

Wycombe District Local Plan Examination – Stage 2

Statement by Berkeley Strategic (966) - August 2018

Introduction

1. This Statement is submitted by Berkeley Strategic ('Berkeley') in relation to Matters 9 and 10 of the Wycombe Local Plan examination (Stage 2). Berkeley controls two sites at Chapman Lane, Bourne End (Ref: SBE0048) and Heath End Farm, Flackwell Heath (Ref: SWC0070).
2. Berkeley's previous consultation response on the Regulation 19 Proposed Submission Local Plan (November 2017) raises concerns about the soundness of the Local Plan with particular regard to the issues of the spatial strategy, housing supply and Green Belt. Berkeley also submitted hearing statements in June 2018 in relation to Stage 1 of the examination for Matters 1,2,3 and 6. A particular concern raised previously relates to the proposed approach of the Council to deliver a significant proportion of Wycombe's housing requirement in Aylesbury Vale District where unprecedented rates of housing delivery are relied upon.
3. Within the Stage 1 Hearings, the Council maintained that it is releasing all the Green Belt land that it can, based on the Green Belt Part Two Assessment, despite the significant concerns about the robustness of the assessment process and its outcomes raised by multiple parties. The Council's position is that, despite having reviewed around 80 sites within the Green Belt Part Two Assessment, only a small handful of sites, capable of delivering 1,139 homes, have exceptional circumstances meaning that they are capable of being released.
4. It is clear that the Council's overall strategy in preparing the Local Plan has been to minimise the amount of sites that it is allocating within its own district area in a way that is 'constraints-led', contrary to the NPPF paragraph 157. With such a limited amount of Green Belt land to be released, the Local Plan also fails to establish Green Belt boundaries capable of enduring beyond the plan period in accordance with NPPF paragraph 85.

5. Evidence submitted to the examination by multiple parties indicates there is additional capacity for sustainable development within Wycombe. Berkeley's view, shared by others, is that the Green Belt and site selection evidence prepared by the Council – including the SA - is inconsistent in its assessment of individual sites. In the case of Berkeley's sites at Bourne end and Flackwell Heath, these sites are in sustainable locations (Tier 2 and Tier 3 settlements respectively) outside the highly sensitive AONB.

6. In this context specific comments are made below in relation to selected sites that the Council is proposing to allocate in the Rural Areas and in in Marlow, Bourne End & Wooburn. These comments serve to illustrate where the Council's selection and assessment of these sites is inconsistent (therefore not soundly based) and where there is further potential to release land in sustainable locations, which performs as well if not better than a number of the proposed allocations, to ensure the Local Plan will deliver as much as possible of the housing requirement within the district.

Matter 10 - Development Framework – Marlow, Bourne End & Wooburn

Are the following allocations soundly based and is there evidence that the development of the sites is viable and deliverable?

d) BE2 – Hollands Farm, Bourne End & Wooburn

22. Hollands Farm is a substantial site in Bourne End currently forming part of the Green Belt. It is the largest of the Council's proposed Green Belt allocations. Berkeley does not oppose the allocation of the Hollands Farm site in principle, but questions the soundness of the evidence on which it has been selected over other sites in the area and the amount of housing that is planned on the site (467 homes).
23. The site shares many similar characteristics with Berkeley's sites at Chapman Lane, Bourne End and Flackwell Heath including the level of enclosure by existing built development and landscape features, characteristic of an edge of settlement location.
24. Berkeley disputes the scoring and commentary given to Hollands Farm in the Green Belt Part Two Assessment when compared to the Chapman Lane and Flackwell Heath sites. For example in relation to Green Belt purpose / criterion 3 to '*assist in safeguarding the countryside from encroachment*', Hollands Farm is given a score of 2 whereas Chapman Lane is given a score of 4. The commentary explains that this is based on the Hollands Farm site being influenced by surrounding built form, giving a semi-urban character. However, Chapman Lane, which shares the influence of built form on 3 sides particularly in the south, is stated to feel largely rural character (p24). This is in direct contradiction to the later commentary in the assessment which acknowledges the suitability of the southern half of the Chapman Lane site for development (p26). Hollands Farm is in fact a much more substantial area of open land (openness being the key characteristic of Green Belt land) compared to the sites at Chapman Lane, Bourne End and Flackwell Heath. Therefore contribution of Hollands Farm to Green Belt purposes is in fact similar to Berkeley's sites and not less significant as the Council has assessed.
25. Berkeley also questions the capacity of the Hollands Farm site (467 dwellings). The application of this anticipated development density across such a large site in this semi-rural location is likely to be harmful in landscape terms, and a less dense scheme with the inclusion of additional landscaped areas would be more appropriate to the local

context and could mitigate some of the concerns raised about the allocation. In this regard Berkeley notes that there is a significant level of local opposition to the Hollands Farm allocation from third parties, including from Keep Bourne End Green (KBEG).

26. If on the basis of the concerns raised the site was to be found to be unacceptable or if the capacity of the site has been over estimated, then Berkeley's sites at Chapman Lane, Bourne End and Flackwell Heath which together have a capacity for around 260 homes would be suitable alternative / additional sites to provide for new homes in the Bourne End area.

Conclusion

27. An analysis of allocations proposed in the draft Local Plan serves to highlight some of the problematic aspects of the Council's site selection process and Part Two Green Belt Assessment as previously raised.
28. The proposed allocations in the Local Plan are in general scored very favourably in the Council's Green Belt evidence, whereas certain other sites, including Berkeley's sites at Bourne End and Flackwell Heath, are scored very negatively despite sharing many similar physical characteristics to the proposed allocations, in terms of their contribution to Green Belt purposes. Furthermore Berkeley's sites are not located in the AONB but on the contrary are in sustainable locations (Tier 2 and 3 settlement close to High Wycombe). These issues raises a significant doubt about the robustness and objectivity of the Council's evidence and site selection process which has a clear implication for the soundness of the proposed allocations in these locations.
29. The Council should accordingly be asked to revisit its Green Belt evidence and site selection process, including the SA as previously argued, and identify additional land for development. This exercise would identify additional sites capable of release from the Green Belt and enable the Council to meet a greater proportion of its own housing needs over the Local Plan period instead of relying so heavily on unprecedented rates of housing delivery in Aylesbury Vale.