
Wycombe District Council Local Plan Examination in Public

Hearing Statement – Matter 2 – Catesby Estates plc
(ID 1168)

1. Introduction

- 1.1. Savills is the agent for Catesby Estates plc in relation to the draft allocation at Hollands Farm, Bourne End (Policy BE2). The allocation is in two ownerships; Jacksons Field and Hollands Farm. Catesby Estates Plc has been appointed as the land promoter for the larger, southern portion of the site and is working alongside the second landowner/developer to deliver the allocation. Hollands Farm, as referenced to in this document, refers to the southern portion of the allocation. This statement addresses the questions for Matter 2 set out in the Matters, Issues and Questions identified by the Inspector, dated May 2018.
- 1.2. Matter 2 - the main topic identified by the Inspector for this session is the Plan's Strategy.
- 1.3. Using the same numbering as in the Matters, Issues and Questions document we set out below a response to the questions that are relevant to our case. Representations were duly submitted to the Submission version of the Local Plan dated 1 December 2017. This statement should be read in the context of those representations. The comments set out below are in addition to those in the earlier representations.
- 1.4. With this Hearing Statement, the following documents submitted to the examination area relied upon;
 - Sustainability Appraisal (Examination Ref: SA1, SA2, SA3, SA4, SA5)
 - Settlement Hierarchy (Examination Ref: SHS1)
 - Housing and Economic Land Availability Assessment September 2017 (HELAA) (Examination Ref: HELS1)
 - Housing Market Area and Functional Economic Market Areas in Buckinghamshire (2016) (Examination Ref: HMA1, HMA2, HMA3, HMA4)
 - Green Belt assessment (Examination Ref: GB1, GB2)
 - Habitats Regulations Assessment (Examination Ref: WDLP3)

2. Discussion of Matters

Question 3 – Is the Plan’s Spatial Strategy (Policy CP2) consistent with the requirement of the NPPF to promote sustainable development?

- 2.1. Section 19 of the Planning and Compulsory Purchase Act 2004, the SEA Directive, implemented through the Environmental Assessment of Plans and Programmes Regulations 2004 and the NPPF requires Local Plans to promote sustainable development. The sustainability of the Wycombe District Local Plan submission version was assessed via the Sustainability Appraisal, published in September 2017 (*WDLP2 Sustainability Appraisal (SA) of the publication (regulation 19) draft of the Wycombe District Local Plan*).
- 2.2. A sustainability appraisal is a systematic process that must be carried out by local authorities during the preparation of a Local Plan. Government guidance states that its role is to *‘promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’*
- 2.3. A sustainability appraisal is therefore integral to the preparation and development of a Local Plan and work should start at the same time work starts on developing the Plan. Government guidance states that sustainability appraisal should only focus on what is needed to assess *‘likely significant effects’* and *‘does not need to be done in more detail than is considered to be appropriate for the content and level of detail in the Local Plan’* (Planning Practice Guidance).
- 2.4. For the current stage of the WDLP, the Sustainability Appraisal confirms that while there is an Objectively Assessed Housing Need for the District of 13,200 homes for the period 2013-2033 the housing capacity for the District for this period is 10,925. As part of the Duty to Cooperate Aylesbury Vale has agreed to accommodate 2,275 homes in the Vale of Aylesbury Local Plan.
- 2.5. After appraising alternatives for the Local Plan, WDC chose Option B as their preferred approach for the spatial strategy, detailed below.
- 2.6. Appendix III of the Sustainability Appraisal contains the appraisal of the site options. Site options (sites which were available, deliverable and potentially suitable for allocation) were appraised in early 2017. This provided an evidence base to facilitate the development of strategic alternatives for settlements growth and District-wide spatial strategy options.
- 2.7. The submission version of the plan focuses the majority of development at the larger settlements (determined at Tier 1 or Tier 2 in the Settlement Hierarchy) but also directs a number of new homes towards smaller settlements. It is deemed that this will help meet housing needs for all communities within the District and the submission version of the plan as a whole was appraised to have a *‘significant long term positive effect’* in terms of housing.
- 2.8. The Housing and Economic Land Availability Assessment September 2017 (HELAA) identifies the availability and suitability of sites across the District with the potential to accommodate housing and employment as well as other uses. Updates to the Green Belt and AONB assessments were published in 2016 and these informed the identification of sites through the HELAA as well as their potential capacity to accommodate development.

- 2.9. GIS tools were used to inform the assessment of sites by measuring how each option related to various constraint and opportunity features. A Significance Key was established to show the criteria for the Sustainability Appraisal. In our opinion this process shows that WDC have undertaken the assessment in a systematic, evidence-based approach as supported by guidance.
- 2.10. Government guidance (2015) requires that sustainability appraisals need to:
- Compare all reasonable alternatives to the preferred approach and assess these against baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted;
 - Predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each;
 - Identify, describe and evaluate the significant effects on environmental, economic and social factors using the evidence base;
 - Identify any likely significant effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. It must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward;
 - Consider realistic and deliverable reasonable alternatives sufficiently distinct to highlight the different sustainability implications of each;
 - Outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach and provide conclusions on the overall sustainability of the alternatives;
 - Be an iterative process with the proposals being revised to take account of appraisal findings.

How the WDC Sustainability Appraisal compares to these criteria is discussed below.

- 2.11. WDC considered both 'top-down' and 'bottom-up' factors when assessing the evidence base for growth options to deliver the spatial strategy. Evidence from the Bucks HEDNA, including population and employment data based on objectively assessed housing need (OAN) and Oxford Economics projections informed the top-down considerations. Methodology agreed across the Buckinghamshire Districts was used to identify sites set out in the five-year housing land supply and HELAA which formed the bottom-up evidence. As stated in paragraph 3.2, WDC determined Option B of the five Options to be the most sustainable and appropriate option to meet the spatial strategy in a manner consistent with the NPPF. The detail of each Option and how these were assessed is detailed in Chapter 4 and Appendix VI of the Sustainability Appraisal (September 2017).
- 2.12. In line with the NPPF it was considered that major growth within the AONB would not be appropriate and that there were *'no exceptional circumstances to justify it at this stage'* (Sustainability Appraisal, paragraph 4.4). Princes Risborough and Kimble (outside the AONB and Green Belt) were considered to be settlements realistically capable of delivering additional growth. However, in order to meet the OAN it was also considered appropriate to revisit findings of the Green Belt assessment through a number of proposed options. These are considered in detail in Chapter 5 of the Sustainability Appraisal.

- 2.13. Option B is determined to be the preferred spatial strategy informed by identifying sites in sustainable locations in accordance with the Settlement Hierarchy and an assessment of density and capacity at the site. This strategy only proposes sites that protect the AONB and perform weakly against the 5 Green Belt purposes based on evidence from the Green Belt assessment. A Habitats Regulations Assessment was also undertaken to assess effects on SACs which determined there to be limited effect of new development.
- 2.14. Of the nine criteria of the Sustainability Appraisal, Option B concludes that there will be a significant net positive effect on 3 of these, an uncertain or neutral effect on 2 and a residual minor negative effect on 4. The cumulative effects of the policies in the submission version of the Local Plan are determined to significantly reduce in-combination impacts of housing growth. Of the other Options appraised, Option A was deemed to have the same effect but would deliver less housing and employment and Options C, D and E would have more significant negative effects.
- 2.15. The methodology for the Sustainability Appraisal is published and detail contained within the text. The HEDNA, HELAA and Green Belt Assessment evidence, used to inform the Options appraised, are also published. Chapter 8 of the Local Plan highlights how findings of the Sustainability Appraisal have been taken into account throughout the submission version of the Local Plan. It can therefore be seen that reasonable alternatives to the spatial strategy were robustly considered.
- 2.16. A key tenet of the spatial strategy is directing development towards the most sustainable locations in the District as determined by the Settlement Hierarchy and evidence is published to support the designations. Settlements identified in Tiers 1 and 2 have the largest populations, are well connected and accessible and have employment opportunities and community facilities. Settlements assessed as Tier 3 either have a far smaller population, poorer access to services and public transport or both. Settlements in lower tiers tend to be smaller again. It is therefore reasonable to consider the spatial strategy of directing development towards settlements in Tiers 1 and 2 as sustainable and in line with the requirements of the NPPF.
- 2.17. Appendix 3 of the Sustainability Appraisal (September 2017) details the site options which were appraised and their rating against 15 sustainability criteria. The HELAA was used to identify and assess sites based on updates to the Green Belt and AONB assessments and detail regarding the rating against each criteria is detailed in this Appendix.
- 2.18. Release of Green Belt sites was considered based on evidence from the Green Belt Assessment Parts One and Two. The methodology for assessing and ranking Green Belt areas is clearly explained in these documents. Bourne End and Wooburn are identified as Non-Green Belt Settlements in this Assessment. The Green Belt Part 2 report reviewed the Hollands Farm Bourne End site and indicated that exceptional circumstances exist in this case for removing the site from the Green Belt. The land is enclosed as assessed and mitigation for recreational need would alleviate impact on Burham Beeches SAC. Alternative sites identified in the Green Belt also fell within AONB designations and therefore were correctly identified as less sustainable as government and NPPF guidance limits development in the AONB, the extent of which WDC does not control.

- 2.19. The Green Belt review also identified a number of different sites which would be considered alternatives to Bourne End and others identified for development in the Local Plan. These were assessed against criteria including the need for a site to be capable of providing sustainable development. This included being a logical extension to an existing settlement in Tiers 1-4 which included transport hubs. Another criteria was the need for the site to be suitable from a '*detailed sustainability perspective*' in line with the NPPF. Although not a sustainability appraisal as such, sustainability was clearly therefore considered in line with the NPPF and the policies of the submission version of the Local Plan. Sustainability was therefore considered at this stage as well as later in the Sustainability Appraisal.
- 2.20. In the HELAA sites were only considered if they were determined to be in a sustainable location as defined by the Settlement Hierarchy. Bourne End and Wooburn are designated as a Tier 2 settlement in this. In the Detailed Settlement Audit and boundary maps appended to this document it can be seen that there is no break in the development between the two settlements and that there is good access to shops, schools and facilities. Bourne End and Wooburn fall within the same parish as demonstrated through the Neighbourhood Plan Designation Area (designated on 9th February 2015). Therefore, categorisation as a Tier 2 settlement is correct. The population of Bourne End and Wooburn (approximately 6,890) is only approximately 1,000 less than Princes Risborough (another designated Tier 2 settlement) and it is better connected to High Wycombe, Marlow and Maidenhead. The Bourne End railway station also provides rail links to Maidenhead and hence, Crossrail. Settlements assessed as Tier 3 either have a far smaller population, poorer access to services and public transport or both and accordingly smaller sites are directed to these settlements.
- 2.21. This shows that the approach to use Sustainability Appraisal methodology once a site has gone through the Green Belt Review and HELAA process is sound.
- 2.22. The Sustainability Appraisal shows the site at Hollands Farm to be rated a 'major positive' in regards to accessibility. This is supported by Catesby's Masterplan Delivery Document (December 2017) submitted in conjunction with representations to Wycombe District Council Local Plan publication version (Reg 19) consultation which details the sustainability of Bourne End. Additionally, a proposal on the site would contribute to the improvement of existing facilities or provide new ones and therefore the judgement as a positive contribution could be appropriate.
- 2.23. It is also clearly considered in the Sustainability Appraisal that mitigation as part of any development on the site at Hollands Farm could reduce impact on the historic environment, surrounding landscape and provision of green space.
- 2.24. How a Sustainability Appraisal should assess a Plan and identify effects was outlined in paragraph 2.12. In our opinion, WDC have broadly complied with these requirements as detailed below.

Sustainability appraisal requirement	Consideration
Compare all reasonable alternatives to the preferred approach and assess these against baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted;	In our opinion reasonable alternatives are discussed in detail in the WDC Sustainability Appraisal against baseline data which is detailed in Appendix II.
Predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each;	In our opinion the preferred approach and its effects are estimated and discussed in the Sustainability Appraisal, Part 1 Chapters 4-6, although there could be clearer evidence as to the reasoning behind the conclusions. Positive and negative effects of options are discussed.
Identify, describe and evaluate the significant effects on environmental, economic and social factors using the evidence base;	In our opinion the sustainability approach considers these throughout with reference to the evidence base.
Identify any likely significant effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. It must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward;	In our opinion mitigation is assessed although further information could be required demonstrating how this was assessed for alternatives (Sustainability Appraisal Part 1, Chapter 5 and Part 2, Chapter 8) .
Consider realistic and deliverable reasonable alternatives sufficiently distinct to highlight the different sustainability implications of each;	In our opinion a range of reasonable alternatives for the spatial strategy and site options were considered and detailed (Sustainability Appraisal Part 1 and Appendix III).
Outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach and provide conclusions on the overall sustainability of the alternatives;	In our opinion this is demonstrated robustly in the Sustainability Appraisal (Sustainability Appraisal Part 1, Chapters 5 and 6 and Appendices).
Be an iterative process with the proposals being revised to take account of appraisal findings.	In our opinion this is demonstrated robustly throughout the Sustainability Appraisal.

2.25. It can be seen that the methodology used in completing the Sustainability Appraisal of the submission version of the Local Plan spatial strategy and site identification is sound and detail is provided as to how evidence was used in making the assessments.

2.26. It can therefore be seen that the spatial strategy and sites identified within it is consistent with the requirement in the NPPF to promote sustainable development.

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?

2.27. Section 19 of the Planning and Compulsory Purchase Act 2004, the SEA Directive, implemented through the Environmental Assessment of Plans and Programmes Regulations 2004 and the NPPF requires Local Plans to promote sustainable development. The sustainability of the Wycombe District Local Plan (regulation 19) submission version was assessed via the Sustainability Appraisal, published in September 2017.

2.28. Please see our response to Question 3 for detail regarding the Sustainability Appraisal which considers the approach to delivering sustainable development over the Plan period.

- 2.29. This shows therefore that the submission version of the Local Plan and Policy CP1 represent a spatial strategy that has been positively prepared, justified and will be an effective approach to delivering sustainable development to meet housing and employment needs in the District.

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