

WYCOMBE DISTRICT COUNCIL LOCAL PLAN EXAMINATION

HEARING STATEMENT IN RELATION TO:

'MATTER 10' - Bourne End and Wooburn

**Progress Planning on behalf of Mr L Mason (Land at Old Moor Lane,
Wooburn Moor)**

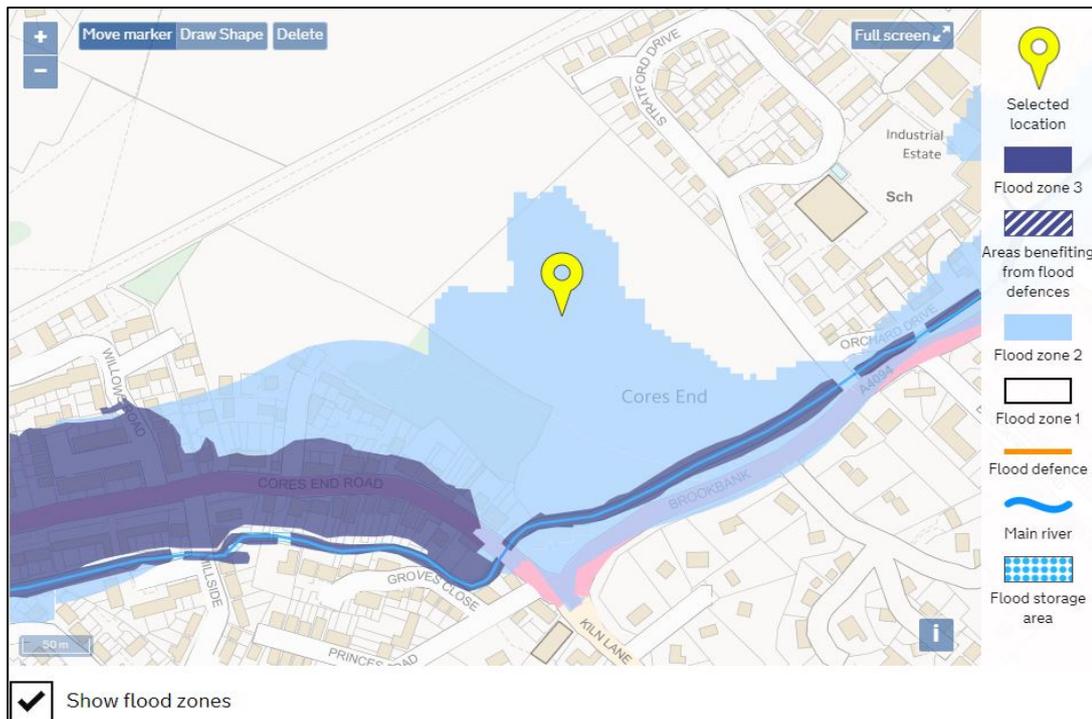
PREPARED BY
PROGRESS PLANNING
CHARTERED TOWN PLANNING PRACTICE

1 Introduction

- 1.1 Progress Planning act on behalf of the owner of land at Old Moor Lane, Wooburn Moor which has been promoted for development through the plan making process for 130 dwellings. This has included:
 - Strategic Housing Land Availability Assessment (SHLAA) and call for sites submissions
 - Representations submitted on the Draft Wycombe District Local Plan in August 2016. This was supported by an indicative masterplan; a Transport Report; and a drainage and utility assessment.
 - Representations submitted on the Publication of the Wycombe District Local Plan in November 2017. These representations warned the Council of our view that the Plan was not legally compliant and unsound, because it was not positively prepared, not justified and not consistent with national policy.
 - 1.2 This statement sets out the concerns with the Council's Strategy, specifically in relation to the proposed approach to accommodating growth In Bourne End and Wooburn.
 - 1.3 As discussed in further in this statement, we disagree with the allocation of both the 'Slate Meadow' and 'Hollands Farm' sites in the draft Wycombe Local Plan. We do consider that Bourne End and Wooburn are sustainable settlements, capable of accommodation Housing Growth. However the sites identified have a series of flaws, which render the draft Plan un-sound. As an alternative, we do believe our Client's site, known as Land at Old Moor Lane, Wooburn represents a sustainable alternative to the proposed allocations.
2. Consideration of the Proposed Allocations (Answers to Q1)
- Slate Meadow – (BE1)
- 2.1 Whilst Slate Meadow is one of the reserve sites released for development in 2014 this does not mean that it shouldn't undergo the same level of assessment and scrutiny that new allocations should undergo if it is to be included as a development site in the new plan.
 - 2.2 The plan making process offers the opportunity to look afresh at all options for development and should make strategic decisions based upon the most appropriate strategy. As set out below we consider that the site's inclusion in the plan is not the most appropriate strategy and the available evidence suggests that there are more suitable sites available for development. Moreover, it is considered that Slate Meadow is also not viable nor deliverable. It's continued inclusion in the plan is therefore considered unsound.

2.3 Our concerns with the continued allocation of the site can be summed up into the following:

- **Flood Risk** – The site is largely located within Flood Zones two and three. National Planning Policy continues to direct development away from the areas which are at most risk of flooding, such as the site in question.



- **Ecological Constraints** – There are a large number of ecological corridors across the site, including the River Wye corridor, the former railway line, hedgerows and ditches and bat foraging corridors due to the current lack of artificial lights. Bat species, their breeding sites and resting places are European protected species and are fully protected by law.
- **Highways Considerations** - The proposed primary access to the site will be onto Stratford Drive, where congestion issues already occur. Stratford Drive is already the only access serving a large number of houses as well as St Pauls C of E Combined School. Access onto the A4094 is via a difficult right-hand turn onto the busy road. Secondary accesses have already been ruled out as unsuitable. As such we question the logic of proceeding with this allocation.

2.4 All of the above, in effect, both question the ability to deliver housing on the site and constrain the amount of units likely to be accommodated on the site. It is therefore considered that the sustainability of the site is questionable, and the reliance on the delivery of the maximum capacity of this site to meet the OAN is not a sound approach to Planning. It is also considered that the removal of the Green Belt from this site, to facilitate the development falls short of meeting the exceptional circumstances required

to justify its removal. The very fact the Council have NOT identified that delivery of this site will lead to the merging of two settlements further reinforces their questionable approach to Green Belt Release. As such it is recommended that this allocation is removed from the Local Plan to ensure the plan can be found sound.

Hollands Farm (BE2)

2.5 Allocation BE2 is located on a sensitive edge of Bourne End and falls partly within the Settlement of Hedsor. Again we have serious concerns with the justification of the proposed allocation. The site is considered to fall within the least sustainable part of the settlement, and represents an awkward addition to Bourne End. Our concerns with the continued allocation of the site can be framed in the following categories:

- Heritage Impact – The site is close to the Hedsor Conservation Area. Under Paragraph 80, the NPPF states that a purpose of the Green Belt is “*to preserve the setting and special character of historic towns*”. It is considered that the development of some 467 homes, alongside the associated infrastructure will not preserve the special character of the adjacent Conservation Area. Rather it will cause irrevocable damage to the Conservation Area, which will be exacerbated by the amount of vehicle movements to the proposed school and health centre.
- Access – The site is proposed to be accessed from roads incapable of accommodating the demand generated by such an intense development. The current infrastructure is not capable of dealing with the demand. The intensification on the Local Road Network is likely to have a significant impact.
- Amount – The proposed allocation suggests some 467 dwellings can be delivered on the site. It is clear, that the constraints present on the site and the surrounding areas will result in delivery at a much lesser rate. As the Plan relies on the full delivery of housing on this site it is considered that its allocation unhinges the soundness of the plan.

2.6 As such it is considered that the continued allocation of the Hollands Farm site is not sound.



3. Consideration of the site at Old Moor Lane and Conclusion

3.1 We do strongly believe that the allocation of the site at Old Moor Lane can assist with ensuring the emerging Wycombe Local Plan is sound. Of particular concern is the apparent shift in view regarding the ability of the M40 to act as a barrier to coalesce with neighbouring settlements. The Arup study concluded, in no uncertain terms that the M40 prevents coalescence between Wooburn and Beaconsfield. Further comfort can be found in the lay of the land, which gently slopes down towards surrounding residential development in Wooburn. Which further removes any perception of the merging of Wooburn and Beaconsfield, as suggested by the Council.

The Council's position evolved through an apparent discussion with Arup. This has not been justified or indeed evidenced by the Council, and is a point that we completely disagree with.

- 3.3 The Council also suggest the site would lead to landscape harm. Again this is not evidenced by the Council in any manner. The site is essentially obstructed from wider views by existing residential development to the South and the M40 to the North. It is suggested that there may only be glimpsed views of the site from Neighbouring Flackwell Heath. However the site is not readily visible from public areas, and is largely indesernable from the wider surrounding residential area. It is recommended that the Inspector visits the site which represents a sustainable opportunity to meet the shortfall of housing need which may fall out of the exaggerated density assumptions employed by the Council or indeed the removal of the Hollands Farm Site from the Emerging Local Plan.
- 3.4 A full, detailed transport assessment has already been provided in previous submissions, which elicit full support for the access arrangements proposed by the site submission, again a point which has not been considered in sufficient detail by the Council. The Old Moor Lane site is suitable, deliverable and viable, which in turn can support the Council in meeting more of the objective assessment of Housing Need.
- 3.5 It is therefore recommended that the Council:
- Undergo main modifications to include the removal of site BE2 Hollands Farm and the inclusion of Old Moor Lane for 130 dwellings (and other sites more appropriate than Hollands Farm as necessary).
 - Undergo main modifications to include an increased buffer in housing delivery taking account of the risks associated with the inclusion of a number of urban sites where deliverability is questionable, whilst providing for full housing need within the District. Together with the inclusion of Old Moor Lane for 130 dwellings which can offer certainty of delivery in the early plan period.
 - Be withdrawn from the examination by the Council (and return to Reg 18 stage consultation on the Local Plan)
 - Be found unsound by the Inspector.