

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION
KEEP BOURNE END GREEN
HEARING STATEMENT IN RELATION TO MATTER 2

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 concerned primarily with Matter 2: Questions 1, 2, 3 and 6, however KBEG also comments on other Questions.

Questions 1: Is the Vision sufficiently aspirational and locally specific to form the basis for planning in Wycombe over the Plan period?

Question 2: Are the Plan’s objectives appropriate, positively prepared and justified and are they capable of delivering the vision for Wycombe District set out in the Plan?

5. KBEG has no particular issues with the wording of the Vision and Strategic Objectives set out over pages 19-25 of the Local Plan, but the Local Plan policies and allocations do not respect the Vision and Strategic Objectives and neither realise the vision nor deliver the objectives.
6. Wycombe District is a classic Green Belt area. It does not “Strengthen the Sense of Place” to release land from the (supposedly permanent) Green Belt, let alone to release substantial land from the Green Belt, but that is what the Local Plan does.
7. Similarly, when seeking to “Deliver housing” it does not give effect to the fact that Green Belt is a (weighty) policy constraint for the Local Plan to then proceed to deliver housing by releasing (supposedly permanent) Green Belt.

Question 3: Is the Plan's Spatial Strategy (Policy CP2) consistent with the requirements of the NPPF to promote sustainable development?

8. KBEG refers to its representation concerning Policy CP2 and its other representations (as noted below).
9. Policy CP2 and the Spatial Strategy is not consistent with the requirement of the NPPF to promote sustainable development, for three principal reasons (so far as relevant to KBEG).
10. First, because Policy CP2 underpins the allocation of substantial housing to an artificial construct “Bourne End and Wooburn” and includes that artificial construct within Policy CP2 (1)(b) as one of “four larger settlements” when there is no such settlement (see KBEG’s representation in relation to Policy CP3, made on its behalf by Pegasus, in particular section 1)¹.
11. Second, because in any event the settlements that (appear to – the Local Plan is unclear) make up “Bourne End and Wooburn”:
 - have limited local services and facilities (see KBEG’s representation in relation to Policy CP3, made on its behalf by Pegasus, in particular sections 2 and 3), such that they are inappropriate for the quantum of new housing proposed in any event;
 - will not be able to absorb the need for employment opportunities brought by the quantum of new housing proposed (see KBEG’s representation in relation to Policy BE2, made on its behalf by Pegasus, in particular section 5); and
 - would suffer severe transport impacts if the volume of housing proposed was distributed to them, not least through the release from Green Belt of Hollands Farm (see Appendix 2 (the Transport Feasibility Appraisal prepared by Motion – which document conveniently summarises matters at page 30) and see also KBEG’s representation in relation to Policy BE2, made on its behalf by Pegasus, and in particular section 5, and KBEG’s representation in relation to Policy CP4);
12. The (artificial construct) settlement the Local Plan terms “Bourne End and Wooburn” is clearly not a sustainable location for the substantial allocation of housing proposed by the Local Plan.
13. Third, because although the wording of Policy CP2 (1)(a)(ii) is broadly compliant with the NPPF, the working out of Policy CP2 (1)(a)(ii) fails to comply with the NPPF requirement that Green Belt be released only in “exceptional circumstances”.
14. The “exceptional circumstances” test is an exacting one, and no such exceptional circumstances exist here. Wycombe District is a Green Belt authority, and the policy drive to meet short-term housing need cannot constitute exceptional circumstances for the release of Green Belt that is intended to be permanent, particularly when all other options have yet to be explored/adequately explored.

¹ Note that the quotations from the draft Development Brief for Slate Meadow are retained in the final Development Brief of February 2018.

Question 4: Does the Plan reflect the strategies and proposals of infrastructure providers?

15. KBEG cannot say whether the Local Plan reflects the strategies and proposals of infrastructure providers as a whole (KBEG has had to target its resources to Bourne End and surrounding settlements), but it is clear that in terms of both transport infrastructure and education infrastructure the artificial construct of “Bourne End and Wooburn” cannot sustainably receive the substantial new housing the Local Plan seeks to distribute to it (and that if Police BE2 is to deliver a primary school in its own right that is an obvious impediment to delivery). See KBEG’s representation concerning Policy BE2, made on its behalf by Pegasus, in particular section 5, and for transport in particular see also Appendix 2 (the Transport Feasibility Appraisal prepared by Motion).
16. As regards transport, it is apparent that without substantial improvement of the local road network the distribution of some 800 new homes to “Bourne End and Wooburn” will have severe transport impacts, so failing the test set by the NPPF. That this is proposed to be done by the release from Green Belt of Hollands Farm makes the position worse.

Question 5: Has the Plan’s Spatial Strategy been positively prepared, is it justified and will it be an effective mechanism for delivering growth over the Plan period?

- a) ***Does the Plan’s Spatial Strategy represent an effective approach to delivering sustainable development (Policy CP1) over the Plan period?***
 - b) ***What are the key components of the Plan’s Spatial Strategy and how do they interact?***
 - c) ***Does the Plan’s Spatial Strategy effectively link transportation, employment and housing growth?***
17. There is no justification for the conclusion that Wycombe District has “four larger settlements” when one of those is the artificial construct of “Bourne End and Wooburn”, nor is directing the substantial development proposed by the Local Plan to “Bourne End and Wooburn” sustainable.

Question 6: Has the Settlement Strategy (Policy CP3) been positively prepared, justified and will it be effective in delivering sustainable growth?

- a) ***How has the settlement hierarchy been defined and what level of growth is proposed for each tier?***
18. KBEG refers in particular to its representation concerning Policy CP3, made on its behalf by Pegasus.
 19. The Settlement Strategy (Policy CP3) is neither justified, nor effective, nor consistent with national policy and it will fail to deliver sustainable growth, certainly insofar as the artificial construct that is “Bourne End and Wooburn” is concerned.
 20. There is no evidential basis that can or could justify the Local Plan’s reliance on a “Tier 2” “settlement” at “Bourne End and Wooburn”, when there is no such settlement and what the Council has done is artificially seek to lump together multiple separate settlements.

21. The Local Plan's construction of "Bourne End and Wooburn" is not only artificial but self-serving, as it is then used to justify placing that "settlement" in "Tier 2" of the settlement hierarchy and distributing new housing to it accordingly.
22. There is, in any event, no evidential basis for the Local Plan then treating the artificial construct of "Bourne End and Wooburn" as a "Tier 2" settlement, even if it were a settlement rather than a number of separate settlements, and the approach taken by the Local Plan is not justified.
23. Bourne End and Wooburn are rural settlements, correctly treated as such by the current Core Strategy, and nothing has changed to alter that. Similarly the current Core Strategy's distinct treatment of the other "Tier 2" settlements, Marlow and Princes Risborough, remains justified. By reference to size, population, limited local services and facilities (contrast with Marlow and Princes Risborough and compare with "Tier 3" settlements), equally by reference to Bourne End's (appropriate) designation as merely a District Centre by the Local Plan (contrast the Town Centres of Marlow and Princes Risborough), and the fact that "Bourne End and Wooburn" in any event fails the Council's own criteria for a Tier 2 settlement (there is no indoor sport or leisure facility), if the artificial construct of "Bourne End and Wooburn" is to be maintained it should on any view be a Tier 3 settlement.
24. It is also not effective to direct substantial development to "Bourne End and Wooburn" based on a Tier 2 ranking, given the obstacles to delivery presented by, inter alia, the transport impacts of such development (see answers to other Questions above).
25. Fundamentally, it is not sustainable to direct the substantial quantum of development to "Bourne End and Wooburn" as the Local Plan does, when the settlements that make up that artificial construct are ill-equipped individually or collectively to receive it and when it requires release of Green Belt.

Keep Bourne End Green

29 June 2018