

**SOUTH BUCKS CORE STRATEGY**

**DRAFT v.4 as at 30.9.10**

**MATTERS FOR THE EXAMINATION  
HEARINGS PROGRAMME**

*The Draft list of Matters for the Examination sets out the main issues which the Inspector considers at this stage to affect the soundness of the DPD. Key points are highlighted in grey. Other points include those seeking further information or clarification. It is an initial assessment and does not reflect every representation which has been made, nor is it necessarily limited to matters raised in the representations.*

Parts 1 and 2 – Objectives and Spatial Strategy

Would the decision to accommodate development without changes to the boundaries of the Green Belt represent the best balance between securing a sustainable form of development, the protection of the Green Belt and the avoidance of harm to the character of the Principal and other settlements?

Does the spatial strategy, which concentrates on development in the northern part of the District, give sufficient attention to the sustainability credentials of settlements the southern area, well-located to the services and facilities of Slough or Uxbridge and to rail links?

CP1 - Housing provision and delivery

Are the housing targets justified by the evidence base, now that the RSS has been revoked?

Should the housing targets be expressed as a minimum range of 2,200-2,800 new dwellings? If not, will that allow sufficiently for changing circumstances?

Is it right to rely on a high proportion of sites with pp in calculating the housing land supply, in the light of paragraph 58 of PPS3? What is the evidence for justification at S. Bucks?

Is the proposed housing strategy realistic when compared to past rates of delivery? Does it take sufficient account of changing circumstances?

Have cross-border issues been taken into account to a sufficient extent (see PPS3 Annex C)? For example, the SHMA [CD2/02] looks only at Buckinghamshire and the Retail and Town Centre Study [CD3/04] considers Chiltern DC and S. Bucks. What are the development strategies of neighbouring authorities, for example what evidence is there of the

consideration of pressures on S. Bucks arising from employment, housing or retail growth in Slough?

What evidence is there for comment in paragraph 3.13 of CD1/33 that some of S. Bucks' housing need could be more appropriately met in adjoining or nearby authority areas, which have larger settlements and fewer constraints?

There is no phasing in the strategy. How will delivery be managed to ensure that there is some provision left for the latter part of the plan period?

If the slowing down of growth is a matter of policy (see the last sentence of Policy CP1) rather than just a result of the pattern of housing land availability over time, then should this be in the CS as a fundamental part of the strategy, rather than in a later DPD? Where is this policy approach expressed, and what is the rationale for it?

[Proportion of development on previously-developed land – I note that the LPA is hoping to arrive at a new PDL target by about the time of the PHM.]

Does the density range of 25-35 dwellings per hectare in Policy CP8 achieve the right balance between making the best use of land and conserving and enhancing townscape character? How does this square with assumptions in the SHLAA [CD 2/01] of considerably higher densities for many urban sites?

Is there sufficient allowance for SHLAA sites not coming forward – is the non-implementation assumption of 5% justified?

#### CP2 - Housing type and size

Parags 3.2.15-16 give an indicative range of housing sizes to aim for, but this is not reflected in Policy CP2. How will local needs be identified at the planning application stage, and by whom? Will reliance on developers to do this be unduly onerous, and would it produce robust assessments?

Is the site size threshold, 5 dwellings or more or 0.16ha or above, the right level?

The elderly form a large and growing proportion of the population of the District. Will the re-use of community infrastructure or employment sites for specialist accommodation for the elderly, together with other provision, deliver sufficient units for elderly people over the plan period? Is there a need to allocate sites for this purpose or to broaden the rural exception sites clause within CP3 to include specialist housing?

#### CP3 - Affordable housing

How will the plan meet the targets for affordable housing provision in the light of high number of commitments and completions?

Should the targets be more ambitious in the light of the high level of local need and the priority placed on this issue in the Sustainable Community Strategy? If so, how could this be achieved?

Are the 40% yield and the site thresholds of 5 units and above or 0.16ha viable?

Should there be a more positive approach to encouraging provision in rural areas in the form of rural exception sites in the light of the limited delivery from this source in past years?

Is the list of parishes in which rural exception sites will be considered (footnote 44 to page 48) too restrictive? Would the selected villages achieve a balance between sustainability and local rural need? Should a full list of the relevant parishes be provided for clarity, for example in an appendix?

What yield of affordable housing units has there been in past years from the spending of sums from commuted payments for off-site provision? What justification is there for the figure of 50 units of the plan period from these sort of sources (see paragraph 3.8 of CD2/07).

#### CP4 - Gypsies, Travellers and Travelling Show People

Should the target in New Paragraph 6 and the first paragraph of Policy CP4 be 7 or 11, or 7-11 as a range? Is the difference from the (now extinct) RSS target of 15 Gypsy and Traveller pitches and 1 for Travelling Showpeople fully justified?

What justification is there for allowing permanent pp on sites with temporary pp in the green belt (bullet point 1 of the policy)? Will these necessarily represent the best sites for development?

Will the criteria-based policy deliver sufficient sites? What evidence of past delivery is there to indicate that this assumption is robust?

Why is there no indicative provision for the later part of the plan period after 2016?

#### CP6 - Local infrastructure needs

The overall view in the CS is that because of the limited nature of growth, and the focus on existing larger towns, infrastructure provision is likely to be in the form of the incremental upgrading of existing facilities, without the need for major new infrastructure projects. However, has work been done to identify any infrastructure thresholds or bottlenecks which might delay supply particularly in relation to larger scale development at the Opportunity Sites?

Has the County Council's concern about the pressure on primary and secondary school places in Beaconsfield, and primary places in Gerrards Cross and Burnham, and the lack of funding for expansion, been fully

addressed? Should BCC be removed from the possible funding sources in Appendix 6 Policy CP6?

Will the reliance on smaller sites in the housing supply limit the amount that can be contributed to local infrastructure through s.106 undertakings?

Will multiple demands on the development sites in terms of s.106 contributions threaten viability and thus restrict the number of sites delivered?

#### CP7 - Accessibility and transport

In the light of the District's high carbon footprint, should the CS include more positive policies to encourage the use of non-car modes of transport, including waterways?

Has the effect of Crossrail on the District's stations and road network been assessed, including parking at railway stations?

#### CP8 - Built and historic environment

Should the strategy include a high-level design policy, for further development in a later DPD and/or SPD?

What is the rationale for the target in Appendix 8 of the creation of 7 new Conservation Areas over the plan period?

#### CP9 - Natural environment

Should the test in Policy CP9 be the protection of *natural beauty* of the AONB, and for the SAC that should be no adverse effect on the *integrity* of the site?

Would 'adverse effect' rather than 'significant harm' reflect the statutory test for sites of international importance, for example as illustrated in Fig.1 of Circular 06/2005? This would also affect Strategic Objective 12.

#### Employment

Policy CP10 distinguishes between more important and less important employment sites, and allows a more flexible approach to the re-use of the latter. Does this represent the right balance between retaining Class B employment land and encouraging a more diverse economy? Does it conform with PPS4? Should the identification of the more important or strategic sites be a function of the CS rather than of a subsequent DPD?

How is the imbalance between job opportunities and the workforce to be measured, and what is the trigger for further action (paragraph 4 of Policy CP10)?

Has there been cross-border working with neighbouring authorities concerning the effect of employment growth there on pressures in S. Bucks?

What is the rationale for designating Court Lane as a Major Developed Site in the Green Belt, in preference to other major employment sites in the District which may be undergoing change?

In the light of the strong support in the Sustainable Community Strategy [CD 7/01] for media and creative industries should there be specific reference to Pinewood Studios including on the Key Diagram?

#### CP11 - Healthy and viable town and village centres

Is the policy including the table of floorspace provision too inflexible? Does it allow for changes in retailing and the economy?

Has there been cross-border consultation on retail matters with neighbouring authorities particularly in relation to development at Slough and Maidenhead?

Is the CS the place to review the boundaries of designated Primary or Secondary Shopping Frontages in the town centres?

#### CP12 - Sustainable energy

Should a higher priority be given to the consideration of energy efficiency, before the use of renewable or other energy sources, in new residential and non-residential development?

Should the policy include specific targets for energy efficiency in the form of the Code for Sustainable Homes or BREEAM? In the light of the large per capita carbon footprint in the District, could targets be higher in S. Bucks than nationally, and higher in some parts of the District than others, for example in the Opportunity Sites?

How will the plan help to meet climate change targets in the face of the large proportion of completions and commitments in the housing supply? What is the expected delivery through existing completions and commitments?

What is the rationale for the threshold of 10 dwellings or 1,000m<sup>2</sup> of non-residential floorspace? In the light of the proportion of the housing supply made up by small sites, will this make an effective contribution to meeting the government's target that all new housing should be zero-carbon by 2016?

Paragraph 3.5.6 refers to the evidence base in the SE Plan, and also work in Uttlesford DC in paragraph 3.5.7. Should there be a footnote with further details of the relevant documents for reference, or a short account in the supporting text of what those approaches are?

Should there be specific, measurable and timed District-wide targets for the three indicators for Policy CP12 in Appendix 8, and should these be included within the policy itself?

#### Opportunity sites - general

There is considerable ambiguity about the status of the Opportunity Sites. The title of the section calls them Development Sites, which seems to imply that they are firm allocations, but the text indicates otherwise. Should the title of the section be reconsidered?

Has early engagement with infrastructure providers made it clear who will provide essential infrastructure at the sites, and when (see for example paragraph 3.6.14 in relation to Wilton Park)?

Should the policies include targets for housing provision, employment or other floorspace?

Are there identifiable triggers for the release of the sites?

All 3 policies say that a Development Brief will be prepared by the landowner or developer (although in conjunction with the Council). Does this give too limited a role for the Council? Should the Local Planning Authority prepare the Brief or at least be the lead agent?

CP14 and CP15 say that the Brief will be adopted as SPD, but Policy CP16 does not? Why?

#### CP14 - Wilton Park

Is there any commitment from Defence Estates, or from the owner of the ransom strip, to indicate that the site would be deliverable within the plan period?

Would the use of s.106 undertakings to address existing deficiencies in Beaconsfield meet the requirements of Circular 05/2005?

On the other hand, how will the CS address identified problems in Beaconsfield in terms of traffic congestion, affordable housing or open space if Site CP14 does not come forward?

Would the multiple demands on development at Wilton Park make it unviable?

Is the emphasis on the A355 Beaconsfield relief road in the policy unjustified, in view of the doubt about its deliverability in the plan period?

#### CP15 - Mill Lane

Should the policy be more flexible, including consideration of phasing in the light of the multiple ownerships on the site?

Is there any commitment from owners to indicate that the site is realistically deliverable within the plan period?

Have impacts on traffic, sewerage infrastructure and water supply been fully assessed, including any cross—border implications in terms of traffic on the A4, shopping or employment?

CP16 - South of Iver

Would a new road or other measures to relieve heavy goods traffic through Iver Village and Richings Park involve the removal of land from the Green Belt, and if so would this open the door to other proposals to change Green Belt boundaries?

Is significant new transport infrastructure viable and deliverable in the light of its absence from County or other highway investment programmes?

Should the last paragraph of the policy apply to all employment sites in the Policy area, not just Thorney Business Park?

Should there be greater reference to the role of the Grand Union Canal, including the Slough Arm?

CP17 – Other development sites, including those sites put forward by representors

Have they been subject to Sustainability Appraisal by the promoters?  
Is it necessary to identify any other sites in order to achieve the strategy?  
Are they better alternatives than the Opportunity Sites?

Other points

Should there be a high-level policy for tourism in the strategy?