flood risk <p>Key outcomes include agreement on level of unmet housing need across the HMA including Wycombe District, approach to employment land across the market area, and agreement</p>

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
		<p>of Green Belt review process.</p> <p>MoU between South Bucks, Chiltern and Wycombe District Councils – agrees approach to mitigation for sites within 5km of Burnham Beeches as part of Habitats Regulations Assessment.</p> <p>Ongoing discussions on Habitats work including clarification on their work and sharing potential work WDC may do.</p>
<p>South Northamptonshire Council</p>	<p>HMA/FEMA</p>	<p>Confirmed that there are no comments to make with regards to duty to cooperate</p>
<p>South Oxfordshire District Council</p>	<p>Flood risk/ Water quality/Water supply, Housing supply and unmet need, Transport, G&T, HMA/FEMA, Green infrastructure and biodiversity</p>	<p>MoU signed.</p> <p>Key outcomes include agreement that the authorities are in different housing market areas and that neither authority is asking the other to meet any of their needs.</p> <p>Agreement to form multi-authority project team (i.e. AVDC, South Oxfordshire and Oxfordshire County Council and Bucks CC) to progress any cross-border impacts. These to be assessed/addressed in the course of preparing more detailed planning guidance or through the development management process.</p> <p>Ongoing discussions on Habitats work including clarification on their work.</p>

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
		and sharing potential work WDC may do.
Surrey Heath Borough Council	N/A	Confirmed that there are no comments to make with regards to duty to cooperate.
Three Rivers District Council	Travellers, HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Vale of White Horse	N/A	Confirmed that there are no strategic issues to be dealt with.
West Berkshire Council	HMA/FEMA	Confirmed that there are no strategic issues to be dealt with. Queries at Reg19 stage whether unmet housing need in the East Berkshire HMA, particular Slough, had been considered. This has been considered and it has been agreed with both Slough and Royal Borough of Windsor and Maidenhead that WDC should not take unmet housing need from those authorities. This has been communicated to West Berks.
Wokingham Borough Council	Travellers, HMA/FEMA	Confirmed that there are no strategic issues to be dealt with.
Civil Aviation Authority	N/A	Confirmed that there are no strategic issues to be dealt with.
Historic England (formerly English Heritage)	Heritage	Confirmed that WDC have worked together in meeting the duty and that Historic England will continue to work with WDC going forward.
Environment Agency	Flood risk/ Water quality/Water supply	Have received acknowledgement that WDC has met the duty to cooperate, and that WDC

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
		and the EA have worked together extensively and the Environment Agency are committed to continuing doing so.
Aylesbury Clinical Commissioning Group	Health, Infrastructure	Letter of approach confirmed. Acknowledgment in Reg 19 consultation that WDC have met the duty
Chiltern Clinical Commissioning Group	Health, Infrastructure	Letter of approach confirmed. Acknowledgment in Reg 19 consultation that WDC have met the duty
Highways England	Transport	Have received confirmation that WDC have met the duty.
Homes and Community Agency	Housing	No response, assumed that authority has no strategic issues to raise.
Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)	Housing supply and unmet need, Objectively assessed need, Transport, HMA/FEMA, Travellers, Infrastructure, Flood risk/Water quality/Water supply	<p>Several Bucks wide MOU's signed during the plan making process. Most recent, July 2017 includes: MoU signed for:</p> <ul style="list-style-type: none"> Housing Need/Unmet housing need HMA/FEMA Green Belt Travellers Transport Infrastructure Flood risk <p>Key outcomes include agreement on level of unmet housing need across the HMA including Wycombe District, approach to employment land across the market area, and agreement of Green Belt review process.</p>
Marine Management Organisation	N/A	Notified WDC that they no longer wish to be contacted.

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
Mayor of London	Housing supply and unmet need, HMA/FEMA, economy, transport	Confirmation that there are no outstanding or additional strategic issues.
Transport for London	Transport	Confirmation that there are no outstanding or additional strategic issues.
Natural England	AONB, Green infrastructure and biodiversity	Have received confirmation that WDC have met the duty.
Bucks and Milton Keynes Natural Environment Partnership (BMKNEP)	Green infrastructure and biodiversity	Have received confirmation that WDC have met the duty.
Network Rail (in lieu of the Office for Rail Regulation)	Transport	Memorandum of Understanding signed October 2017 confirming approach to strategic transport issues in Princes Risborough.
Other bodies involved with joint-working on strategic issues		
Chilterns Conservation Board	AONB	N/A
Thames Water / Affinity Water	Flood risk and water quality, Infrastructure	N/A
NHS England/ NHS Property services	Health, Infrastructure	N/A
Thames Valley Police	Infrastructure	N/A
Bucks and MK Fire	Infrastructure	N/A
South Central Ambulance	Infrastructure	N/A
Chiltern Rail	HMA/FEMA	N/A
Hertfordshire County Council	HMA/FEMA	N/A
Watford Borough Council	HMA/FEMA	N/A
Luton Borough Council	HMA/FEMA	N/A
Spelthorne Borough Council	HMA/FEMA	N/A

Authority / Organisation	Strategic issues authorities/bodies are involved in:	Outcome
West Northamptonshire	HMA/FEMA	N/A

5. Summary and Conclusions

5.1 This report summarises the main strategic issues identified through the Council’s collaborative working under the Duty to Cooperate, the main actions undertaken and the main outcomes secured. It deliberately does not seek to set out a very detailed account of all the collaborative working but focuses on the key outcomes, many of which arise from the joint preparation or commissioning of the evidence base that informs the Plan.

5.2 Amongst those key outcomes are:

- The identification of the housing market area (HMA) and functional economic market area (FEMA) as the basis for the areas of closest joint working/collaboration;
- Agreement amongst the HMA authorities on the scale of the objectively assessed need for housing across the HMA and joint approaches to determining housing land supply/capacity;
- Agreement on the level of unmet housing need in Wycombe, Chiltern and South Bucks Districts, and agreement on this being accommodated within the Vale of Aylesbury Local Plan, i.e. within the housing market area;
- Clarity that no other authority is asking WDC to accommodate unmet bricks and mortar housing or economic needs;
- Confirmation that one other authority is asking WDC if there is scope to accommodate unmet gypsy and traveller housing needs;
- Agreement on the need for employment land and approaches to addressing that, including recognition that there will be some redistribution of employment land requirements from Wycombe, Chiltern and South Bucks to Aylesbury Vale;
- Close joint working on transport modelling and the identification of mitigation measures, with the Buckinghamshire authorities, particularly Buckinghamshire County Council. Also wider cross boundary (Bucks/Oxfordshire) agreement on future transport working arrangements;
- Agreement with Buckinghamshire County Council that the infrastructure delivery plan forms a sound basis for taking the plan forward, including the spatial distribution of growth;
- Close joint working on key technical evidence with the relevant agencies/organisations to address potential environmental impacts, with a

range of agreed outputs that have helped shape the overall strategy of the Plan, proposed site allocations and the detailed policies.

5.3 The Council considers that it has actively and on an ongoing basis cooperated with the relevant bodies on strategic issues under the Duty to Cooperate and secured wide ranging outcomes as a result of that process. As such the Council considers that it has complied with the Duty to Cooperate.