



The Planning Inspectorate

Report to Wycombe District Council

by Nicola Gulley MA MRTPI

an Inspector appointed by the Secretary of State

Date: 10 July 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the

Wycombe District Local Plan

The Plan was submitted for examination on 28 March 2018

The examination hearings were held between 16 July and 26 September 2018

File Ref: PINS/K0425/429/12

Abbreviations used in this report

AA	Appropriate Assessment
AMR	Authority Monitoring Report
AP	Action Point
AONB	Area of Outstanding Natural Beauty
ADSAP	Adopted Delivery and Site Allocations Plan
CCB	Clinical Commissioning Board
ChCB	Chilterns Conservation Board
DASAP	Adopted Delivery and Site Allocations Plan
DtC	Duty to Co-operate
DPH	Dwellings Per Hectare
FOAN	Full Objectively assessed need
FEMA	Functional Economic Market Area
GB	Green Belt
GIA	Gross Internal Area
GTAA	Gypsy and Traveller Accommodation Assessment
HEDNA	Housing and Economic Needs Assessment
HELAA	Housing and Economic Land Availability Assessment
HMA	Housing Market Area
HLS	Housing Land Supply
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
MEA	Main Expansion Area
MHCLG	Ministry of Housing, Communities and Local Government
MM	Main Modification
NHS	National Health Services
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PREA	Princes Risborough Expansion Area
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Wycombe District Local Plan provides an appropriate basis for the planning of the District, provided that a number of main modifications [MMs] are made to it. Wycombe District Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out a sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In three cases, MM7, 17 and 59, I have added consequential modifications that I consider are necessary for the soundness of the Plan. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- An overall increase in housing land supply from 10,927 to between 11,659 and 11,899 dwellings;
- An amendment to Policy CP5 to allow for the delivery of a range of Class B uses and sui generis employment related uses on all employment allocations;
- The inclusion in Policy CP6 of the requirements for new retail floorspace;
- An increase in the indicative number of dwellings at: Policy HW5 - Abbey Barn South and Wycombe Summit from 505 to 580 dwellings; Policy HW6 - Gomm Valley and Ashwells from 530 to between 520 and 720 dwellings; and at Policy HW7 - Terriers Farm and Terriers House from 500 to between 500 and 540 dwellings;
- Deletion of Policy HW15 - Land to the rear of Hughenden Road, High Wycombe
- The amendment of Policy DM24 to require the provision of affordable housing on the basis of units; and
- Modifications to the wording of development management policies for consistency with national guidance, positive preparation and to reflect updated evidence.

Introduction

1. This report contains my assessment of the Wycombe District Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (the Framework) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised Framework was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Unless stated otherwise, references in this report are to the 2012 Framework.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Wycombe District Local Plan, submitted in March 2018, is the basis for my examination. It is the same document as was published for consultation in October 2017.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any Main Modifications [MMs] necessary to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out a sustainability appraisal (SA) of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and have recommended some consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA that has been undertaken. Where necessary I have highlighted these amendments in my report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises a set of 16 no. A3 plans identified as Appendix L: Maps as set out in the submitted Wycombe District Local Plan.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.

7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed to the Policies Map in Appendix L – Maps of the Wycombe District Local Plan (Regulation 19) and the further changes published as Annex 2 of the proposed MMs.

Consultation

8. Section 20(5)(a) of the Act requires that I consider whether the requirements of sections 19 and 24(1), the regulations under section 17(7), and any regulations under section 36 have been met. My findings in relation to these matters are set out in the following paragraphs.
9. The content and timing of the Plan and the approach to public consultation / engagement is set out in the Local Development Scheme (LDS)¹ and the Statement of Community Involvement (SCI)². A number of local residents and interest groups have expressed concerns about the effectiveness of the public consultation. These include claims that the Council failed to engage with local communities in a constructive and meaningful way, informed rather than included local communities in decision making, did not disseminate information effectively and had insufficient regard for the comments and representations made to proposals throughout the plan making process. I am however, satisfied that the Council has made genuine attempts to effectively consult and engage with stakeholders at every stage of the plan making process and has complied with the requirements set out in the SCI for the LP. Moreover, there is no substantive evidence to lead me to conclude that the Council has failed to comply with the relevant legislation, national policy and guidance, or SCI.

Sustainability Appraisal

- 10.A SA report, including a Strategic Environmental Assessment, (SA) was published in September 2017³. As part of the Examination, the SA was updated through the compilation of a composite SA document which brought together evidence base documents⁴ to provide a single document, the provision of a clear explanation of the site selection process and how it relates to the SA, the addition of a new chapter in the SA which provides a detailed overview of findings in respect of the draft Plan and its cumulative effects, and an appraisal of the MMs.
- 11.During the hearing sessions several representors expressed concern that the plan making process had failed to give appropriate consideration to alternatives. These concerns related primarily to the formulation of the strategy, settlement hierarchy and the site assessment process. I am however, satisfied that the SA of the Plan's strategy, policies and allocations has considered reasonable alternatives and that the reasons for selecting particular policy approaches and site allocations, and rejecting others, are clear. Specific aspects of the SA work conducted during the examination are dealt with in the relevant sections of this report.

¹ WDLDP12

² WDLDP11

³ WDLP2 & WDLP2.1

⁴ SA1, SA2, SA3, SA4, SA5, WDLP2, WDLP2.1, WDLP10.19 (where relevant to the SA) and WDLP10.22.

12. Overall, I am satisfied that the sustainability appraisal, including the consideration of reasonable alternatives, has been carried out throughout the process of preparing the Plan, as required by section 19(5) of the Act, and complies with the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance.

Habitats Regulations Assessment

13. In accordance with the Habitats Directive⁵, an HRA⁶ of the Plan has been undertaken and reviewed as necessary in the light of changes put forward during the examination. The HRA, which was revised to take account of the 'People over Wind, Peter Sweetman v Coillte Teoranta' and the 'Holohan v. An Bord Pleanál' **judgements**, concluded that significant effects were likely or uncertain in relation to: Air pollution at Windsor Hill SSSI, Bradenham Woods, Park Wood and the Coppice SSSI, and Bisham Woods SSSI (components of the Chiltern Beechwoods SAC), Aston Rowant SAC and Burnham Beeches SAC; and Recreational pressure at Windsor Hill, (components of the Chiltern Beechwoods SAC) and Burnham Beeches SAC. Appropriate Assessments of these effects were undertaken, and it was concluded that the Plan would not adversely affect, either alone or in combination, the integrity of the SACs assessed. Based on the submitted evidence, I am satisfied that the Plan is compliant with the requirements of the Habitats Directive.

Climate Change

14. The Plan includes policies designed to ensure that the development and use of land in the district contribute to the mitigation of, and adaptation to, climate change as required by section 19(1A) of the Act. These include the development strategy and other policies which focus development in locations within the Tiers 1 to 6 of the settlement hierarchy thereby reducing the need to travel; CP12 (Climate Change), DM33 (Managing Carbon Emissions: Transport and Energy Generation), DM38 (Water Quality and Supply) and DM39 (Managing Flood Risk and Sustainable Drainage Systems); Policies CP10 (Green Infrastructure and the Natural Environment), DM34 (Delivering Green Infrastructure and Biodiversity in Development) and DM35 (Placemaking and Design Quality) which provide a framework for green infrastructure, design and place making, the natural environment and biodiversity. The policies are based on the findings and recommendations of studies contained in the Council's evidence base.

Assessment of the Duty to Cooperate

The Duty to Cooperate

15. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33(A) in respect of the plan's preparation. The Council's Duty to Co-operate Report⁷ (REF WDLP8) details the strategic, cross-boundary issues of relevance to the plan's preparation such as housing, employment (including retail) infrastructure, Travellers and Travelling Showpeople, heritage and the historic environment, Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) green infrastructure and biodiversity, flood

⁵ European Union Habitats Directive (92/43/EEC)

⁶ WDLP 3, 3A, 3B and 3C

⁷ WDLP8

risk, water quality and supply, and identifies the bodies with whom the Council sought to co-operate in the plan making process.

16. Of particular note is the positive and constructive approach to co-operation and joint working taken by the Buckinghamshire Authorities. This approach has led to a number of important outcomes including:

- A Memorandum of Understanding (MoU) between the Council and Aylesbury Vale District Council (AVDC) to allocate land within its emerging LP to meet the unmet housing need of 2,275 dwellings in Wycombe District⁸;
- A MoU between AVDC and the other Buckinghamshire Councils in respect of the allocation and distribution of land for Class B employment uses within the defined Functional Economic Market Area⁹; and
- Joint working between the Councils on the production of a number of strategic evidence base documents including those relating to the definition of Housing Market Area / Functional Economic Market Area in Buckinghamshire, the Buckinghamshire Housing and Economic Development Needs Assessment and the Buckinghamshire Green Belt Assessment.

17. Whilst concerns have been raised under the auspices of the duty to co-operate, these fundamentally relate to other aspects of the Plan's legal compliance or to its soundness and are, consequently, addressed elsewhere in this report. Importantly, no organisation with whom the Council is required to co-operate contends that the Council has not fully met the duty.

Conclusion on the Duty to Cooperate

18. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 10 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness and legal compliance rather than responding to every point raised by representors.

Issue 1 – Is the objectively-assessed need for housing soundly based, supported by robust and credible evidence, consistent with national policy? And are there any unmet needs and if so, how will they be addressed during the Plan period?

⁸ MoU3 and WDLP8.1

⁹ MoU5 and WDLP8.1

Housing Market Area

20. The Council, together with its partner authorities, commissioned a study to determine the housing market area (HMA) and Functional Economic Market Area (FEMA) for each local authority within Buckinghamshire. The study¹⁰, which was updated in 2016 to allow for consideration of additional 2011 Census data¹¹, looked at a range of factors including commuting patterns, house price data, migration flows within the County and wider region. The findings of the updated Study indicate that Wycombe District exhibited high levels of self – containment and, as a consequence, falls wholly within the Central Buckinghamshire HMA. On the basis of the evidence presented the HMA is justified and represents an appropriate basis on which to assess housing need in the District.

Objectively-Assessed Need for Housing in Wycombe

21. The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) has sought to establish the Full Objectively Assessed Need for Housing (FOAHN) and Full Objectively Assessed Economic Needs (FOAEN) across Buckinghamshire. The assessment was: initially produced in 2015¹²; updated in 2016¹³ to reflect the decision of South Buckinghamshire and Chiltern District Councils to produce a joint local plan, as well as include newly released population and household projection data and consultation feedback received by all four authorities; and supplemented by an Addendum in 2017¹⁴ which provided additional analysis and clarification in relation to the economic development needs assessment and the need for affordable housing. The evidential base line for the Plan is provided by the HEDNA Update (2016) and HEDNA Addendum (2017).

22. The HEDNA Update identifies an OAHN for Wycombe District of 13,200 dwellings for the plan period. This figure has been derived using the 2014-based household projections which identified a baseline figure of 10,991 households that was adjusted to reflect the individual circumstances of the District. In accordance with the advice in the PPG¹⁵, adjustments have been made to the baseline figures, including the use of a 10-year migration variant, an allowance for transactional vacancies, second homes and suppressed households and other demographic factors such as changes in the birth and death rates and the reduction in household size. The use of a 10-year migration trend, which takes account of short-term fluctuations in migration rates and household formation rates is a robust and appropriate approach. The result of these adjustments was an increase in the base line figure to 11,207 dwellings. The approach to, and nature of, the adjustments made to the baseline have been clearly explained in the HEDNA Update, are based on robust evidence and have resulted in the definition of a figure on which the OAHN can be based.

23. In addition to the adjustments to the 2014 baseline, the HEDNA Update also assessed the need for a further uplift to be made to the figure arising from other factors including:

¹⁰ HMA3

¹¹ HMA1

¹² HEDNA5

¹³ HEDNA3

¹⁴ HEDNA2

¹⁵ Planning Practice Guidance – Housing and Economic Needs Assessment (2014)

- Market Signals – Consideration was given to a range of different market signals in the HMA, including matters such as house prices, affordability and development rates. These findings indicated that house prices in the HMA had increased consistently over the period 2011-16, that the affordability ratio for housing had deteriorated over the same period and the rate that new housing was being developed in the HMA was below that of the national average. The study concluded that in addition to making provision for concealed families and homeless households, a 10% uplift should be applied to the baseline housing requirement figure for Wycombe to address market signals. Based on the evidence presented I consider this is realistic and robust approach.
- Jobs Growth – In order to determine the potential impact of jobs growth on the OAHN for the Buckinghamshire HMA, the HEDNA considered a range of factors including: changes in the number of economically active people; forecast growth in the number of employees in the HMA/FEMA; and the impact of commuting patterns throughout the county. The findings suggest that overall it was likely there would be an increase of 40,700 jobs in the FEMA over the period 2013-33 and that in order to meet this increase there will be a need for 28,800 extra workers. Demographic projections predict that natural growth would result in the provision of an extra 22,500 workers. Therefore, in order to address the projected shortfall in workers, the HEDNA recommends an increase in the provision of new housing in the HMA/FEMA of 4,329 dwellings. The requirement was apportioned across the FEMA authorities and resulted in an additional need for 1,254 dwellings in Wycombe. However, when account was taken of the uplift for market signals it was clear that the projected growth in workers exceeded forecast and planned jobs growth in the District and that, as a result no further adjustment was needed. Although some concern was expressed about the use of census data, the approach taken is justified and based on robust and credible evidence.

24. I have had regard to the arguments that the OAHN should be either higher or lower than 13,200 dwellings. However, I consider that the figure is based on robust evidence which included a reasonable set of assumptions and is justified having regard to the circumstances of the District.

Affordable Housing

25. In accordance with the Planning Practice Guidance¹⁶, the HEDNA Update defines the quantum of new affordable homes needed in Wycombe over the plan period and considered whether an increase in the OAN for housing would assist in delivering the number of homes required. In doing so the assessment looked at a range of different data sources including those in relation to homelessness, concealed households and overcrowding and considers the ability of households to buy or rent accommodation within the District. The Assessment concludes that there is a need for an additional 3,100 new affordable homes to be provided in Wycombe over the plan period. Topic Paper 2: Housing¹⁷, explains that based on the housing supply contained in Policy CP4, the Plan would make provision for some 3,065 new affordable homes over the Plan period. The estimated need would therefore be within 1% of the estimated supply. As a consequence, the HEDNA Update makes no provision for an uplift in the baseline figure.

¹⁶ Planning Practice Guidance – Housing and Economic Development Needs Assessment

¹⁷ TP2

26. Whilst the potential exists for the delivery of affordable housing to fall below the level required, I am content that the mechanisms outlined in the monitoring framework would be sufficient to ameliorate such an occurrence.

Student Accommodation

27. The Wycombe District Council Strategic Housing Market Assessment (2013) Report of Findings¹⁸ indicates the presence of the Buckinghamshire New University is a potential driver for change in the High Wycombe housing market area. To ensure that appropriate consideration has been given to the potential impact of student accommodation on the OAHN, the Council reviewed the issue and presented evidence¹⁹ that: indicates that there has been a decline of approximately 598 or 7% in student numbers over the period 2005-16; that this trend data had been factored into the calculation of OAHN for the District; and that should a need arise for additional accommodation, it could be met through the implementation of an extant permission for a 258 bed halls of residence. Based on the evidence presented, I am satisfied that the approach taken to considering the need for student accommodation and its impact on the OAHN accords with the requirements of national planning policy.

Latest Household Projections

28. The 2016 – Based Household Principal Projections for England were issued shortly after the completion of the LP hearing sessions in September 2018. The projections indicate that household growth in Wycombe has slowed significantly and that the number of households shown in the 2016-based household projections is approximately 40% lower than that shown in the 2014-based household projections. Additional evidence presented in respect of this matter indicates that should the OAHN be revisited in light of the latest projections it is likely to result in a reduced housing requirement for the District²⁰.

29. However, there are some doubts about the reliability of the 2016-projections and their reliability for plan making. Notwithstanding this, the PPG on HEDNA makes clear that the household projections are only the starting point for establishing a housing requirement figure. For these reasons and having regard to the importance of boosting the supply of housing, it would be unjustified to revisit the Plan's evidence base and delay adoption of the Plan in the light of the 2016-based projections. In order to ensure certainty about the approach, it is recommended that the revisions outlined in **MM6** in respect of this matter are included in the plan.

Housing Land Availability

30. In order to meet the FOAHN for Wycombe the Council undertook an assessment of the capacity of the District to accommodate additional housing development. The Housing and Economic Land Availability Assessment²¹ (HELAA), through a number of iterations and in conjunction with other studies such as the housing capacity

¹⁸ HM4

¹⁹ Council's Response to the Inspectors Follow Up Question 4

²⁰ Council's Response to the Inspectors Follow Up Question 3

²¹ HELS1

review, Green Belt and AONB assessments and the SA process²², assessed in detail the potential for new housing to be delivered from a range of sources. This included: the potential for development on unallocated sites capable of accommodating 5 dwellings or more; the release of land within the Green Belt; development in the AONB; a new settlement; the expansion of the existing settlements of Longwick-cum-Ilmer, Great and Little Kimble-cum-Marsh, Saunderton and Stokenchurch; an increase in the development capacity at the Princes Risborough Expansion site; a windfall allowance; and increased site densities. Matters in relation to the Green Belt, AONB and site specific issues are considered under issues 4, 7 and 8.

31. The HELAA used a 5-stage assessment process which identified the site/broad locations for development, considered the suitability, availability and achievability of sites/broad locations, assessed the potential for windfall development, reviewed the results of the assessment in order to determine if further opportunities for housing development existed, and identified the Plan's potential 5 year housing land supply and trajectory.
32. The findings of the Draft HELAA²³ indicated that the combination of all of the sites identified as suitable for development, including those within the Green Belt and AONB, would result in the provision of land for the development of 9,083 new dwellings. Following comments from Aylesbury Vale District Council²⁴ the Council reviewed the assumptions in the HELAA. The review concluded that Wycombe had the capacity to deliver 10,927 dwellings, some 2,275 dwellings short of the defined OAHN for the District.
33. The approach taken to defining the development capacity of the District in the HELAA process was well-considered, methodical and comprehensive and has resulted in the identification of a realistic and achievable housing target.

Unmet Need

34. To ensure the OAHN is delivered, the Council has, under the DtC, entered into a MoU with the AVDC for land to accommodate the remaining 2,275 dwellings to be allocated in their emerging local plan. Evidence presented at the hearing sessions confirmed that an appropriate uplift in housing supply had been included in the Regulation 19 Vale of Aylesbury Local Plan (VALP) and that the plan was, at that time, subject to examination. Whilst some apprehension has been expressed about the appropriateness of the unmet need for Wycombe being provided in the emerging VALP, it is consistent with NPPF and represents a positive approach to the delivery of new housing that would, largely, be within the same HMA and timeframe as that of the LP. As such, I consider that the approach to the delivery of unmet need is sound.

Housing Requirement

35. To meet the OAHN, Policy CP4 outlines a requirement for 10,925 new dwellings to be constructed in the District over the Plan period. Figure 6, as updated by **MM6**, indicates that in order to meet the housing target over the plan period, there is a

²² HELS6, GB1, AONB1 and SA1

²³ HELS2

²⁴ HELS5

housing land supply (HLS) of between 11,659 and 11,899 dwellings. The HLS is made up of:

- Between 5,359 – 5,599 dwellings on allocated sites;
- 255 dwellings on sites allocated in the Adopted Delivery and Site Allocations Plan (2013);
- 100 dwellings on sites allocated in the 'made' Longwick-cum-Ilmer and Bledlow-cum-Saunderton Neighbourhood Plans (NP);
- 137 dwellings on sites to be allocated in the emerging Great and Little Kimble-cum-Marsh NP;
- 2,404 dwellings on sites that had been constructed between 1st April 2013 and 1st April 2018;
- 2,865 dwellings on sites which had an extant planning permission or were under construction on 1st April 2018; and
- 539 dwellings on windfall sites.

36. The Updated Monitoring Data to April 2018²⁵ indicates that when data from 2017-18 is taken into account the number of completions increases from 1,065 to 2,404 dwellings and the number of sites with planning permission or under construction has increased by 409 to 2,865 dwellings. These figures have also been adjusted to take account of expired permissions on unallocated sites and demolitions and in my view provide a robust basis on which to calculate this element of the Plan's housing supply.

37. The HLS makes an allowance for the provision of 80 dwellings within the NP of Longwick-cum-Ilmer (Policy RUR5), 20 dwellings in the Bledlow-cum-Saunderton NP and 137 dwellings in the emerging Great and Little Kimble-cum-Marsh NP (Policy RUR6). Sites which already have planning permission in Longwick-cum-Ilmer are included in the commitments.

38. The windfall element of the supply provides for 539 dwellings to be constructed on unallocated sites during the period 2020-33. The allowance has been calculated having regard to the historic trend data in respect of completions on sites of 5 dwellings or less over the period 2006-2016. No allowance is made in the calculation for the development of residential gardens or prior approvals for office to residential conversions. This is because the use of data relating to development of residential gardens to predict future windfall allowances is contrary to the requirements of the NPPF and insufficient trend data currently exists to accurately predict the contribution office conversions may make to the supply of housing. In my view the approach taken to defining the allowance is justified and supports the windfall figure contained in the Plan.

39. The housing supply calculations do not include a provision for undetermined planning applications. Although this source has the potential to yield housing, sites which did not have planning permission on the base date were, correctly, omitted from supply calculation. The sites will, following the grant of planning permission, be included in subsequent iterations of the Plan. Equally, the Plan does not identify reserve or safeguarded sites.

40. Whilst the HLS contained in Policy CP4 exceeds the requirement by between 734 and 974 dwellings, the level of exceedance is not significant, but would be

²⁵ AP3.3

sufficient to provide a buffer for flexibility and allow the Council to manage the fluctuations in the supply and delivery of new housing over the Plan period.

Other Housing Policies

41. Policy DM22 provides the mechanism for managing the provision of new development to meet a range of housing needs and tenures in Wycombe over the Plan period. This includes the requirement for all sites to include a mix of dwelling size, type and tenure and, on sites of 100 dwellings or more, for at least, 5% of the plots to be self-build. Concerns were expressed about the appropriateness of requiring a mixture of dwellings on all sites, that the policy failed to adequately address the needs of older people and that the scale of the requirement for self-build plots was overly restrictive and would have an adverse impact on site viability. Although concerns have been expressed about Policy DM22, subject to **MM57** which is necessary to clarify requirements in respect of mixed housing developments, self-build plots and to explain the need for older persons accommodation, the policy is sound.
42. In conjunction with Policy DM22, Policy DM23 provides a framework for the development of other residential uses in Wycombe. Subject to the revisions contained in **MM58** which is necessary to clarify when Class C2 development is acceptable in the countryside, the policy is supported.
43. Modifications, through **MM68**, are also necessary to Policy DM36 to ensure that the requirements in respect of managing future extensions and alterations to dwellings are clear and robust.
44. Policy DM40 seeks to ensure that new dwellings meet up-to-date national technical standards for accessible and adaptable housing as set out in the Planning Practice Guidance on Housing- Optional Technical Standards. In support of the policy, additional evidence was submitted which demonstrates that the need for the implementation of the standards in Wycombe and that the requirement would not place an undue burden on new development in the District²⁶. In light of this, and subject to **MM71** which requires the inclusion of the current technical standards in the Plan, the requirements of Policy DM40 are justified and comply with the requirements of the NPPF.

Conclusions on Issue 1

45. Having considered all the matters raised and subject to the MMs, I am satisfied that the Plan's overall requirement for housing is based on a rigorous and objective assessment of need which takes account of local circumstances. Although the OAHN for housing cannot be met fully within the District, the approach to identifying the Plan's housing land supply has been rigorous, based on robust and credible evidence and has sought to maximise the provision in accordance with the key objectives of national planning policy. The approach to providing for unmet need is sound.

²⁶ Action Point 3.20

46. Issue 2 - Is the objectively-assessed need for employment provision soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Functional Economic Area

47. With the adjoining authorities of Aylesbury Vale, Chiltern and South Buckinghamshire, Wycombe District lies within the Central Buckingham FEMA and in the sub-FEMA of Wycombe, Chiltern and Beaconsfield. Travel to work patterns show strong levels of containment within the four Districts, with approximately 68% of residents employed in the Central Buckingham FEMA²⁷. Having regard to the nature of the District and its strategic location, the FEMA represents the most appropriate basis to assess employment needs.

Employment OAN and Employment Land Requirements

48. The Vision and objectives of the Plan seek to ensure that Wycombe is a District that is economically strong and fosters the economic strength of the M40/A404 location and that of the rural economy. The Plan through Policy CP5 seeks to provide a framework to deliver and manage these strategic requirements.

49. The evidence base for the economic components of the Plan is provided by a combination of the HEDNA Update²⁸ and HEDNA Addendum²⁹. These test a number of forecasts and projections, including labour demand forecasts³⁰ which are based on the anticipated growth in the employment sector; labour supply forecasts which are founded on the dwelling led population projections; past employment take up projections which are based on floorspace completions over a 10 year period; and 'bottom up' forecasts which take account of local demand information. In addition, the studies provide an updated analysis of the property market, assess the supply and demand balance and, using an established national methodology³¹, identify future floorspace and land requirements for the FEMA and constituent authorities.

50. Critics contend that the approach taken to defining the OAN for employment is too cautious, it fails to take account of commercial insights and would result in the under provision of employment land in the FEMA. However, determining the OAN for employment is not an exact science. In this case the approach taken to determining employment needs in the combined HEDNA was based on a detailed assessment which looked at a range of clearly defined and distinctly different growth scenarios and was informed by a property market analysis that considered a range of contextual indicators. It includes a review of the current and future trends in the sector and the views of property agents, business representatives and organisations operating in the FEMA. The approach accords with the requirements of the PPG on HEDNA, is comprehensive, well considered and provides a positive basis on which to plan for the employment needs of Wycombe.

51. The findings of the Addendum indicate that jobs growth in the District is projected to rise from a total FTE workforce of 36,100 in 2013 to 40,200 by 2033, an increase of 4,100 jobs or 11%. When considered on a sectorial level the findings

²⁷ HMA1

²⁸ HEDN3

²⁹ HEDN2

³⁰ Provided by Oxford Economics and Experian

³¹ Homes and Communities Agency Employment Density Guidance (2015)

indicate that there will be a combined growth for Class B1a and B8 uses of some 5,400 FTE employees and a decrease of 1,300 FTE employees in Class B1c/B2 uses. When the level of projected job growth is converted into floorspace requirements, the assessment concludes that there would be a total need for an additional 54,000 sqm of floorspace to accommodate the total projected employment growth up to 2033. The Addendum indicates that this would result in a need for 14 hectares of land for Class B1a, 8 hectares for Class B1c/B2 and 10 hectares for Class B8 use. This equates to a total need for 32 hectares of new employment land in Wycombe over the Plan period once existing commitments are taken into account.

52. The conversion ratios were based on those contained in the Housing and Communities Agency Employment Density Guidance (2015) and have been reviewed against the methodologies used by other local plans in the region. Some concern has been expressed about the level of the ratio applied to Class B8 use, principally because it is suggested that it does not reflect the floorspace requirements associated with national and regional warehousing and distribution development. However, I am content that the ratio falls within the parameters identified in the Guidance for Class B8 use and would ensure that appropriate provision is made for warehouse development. **MM7** is required to allow for a more flexible approach to the delivery of Class B uses on allocated sites and to ensure that Class B8 development could, where necessary, be accommodated in the District.

Employment Land Supply

53. The process of identifying land for the development of new employment related uses, was, broadly, similar to that undertaken in respect of housing. The HELAA process identified 23 possible sites for employment related development. Each site was then subject to a detailed assessment process which considered its development potential, suitability, availability, achievability including viability and the potential to overcome constraints to development. This was informed, in part, by the findings of the Wycombe Commercial Assessment³² which provided commercial property advice on the provision of employment allocations. Sites within the Green Belt and AONB were subject to additional assessments which looked specifically at the impact the removal or development of the site would have on the specific designation.

54. The findings of the HELAA process identifies 6 sites, of which 1 site is within the Green Belt, as suitable for allocation in the Plan for strategic and local Class B use. Each of the sites identified for allocation was found to be deliverable within the second quarter of the plan period and would serve, to differing levels, the needs of the regional and local employment market. The combination of these sites would deliver 21 hectares of land for new employment related development. This leaves a shortfall of some 10 hectares in employment provision which, subject to the MoU³³, would be provided within in Aylesbury Vale.

55. The quantum of land identified in the HELAA falls below the level of the OAN for employment in the District. Therefore, in order to ensure that sufficient land is made available to meet the defined need within the FEMA land has been identified

³² HELS12

³³ MoU5

for new employment related development within the emerging Aylesbury Vale Local Plan. This includes land for Class B1a and B8 uses. Critics of the approach suggest that the provision of land for Class B8 use in Aylesbury Vale would not address market demand in the sector nor would it assist in meeting the suppressed need for warehousing in Wycombe. However, the Plan makes provision for 6 hectares or 60% of the OAN for Class B8 use; that the remaining 4 hectares would be provided within the same FEMA as the need arises; and, as I outline later in my report, the revisions proposed to Policy CP5 would allow for greater flexibility in the delivery of land for Class B8 use in Wycombe. In light of this, I am satisfied that the approach taken to the allocation of land to meet the identified OAN for employment is sound.

Employment Requirement

56. To address the need of the local economy, Policy CP5 outlines a requirement for the provision of 21 hectares of new strategic and local employment land. To meet this requirement land is allocated at the following sites:

- Wycombe Air Park, High Wycombe Policy HW16);
- Abbey Barn South, High Wycombe (Policy HW5);
- Gomm valley, High Wycombe (Policy HW6)
- Land adjacent to Regents Park, Princes Risborough (Policy PR9);
- Lower Icknield Way, Princes Risborough (Policy PR10); and
- Stokenchurch Business Park, Stokenchurch (Policy RUR10)

57. In addition, the policy seeks to: safeguard strategic and local employment areas; support High Wycombe as a centre for office development; and facilitate rural enterprise and diversification.

58. In order that Policy CP5 is flexible and therefore responsive to changes in the sector, **MM7** is necessary to include a new criterion which seeks to ensure that a range of Class B Uses or similar sui generis uses can be developed on new or existing employment sites and to amend criterion 2 to support the development of new offices within High Wycombe town centre. Similar revisions are necessary Policy PR9 (**MM34**) and Policy RUR10 (**MM53**). Whilst I note the representations made to MM7, I am content that the modified Plan would improve the clarity and application of the policy and accord with the Framework. I have made a consequential change to Policy CP5 (3) to read 'town centre'.

59. Policy DM28 seeks to restrict development within strategic employment areas to B class uses. Whilst the approach is similar on local employment areas the policy provides some flexibility and allows Class D1 uses and sui generis /other uses which complement the primary use of the site. In order to improve the clarity and application of the policy, **MM61** is required to provide a new criterion and reasoned justification which seeks to clarify the nature and scale of the sui generis /other uses acceptable on local employment sites and the approach to be taken to the redevelopment of existing sites. A further revision, through **MM78** to Appendix G – List of Strategic and Local Employment Areas, is necessary to ensure the accuracy of the information contained in the Plan.

Conclusions on Issue 2

60. Overall, having regard to all the matters raised and subject to the MMs the Plan's strategy for employment is soundly based, supported by robust and credible evidence and consistent with national planning policy.

Issue 3 – Is the Plan's overall strategy justified, effective and consistent with national planning policy?

Vision and Objectives

61. Wycombe District is in southern Buckinghamshire and is characterised by attractive and historic settlements many of which are set within or close to the spectacular landscape of the Chilterns AONB and / or the Metropolitan Green Belt. The location of Wycombe in relation to the strategic road and rail network and its proximity to London has meant the District has experienced a significant increase in the demand for new housing and commercial development over recent years.

62. The key issues which need to be addressed by the LP have been identified in Wycombe District – Big Challenges. These include the need to provide new market and affordable homes, jobs and infrastructure in a manner that promotes sustainable development meets the need of the growing and aging population and respects the unique character of the District.

63. The Plan's Vision, which is taken from the Sustainable Community Strategy for Wycombe, encapsulates these key issues and provides a clear, locally distinct and aspirational picture of the place Wycombe is intended to be at the end of the Plan period. Whilst it has been suggested that the Vision should be expanded to include reference to the rich natural and historic environment of the District and to provide a commitment to planning for future development needs, these amendments are not necessary to improve either its clarity or application.

64. In order to achieve the vision, the LP sets out a series of objectives under the following eight themes: Cherish the Chilterns; Strengthen the Sense of Place; Foster Economic Growth; Improve Strategic Connectivity; Facilitate Local Infrastructure; Deliver Housing; Champion Town Centres; and Mitigate Climate Change. Subject to **MM3**, which correctly amends the Plan to clarify that there is no prioritisation between objectives, and its approach to flood risk, I am satisfied that the objectives address the key issues and considerations that have been identified, expand on the Plan's vision and provide a clear context for the LP Strategy.

Overall Strategy

65. The strategy contained in the submitted Plan comprises four distinct elements: an overarching core policy which seeks to deliver sustainable development throughout the District; a spatial strategy which seeks to distribute development in a proportionate and sustainable manner throughout the defined settlement hierarchy; a growth strategy which seeks to meet the defined need for infrastructure, future housing, employment and retail development; and a policy framework for the management of future development in Wycombe, which needs to be updated by **MM5** to reflect the requirements of the NPPF. The strategy is

accompanied by a diagram which clearly illustrates the distribution of development throughout the District, the AONB and Green Belt and the transportation linkages between individual settlements and the wider region.

66. A number of alternative strategy options were considered as part of the Local Plan: Options Consultation (2014)³⁴. This included the consideration of a range of different housing and employment growth and spatial development options. These options were assessed and refined in light of the findings of the SA process, public consultation, the Duty to Cooperate and the evidence contained in a range of studies including those in relation to the settlement hierarchy, housing and functional economic market areas, retail, viability, land supply, the Green Belt, the AONB, transport, green infrastructure and flood risk and water. I am content that the process of assessing options and all reasonable alternative strategies was comprehensive and undertaken in a positive and robust manner.

Sustainable Development

67. Policy CP1 provides an overarching framework for the delivery of sustainable development at local level and requires that all new development contributes towards achieving the objectives of the Plan and the principles for development in High Wycombe, Marlow, Princes Risborough, Bourne End and Wooburn and the Rural Areas. The approach advocated by Policy CP1 is appropriate, consistent with the requirements of the NPPF and will provide a positive basis on which to deliver new, sustainable development throughout the District.

Spatial Strategy

68. The spatial components of the strategy are expressed under Policies CP2 and CP3 which, in combination, distribute growth and define the settlement hierarchy for the District.

69. It has been suggested that the approach to the distribution of housing and employment development outlined in Policy CP2 is constraints led. I am however, mindful that the combination of the AONB and Green Belt designation means that 77% of the District is subject to significant constraint and that it is incumbent on the Council, as part of the plan making process, to have appropriate regard for these constraints. In my view, the approach taken to the formulation of the overall strategy has, carefully, sought to balance the socio-economic and the environmental needs of the District. As a consequence, I consider that the Plan's strategy provides a positive framework which seeks to meet the District's need for new housing and commercial development, whilst continuing to safeguard those aspects of the built, natural and historic environment that are of local and national importance. These matters are considered in more detail in Issues 1, 2 and 7 of this report.

70. In light of this, I consider that Policy CP2 provides a logical and realistic approach to the delivery of development, is based on a clear understanding of the relevant socio-economic and environmental factors and provides a positive and flexible framework to meet the need for new development.

³⁴ CONS4

Settlement Hierarchy

71. Policy CP3, subject to **MM5** which is necessary to provide clarification about the approach to the development of previously developed land and the nature of the constraints to development, identifies those settlements which are considered to be sustainable and therefore capable of accommodating growth over the Plan period. These include: Tier 1 - Large Urban Areas; Tier 2 - Market Towns and Other Major Settlements; Tier 3 - Higher Order; Tier 4 - Other Service Villages; Tier 5 - Small Villages; and Tier 6 - Hamlets.
72. The Settlement Hierarchy³⁵ was defined following an assessment of the main socio-economic characteristics of each settlement and refined through the SA and public consultation process. The assessment process considered a range of factors including the existing population of each settlement, the availability of key services³⁶, travel distance between settlements and higher tier settlements and accessibility to public transport. The settlements were then ranked with those with the largest population and greatest number of key services at the top of the hierarchy. Some adjustments were made to the definition of higher tier settlements to allow for geographical factors and the proximity of smaller settlements. In my view the approach to defining the settlement hierarchy was based on comprehensive and robust evidence and has resulted in the logical and realistic categorisation of settlements across the District.
73. High Wycombe has the largest population and the highest number of services and has correctly been identified as the only Tier 1 Settlement in the District. Having regard to its role in the District and beyond, and taking account of its potential, it is justified that around 50% of the Plan's allocated housing and 75% of the allocated employment growth will be constructed in this settlement over the Plan period.
74. Tier 2 of the hierarchy includes the 'Market Towns and Other Major settlements' of Princes Risborough, Marlow and Bourne End/Wooburn. In combination these settlements are intended to accommodate 3,045 new houses on allocated sites and will provide for new/relocated employment development on the Regents Park (Policy PR9) and Lower Icknield Way (Policy PR10) sites over the plan period. These settlements have populations of between 6,890 and 14,325 residents and have between them 24 key services, 14 high-order services and have good access to public transport. Although more limited in terms of size and facilities than the 'Large Urban Areas', the 'Market Towns and Other Major Settlements' offer a good range of facilities and act as service centres for their own and surrounding communities. It is therefore appropriate that these settlements have been identified as capable of accommodating further growth.
75. Eleven settlements are identified as being 'Higher Order Service Villages' and 'Other Service Villages' and are in the third and fourth Tier of the hierarchy. These settlements have populations of between 5,965 and 682 residents and provide between them 73 key services, 11 high-order services and have good to limited access to public transport. Proposed new housing and employment related development in these settlements is of a smaller scale with the Plan allocating land

³⁵ SHS1 and SHS1.1

³⁶ Defined as post offices, primary schools, GP surgeries, food stores, community/village halls, high-order services such as secondary schools, dentists, pharmacies, indoor sports / leisure centres and permanent libraries.

for 326 new houses and 2.9 hectares of new employment land. In addition to these allocations, Policy RUR 5 and RUR 6 indicate that the Neighbourhood Plans for Longwick-cum-Ilmer Parish and Great and Little Kimble-cum-Marsh Parish will identify opportunities for a further 460 new houses to be built over the Plan period. Although more limited in terms of size and facilities than the 'Market Towns and Other Major Settlements', the 'Higher Order Service Villages and Other Service Villages' offer a good range of facilities and act as important service centres for their own, and surrounding communities. It is therefore appropriate that these settlements have been identified as capable of accommodating further growth.

76. The lowest two tiers of the hierarchy are 'Small Villages' and 'Hamlets' and include 38 settlements which have populations of less than 700 and offer limited key services. In view of the small scale of these settlements the Plan does not specifically allocate sites but, correctly, provides a policy framework which seeks to ensure that proposals for new housing and employment related development in these settlements comply with the Framework.

77. It was suggested that the approach to the categorisation of Bourne End/Wooburn as a Tier 2 settlement and Flackwell Heath as a Tier 3 settlement were incorrect. However, the evidence indicates that Bourne End and Wooburn combined have the fourth largest population in the district, benefit from a full range of key services and all but one of the high-order services, and have a 'good' accessibility by public transport to the district and wider region. Based on the evidence presented I am content that combining the settlements Bourne End and Wooburn to form a single Tier 2 settlement is justified, and that the combined settlement would be capable of absorbing future growth. With regard to Flackwell Heath, the evidence makes clear that, although the settlement has the fifth largest population in the district, it does not provide all the key services or high-order services expected of a Tier 2 settlement and only has 'fair' access to public transport serving Wycombe. In light of the evidence presented, I am content that Bourne End / Wooburn and Flackwell Heath have been correctly categorised.

78. Overall, I conclude that the approach to Policy CP3 and the definition of the settlement hierarchy is justified.

Growth Strategy and Management of Future Development

79. The growth component of the strategy outlines a realistic but nevertheless positive approach to meeting the defined needs and delivering the vision and objectives of the Plan. The growth strategy is expressed through Policies CP4 (Delivering Homes), CP5 (Delivering Land for Business), CP6 (Securing Vibrant and High-Quality Towns) and CP7 (Delivering the Infrastructure to Support Growth) which, collectively, provide a framework for the delivery of: between 5,359 and 5599 new dwellings; 3100 new affordable homes; 21 hectares of land for employment purposes; and 22,300 square metres of new retail floorspace. The level of growth identified is based on the findings of evidence produced specifically to inform the development of the Plan and is consistent with the approach advocated in the Framework. More detailed matters relating to the growth strategy are considered elsewhere in the report and in the light of all the evidence, I am satisfied that it is sound.

Strategic Context

80. The location of Wycombe, between London and Oxford and its close links with the national motorway network and Heathrow Airport, means that the District is, in the later stages of the Plan period, likely to be affected by the implementation of a number of key strategic projects. These projects include the Cambridge –Milton Keynes – Oxford Arc, the East-West Expressway and the construction of a third runway at Heathrow. The Plan, as submitted, makes little reference to these projects or their potential socio-economic significance for the District. **MM1,2 and 4**, are necessary to include an explanation of the proposals, timescales and possible governance arrangements for the delivery of these projects so that the Plan has been positively prepared ³⁷.

Conclusions on Issue 3

81. The Plan's overall strategy has been informed by evidence in relation to key strategic issues, objectives and the vision for the District. Based on clear and robust evidence, a sensible and logical settlement hierarchy has been defined which provides an effective framework for the distribution of growth and management of resources throughout Wycombe. Subject to the MMs described above, the strategy set out in the Plan is justified and likely to be effective in ensuring that the development needs of the District can be met in a way that contributes to the achievement of sustainable development, and it is consistent with national planning policy.

Issue 4 - Can the identified need for housing and employment provision be accommodated without releasing any land from the Green Belt? If not, do exceptional circumstances exist that would justify the release of land from the Green Belt?

Overview

82. The HEDNA³⁸ and HEDNA Addendum³⁹ suggest that the OAN for Wycombe over the Plan period is 13,200 new dwellings and 32 hectares of employment land. The Plan has been prepared in the context of the 2012 NPPF which requires that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities for growth.

83. In order to maximise the potential for delivering the objectively assessed need for housing and employment within the District, a Green Belt Review has been undertaken. The decision to undertake a Green Belt review was informed by early work on the SA, HEDNA and HELAA⁴⁰, which looked at a range of factors to determine the overall capacity for development across the District, including: appropriate scope for development at settlements in different tiers of the settlement hierarchy; capacity for development within the AONB; the release of employment land for housing; as well as considering different strategies for distributing growth across the District. In the Council's Response to the Aylesbury

³⁷ Council's response to Inspectors Follow Up Question 2

³⁸ HEDN3 and 5

³⁹ HEDN2

⁴⁰ HELS1

Vale Review of Housing Capacity⁴¹, the Council further refined work on capacity including reviewing:

- The scope for development within the Parishes of Great and Little Kimble and Longwick-Cum-Ilmer (outside the Green Belt);
- The possible enlargement of the Princes Risborough Expansion Area;
- A re-assessment of developable areas within the former 'reserve' sites;
- An examination of the potential for releasing further employment and publicly owned land for the construction of housing;
- An appraisal of the potential for empty homes and housing estates for regeneration to yield additional housing supply.
- A review of windfall assumptions; and
- A re-assessment of development densities for all sites

84.The GB Review found that, outside the Green Belt, the District had the capacity to accommodate 9,788 new dwellings (74% of the OAHN) and approximately 5 hectares of new employment land (15% of the OAEN). This left a shortfall of some 5,689 dwellings and 27 hectares of employment land.

85.The findings of the Green Belt review concluded that there were 10 sites within the designation that were suitable for release and that the development of these sites would result in the provision of an additional 1,139 new dwellings and 17 hectares of new employment land. To accommodate this level of development, changes are proposed to the Green Belt boundary which would result in the removal of approximately 77 hectares of land from the designation. This equates to approximately 0.5% of the District's Green Belt.

86.The combination of all of the sites identified as suitable for development within, and outside the Green Belt, would result in the provision of land for the development of 10,927 new dwellings (83% of the OAHN) and 21 hectares of new employment land within the District (66% of the OAEN). The unmet need for 2,275 new dwellings will be met, through the DtC, in Aylesbury Vale. The remaining 10 hectares of new employment land will be delivered in the FEMA outside the District.

87.It is clear from the evidence presented that although every effort has been made to identify suitable land for development outside the designation, there would still be a considerable shortfall in the provision of land for new housing and employment development. The release of land from the Green Belt to provide for 1,139 new dwellings and 17 hectares of new employment land would make a significant contribution towards reducing this shortfall.

88.As such, I conclude that there is a compelling case for the release of land from the Green Belt to meet the OAN housing and employment development. This is, however, subject to exceptional circumstances being demonstrated for the alteration of the Green Belt boundaries to justify the removal of specific sites for development, a matter that I deal with in Issue 8.

Green Belt Review

⁴¹ HELS3

89. The Buckinghamshire Green Belt Assessment⁴² was commissioned in partnership with the other authorities in the County⁴³. The study reviewed: Green Belt and non-Green Belt land within the county; defined 'large built-up areas' within each constituent authority; identified logical and justified parcels of Green Belt land for assessment; assessed the parcels at a strategic level against the Green Belt purposes contained in the NPPF; and presented conclusions on the performance of each parcel. The findings of the review indicate that, within Wycombe, only the settlement of High Wycombe was considered to be a large built-up area and that that, although every area of the Green Belt met the NPPF purposes to some degree, there were some weakly performing areas that required further consideration. The study identified 7 weakly performing areas, either wholly or partially, within Wycombe.

90. The Green Belt Part Two Assessment (GB2)⁴⁴ reviewed the designation within Wycombe at a detailed level. The study built on the earlier review and considered adjustments to the Green Belt boundary in respect of, weakly performing areas identified in the Part One study, sites promoted by land owners and developers at earlier stages in the LP process and sites identified by the Council. In total 104 sites were identified. The sites were subject to a 4-stage assessment process in order to determine if exceptional circumstances existed and justified their removal from the Green Belt. These stages considered whether a site: was capable of delivering sustainable development; was, when considered against the Green Belt purposes, capable of being removed from the designation; otherwise developable; and whether there were exceptional circumstances to justify the amendment to the Green Belt Boundary.

91. The review identified 10 sites which it considered appropriate for removal from the Green Belt. These were:

- Wycombe Air Park, High Wycombe (Policy HW16);
- Land Adjoining High Heavens Household Recycling Centre, Off Clay Lane, High Wycombe (Policy HW 17);
- Hollands Farm, Bourne End (Policy BE2);
- Land at Green Farm, Glynswood, High Wycombe (Policy HW9);
- Land off Amersham Road including Tralee Farm, Hazlemere (Policy HW8);
- Land East of Sidney House, Lane End (Policy RUR 3)
- Land adjacent to Seymour Court Road, Marlow (Policy MR6);
- Clappins Lane, Naphill, (Policy RUR7);
- Poppy Road, Princes Risborough (Policy PR11); and
- Heavens Above, 16 High Heavens, Marlow Bottom (Policy RUR 11)

92. The Council has considered the need to deliver sustainable development which is central to the assessment, and appropriate consideration was given to the matters identified by representors. Equally clear is that the approach to identifying sites suitable for removal from the Green Belt has been rigorous and demonstrates the Council's wish to maximise the opportunities to meet as much of the housing need within the District as possible. With regard to consistency with the NPPF, there is no nationally prescribed methodology for reviewing Green Belts. The NPPF does

⁴² GB2

⁴³ Aylesbury Vale DC, Chiltern DC, South Bucks DC and Buckinghamshire CC

⁴⁴ GB1

however, clearly set out the 5 purposes of designation and it has become common practice amongst LPAs to conduct reviews which seek to test whether the designated area, as a whole, still meets these purposes and if any subsequent removal of sites would be deliverable and promote sustainable development. The methodology in both the Green Belt Studies reflects this approach, and in my view adequately addresses the requirements of the NPPF.

93. As such, I am satisfied that both the Green Belt Assessments, as they relate to Wycombe District, provide a sound and robust evidence base which are consistent with the requirements of the NPPF and afford a basis for the enduring Green Belt boundaries shown on the policies map.

Green Belt Policy

94. The framework for the management of development in the Green Belt is provided by Policies CP2 and CP8. In addition, Policies DM42, DM43 and DM45 provide a mechanism for managing the development, replacement or extension of dwellings and conversion of existing buildings in the Green Belt. Subject to **MM72, 73, 74, 75** and **76**, which are necessary to reflect the requirements of the NPPF and provide greater clarity about the application of the policies, I am satisfied that the framework provided is justified and consistent with the requirements of national policy.

Conclusions on Issue 4

95. Subject to the MMs outlined, I conclude that there is a compelling case in principle for the release of land from the Green Belt to meet objectively assessed need for housing and employment. This is however, subject to the exceptional circumstances being demonstrated for the alteration of the Green Belt boundary to justify the removal of specific sites from the designation for development, matters dealt with in Issue 8.

Issue 5 – Are the requirements for affordable housing and Gypsy and Traveller accommodation supported by robust and credible evidence, consistent with national policy and will they be met during the Plan period?

Affordable Housing

96. As indicated in Issue 1, the findings of the HEDNA indicate that there is a need for an additional 3,100 new affordable homes to be provided in Wycombe over the plan period.
97. The Wycombe District Council Viability Assessment (2017)⁴⁵ provides the evidence base for the Plan's approach to securing affordable housing. The study employs a residual land valuation model, which: includes locally specific factors such as construction cost, sales values, developer profit, density and housing mixes, CIL and S106 contributions and benchmark land values for agricultural, residential and commercial/employment land; and tests a number of target options against a range of different sized and located notional sites in order to determine the contribution new residential schemes can make to the supply of affordable housing in the District.

⁴⁵ VIA1

98. I am content that the viability assessment has been prepared in accordance with the requirements of national planning policy and provides a robust and comprehensive basis on which to determine the Plan's affordable housing target.
99. Policy DM24 of the submitted LP sets out the requirement for the provision of affordable housing on sites of 11 dwellings or more outside the AONB. Sites outside the AONB are required to provide on-site affordable housing of at least 40% of the total Gross Internal Area (GIA) on sites that are greenfield, were last used for Class B Business uses or similar sui generis employment generating uses, and 30% of the total GIA on all other sites. Whilst inside the AONB, sites of between 6 and 10 dwellings or more or greater than 1000 sqm of residential floorspace, are required to make commensurate financial contributions.
100. Policy DM24 as drafted does not comply with the requirements of national planning policy in the NPPF, which seeks the provision of affordable homes on sites of 10 or more dwellings. In addition, although the use of GIA as a means of securing affordable housing is innovative, it is also likely to lead to uncertainty amongst land owners, developers and lending institutions about the cost of a development over the life of a scheme and could, potentially, delay new housing delivery.
101. **MM59** is necessary to amend Policy DM24 to require the provision of affordable housing on sites of 10 or more dwellings outside the AONB, replace the use of GIA with a requirement for provision to be based on the total number of units on sites and to provide further clarification about the mix and tenure of provision. Additional evidence contained in the Wycombe District Council Viability Assessment Briefing Note⁴⁶ supports the proposed modifications and indicates that these changes would result in a requirement outside the AONB for 48% of the total number of units on greenfield sites or land last used for Class B business or a similar sui generis use and 35% of the total number of units on all other sites.
102. Whilst I note the representations made to MM59, I am content that the revision proposed would improve the clarity and application of the policy and accord with the Framework. However, in order to ensure numerical consistency, I have made a consequential change to Policy DM24(3) to delete 'between 6 and 10 dwellings' and replace it with 'between 6 and 9 dwellings'.

Gypsy and Travellers Accommodation

103. In accordance with the requirements of the Planning Policy for Traveller Sites (PPTS) (2015), the Aylesbury Vale, Chiltern, South Bucks and Wycombe District Gypsy, Travellers and Travelling Showpeople Accommodation Assessment (GTAA)⁴⁷, provides an assessment of the current and future accommodation needs in Wycombe District for the period 2016-2033.
104. The findings of the GTAA indicate that: there is no need for additional Gypsy and Traveller pitches to meet the needs of households that fall within the PPTS, Annex 1 definition but a need exists for 7 pitches to meet the needs of unknown households; and a need exists for 1 plot to meet the needs of Travelling

⁴⁶ AP3.10

⁴⁷ GT1

Showpeople households that fall within the PPTS, Annex 1 definition and for 2 additional plots to meet the needs of unknown households. The GTAA therefore shows a total need for 1 plot to meet the needs of a household and 7 pitches and 2 plots for unknown households over the Plan period. Of these, 3 pitches and 1 plot are required to be provided between 2016-23, with the remainder required towards the latter end of the Plan period.

105. The approach taken to determining the need for new accommodation is based on clear and robust evidence which, I am satisfied, has been prepared in a manner that is consistent with the requirements of the NPPF and PPTS.
106. Evidence contained within Topic Paper 10: Meeting the needs of Travellers⁴⁸, indicates that planning permission for 5 qualifying pitches has been granted since the base date of the GTAA. The remaining need, for 2 pitches and 3 plots, will be accommodated through the intensification of existing sites in the District during the last quarter of the Plan period
107. The submitted Plan makes no specific provision to address the remaining need. Rather, through Policy DM26, as amended by **MM60** which is necessary to make clear that the policy applies to the settlement area of Marsh, it provides a framework for delivering additional pitches/plots through a combination of new sites and/or the expansion and intensification of existing sites. In light of the modest scale of the remaining need and the evidence of delivery I am content that the proposed approach to providing additional pitches and plots is realistic and justified.

Conclusions on Issue 5

108. Overall, subject to the MMs, I am satisfied that the requirements for affordable housing and Gypsy and Traveller accommodation are supported by robust and credible evidence, consistent with national policy and that they will be met during the Plan period. In addition, I am satisfied that, subject to the MMs, the Plan takes fair and reasonable account of the needs of Gypsies and Travellers as a group with protected characteristics in accordance with the Equality Act.

Issue 6 - Are the requirements for town centres and community facilities supported by robust and credible evidence and consistent with national policy?

Town Centres

109. The submitted Plan through Policy CP6 augments the ADSAP and defines the hierarchy for town centres, directs development to the appropriate centre and seeks to improve the quality of the public realm through the implementation of regeneration proposals and a reduction in vacant units.
110. To provide certainty, **MM8** is necessary to amend Policy CP6 to identify a need for new convenience and comparison goods floorspace in High Wycombe and Princes Risborough and explain how it will be delivered. The requirement of the policy is supported by the findings of the Wycombe Town Centres and Retail Study,

⁴⁸ TP10

Addendum⁴⁹ which identifies a need for: 4,500 sqm of new convenience and 30,600 sqm of new comparison floorspace in High Wycombe; and 1,200 sqm of new convenience and 800 sqm of new comparison floorspace in Princes Risborough for the Plan period.

Community Facilities

111. Policy DM29, supported by the Community Facilities Strategy⁵⁰, provides the framework for the management of existing and provision of new community facilities in the District. To ensure the currency of the policy and to allow for the consideration of issues in relation to the viability of existing and future uses, **MM62** is necessary to update the reasoned justification to accord with national policy.

Conclusions on Issue 6

112. Subject to the MMs, I am satisfied that the requirements for town centres and community facilities are supported by robust and credible evidence and consistent with national policy.

Issue 7 – Does the Plan provide a framework for the management of the Natural, Built and Historic Environment that is soundly based, justified and consistent with the requirements of national policy?

The Chilterns Area of Outstanding Natural Beauty

113. The strategic framework for development in that part of the Chilterns AONB that falls within the District is outlined by Policy CP2 of the submitted Plan. The policy, which is supported by the findings of the AONB Site Assessment Report, provides a strategy which seeks to ensure that all new development within the AONB, when considered as a whole, contributes towards the conservation and enhancement of the natural beauty of the area. In my view the policy provides a clear, justified and positive strategy which appropriately balances the requirement to conserve and enhance the AONB with the need for future development.
114. At local level, Policy DM30 provides the mechanism for managing all new development within the AONB.
115. The inclusion of '*where possible enhance*' within the policy, does not in my view diminish the requirement to enhance the AONB contained in national policy, rather it recognises that not all new development could or should seek to improve the designation. This is particularly the case with development such as small-scale domestic extensions and proposals for the change of use of existing buildings. Equally, I consider that the inclusion of '*significant*' in criterion 3 of the policy, in relation to the assessment of the impact of development on the setting of the AONB, does not weaken the approach but represents a sensible way of allowing the nature, scale and location of new development to be balanced against its potential impact on the designated area. With regard to major development, I am satisfied an appropriate definition has been provided within the reasoned justification of the policy and that it complies with the NPPF. To provide greater clarity about the requirements of the policy, **MM63** revises the reasoned justification of Policy DM30

⁴⁹ RET1

⁵⁰ INF9 and 10

to make reference to Policy CP10 and explain how proposals in the setting of the AONB will be assessed. This is necessary for the effectiveness of Policy DM30.

Development in the Area of Outstanding National Beauty

116. The Area of Outstanding Natural Beauty Site Assessment Report⁵¹ provides the evidential basis for the identification and allocation of sites for housing and employment related development within the AONB. The study reviewed sites using a four stage methodology which: identified the broad locations suitable for development, having regard to the settlement hierarchy and the findings of the Green Belt Assessment; considered the suitability of the sites in light of a variety of possible constraints; provided a detailed landscape assessment of the site; and assessed whether the allocations of each of the remaining sites would be major development in the AONB. Of the sites reviewed the assessment identified 12 sites for allocation, on which it was considered development would not be 'major' and would therefore not have a serious adverse effect on the AONB. These sites are:

- Land to the rear of Stokenchurch Business Park (Policy RUR10)
- Land to the rear of Mill Road, Stokenchurch (Policy RUR8)
- Land at Wood Farm, Stokenchurch (Policy RUR9)
- Land south of Finings Road (Policy RUR1)
- Land at Sidney House (Policy RUR3)
- Land between Chalky Road and Marlow Road, Lane End (Policy RUR2)
- Part of Greens Farm, Glynswood, High Wycombe (Policy HW9)
- Seymour Court Road, Marlow (Policy MR6)
- Heavens Above, 16 High Heavens Wood, Marlow Bottom (Policy RUR11)
- Land off Clappins Lane, Naphill (Policy RUR7)
- Land to rear of Poppy Road, Princes Risborough (Policy PR11)

117. Although differing approaches have been taken in the Green Belt and the AONB Assessments, it is clear that the legislative and policy basis for these designations are fundamentally different and that these differences, are, at least in part, the reason why the assessments have not been conducted in the same way. A key difference is the way the boundaries of the designations can be altered. In the case of Green Belts these changes can be made by local authorities through the plan making process, whilst AONB boundaries can only be altered by Central Government.

118. In terms of the development within the AONB, the Assessment explains that the NPPF does not provide a strict numerical definition of 'major development' but rather requires that a judgement is made about the individual circumstances of a site, the nature and scale of the proposal and the potential impact of these factors on the AONB. To provide clarity the Assessment methodology outlines the factors which need to be considered in determining the significance of the development. These include an assessment of the local context of the site in terms of its scale and form in relation to the existing settlement, the potential for the allocation to have a serious impact on the landscape, quiet enjoyment, wildlife/habitats and heritage of the AONB and whether or not the development could be considered 'major' in the normal meaning of the word. The approach taken in the Assessment and subsequent site allocations complies with the requirements of the NPPF and

⁵¹ AONB1

provides a clear, logical and justified basis on which to make a judgement about what constitutes 'major development' in the AONB.

Green Infrastructure and Biodiversity

119. The Natural Environment Topic Paper indicates that in addition to the AONB, Wycombe has a number of sites of European, National and Local ecological and/or geomorphological importance. This includes Ancient Woodland, Special Areas of Conservation, Sites of Special Scientific Interest and Priority Habitats⁵².
120. Policy CP10 in conjunction with Policy DM34 and Policies in the ADSAP provides a mechanism for protecting, conserving and enhancing natural environmental assets of local, national and international importance, protecting and enhancing green infrastructure networks and making provision for the long-term management and maintenance of green infrastructure.
121. Policies CP10 and DM34, as submitted, do not reflect the requirements of the NPPF in respect of green infrastructure and biodiversity gain. **MM9** and **MM66**, are necessary to ameliorate this and ensure consistency with national policy.
122. A number of representors have expressed concern that Policy DM34 (3) would have an adverse impact on the delivery of new housing, employment and retail sites. In many cases these concerns are based on the belief that to achieve the objectives of the policy, it would be necessary for trees to be planted on 25% or more of the developable area of a site. This is not the case, and the additional evidence presented during the Examination⁵³ demonstrates that the provision of trees with the capacity to create 25% canopy cover could be achieved without requiring tree planting on a quarter of the developable area of a site or adversely affect its development capacity. That said, no substantive evidence has been presented to demonstrate that significantly more than 25% canopy cover could be achieved on a range of sites or that the requirements of the policy are flexible enough to respond to the individual characteristics of a development or site. Therefore, **MM66** is required to amend the criterion by the deletion of 'at least', and to expand the definition of tree canopy to include green roofs and walls.

Landscape Character and Settlement Patterns

123. Policy DM32 provides a framework for assessing and managing the impact of development on the landscape character and settlement patterns of the District. Subject to **MM65**, which is necessary to clarify requirements in relation to the design, density and layout of development in semi-rural areas, the policy is sound.

Historic Environment

124. Wycombe is an area rich in heritage and has 61 designated Conservation Areas, over 1,200 Listed Buildings, 54 Scheduled Ancient Monuments and 11 registered historic parks and gardens and a significant number of non-designated heritage assets⁵⁴. The framework for the management of the historic environment is provided by Policies CP11 and DM31.

⁵² TP7

⁵³ Action Point 5.9

⁵⁴ TP9

125. It has been suggested that the Plan does not provide a positive and comprehensive strategy for the conservation and enjoyment of the historic environment, and that Policy DM31 fails to differentiate between designated and non-designated heritage assets.
126. To ameliorate the situation, **MM10** provides for revisions to Policy CP11 that clarify the approach to be taken to the management of designated, non-designated and historic landscapes in the District. Modifications are also necessary to Policy DM31, through **MM64**, to ensure that the policy clearly differentiates between designated and non-designated heritage assets. On this basis I am satisfied that Policies CP11 and DM31 comply with the requirements of national policy. However, I note that not all of the text proposed for deletion in Policy DM31 was shown in the MMs table that was subject to consultation. I have therefore made an amendment to the text of MM64 to clarify the text to be deleted from Policy DM31.

Sense of Place

127. The framework for the management of the design of new residential and non-residential development within the built environment and the countryside is provided by Policies CP9, DM32, DM35, DM36, DM37 and DM44. In the interests of a clear and effective policy **MM67** is necessary to amend Policy DM35 by including a criterion which seeks to ensure the efficient use of land and a reference to the Chiltern Design Guide; **MM75** is required to modify Policy D44 by the deletion of the reference to 'employment' in the criterion 1.c; and revisions through **MM69** are necessary to ensure that Policy DM37 makes clear the approach to the provision of security shutters in buildings fronting a public highway.

Other Policies

128. Policy DM20 outlines those matters to be determined in accordance with the NPPF. In order to ensure the longevity of the policy, **MM56** correctly proposes to delete the specific reference to paragraphs of the NPPF in the policy. In order to ensure the factual accuracy of the Plan I have amended MM56 to clarify that it applies to the third version of the NPPF.

Conclusions on Issue 7

129. Subject to the MMs outlined, the Plan will provide a positive framework for the management of the natural, built and historic environment that is soundly based, justified and consistent with the requirements of national policy.

Issue 8 – Are the housing, employment, mixed-use and transportation and other allocations positively prepared, justified and effective? where necessary have exceptional circumstances been demonstrated to justify releasing land from the Green Belt? And do the allocations in the AONB accord with the requirements of national planning policy?

Site Selection Process

130. The individual site allocations contained within the submitted Plan were identified through the HELAA and refined as part of the SA process. In total 356 possible development sites were identified which, following an initial review, were

reduced 160 sites. Each of the site was then subject to a detailed assessment process which considered its development potential, suitability, availability, achievability including viability and the potential to overcome the constraints to development.

131. Sites within the Green Belt and AONB were subject to additional assessments which looked specifically at the impact the removal or development of the site would have on the specific designation.
132. There have been some challenges to the approach taken to the identification and assessment of sites, this is inevitable given that an element of planning judgement is required as part of the process. I am however, content that the reasons for selecting allocated sites and rejecting others are clear and that the conclusions are reasonable and logical.
133. In addition to identifying developable sites, the detailed findings of the HELAA and related studies were used to inform and define the scale of development and the detailed requirements contained in the Plan's site allocation policies. This approach will assist in ensuring the timely delivery of the allocated sites and that future development proposals respond appropriately to site specific issues.

Housing Densities

134. The HELAA explains that the Plan does not take a standard approach to the application of site densities. Rather, to determine the indicative development capacity for individual sites, consideration was given to a range of factors including the local development context, landscape and ecological constraints. Evidence in relation to the approach taken to the definition of density levels for every allocated site is contained in Appendix 4 of the HELAA⁵⁵. To provide greater clarity about the average density for each of the allocations, **MM77** is necessary to include specific information in relation to the net developable area and dwellings per hectare (dph) of the allocated and committed housing sites within Appendix 7. The revised appendix indicates that the density levels on allocated sites range from 16 to 300dph. Although I note the variation in density levels, I am mindful that two thirds of the sites exceed 30dph and nearly half 35dph and that where they fall below these levels there are clear and logical reasons for doing so. In my view the approach to defining density levels is realistic, based on robust evidence and will assist in maximising the potential for the delivery of new housing development in the District.
135. **MM13, 14, 15** and **16** are necessary to amend the indicative development capacity at: Policy HW5 - Abbey Barn South and Wycombe Summit from 505 to 580 dwellings; Policy HW6 - Gomm Valley and Ashwells from 530 to between 520 and 720 dwellings; Policy HW7 - Terriers Farm and Terriers House from 500 to between 500 and 540 dwellings; and Policy HW11 - Clay Lane, Booker, High Wycombe from 30 to 40 dwellings. These modifications are necessary to reflect changes in the development context of the sites and will assist in ensuring an appropriate level of flexibility in the housing land supply.

⁵⁵ HELS1.4

Flood and Landscape Management

136. The framework for the consideration of matters in relation to flood risk and sustainable drainage systems is provided by Policy DM39, as revised by **MM70**, which is necessary to provide clarity about the requirements of national policy. The policy is based on the findings and recommendations contained in the Wycombe Strategic Flood Risk Assessment (SFRA) Level 1⁵⁶ and SFRA Level 2⁵⁷ and is, in my view, consistent with the requirements of national policy. To ensure that the requirements of the Policy are addressed in site specific proposals, revisions through **MM12, 14, 15, 22, 38, 39, 40, 46** and **48** are necessary to the Policies HW4, HW6, HW7, HW19, PR13, PR14, PR15, RUR2 and RUR 4 to explain the requirement for proposals to manage local sources of flood risk. Similarly, in order to ensure that the development of allocated sites does not have an adverse impact on the landscape or AONB, **MM51** and **52** are necessary to amend Policies RUR8 and RUR9 to ensure that development takes a landscape-led approach. Other policies subject to similar modifications in relation to flood risk and landscape are addressed in the following site-specific assessments.

Housing Allocations

Policy HW8 - Land off Amersham Road including Tralee Farm, Hazlemere

137. The site could accommodate 350 dwellings and associated public open space. It is anticipated that the allocated site will be brought forward in conjunction with the adjoining site known as 'Land Off Earl Road' which is in Chiltern District. The site is situated within the Green Belt and adjacent to the AONB. The allocated site, which comprises approximately 12 hectares of land currently occupied by agricultural buildings, warehousing, a former equestrian centre and some residential dwellings, is enclosed largely by residential development and is located adjoining the Tier 1 settlement of High Wycombe. The conclusions of the GB2 Assessment indicate that the Green Belt parcel, which contains the allocation: only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location for growth; capable of being removed from the Green Belt; and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

138. Although I note the issues in relation to the impact of the proposal on the existing orchard, flood risk and the provision of a primary school, I am content that, subject to **MM16** which is required to explain the requirements for flood management and educational provision, these issues are addressed in the policy and can be appropriately managed through the course of the development. Therefore, based on the submitted evidence, I am content that the allocated site is sound.

Policy HW9 Land at Green Farm, Glynswood, High Wycombe

139. The site at Green Farm, Glynswood is allocated for the construction of 50 dwellings. It is situated within the Green Belt and in the AONB. The allocated site,

⁵⁶ FRW12

⁵⁷ FRW2

which comprises a roughly square area of grassland enclosed by a combination of residential development and mature trees, is located on the urban fringe of the Tier 1 settlement of High Wycombe. The findings of the GB2 Assessment indicate that the allocated site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location, is capable of being removed from the Green Belt without adversely impacting on the wider designation and is suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

140. Several representors have suggested that because of its potential impact on a heritage asset, the Disraeli Monument, which is located across Hughenden Valley, the proposal constitutes 'major development' in the AONB. Whilst I recognise that the allocated site is visible from the Monument, I consider that the long range nature of these views together with the location of the site, adjacent to existing residential development, and the presence of boundary trees would ensure that the development of the site would appear to be part of the existing urban area and as such would not have a significant impact on the heritage asset or the enjoyment or landscape qualities of the wider AONB. Therefore, subject to the revision proposed in **MM17** which requires the addition of new criteria that seek to manage flood risk and clarify the nature of the view from the site, I am content that the allocated site is sound. Whilst, I note the representations made to MM17, I am content that the revision proposed would improve the clarity and application of the policy and accord with the Framework. I have made a consequential change to paragraph 5.1.71 of the LP.

Policies HW10 - Horns Lane, Booker, High Wycombe and HW11 - Clay Lane, Booker, High Wycombe;

141. Land at Horns Lane and Clay Lane are allocated for the construction of 64 dwellings and, subject to **MM18** which is necessary to increase the scale of development, 40 dwellings respectively. The sites, along with that allocated under Policy HW16 for employment, are located within close proximity to each other and are situated within the Green Belt to the south-west of High Wycombe. As a result, the submitted Plan identifies the sites allocated under Policies HW10, HW11 and HW16, and the intervening land, which accommodates small-scale commercial and residential development along Clay Lane, as being a single site proposed for removal from the Green Belt.

142. The Horns Lane allocation is located on the urban fringe of High Wycombe and comprises a roughly triangular area of land enclosed by a combination of residential development, the M40 and allotments. The Clay Lane allocation, which comprises an area of undeveloped land enclosed by Clay Lane and Clay Hill, is also located close to High Wycombe. The Wycombe Air Park allocation comprises two parcels of land which include the existing operational air park and a substantial area of undeveloped land. The allocation is enclosed by a combination of the M40, Clay Lane, Marlow Road and to the west by the legal and regulatory limits to development associated with the licensing and operation of the air park. The findings of the GB2 Assessment indicate that the combined site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, and is capable of being removed from the Green Belt without

having an adverse impact on the integrity of the wider designation and suitable for the proposed use.

143. Whilst the combined site is situated largely outside the urban area of High Wycombe, because of its proximity, connectivity and predominantly semi-urban character, the area for removal is, functionally, part of the larger area of the Tier 1 settlement, and as such in a sustainable location. The removal of a relatively small area of land, which is largely semi-urban in character, would not materially increase the potential for High Wycombe, Lane End or Marlow Bottom to coalesce, promote urban sprawl or result in the further encroachment of development into the countryside. Moreover, the requirements outlined in Policy HW11 and HW16 would, for the most part, ensure the establishment of appropriate and enduring boundaries. Therefore, having regard to my conclusions on Issue 1, 2, 4 and HW16 and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for employment and housing development.

144. The conclusions of the HELAA indicate that both the proposed allocated sites are largely free from constraint and based on the evidence presented I am content that the allocations in respect of Policies HW10 and HW11 are sound. I have made a consequential change to MM11 which amends Table 11 - Sites identified for housing or housing-led mixed use development in the High Wycombe area to reflect the change in indicative capacity at the Clay Lane site contained in MM18.

HW15 - Land to the rear of Hughenden Road, High Wycombe

145. The site, which is located close to the Hughenden Stream, is allocated in the Plan for the construction of an unspecified number of dwellings. Evidence presented by the Environment Agency⁵⁸ indicates that the site should be considered a Functional Flood Zone (Flood Zone 3b)⁵⁹ and that proposals other than 'water compatible' development and 'essential infrastructure' would be inappropriate and undeliverable at this site. The site allocation is not soundly based and **MM19 and MM80** are necessary to delete the allocation.

Policy MR6 - Land adjacent to Seymour Court Road, Marlow

146. Land adjacent to Seymour Court Road comprises an area of some 0.3 hectares of undeveloped agricultural land, which is allocated for the construction of 9 dwellings. The allocated site, which is situated within the Green Belt and the AONB, adjoins the Tier 2 settlement of Marlow and is enclosed by a combination of residential development and mature trees. The findings of the GB2 Assessment indicate that overall the site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

⁵⁸ SCG2A

⁵⁹ As defined by Table 1 'Flood risk' the Planning Practice Guidance

147. Whilst I note the issues in relation to the impact on the countryside and ribbon development, none of the matters identified demonstrates that the development of the allocation would be of an inappropriate scale or be harmful within the wider landscape. I am therefore, satisfied that the allocation, subject to **MM25** which is necessary to ensure a landscape-led approach to development, is sound.

Policy PR11 – Land to the rear of Poppy Road, Princes Risborough

148. The Poppy Road site is allocated for the construction of 58 dwellings. The site is situated within the Green Belt and, partially, the AONB. The allocated site, which comprises part of the existing garden of 108 Wycombe Road, is enclosed by a combination of residential development and mature trees and located adjacent to the Tier 2 settlement of Princes Risborough. The indicative layout plan⁶⁰ for the site indicates that the development would be sited in the north-eastern section of the site close to the existing urban area, whilst the remainder of the site would be undeveloped. Access to the allocation would be via a new link road leading from the Princes Risborough relief Road (Policy PR8) and the existing access from Wycombe Road.

149. The findings of the GB2 Assessment demonstrate clearly that the allocated site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location, is capable of being removed from the Green Belt without adversely impacting on the wider designation and is suitable for the proposed use. The Assessment recommended that, to ensure an enduring boundary for the Green Belt, landscape mitigation would be needed along the southern boundary of the site with Culverton Farm. This requirement has, correctly, been addressed in Policy PR11. Therefore, having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

150. The location of the proposed allocation, adjoining the urban area of Princes Risborough and the presence of mature boundary trees which, largely, screen the site from Pyrtle Spring and the countryside beyond, would, in my view, ensure that the development of the site would not be visually prominent or have a serious adverse impact on the character or visual qualities of the AONB. Matters in relation to the impact of a new highway access on the AONB are addressed in my findings in relation to the Princes Risborough Expansion Area.

151. With regard to constraints, it is clear that the allocation is, in part, a priority habitat, would be within Flood Zone 3 and that highway improvements would be required to ensure safe vehicular access arrangements. The written and oral evidence presented during the examination make clear that these issues can be positively addressed and managed through the development of the site. To ensure that this is accurately reflected in the policy framework, **MM36** proposes revisions to Policy PR11 necessary to require future development proposals to include a detailed ecological, hydrological and visual impact assessment of the site, a water management strategy, implement an ecological buffer, provide additional landscaping and a landscape-led approach to the design and layout of the site, and clarify access arrangements.

⁶⁰ Figure 32 of the Submitted LP

152. Based on the evidence presented, and, subject to the proposed modifications, the allocation is sound.

Policy BE2 - Hollands Farm, Bourne End

153. Land at Hollands Farm is allocated for the construction of 467 dwellings, a primary school and associated public open space. The site is situated in the Green Belt and comprises some 23 hectares of agricultural land which is enclosed on all sides by built development and located within the Tier 2 settlement of Bourne End/Wooburn. The findings of the GB2 Assessment indicate that the allocated site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location, is capable of being removed from the Green Belt without adversely impacting on the wider designation and is suitable for the proposed use.

154. The NPPF indicates that the first purpose of Green Belts is to check the unrestricted sprawl of large built up areas. The Buckinghamshire Green Belt Assessment⁶¹, defines 'large built up areas' as being the Tier 1 settlements within constituent authority areas. In this case, the land proposed for removal is located adjacent to the Tier 2 settlement of Bourne End/Wooburn, and so therefore has correctly been adjudged not to fulfil the requirements of the first purpose.

155. The Settlement Hierarchy Study⁶² does not identify either Hawks Hill/Harvest Hill as a separate settlement and considers that it is, functionally, part of the Tier 2 settlement. As such, I do not consider that the proposed allocation would materially alter this situation or promote the coalescence of separate settlements. As for encroachment, the proximity of the surrounding built development, gives the site the appearance of being semi-urban, and as such, I do not consider that its removal from the Green Belt would result in the loss of, or promote development in, the countryside. Based on the foregoing, the evidence presented and having regard to my conclusions on Issue 1 and 4, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

156. The Hollands Farm site provides an area of open pasture and woodland on the edge of the settlement of Bourne End/Wooburn and is not currently subject to either a local or national landscape designation. Moreover, whilst I note the allocation is part of a significantly larger area of land being considered for inclusion in the AONB, no decision has been made by Natural England on the suggested revision to the designation's boundary.

157. In terms of the quality of the land, it is accepted that the proposed allocation would result in the loss of fields currently in agricultural use. However, I am content that the approach taken by the Council in assessing and allocating the Hollands Farm site, and other sites in the plan, complies with the requirements of NPPF which seeks to protect the best and most versatile agricultural land.

⁶¹ GB2

⁶² SHS1

158. With regard to the impact of the proposal on the local highway network, the Wycombe Local Plan Sites Traffic Modelling Study⁶³ and the Countywide Local Plan Modelling Study⁶⁴ have both assessed the impact of additional traffic generated by the Hollands Farm site on the local area and concluded that, subject to the provision of a spine road which would link Princes Road with Hedsor Road and distribute traffic within the allocation, the additional traffic generated by the site could be accommodated on the highway network. The indicative access point at Hedsor Road is within Flood Zone 3 but, the findings of the Sequential Test Report⁶⁵ makes clear that the site passes the exceptions test and that in the event of a flood event affecting the southern access, alternative access and egress would be available at two other locations to the north of the site. In my view this approach is robust and sufficient to demonstrate that, in principle, a safe and suitable access can be achieved.

159. In terms of the impact the proposed access road would have on the Hedsor Road and Riverdale Conservation Area, the exact siting and design of the road has yet to be determined. As such these are matters that can be effectively addressed by Policies DM31, DM35 and BE2, which has correctly been amended by **MM43** to emphasise the need to have special regard to conserving heritage assets and their settings, and through the masterplanning of the site.

160. Overall, I am content that the proposed Hollands Farm allocation is sound.

Policy RUR3 - Land East of Sidney House, Lane End

161. Land East of Sidney House site is situated within the Green Belt and the AONB. The allocation, which comprises a redundant and vacant sheltered housing development and an area of undeveloped land, is located on the northern edge of the Tier 3 settlement of Lane End and enclosed by the M40 motorway. The findings of the GB2 Assessment indicate that the site: does not fulfil any of the Green Belt only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, is capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation; suitable for the proposed use and that its removal from the Green Belt would assist in the redevelopment of an underused PDL site for residential purposes. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development. Therefore, subject to the revision proposed in **MM47** which requires the addition of a new criteria that seeks a landscape-led approach to development, I endorse the allocation.

Policy RUR1 - Land South of Finings Road, Lane End; Policy RUR2 – Land Between Chalky Field and Marlow Road, Lane End; Policy RUR8 - Land South of Mill Road, Stokenchurch; and Policy RUR9 - Land at Wood Farm, Stokenchurch

162. Policies RUR1, RUR2, RUR8 and RUR9 allocate land within the AONB for the development of 10 (MM45), 27, 100 and 28 dwellings respectively. Evidence contained in the AONB Study and HELAA indicate that the proposed allocations are in sustainable locations, would not have an adverse impact on the enjoyment or

⁶³ TR6

⁶⁴ TR1

⁶⁵ FRW1

visual qualities of the AONB and are largely free from constraint. Whilst I note that some concerns have been raised about the development of these sites, none of the matters identified demonstrate that the development of the allocated sites would be of an inappropriate scale or be harmful to the visual qualities of the wider landscape. Therefore, subject to the revisions required in **MM45, 46, 51** and **52**, which correctly reduce the indicative number of dwellings on the site allocated under Policy RUR1 and require the addition of a new criteria Policy RUR2 to manage flood risk, and in Policies RUR1, 2, 8 and 9 seeking a landscape-led approach to the design and layout of the sites, I am satisfied that the allocations are sound.

Policy RUR6 – Great and Little Kimble-Cum-Marsh Parish

163. Policy RUR6 provides the framework for the development of 160 new dwellings within the emerging Great and Little Kimble-Cum-Marsh Neighbourhood Plan (NP). In order to improve the clarity and application of the policy, **MM49** makes revisions necessary to explain the type of development permissible, the need for it to be phased over the lifetime of the LP and explain the requirement for the site selection process to have regard to local sustainability issues, such as landscape capacity and the availability of public transport. It also includes an additional criterion explaining how development will be delivered in the absence of a made NP. Based on the evidence presented, I am satisfied that the level of growth outlined in the Policy is reasonable and proportionate and that the approach to the delivery of new development is realistic and achievable.

Policy RUR7 - Clappins Lane, Naphill

164. The Clappins Lane site is allocated for the construction of 64 dwellings. The site is situated within the Green Belt and the AONB. The allocated site, which comprises an area of some 2.2 hectares of undeveloped pasture, is enclosed largely by residential development and is located adjoining the Tier 3 settlement of Naphill. The findings of the GB2 Assessment indicate that the site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

165. Whilst some concerns have been raised about the development of the site, none of the matters identified demonstrate that the proposals would have an adverse impact on the enjoyment or visual qualities of the AONB or are significant enough to warrant the removal of the sites from the Plan. Therefore, subject to the revision proposed in **MM50** which require the addition of a new criteria to manage flood risk, I endorse the allocation.

Policy RUR 11 - Heavens Above, 16 High Heavens, Marlow Bottom

166. The Heavens Above site is allocated for the construction of 20 dwellings. The site is situated within the Green Belt and the AONB. The allocated site, which is currently in residential use, is located on the edge of the Tier 3 settlement of Marlow Bottom and enclosed on three sides by dense woodland. The findings of the

GB2 Assessment indicate that the site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation, and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and in light of the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

167. Based on the additional evidence presented⁶⁶, I am content that the site is deliverable and can be brought forward in the manner envisaged in the Plan. Subject to the revision proposed in **MM54** which seeks a landscape-led approach to development and to manage local sources of flood risk, I am satisfied that the allocation is sound

Employment Allocations

Policies HW16 Wycombe Air Park, High Wycombe

168. Land at Wycombe Air Park, subject to **MM20** which is required to explain the increase in the quantum of development, is allocated for the creation of between 22,000 and 26,600 square metres of new employment floorspace. The site is located close to those allocated for housing development under Policies HW10 and 11 and is situated within the Green Belt to the south-west of High Wycombe. As a result, the submitted Plan identifies the allocated sites and intervening land as being a single site proposed for removal from the Green Belt. The Air Park site is not within the AONB but is within the setting of the designation.
169. The Wycombe Air Park allocation, which is owned by the Council, comprises two parcels of land. The northern parcel includes much of the existing operational Air Park such as air craft hangers, commercial buildings and car parking, whilst the southern parcel is undeveloped land. The site is enclosed by a combination of the M40, Clay Lane, Marlow Road and to the west by the legal and regulatory limits to development associated with the licensing and operation of the air park. The findings of the GB2 Assessment indicate that the combined site: only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location for growth; capable of being removed from the Green Belt; and suitable for the proposed use.
170. For the reasons outlined earlier in this report, the removal of the Wycombe Air Park Site in conjunction with those allocated for development by Policies HW10 and 11 is supported. Therefore, having regard to my conclusions on Issues 1, 2 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for employment and housing development.
171. The Wycombe Air Park allocation proposes the intensification of the existing commercial use of the site and its expansion to allow for the creation of additional, non-aviation, employment related floorspace. The findings of the Wycombe Commercial Assessment⁶⁷ indicate that although the location of the Air Park site may not make it attractive to companies wishing to serve the regional and national

⁶⁶ Action Point 9.9

⁶⁷ HELS12

warehousing and distribution market, it would be well placed to meet more localised needs.

172. To support this, the land owner⁶⁸ has provided additional evidence which outlines the key actions necessary for the development of the northern and southern sections of the site. The evidence indicates that proposals for the upgrading of the existing access to serve the northern parcel have been agreed with the Highway Authority, that the work on the new access road will commence in 2019 and that discussions in relation to the acquisition of land/and proposals to relocate the Gliding Club are at an advanced stage. It is anticipated that development on the northern site to accommodate the glider club and alterations to air traffic movements will be completed by summer 2020 and a planning application for the development of the southern parcel will be submitted in summer 2019 with construction work on the site estimated to start a year later. Whilst this is a complex proposal, based on the evidence presented it is clear that the allocation can be delivered in the manner and timescales envisaged in the LP.

173. The development on the Air Park site would be within the setting of the AONB and as such, must have regard to the need to preserve and, where appropriate, enhance the landscape. The detailed design, scale and siting of future buildings on the site can be effectively addressed through the master planning of the site and, I am content that the framework provided by Policies HW16, DM32, DM33 and DM35 will provide an appropriate mechanism for assessing and managing future development.

174. In light of the foregoing, I am content that the allocation is sound.

Policy HW 17 - Land Adjoining High Heavens Household Recycling Centre, High Wycombe

175. Land Adjoining High Heavens Household Recycling Centre is allocated for low density yard-based activity⁶⁹. The site is situated within the Green Belt and the AONB. The allocated site comprises an area of some 3.7 hectares of rough grassland, largely enclosed by a combination of mature trees and hedgerows and is located adjacent to the established High Heavens Household Recycling Centre. The submitted Plan proposes the removal of the allocated site, and the existing Household Recycling Centre from the Green Belt. The findings of the GB2 Assessment, indicate that: the combined site only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location; and capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation and suitable for the proposed use.

176. As with the site proposed for removal in relation to Policies HW10, HW11 and HW16, although the combined site is located outside the urban area of High Wycombe, I nevertheless consider that because of its proximity, connectivity and the nature of the existing use, the area proposed for removal is, functionally, part of the larger High Wycombe area, and as such is in a sustainable location. With regard to the potential impact of removing the combined site from the Green Belt, I am mindful that the existing and future use of the land will make an important contribution towards meeting the social and economic needs of the District and

⁶⁸ AP7.13

⁶⁹ AP7.17 and 7.20

that the removal of a comparatively small area of land would not undermine the integrity of the designation or its ability to meet the purposes set out in the NPPF. Moreover, having regard to my conclusions on Issue 2 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for economic development.

177. The evidence contained in the HELAA and submitted in respect of Action Point 7.16 indicates that the proposed allocation does not constitute major development in the AONB and is largely free from constraint. However, these findings have been disputed and it has been suggested that because of its potential impact on the landscape the proposal constitutes 'major development' in the AONB. Whilst I agree that the allocated site can be viewed from public vantage points, these are limited in scope and, largely, restricted to the area immediately surrounding the site. Moreover, I consider that the nature of the allocation, its proximity to the existing recycling centre and the presence of mature boundary trees would ensure that the site would not be visually prominent or have a serious adverse impact on the enjoyment or visual qualities of the AONB. As such I do not consider that the proposed allocation would result in major development in the AONB. Therefore, subject to the revision proposed in **MM21** which requires the addition of new criteria that seek a landscape-led approach to development, the allocation is soundly based.

Policy RUR10 - Land rear of Stokenchurch Business Park, Stokenchurch

178. Land to the rear of Stokenchurch Business Park is allocated for Class B1, B2 and B8 uses. The allocated site is located in the AONB and comprises a roughly triangular area of agricultural land enclosed by a combination of the existing business park, the M40 and mature hedgerows. The evidence contained in the AONB Study and HELAA indicate that the development of the allocation would not be of an inappropriate scale or be harmful to the visual qualities of the wider landscape and is largely free from constraint. I am satisfied that the development framework provided by the policy is sufficient to address detailed issues in relation to the future use, access arrangements and that the impact of the allocation on the SAC has been fully and rigorously considered as part of the HRA. Therefore, based on the evidence presented, I am content that the allocation is sound.

Mixed Use and Transportation Allocations

Princes Risborough Expansion Area

179. The combination of Policies PR3, PR4, PR5, PR6, PR7, PR8, PR10, PR11, PR16 and PR17 provide the framework for the Expansion of Princes Risborough (PREA). Matters in relation to Policies PR11 and PR16 are discussed separately. Policies PR3 and PR4, as revised by **MM27, 28** and **29** which are necessary to clarify the requirements for housing and infrastructure delivery, allocate land within the PREA for the construction of up to 2300 dwellings on the MEA allocation, 58 dwellings at the Poppy Road allocation (Policy PR11) and 45 dwellings at the Princes Risborough Station allocation (Policy PR16), two primary schools, a local centre, public open space/green infrastructure and a relief road. The MEA comprises 177 hectares of, largely, agricultural land with some employment uses located between the north-west boundary of the Tier 2 settlement of Princess Risborough and the southern boundary of the smaller settlement of Longwick. The

site is bordered to the north by Lower Icknield Way and to the south by the Chiltern railway line.

180. The allocation is supported by Policies PR6, PR7, PR8 and PR10, as revised by **MM26, 31, 32** and **33** which are necessary to clarify the requirements of the policies and make consequential amendments to the boundary of the strategic buffer. The combination of the policies outlines the design principles; development requirements for the expansion; seeks the provision and safeguarding of transport infrastructure, including the relief road and a number of local highway improvements; and reserves land at Lower Icknield Way for the relocation of businesses affected by the expansion area. In order to ensure the timely and effective delivery of the development, Policy PR17, subject to **MM42** which is necessary to clarify the application of the policy, outlines the requirement for the provision, funding and management of new educational, recreational and highway infrastructure. Policy PR5 provides the mechanism for managing the defined settlement boundary and strategic buffer between Longwick and Princes Risborough.
181. The MEA is within the setting of the AONB and would be visible from several vantage points in the Chilterns including Whiteleaf cross, Brush Hill Local Nature Reserve and along the Ridgeway National Trail. Critics of the proposed allocation contend that the development of the site would result in increased noise and vibration levels, a reduction in air quality and would ultimately erode the tranquillity of the AONB. The Princes Risborough Expansion Landscape Sensitivity and Capacity Study⁷⁰ analyses in detail the ability of the land immediately to the south, west and north of the settlement to accommodate a major expansion area. The study found that those parts of the site closest to the built-up area and railway line have the greatest capacity to absorb new development, whilst those along Icknield Way have less capacity. The findings recognised that the development of the MEA would have an impact on the setting of the AONB, but concluded that with appropriate mitigation, any impact could be effectively ameliorated. The recommendations of the study in respect of masterplanning and landscape mitigation have been carried forward into the principles for development in Princes Risborough and the requirements of Policies PR6 and PR7.
182. A key element of the PREA is the provision of a relief road to serve the development and relieve traffic in the centre of Princes Risborough. The indicative route of the proposed relief road runs from Lower Icknield Way, south through the MEA and skirts the existing urban area to connect with Wycombe Road. The opponents of the proposed scheme question both the need for, and the route of the proposed road. However, the evidence presented in respect of the need for the scheme supports the provision and makes clear that the forecast volume of traffic from the PREA could only be accommodated if extra road capacity in the form of a new relief road was provided⁷¹. The options for the indicative alignment of the relief road were defined in discussion with statutory consultees and through engagement with local residents. The options, and a number of variants, were reviewed through a number of technical studies^{72 73} and assessed as part of the SA process. The reviews /assessments process concluded that, overall, the indicative

⁷⁰ LAN1

⁷¹ TR19

⁷² TR22

⁷³ TR15

alignment of the proposed relief road identified in the submitted Plan was the best performing option. Based on the evidence presented, and subject to detailed considerations, the need for, and indicative route of the proposed relief road is justified and based on robust and credible evidence.

183. The southern section of the indicative relief road, between Picts Lane and Wycombe Road, is located within the AONB and the Green Belt. In addition to its primary function, the road will also provide access to the Poppy Road allocation (Policy PR11). The southern section of the highway would be some 700 metres in length and would have a land take of less than 1.5 hectares and would because of its siting, in the countryside to the west of Wycombe Road and close to Pyrtle Brook, be visible in the landscape of the AONB. This in itself does not demonstrate harm, and it is clear from the evidence presented that any impact could, with careful siting and a detailed design that incorporates the mitigation measures in relation to matters such as lighting, ecology, hydrology and visual impact, be effectively mitigated⁷⁴.
184. On balance, and in light of the submitted evidence, I am satisfied that the MEA and the indicative route of the relief road would not have a serious adverse impact on the AONB.
185. With regard to the impact on the Green Belt, the NPPF makes clear that local transport infrastructure schemes are not inappropriate development in Green Belts, provided it can be demonstrated that the location is necessary. In light of my earlier conclusions in respect of the need for, and indicative siting of the relief road, I consider that its location within the Green Belt is justified in principle.
186. Situated in the centre of the Expansion area is the small historic hamlet of Alscot. Whilst concerns have been expressed about the impact of development on the character and appearance of the Conservation Area, these are matters of judgement which should be made on the basis of detailed evidence. In the absence of such detailed evidence, matters in relation to the impact of the development on the setting or character and appearance of the heritage asset can, having regard to the statutory requirements⁷⁵, be effectively addressed through the masterplanning of the site and the framework provided by Policies PR6, DM31 and DM35 which provide an appropriate mechanism for assessing and managing future development on the site.
187. A strategic buffer, approximately 50 metres wide and extending the length of the northern boundary of the MEA area, provides a barrier/open space between: the MEA and Longwick; and the MEA and the countryside beyond Lower Icknield Way. A number of concerns have been expressed about the width of the buffer because, it is suggested that it would not be visible when viewed in the wider landscape and because the open land would, in part, be used for strategic open space.
188. Policy PR5, as amended by **MM30** which correctly takes account of the granting of planning permission at Ivy Farm, Longwick, and the Princes Risborough Expansion: Issues and Options Report⁷⁶ make clear that the purpose of the strategic buffer is, for the most part, to protect the undeveloped character of the

⁷⁴ TP6, AONB1 and WDLP2

⁷⁵ Planning (Listed Buildings and Conservation Areas) Act 1991 and NPPF

⁷⁶ PR9

countryside within the designation and to maintain separation between smaller settlements and the MEA. The scale and location of the strategic buffer would, when viewed from the area immediately surrounding the MEA, be sufficient to ensure the visual and physical separation of the settlements and protect the identity of Longwick as a separate village. With regard to the issue of development in the strategic buffer, Policy PR5 explains that the designation is not intended to be an absolute restriction on all development but that any such development would need to be small scale in order to respect the rural character of the area.

189. The scale of growth at the MEA was defined through public consultation⁷⁷ and the SA⁷⁸ process. The revised trajectory⁷⁹ for the allocation, indicates that construction work will commence in 2024, with 792 dwellings delivered by 2029, a further 840 dwellings by 2033, and the remainder of the site, some 599 dwellings, constructed beyond the Plan period. The anticipated rate of delivery allows for the construction of 180 dwellings per annum. As the site is likely to be constructed by at least 3 national housebuilders this rate of delivery would equate to 60 dwellings per annum, for each developer. In my view, a reduction in the scale of the growth proposed would undermine the objective of delivering the OAHN, whilst an increase in the scale of the allocation is likely to be undeliverable given the anticipated rate of delivery on the site. In light of the evidence presented and the need to meet the OAHN the scale and rate of delivery of housing at the MEA is considered reasonable and realistic.
190. To facilitate the development of the MEA for housing, it will be necessary for the employment related uses within the site to be relocated. Policy PR10, in conjunction with Policy PR4, reserves an area of some 12 hectares of land at the junction of Chestnut Way and Lower Icknield Way immediately west of the Birmingham railway line, for the relocation of existing B1, B2 or B8 business uses affected by the expansion of Princes Risborough. The approach outlined in Policy PR10 is logical and, subject to **MM35** which is desirable to allow for the flexible delivery of employment related uses, is sound.
191. The delivery of social, educational and transport infrastructure is an integral part of the proposal. The framework for managing infrastructure provision is provided by Policy PR17, which seeks to deliver on-site provision and off-site contributions in an equitable way and phase delivery to ensure that infrastructure and housing development align. The required infrastructure will be funded, largely, from S106 contributions secured from the Land Owners/Developers of the site, with, subject to final approval, additional funding for the southern section of the relief road provided by a grant from the Housing Infrastructure Fund (HIF).
192. Seeking a coordinated approach to the delivery of infrastructure and housing across the site is an important element of the scheme and necessary to ensure that the PREA functions and integrates effectively into the settlement. **MM28** is necessary to amend Policy PR3 to allow the submission of planning applications for individual parcels. In my view this revision is necessary to introduce flexibility into the policy framework and ensure that development can commence on site in a timely manner. The use of a framework for equalisation is necessary to ensure an equitable distribution of costs and the timely delivery of infrastructure.

⁷⁷ PR6, PR8 and PR9

⁷⁸ WDLP2

⁷⁹ Council's Statement for Matter 8 – Development Framework for Princes Risborough

193. Critics have suggested that not all the infrastructure identified in the Plan is necessary for the delivery of the development and that the scale of provision would impact adversely on the viability of the site. These are matters that will change over the lifetime of the scheme and will need to be revisited as the delivery of the site progresses. The evidence presented in respect of the site does however, demonstrate that there is a need for the provision of affordable housing, school places, medical facilities, open space and transportation improvements⁸⁰ and that, based on the submitted evidence⁸¹ and allowing for development costs and S106 contributions, there would still be significant headroom in the scheme. With regard to HIF funding, the Council accepts that the provision of the grant may not be guaranteed and, sensibly, outlines in its statement for Matter 8 an alternative funding mechanism for the scheme.

194. Overall, and based on the submitted evidence, I am content that the PREA allocation is sound.

Other allocations in Princes Risborough

195. Policies PR12, PR13, PR14 and PR16 collectively provide the framework for the management of Town Centre Traffic and Public Realm Enhancements in Princes Risborough and the redevelopment of the: Land Fronting New Road (Back Lane); Land South of Horns Lane; and Land at Princes Risborough Station. Subject to the revisions proposed by **MM37, 38, 39, 40** and **41** which, correctly, seek to clarify the requirements of the policies and are necessary for soundness, I am content that Policies PR12, PR13, PR14 and PR16 are sound.

Other Allocations

Policy HW21 – Land at Queensway, Hazelmere

196. Land at Queensway is allocated for the development of a new cemetery, which is intended to meet the future burial ground needs of the High Wycombe area over the Plan period. The site is located within the Green Belt and AONB. The NPPF makes clear that cemetery uses are not inappropriate development in Green Belts, as long as they preserve the openness of the Green Belt and do not conflict with the purpose of including land within it. Based on the submitted evidence, I am content that the framework provided by the policy would ensure that the openness of the Green Belt in this location would not be reduced. Similarly based on the evidence contained in the HELAA I am content that the proposal would not have a serious adverse impact on the AONB or constitute major development. Therefore, subject to the revision proposed in **MM23** which requires a landscape-led approach to development, I am satisfied that this allocation is sound.

Policy RUR4 – Little Marlow Country Park

197. The Little Marlow Country Park allocation occupies approximately 329 hectares of land formerly used for minerals extraction and is situated in the Green Belt and AONB to the west of Bourne End. The Country Park allocation is intended

⁸⁰ HEDN2, INF4 and TR19

⁸¹ VIA2

to provide environmental improvements, including ecological and biodiversity enhancements, open space and informal recreational opportunities for the residents of the District. Evidence presented by the Council demonstrates its commitment to delivering and securing funding for the project⁸². Although not directly related to either its scale or primary purpose, the allocation will also contribute towards attenuating the recreational impacts of new development within the vicinity of Burnham Beeches SAC, specifically the allocation at Hollands Farm (Policy BE2) by providing alternative recreational opportunities⁸³. Subject to the necessary revisions outlined in **MM48**, I am satisfied the proposed allocation is sound.

Conclusions on Issue 8

198. The Plan's site selections are based on a logical and appropriate set of criteria and assessment methodologies, SA and HRA. Subject to the MMs, I consider that all of the Plan's employment, housing, mixed use and transportation and other allocations have been positively prepared, are justified and will be effective. Where necessary, exceptional circumstances have been demonstrated to justify alterations to the Green Belt boundary and the removal of land to meet the objectively assessed need for employment and housing. In addition, I have found that none of the site allocations within the AONB would constitute 'Major Development' and as such comply with the requirements of the NPPF.

Issue 9 - Will a 5-year supply of deliverable sites be available on adoption of the Plan and are there reasonable prospects that this can be maintained over the Plan period?

199. The housing requirement figure as proposed is 10,925 or 546 dwellings per annum (PA). This represents a modest but nevertheless significant increase in the level of delivery rates from those previously experienced in Wycombe. Delivery has varied considerably over the period 2006 - 17 with completions ranging from 625 dwellings in 2008 - 09, to 223 dwellings in 2012 - 13. This resulted in an average of 482 dwellings pa over that period. Completions for the early part of the LP period (2013 -18) were expected to be 2,730 dwellings, but have fallen below the level required with only 2,404 or 480 dwellings pa delivered.

200. The revised housing supply data (MM6) indicates that completions, current commitments, windfalls and site allocations would provide between 11,648 and 11,888 dwellings during the plan period. The increase in the overall supply figure of between 721 and 961 dwellings has, principally, occurred as a result in changes to the indicative capacity at 4 allocated sites and an increase in sites with planning permission. Whilst the 'headroom' between the requirement and total supply remains limited, this addition provides sufficient 'contingencies' to ensure that delivery will not be put at risk.

201. The Council has robust monitoring arrangements in place and has positive working relationships with the majority of the developers of the allocated sites. This will ensure that any barriers to delivery can be identified and addressed in a timely manner. Delivery rates will be carefully monitored through the Council's Annual Monitoring Report and, if necessary, the plan may need to be reviewed to

⁸² Council's Statement for Matter 9 - Development in Rural Areas

⁸³ WDLP3B

ensure that housing need to 2033 is achieved. Whilst some representors consider that additional sites should be allocated to bolster supply, that would be likely to require the deletion of further land from the Green Belt and result in a delay in Plan adoption.

202. Turning to the five-year requirement, from 2006 to 2015 against a Wycombe Core Strategy (2006 – 20) proportionate requirement of 3,618, 4,334 dwellings were delivered. This is some 20% above the anticipated rate of delivery and, in accordance with paragraph 47 of the NPPF, a 5% buffer has been applied to the five year housing requirement figure.

203. As I indicated earlier, there has been a shortfall in delivery in the first quarter of the Plan period of 326 dwellings. The Council's preferred approach has been to deal with the shortfall within the first five years from adoption - the Sedgefield method. Applying the necessary 5% buffer and allowing for the delivery of the shortfall, the five year requirement from 2018/19 to 2022/23 would be 3,082 dwellings or 616 pa. Based on past rates of delivery, and in light of the new site allocations this requirement is realistic and achievable.

204. Assessing the precise level of five-year supply and anticipated rates of delivery is not an exact science. It involves making assumptions about a large number of sites and various factors including likely start rates and annual rates of building which could be subject to change. In broad terms I am satisfied that most of the sites that the Council has identified within the five-year supply from 2018 - 19 to 2022 - 23 have a realistic prospect of being delivered over the next 5 years and that the level of contingency within the supply is sufficient to address any slippage in delivery at major sites.

Conclusions on Issue 9

205. In light of the evidence presented I consider that there is a reasonable prospect that at the adoption of the Plan there will be a 5-year supply of deliverable housing land and that this situation will be maintained throughout the Plan period.

Issue 10 – Are the arrangements for monitoring and delivery robust and will the Plan be flexible enough to respond to changing circumstances?

206. The Plan includes a monitoring framework that will provide an effective means of measuring the implementation and delivery of the policies and allocations. The findings of the Council's monitoring process will be reported in the Authority Monitoring Report (AMR). Details in respect of housing delivery, including the housing trajectory indicating housing delivery rates, are set out in the HELAA and will be subject to regular review/update through the monitoring process. Amendments necessary to provide an update on the delivery of the identified housing or housing mixed-use developments in High Wycombe, Marlow, Princes Risborough and the Rural Areas are set out in **MM11, 24, 27** and **44**. In addition, in recognition of the changing strategic context for the Plan (MM1, 2 and 4), **MM79** correctly propose to extend the monitoring framework for Policy CP2 to include consideration of wider sub-regional growth dynamics.

207. The Plan does not contain a specific commitment to an early review but recognises that the delivery of employment land, in light of the levels of forecast

need and challenging market conditions, has to be closely monitored. Having regard to the requirement in the PPG that plans should be reviewed every five years, I do not consider that a specific review policy is necessary. The monitoring process set out in the Plan will, in my view, provide an effective mechanism to assess whether the Plan is meeting its objectives and intended outcomes.

Conclusions on Issue 10

208. The provisions made for monitoring and review in the submitted LP, as amended by the MMs, are consistent with national planning policy and will provide a robust and sound basis on which to assess the performance of the Plan.

Public Sector Equality Duty

209. In conducting the examination, I have had due regard to the aims expressed in Section 149(1) of the Equality Act 2010 and the evidence presented in the Council's Equality Impact Assessment⁸⁴. This includes the consideration of matters including the accommodation of Gypsies and Travellers and the need for accessible design.

Assessment of Legal Compliance

210. Overall, I am satisfied that the Plan complies with Section 19(1A) of the 2004 Act which requires that development plan documents (taken as a whole) must include policies to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change.

211. My examination of the legal compliance of the Plan is summarised below:

- The Local Plan has been prepared in accordance with the Council's Local Development Scheme;
- Consultation on the Local Plan and the Main Modifications (MM) was carried out in compliance with the Council's Statement of Community Involvement.
- A Sustainability Appraisal has been carried out and is adequate.
- The Habitats Regulations Appropriate Assessment Report⁸⁵, most recently updated in January 2019 sets out why an Appropriate Assessment was undertaken and explains why it concluded that the Plan would not adversely affect, either alone or in combination, the integrity of the SACs assessed; and
- The Local Plan complies with all relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

⁸⁴ WDLP4

⁸⁵ WDLP3 and WDLP3B

Overall Conclusion and Recommendation

212. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
213. The Council has requested that the appointed Inspector recommend MMs to make the Plan sound and capable of adoption. I conclude that, subject to the recommended MMs set out in Appendix 1, the Wycombe District Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the Framework.

Nicola Gulley
Inspector

This report is accompanied by an Appendix containing the MMs.