

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION
KEEP BOURNE END GREEN
HEARING STATEMENT IN RELATION TO MATTER 1

1. Keep Bourne End Green (“KBEG”) is concerned by the Local Plan’s release of Green Belt at Bourne End, through the release and allocation of the Green Belt land known as Hollands Farm, and the Local Plan’s interlinked distribution of some 800 homes to what the Local Plan terms “Bourne End and Wooburn”.
2. KBEG has the support of over 3,000 local residents, by way of signed mandates. The vast majority are from the immediate locality (over 2,600 from the wards of: Bourne End-cum-Hedsor; The Wooburns; and Flackwell Heath and Little Marlow) and the rest almost all from areas nearby (such as High Wycombe, Taplow, Beaconsfield).
3. KBEG submitted representations on the Regulation 19 publication version Local Plan in relation to: the Sustainability Appraisal underpinning the Local Plan [WDLP2] (“the WDLP SA”); Policy CP2; Policy CP3; Policy CP4; Policy CP8; and Policy BE2. Some of the representations (concerning the WDLP SA and Policies CP3 and BE2) were made by Pegasus Group (planning and environmental consultants) on behalf of KBEG (representor ID 1347), some of the representations (concerning Policies CP2, CP4 and CP8) were made by KBEG direct (representor ID 1265). The representations relied on a substantial evidence base prepared by independent experts, Appendices 1-8 of the representations made by Pegasus for KBEG, and references to appendices are to those (i.e. Appendix 1 is the Pegasus Sustainability Assessment Review of Hollands Farm).
4. This Hearing Statement is primarily concerned with Matter 1: Question 7 but KBEG also comments on other Questions.

Question 7: Is the Sustainability Appraisal (WDLP 2) adequate in terms of its assessment of the likely effects of the Plan’s policies and allocations and its consideration of reasonable alternatives and have the requirements for Strategic Environmental assessment been met?

5. In short, no. KBEG refers to its representation concerning the WDLP SA, made on its behalf by Pegasus Group, and associated Appendices.
6. There are two principal areas of inadequacy in the WDLP SA relevant to Bourne End/Hollands Farm (there may be more, but KBEG has had to target its resources):
 - (1) Failure to consider reasonable alternatives to the distribution of some 800 homes to “Bourne End and Wooburn” via the (associated) release of Green Belt at Bourne End by the release and allocation of Hollands Farm;
 - (2) Failure to base its assessments, at least as regards Hollands Farm, on site-specific evidence, so failing to identify likely significant effects.
7. These failings mean the Local Plan is presently in breach of the SEA Regulations.

8. The *St Albans* decision, attached as Appendix 9 to KBEG’s representations, is on point in relation to the failure to consider reasonable alternatives. To paraphrase paragraph 21 of the judgment, it is not inevitable (not remotely) that there must be 800 dwellings at “Bourne End and Wooburn” (an artificial construct of the Local Plan), nor that Green Belt must be released at Bourne End, nor that it must be released at Hollands Farm, but the WDLP SA does not trouble to consider reasonable alternatives, and in particular does not consider reasonable alternatives to Green Belt release at Bourne End.
9. As regards the WDLP SA’s failure to base its assessment of Hollands Farm (at least) on site-specific evidence, the work done by Pegasus (see Appendix 1 for the summary, and Appendices 2-8 for the detail) has laid bare the absence of, in particular, any or any adequate site-specific consideration of the landscape, of heritage, of flood-risk, of transport impacts and of biodiversity, and even of Green Belt performance. Had at least some of those been given adequate consideration, Hollands Farm would not be proposed for release from Green Belt, as demonstrated by the site-specific work that KBEG had to commission in order to plug the gaps in the Council’s evidence base: Appendices 2-8.
10. Since it prepared the WDLP SA and submitted the Local Plan, the Council has produced a document “Statement of Consultation Appendix 22 – Sustainability Appraisal Clarification Note in response to Regulation 19 Representations” [WDLP10.22]. WDLP10.22 explains that a number of representations considered the Local Plan unsound because the WDLP SA ‘didn’t include their site as a reasonable alternative’ and so WDLP10.22 ‘explains how the Council determined the site options and when and where the Council made this decision’. WDLP10.22 makes no attempt to grapple with KBEG’s complaint that the WDLP SA fails to consider reasonable alternatives to the release of Green Belt at Bourne End. Nor does WDLP10.22 address KBEG’s complaint that, in relation to Hollands Farm at least, the WDLP SA is not based on site-specific evidence so fails to identify likely significant effects.

Question 10: Does the Plan include policies designed to ensure that the development and use of land in Wycombe contribute to the mitigation of, and adaptation to, climate change

11. In so far as the Local Plan concerns Bourne End, the answer is no. Seeking to take (greenfield) land out of the Green Belt and develop it, in a location that performs poorly in terms of transport infrastructure, and has flooding issues, and where the development will have significant adverse transport impacts, does nothing to contribute to the mitigation of and adaptation to climate change.

Question 11: How does the Plan address the issue of air quality

12. So far as the Local Plan concerns Bourne End, the answer is that the Local Plan’s approach to air quality is inadequate. Loading the additional traffic the flows from some 800 dwellings onto the already congested local road network in the settlement of Bourne End and the surrounding area will unacceptably increase congestion (see Appendix 2, the Transport Feasibility Appraisal by Motion) and inevitably adversely affect air quality.

Keep Bourne End Green

29 June 2018