

## CHAPTER 1 - INTRODUCTION

<b>GENERAL</b>
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### The Objections

0158/91	High Wycombe and Marlow Green Party
0649/1	E B Andrews
0821/4	James Michael Campbell
0956/1	R Lawton
1042/4	J D Burnham
1133/2	Mr Keith F J Lawrence

### Summary of Objections

- (a) The word 'mitigate' is over used in the Plan and often wrongly.
- (b) The Policy Impact Matrix appeared so subjective in its scoring that it is of little use to the process.
- (c) The price of the Local Plan (£25) dissuades people from taking part in the democratic process; difficult for a person to spend 8 hours or more in a public library trying to digest such a complex and detailed document.
- (d) Layout of policies should include a 'line' between them, to avoid confusion. Similarly the paragraphs within Policies should be numbered.
- (e) Object to the structure of the Plan; rural matters should be dealt with separately to urban matters.
- (f) Object to Plans approach to High Wycombe, which would lead to increased disruption and congestion.

### Inspector's Reasoning and conclusions

1.1.1 Broadly speaking, I consider that the term mitigate is a reasonable term to use in both policies and supporting text, as it concerns the reduction of impacts of particular types of development, which is a legitimate purpose of the planning system. I note that the Council has identified that the term is only used six times in the Plan and I therefore do not consider that the term has been over used.

1.1.2 As regards the objector's concerns over the Policy Impact Matrix, although it is a core document it does not form part of the Plan and therefore I have no remit to comment on its contents. Similarly the acceptability of the price of the Plan falls outside of the remit of my report.

1.1.3 Whilst I recognised that the change in layout between the adopted Plan and this deposit draft may have confused readers, I find that generally the layout and paragraph numbering are clear and easy to understand. Although the policies are generally quite short, I suggest that numbering paragraphs within them would helpfully add clarity for future use.

1.1.4 Whilst I recognise that other Plans have made the separation between urban and rural issues, I do not consider that this would be helpful in this District. Current government planning guidance stresses the importance of the links between urban and rural locations and the

approach taken by the Plan reflects this emphasis.

1.1.5 As regards the final issue, I recognise that High Wycombe suffers from a number of environmental and topographical constraints, but the Plan's emphasis on High Wycombe as a centre for growth was supported by the report into the most recent Structure Plan. Furthermore national planning guidance stresses the importance of the development of urban areas over less accessible locations. I consider that the Plan's policies are sufficiently strong to guard against the detrimental effects of future development and that broadly speaking the Plan follows an acceptable approach in identifying High Wycombe as a centre for growth.

## RECOMMENDATIONS

- IN/1 That no modification be made to this section of the Plan

## THE DISTRICT AND DEVELOPMENT PRESSURES

### The Objections

0533/3	Longwick-Cum-Ilmer Parish Council
0817/15	Croudace Ltd
0840/9	Marlow and District Chamber of Trade & Commerce
1201/7	<i>Mr C G Hamilton, Downley Parish Council</i>
1475/6	Mr D V Baker
1475/7	Mr D V Baker

### Summary of Objections

- (a) Doubt whether the population can be expected to drop by 1% between 1991 and 2011.
- (b) Contend that Bourne End is sufficiently large to be considered in the same context as the settlements identified in paragraph 1.01; paragraph should be revised accordingly.
- (c) Require a reference to the important matter of protecting the integrity and social/economic viability of community; policies should be community based. There should be, for example, a clear understanding of the infrastructure needs and policy requirements for the community of Marlow; the Council should consult closely and liaise with the community. Object that policy proposals are more to do with District wide objectives than the needs of the communities and therefore do not conform with the guidelines for formulation of the Plan.
- (d) Lack of consideration is given to the housing demand for persons of retirement age within the community.
- (e) Not convinced that sufficient notice has been taken of the large proportion of the District covered by green belt and AONB. Area covered should be expressed as a percentage of total area.
- (f) Paragraph 1.04 refers to static population, whilst over 12000 homes are still required; this is not logical.

### Inspector's Reasoning and conclusions

1.2.1 The estimated fall in population was based on the most appropriate and up to date figures available, and was tested as part of the Structure Plan process. The objector has not

presented any evidence to support their doubts about this fall in population. I find that this prediction is therefore acceptable. As regards Croudace Ltd's contention that Bourne End should be included in the list of settlements in the opening paragraph, I consider that this list purely serves as a brief description of the District's characteristics. It confers no particular status on any of the settlements listed and so I do not consider that there is any necessity to include Bourne End in this list.

1.2.2 As regards the third issue I consider that very broadly speaking, the approach suggested by objectors is not at variance with that of the Plan. One of the purposes of the planning system is the protection of amenity either for individuals, communities or the whole district and the Plan includes many policies that seek to protect or enhance specific communities. However to extend this approach to making each 'community' self-sufficient and autonomous as regards needs and provision could be viewed as a means of diverting all new development away from established areas out of deference to the views of their existing residents. This suggestion is effectively contrary to the need to conserve land and to restrict rural and urban greenfield development. It also begs the question of how these communities should be defined. Whilst emerging government guidance is moving toward greater community involvement in the planning system, this has not yet been adopted as formal planning guidance and there is no indication of precisely the form this involvement should take. However on the basis of draft guidance, I consider that it would be highly unlikely that this change in policy would empower communities with the level of autonomy suggested by the objectors. Therefore I consider that it would be inappropriate to amend the Plan in the manner suggested.

1.2.3 Whilst the increase in the age of the population of the district has clear implications for housing, I find that this has been addressed by policies in the Housing Chapter, particularly Policy H10. I note that this objection was conditionally withdrawn.

1.2.4 I note that the Council have altered paragraph 1.03 by way of PIC 1/1 so that it refers to green belt and AONB as a percentage of the District. I consider that this meets the objector's concerns about this issue. As regards the final issue, national household predictions clearly identify a reduction in household size and I find that this would justify the increased level of demand for houses in the District, despite the static population. However this linkage is not clear from the text, particularly to readers that are unfamiliar with planning terminology. I have suggested a minor amendment to help clarify this.

## RECOMMENDATIONS

- IN/2 That the policy be modified as set out in PIC 1/1 to 1/4 and that the first part of the first sentence of paragraph 1.05 be deleted and replaced by the following wording;

*'Despite this fairly static population national household projections have identified a reduction in household size. taking these projections into account the county council has identified that ....'*

## SUSTAINABLE DEVELOPMENT

### The Objections

0158/1	High Wycombe and Marlow Green Party
0376/24	Axa Equity and Law Life Assurance Society PLC
0526/1	Chepping Wycombe Parish Council
0834/6	Prudential Assurance Company Ltd
1200/1	English Nature

### Summary of Objections

- (a) Object to 'sustainable development and growth'; unbridled growth has caused many problems. Progress can be achieved without growth.
- (b) Object to the incorporation of the Sustainability Appraisal as an integral part of the Plan; it is a background paper which represents a snapshot in an ongoing process and should not be accorded status as part of the Local Plan.
- (c) The proximity of the proposed High Wycombe sites will not be conducive to a healthy environment and the inevitable traffic congestion will conflict with the policy of a thriving economy.
- (d) To give the four-part 'vision' for Wycombe District proper status, in terms of Section 54A, suggest it should be encapsulated in a policy, rather than supporting text and translated to deal with land use planning matters.
- (e) Reference is made throughout the Plan to high standards of design; this should be included in the vision.
- (f) Paragraph 1.16 could be more positively worded. Replace 'environmental constraints' with 'the need to conserve our main environmental assets'; paragraph should be adopted as a 'keynote' environmental policy, which would clearly establish an environmentally-led development plan.

### Inspector's Reasoning and conclusions

1.3.1. Whilst the phrase "Sustainable Development and Growth" does not actually appear in this section of text, I recognise that there are clear environmental dangers to unbridled growth. However following PIC 1/5 paragraph 1.14 reflects the sustainable development objectives set out in the Government's Sustainable Development Strategy. Although the paragraph now refers to the importance of economic growth and employment, it also stresses the effective protection of the environment and the prudent use of natural resources. It is appropriate that the paragraph reflects this balance stressed in government sustainability guidance and no further amendment is necessary. I find that objector's concerns over the status of the Sustainability Appraisal have been fully met by PIC 1/6. This amends the text so that it is clear that the Sustainability Appraisal does not form an integral part of the Plan.

1.3.2. With respect to the third issue, I have addressed the overall thrust of the District's Housing Policy and the suitability of individual housing sites around High Wycombe in my consideration of objections to the Housing Chapter. Although I have recommended amendments to these allocations, for the reasons explained in that section of my report, I find that focusing development on this part of High Wycombe broadly accords with both national and local planning guidance on the sustainable location of development. Given that the Plan attempts to mitigate the negative impacts of development in terms of traffic and community resources, I do not consider that these housing would place unacceptable pressure on existing local communities.

1.3.3. I do not consider that the four part vision set out in paragraph 1.16 should form part of a policy. This paragraph provides a useful statement of how the Council consider the development of the District should progress. However I consider that this text could not be used as basis for assessing the suitability of a proposed development. Similarly whilst the emphasis on a high quality of design is an important feature of national policy guidance, I consider that this emphasis is sufficiently reflected in other chapters and policies in the Plan and there is no necessity to raise this issue here in such a broad context.

1.3.4. As regards the final issue, although the presence of natural resources is clearly beneficial to the District. In order to ensure their continued protection it is right that they should be recognised as restraints to development. I consider that the paragraph as currently worded

conforms with the balanced approach required by government policy and should not be amended in the manner suggested by the objector. The suggested text could not be used as a basis against which individual proposals could be tested and it should not be used as a policy.

## RECOMMENDATIONS

- IN/3          Modify the Plan in accordance with PICs 1/5 and 1/6

## BROAD DEVELOPMENT STRATEGY

### The Objections

0526/32	Chepping Wycombe Parish Council
0376/25	Axa Equity and Law Life Assurance Society PLC
0817/1	Croudace Ltd
1293/10	Naphill & Walter's Ash Residents Association
1578/7	M J Jeanes (Group) Ltd

### Summary of Objections

- (a) Reference to the development of the Gomm Valley should be made in the Broad Development Strategy. The text to paragraph 1.23 should be amended to add "identifies the opportunity for a major mixed use site at Gomm Valley, High Wycombe" after the wording 'Loudwater and Wooburn Green'.
- (b) Concern that due to the number of proposed development sites adjoining the Chepping Wycombe Parish area, the objectives set out in paragraphs 1.20-1.21 cannot be met. Community facilities, schools and recreation provision will be unable to cope; additional pressures on the countryside, green belt and AONB; additional traffic etc.
- (c) The introduction to the Adopted Plan contained objectives for settlement categories and these should be included in the Deposit Plan as important statements, or upgraded to policies in the Landscape and Nature Conservation Chapter.
- (d) Decision not to review green belt boundaries is unjustified. It is essential for a truly sequential and sustainable approach to land allocations.
- (e) Whilst agree with High Wycombe as the main focus for new development, suggest that it is essential that the Plan provides a range of sites across the District. Opportunities which exist in other settlements, such as Bourne End, can also provide a sustainable form of development e.g. Slate Meadow.

### Inspector's Reasoning and conclusions

1.4.1. In my consideration of objections to the Plan's Housing Chapter, I have made a comparative assessment of the suitability of allocated and proposed housing sites. For the reasons given there, in particular its high quality landscape, I concluded that the Gomm Valley should not be allocated for mixed-use development but should remain as safeguarded land for the duration of the current plan. I therefore do not support the objector's suggested amendment to the text of this section.

1.4.2. I have assessed the impact of housing sites around High Wycombe in Chapter 3 of my report. The recommended deletion of the Abbey Barn North (ABN) site is likely to reduce some

pressure on transport and other infrastructure in the eastern part of High Wycombe. However, the continued focus of development in this sector through the important Wycombe Marsh site accords with both national and local planning guidance on the sustainable location of new buildings. The Plan attempts to mitigate the negative impacts of development in terms of traffic and community resources through a variety of other policies. I do not consider that the housing allocations would place unacceptable pressure on existing local communities.

1.4.3. Whilst the 1995 Plan contained a list of objectives for listed settlements, the current plan, utilises a mixture of criteria based and site specific policies. As the aims and objectives are clearly stated in this introductory section, I consider that the Plan is able to meet specific needs without the use of a list of settlement specific objectives

1.4.4. PPG2 is quite clear that a general review of green belt boundaries would be a matter for consideration as part of a Structure Plan Review. As there has been no recommendation at Structure Plan level for a review of these boundaries, either around High Wycombe or anywhere else in the District, I do not consider that it would be appropriate for the District Local Plan to review or amend the green belt. As regards the last issue, the broad locational strategy of the Plan focuses development on High Wycombe, with some other allocations in the rest of the District, including Princes Risborough. The Plan's urban focus accords with both local and national planning guidance on the sustainable location of development, which stresses the benefits of locating development in urban areas. I do not consider that this strategy overburdens High Wycombe and there is no necessity to allocate development to other less urban areas.

## RECOMMENDATIONS

- IN/4 That no modification be made to this section of the Plan.

## PREPARATION OF THE DEPOSIT PLAN

### The Objections

0929/2 Paul Turner

### Summary of Objections

- (a) Paragraph 1.28 is inaccurate; participation in the decision making process is not actually intended; procedures are forbidding and intimidating, favouring developers. Legitimacy of the Plan should be in terms of guidelines rather than directives; every household should be surveyed to decided general principles.

### Inspector's Reasoning and conclusions

1.5.1 At the first inquiry appearance the objector argued that the Plan was based on national government and County Council policy with which the public had no chance to disagree. He requested that the Plan be amended to include a short statement to this effect. However, he accepted that the Council had not breached any regulations in the course of preparing, publicising or making decisions on the content of the Plan. From the evidence put to me, I consider that the Council went well beyond the minimum statutory requirements for achieving public comment on the Plan proposals, which have been subject to all proper processes of scrutiny at the Local Plan inquiry. The suggested amendment would not materially affect the

content of the Plan; nor in my view would it suggest that any agreed proposals for development in the High Wycombe area would have any less legitimacy.

### RECOMMENDATIONS

- IN/5          No modification

## IMPLEMENTATION RESOURCES

### The Objections

0834/7          Prudential Assurance Company Ltd

### Summary of Objections

- (a) References to development meeting its wider impacts do not correspond to the guidance in Circular 1/97.

### Inspector's Reasoning and conclusions

1.6.1 I consider that the paragraph reasonably identifies that developers would often be expected to contribute to addressing the local impact of development. There is nothing in this paragraph that compels the Council to enter into agreements that exceed the provisions of Circular 1/97 and I do not consider that this text should be modified.

### RECOMMENDATIONS

- IN/6          That no modification be made to this section of the Plan.

## MONITORING, REVIEW AND TIME-SCALE

### PIC 1/8 Objections

0376/79          Axa Equity and Law Life Assurance PLC  
0379/73          Sport England  
0408/37          Ercol Furniture Ltd  
0817/45          Croudace Ltd  
1141/54          Beazer Strategic Land

### Summary of Objections

- (a) 70% target for previously developed land for housing will need to be reappraised prior to the adoption of the Local Plan; less previously developed land should be used for housing, to protect employment land. Great weight should be attached to the protection of designated green space, in preference to its reallocation for housing. Target of 70% should be reduced as a result of allocating more land for Wycombe Marsh for employment use, retaining Bucks

Free Press in employment use and retaining Green Space at the three school site allocations. Unlikely that 70% of new dwellings will be built on previously developed land.

- (b) With regard to Indicator 7, question whether this could also measure positive additions or improvements to sport and leisure facilities.
- (c) Object to target of at least 30% affordable housing; the amount of affordable housing to be provided in individual proposals should reflect individual site suitability and be a matter of negotiation; this should be reflected in the table. No justification given for the suggested minimum
- (d) Indicator 2 should be based on completion rather than the availability of supply.
- (e) Indicator 5; consider that the 'target' is an aim, and is therefore inappropriate.
- (f) Indicator 7; wording should state 'no net loss of designated green space' to allow for an appropriate degree of flexibility.
- (g) It is unclear how the proposals to maintain employment land are to be reconciled with the substantial loss of employment land envisaged with housing proposals.
- (h) Development contributions to the Local Transport Plan should only be sought where justified, which is not referred to in the target.
- (i) With regard to meeting Structure Plan requirements, the Plan fails to do this at present and does not meet the advice in PPG3.

### **Inspector's Reasoning and conclusions**

1.7.1. As regards the first issue, the introduction of a percentage target for housing development on previously developed land is not unreasonable. Recent local and national policy guidance, particularly PPG3 and RPG9, both place great emphasis on the importance of the re-use of land. PPG3 suggests a nation-wide target of 60% and RPG a target of "at least 60%". The Council's argument that, based on analysis of past trends and future brownfield land allocations, this target is achievable has considerable force. However given my recommendations concerning the allocation of housing sites in the Plan's Housing Chapter, I have reservations about the likelihood of this target being annually met towards the later part of the Plan, as a significant proportion of housing allocations that are in this phase of the Plan are on greenfield sites. I appreciate that new windfall sites on previously developed land may well come forward, but this source of contribution suggests a degree of uncertainty in the supply of previously developed land. Given this I suggest that the target for housing contribution from previously developed land remains at 70% but this is treated as a target for the whole Plan period, rather than an annualised rate. The presence of such a target for previously developed land would not place an unreasonable pressure on land that is currently in employment use. Employment land is not the sole source of previously developed land in the district and I find that the Plan's Employment Chapter contains sufficient safeguards to ensure its continued protection.

1.7.2. I will deal with issues (b) and (f) together. It is possible that circumstances may allow for a net increase in green space over the Plan period. However given the provisions of Circular 1/97, the nature of developer contributions is largely governed by site specific circumstances. To commit the Plan to a positive target such as this may not be realistic or necessary. Therefore it would be both illogical and unreasonable to commit the Plan to such a target. Once the Plan has been adopted, it would not be possible to designate further green space until the next plan, but detailed policies would ensure that where designated green space is lost a suitable replacement would be provided. The objector's suggestion that the indicator should require no net loss of green space would therefore be both illogical and unnecessary.

1.7.3. As regards objector's concerns about how the level of affordable housing supply is expressed, I refer to my recommendations concerning the Plan's affordable housing policies in

the housing chapter. For the reasons given there I find that the setting of an overall target in these policies of 30% is a reasonable approach that would contribute to meeting the District's considerable affordable housing needs. The indicator in the introduction should reflect these policies. I consider that setting an annual indicator would not be useful, as it is clear that given the staggered nature of the development process, the annual contribution of affordable housing would vary considerably.

1.7.4. Whilst I accept that the target associated with indicator 5 is not such a quantifiable target as other targets suggested in this table, I find it still provides a useful indication of the progress of one of the Plan's recognised aims and accords with the aims of policy CF2.

1.7.5. It is clear that former employment land will contribute to the housing land supply. There is a need to maintain an appropriate balance between housing land supply and the provision of employment opportunities. For the reasons identified in chapters 3 and 4 of my report, I consider that the loss of the allocated sites is justified, having regard to their specific circumstances. The Plan as proposed to be changed identifies one new employment site, where development is under way, but seeks to protect most existing sites. At some locations, modern business practices allow for increased employment on existing sites and the redevelopment of certain sites for mixed use may occur without a net loss of employment. Therefore I find that it is still logical that the target seeks no net loss of employment land.

1.7.6. I recognise that development contributions to the Local Transport Plan should only be sought where justified by the individual circumstances of development. However, as this point is made clear both by Circular 1/97 and other relevant plan policies I consider it would be unnecessary for this consideration to be repeated at this stage of the Plan.

1.7.7. For the reasons I have given in my consideration of objections to the Housing Chapter, I am confident that my recommendations provide for sufficient land allocations to allow the Plan to achieve the Structure Plan housing target.

## **RECOMMENDATIONS**

- IN/7 Delete the phrase "on an annualised basis" from the target of the first indicator.