

**Wycombe Local Plan Hearing Statement -  
Matter 5 - Natural, Built and Historic  
Environment**

Land off Holtspur Avenue, Wooburn Green

**Representor ID: 1165**

**IM Land**

June 2018

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# 1. Introduction

- 1.1 This statement has been prepared on behalf of our Client, IM Land, in relation to Matter 5 of the Wycombe District Council ('WDC') Local Plan Examination.
- 1.2 Our Client has promoted 'Land at Holtspur Avenue, Wooburn Green' through the emerging Local Plan and whilst we appreciate that the Inspector does not wish to consider omission sites at this time, there are a number of issues which are pertinent to considering whether the Local Plan meets the tests of soundness as required under paragraph 182 of the Framework. We consider that our client's site has not been adequately considered or assessed by the Council, despite its merits.
- 1.3 Our Client has submitted representations to the AVDC Local Plan Examination on account of number of matters being raised by the Inspector relating to the soundness of the Local Plan. In particular he is raising questions regarding whether the level of unmet need to be accommodated within AVDC from the Buckinghamshire Authorities is appropriate and justified. We would invite the WDC Inspector to liaise with her colleague on this matter, given that the AVDC EiP will be held slightly in advance and concurrent to that for WDC.
- 1.4 We do not repeat the detailed submissions made at Regulation 19 stage. This statement specifically addresses Issues raised by the Inspector under Matter 5 of the Hearing Timetable which relate to the Inspector's questions associated with the Natural, Built and Historic Environment.

## 2. Matters to be examined

**Issue 1: Does the Plan provide a framework for the management of the Natural, Built and Historic Environment that is soundly based, justified and consistent with the requirements of national policy?**

### **b) Policy CP10 (Green infrastructure and the natural environment);**

- 2.1 The Plan does not ‘*conserve, protect and enhance the AONB*’ through allocating major development sites within the AONB.
- 2.2 It is also clear from the objection from the Chilterns Conservation Board to the Local Plan that WDC has failed to facilitate positive discussions regarding a number of sites proposed for allocation within the spatial strategy and nor received support with regard to the soundness of the Local Plan at this time. At present, this policy is at odds with the broader spatial strategy of the Local Plan. It may be appropriate for smaller sites to come forward within the AONB where they demonstrate that they will ‘*conserve, protect and enhance the AONB*’ through the Council’s evidence base to the Local Plan.

### **e) Policy DM30 (The Chilterns Area of Outstanding Natural Beauty);**

- 2.3 We do not object to the policy itself, but more its application in light of the spatial strategy proposed by the Council. Paragraph 115 of the Framework states that ‘*great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.*’
- 2.4 We do not consider that great weight has been given to the AONB, given the major allocations proposed within the AONB particularly at Stokenchurch where no overriding public interest point demonstrated. This view is shared with the Chilterns AONB Board.
- 2.5 We consider that the Inspector’s Reports into both the Vale of White Horse Local Plan Examination and the West Oxfordshire’s Local Plans are clear on this matter where sites proposed for development within the AONB were advised to be removed from the Local Plan due to failing to comply with the relevant paragraphs of the Framework. The relevant Report’s are enclosed at **Appendix 1**.
- 2.6 We have further enclosed an independent review by Turley of the LVIA position in relation to the proposed residential allocations for consideration at Examination enclosed at **Appendix 2**.

### **i) Policy DM34 (Delivering green infrastructure and biodiversity in development**

- 2.7 Whilst the broad aspirations of the Policy are supported, concern is raised regarding the following specific requirements:

*“b) Achieve a future canopy cover of at least 25% of the site area on sites outside of the town centres and 0.5HA or more;*

*c) Within town centres and on sites below 0.5HA development is required to maximise the opportunities available for canopy cover (including not only tree planting but also the use of green roofs and green walls.”*

- 2.8 Even if a degree of planting were to be appropriately secured through biodiversity offsetting to compensate for the level of development proposed, it is unclear why the Council would seek to artificially constrain the development capacity of what it considers to be the most suitable locations for development in the District, thereby further bringing into question the deliverability of its housing target.
- 2.9 If the principle of the requirement of criterion b were to be accepted, it would remain unclear as to how the future canopy cover is to be calculated. Whilst the Council have clarified that it is future canopy cover that is to be considered not at the immediate planting stage, clearly there will remain significant differences as to whether this is assessed 5, 10 or 100 years into the future.
- 2.10 Furthermore, depending on the ‘future’ timescale envisaged, the level of canopy cover will be dependent on the level of future growth of saplings. Whilst conditions requiring replacement planting should the existing plants die are generally applied in permitting new developments, these are normally for a period of 5 years and therefore there remains a degree of uncertainty as to the level of canopy growth which will be experienced. Clearly the level of growth will also be impacted by other factors such as climatic conditions.
- 2.11 If the Council are willing to include the use of green roofs and green walls in relation to town centre sites, it is unclear why this approach could not equally be applied to non-town centre sites. The draft Local Plan requires a mix of dwelling types to be delivered as part of new developments which is likely to include a proportion of flatted development where the inclusion of green roofs could be an acceptable and appropriate design solution.
- 2.12 Should the principle of the requirement be accepted, which as outlined above we have significant concerns regarding, it is unclear why solutions such as green roofs should not be considered as counting towards this requirement in non-town centre locations.
- 2.13 The application of this policy is not included within the Site Capacity Assessments for AONB and Green Belt Sites and there is no evidence to suggest this has been applied to other sites contained within the Council’s Housing Land Supply. If this were to be applied at the application sites of the reserve sites this would further significantly reduce the capacity of the sites and the ability of the Council to meet its housing target.

## **Appendix 1: WODC Interim Inspector's Report and VoWH Inspector's Report**

## Inspector's Note to the Council (1)

### Development Within the North Wessex Downs AONB

Following on from the discussion at Hearing Session 2 and prior to the more detailed discussion on the allocated sites in the AONB I thought it would be helpful to set out my current thinking regarding development within the AONB. I must stress that I have drawn no conclusions on the issue and will not do so until I have heard the evidence relating to the settlements and the allocated sites in the AONB.

The Core Strategy (CS paragraph 4.11) confirms that the conservation and enhancement of the natural beauty of the protected landscape will be the primary consideration in the allocation of sites in the AONB. In order to achieve this objective CS policy ADPP5 states that provision will be made for up to 2,000 dwellings (as opposed to the 'at least' and 'approximately' referred to in the other ADPPs).

It is clear to me that the CS Inspector considered the 2,000 figure to be a cap and indeed he confirms that this is not a figure that has to be achieved and that delivering a lower number would be acceptable (paragraph 78 of his Report).

Great weight must be given to the conservation of the landscape and scenic beauty of the AONB but I acknowledge that this does not necessarily mean that new sustainable development would be objectionable. However, bearing in mind that overall the Council is proposing a higher level of development than the 'at least 10,500 dwellings' set out in the CS the justification for the 'overprovision' of 91 dwellings in the AONB (as set out in Appendix 4 of the Council's Statement on Issue 1) would have to be robust.

The Council describe the Housing Site Allocations DPD as a 'daughter' document to the CS. As such I would expect the level of compatibility between the two documents to be high. I am not yet convinced that this has been achieved with regard to housing allocations within the AONB.

On this basis I am currently not satisfied that the Council is advocating the most appropriate strategy for the AONB when considered against the reasonable alternatives.

I do not expect a detailed written response at this stage but I thought it would be helpful to set out my current thinking and to invite the Council to consider what options are available in order that these initial concerns can be satisfactorily addressed. A brief preliminary written response to this Note by Monday 4<sup>th</sup> July would be helpful, as there may be implications for the relevant forthcoming hearing sessions.

*David Hogger*

Inspector

24<sup>th</sup> June 2016

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By email

7 June 2016

Dear Mr Duffield

**Vale of White Horse Local Plan 2031: Part 1 Examination - Inspector's Interim Findings**

1. Introduction

1.1 Following the completion of the Stage 1 and Stage 2 hearing sessions, and based on all that I have now read, heard and seen, I write to set out my interim findings on the Vale of White Horse Local Plan 2031: Part 1. However, I emphasise that this is not my final report on the Examination and that these findings may be subject to change dependent upon, amongst other things, the Council's response to my requests below and the results of Sustainability Appraisal, Habitats Regulations Assessment and consultation on proposed modifications.

1.2 In essence my findings fall into one of four categories:

- a. Aspects of the plan which I consider are likely to be found sound/legally compliant. In this letter I deal with these matters very briefly and, as highlighted by a \* in the relevant paragraphs, I will set out my reasoning for these conclusions in my final report;
- b. Aspects of the plan which I consider are likely to be found sound, subject to main modifications along the lines of those discussed at the relevant hearing sessions. Again, as highlighted by a \* in the relevant paragraphs, I will set out my reasoning for these conclusions in my final report. I have read the draft modifications which the Council has prepared in the light of the hearings, a number of which are likely to need revision to ensure that the plan

would be sound. I will contact the Council in due course with detailed comments on the proposed modifications.

- c. Aspects of the plan (relating to housing allocation sites 12 and 13 and land proposed to be removed from the Green Belt but not allocated for any particular use) which I consider are unsound but which could potentially, through modification (ie not one currently proposed by the Council), be made sound. These are matters on which I am inviting the Council to confirm how it wishes to proceed; and
- d. Aspects of the plan (relating to housing allocation site 6 and Botley Central Area) on which I need further evidence before I can reach a conclusion in respect of soundness. However, whilst important in their own right, these are matters in relation to which I envisage the plan is likely to be capable of being found sound, albeit potentially subject to modification.

## 2. Duty to Co-operate

- 2.1 I conclude that the Council has adequately discharged its Duty to Co-operate in preparation of the plan.\*

## 3. Objectively-Assessed Need for Housing

- 3.1 I am satisfied that 20,560 dwellings is a soundly based figure for the objectively-assessed need for housing in the district for the plan period.\* However, this does not automatically mean that the appropriate housing requirement figure for the plan is also 20,560 and I deal with possible constraints and my conclusions on the housing requirement figure in section 12 below.

## 4. Unmet Housing Needs from other Districts

- 4.1 I am satisfied that, at the present time, the plan's broad approach to addressing, within the Vale, potential unmet housing needs from other districts is soundly based – ie that provision, in overall numerical terms at least, for unmet housing needs from other districts, over above the Vale's own identified needs, will be made in a subsequent DPD. However, in the interests of clarity and to incentivise the Council to ensure that such needs are planned for in a timely manner, modification of policy CP2 along the lines of that discussed at the hearings is necessary.\* As previously mentioned I will contact the Council separately regarding the modifications it has proposed to date ('Strikethrough Local Plan'), but I note that whilst the Council's draft modification of paragraph 1.28 of the supporting text broadly reflects the discussions at the Stage 1 hearing session, the most recent draft proposed wording of policy CP2 is, seemingly, not entirely consistent with this supporting text. Whilst it is appropriate that the extent of provision with the Vale for unmet housing

needs from other districts is ultimately defined through a DPD for the Vale, it is equally appropriate for me to ensure that the Council is incentivised to adopt such a plan as quickly as possible.

- 4.2 One of the key reasons for my conclusion on the issue of unmet housing needs is the fact that, as detailed in section 8 below, the plan will enable some 1500 or so new dwellings to come forward in the Abingdon-on-Thames and Oxford Fringe area (sites 1,2,3 and 4) which are very unlikely to secure planning permission unless and until the plan is adopted. Even in the absence of agreement on the level and distribution of unmet needs, dwellings on these sites would be as likely to be occupied by households comprising part of Oxford City's housing need as that of the Vale, notwithstanding the wishes or policies of the Councils.
- 4.3 I understand that it is intended that the Oxfordshire Growth Board will publish a Memorandum of Understanding by the end of September 2016 setting out a distribution between the districts of unmet housing needs. It is, thus, very likely that this will be published before this plan is adopted. There appears to be some disagreement over the extent to which the distribution will be a definitive figure and ideally the Statement itself will clarify this point as far as is possible. However, even if it is a definitive figure, it would then inevitably take some time for the Vale to identify, test and consult on appropriate sites to fully meet the agreed figure. Consequently, if this plan were to be delayed to address the agreed distribution, it would also delay the delivery of dwellings on sites 1,2,3 and 4 to the detriment of actually providing for (as opposed to simply including allocations within a plan for) at least some of Oxford City's housing needs.
- 4.4 However, obviously it will be necessary for me to keep this particular finding under review in the light of the emerging work of the Growth Board.

## 5 Settlement Hierarchy

- 5.1 Subject to the receipt of further information in respect of East Hanney (see section 10), and to a modification necessary to address factual errors, I am satisfied that the settlement hierarchy (policy CP3) is soundly based.\*

## 6. Housing Supply Ring Fence

- 6.1 I am satisfied that the general principle of a housing supply ring fence for the Science Vale area is sound.\* However, to ensure effective operation of the ring fence, modification of policy CP5 is necessary to align the ring fence area with the boundary of Science Vale and to explicitly state how it is intended that the policy will be applied. I will provide detailed comments on the Council's currently proposed modification of policy CP5 in due course.

7. Employment Land

- 7.1 I am satisfied that the provision for meeting business and employment needs set out in policy CP6 is soundly based, although a modification to the wording of the policy or its supporting text is likely to be necessary in the interests of clarity.\*

8. Green Belt

- 8.1 In view of the level of employment growth envisaged in Science Vale it is appropriate that the majority of new housing during the plan period is located in the South East Vale sub-area of the district. However, the Abingdon-on-Thames and Oxford Fringe sub-area contains the Vale's largest settlement (Abingdon) in addition to the local service centre of Botley and a number of larger villages, including Radley and Kennington. A significant part of the OAN arises from forecast demographic changes, which point to a need for new housing in this part of the district. This part of the district is also closest to Oxford City which, notwithstanding the growth of Science Vale, is likely to remain a very important centre for employment and services for residents of the Vale. The plan's indicated requirement for housing in this sub-area is thus soundly based.
- 8.2 The built-up areas of Botley, Radley and Kennington are very closely bounded by Green Belt, as are the eastern, northern and western sides of Abingdon. Whilst land to the south of the built-up area of Abingdon is outside the Green Belt, access difficulties and potential flooding render its development for housing highly problematic. Some new housing is appropriate to support the villages in the southern and western parts of the Abingdon-on-Thames and Oxford Fringe sub-area (which lie beyond the Green Belt). However, given their distance from and limited public transport links with Abingdon, Botley and Oxford, they would not be a sustainable location to provide for the majority of the sub-area's housing requirement, most of which is likely to arise from people currently living in Abingdon, Botley, Radley and Kennington.
- 8.3 Given this situation I consider that it was appropriate for the Council to undertake a review of the Green Belt boundaries and, having regard to all that I have read, heard and seen, I conclude that the exceptional circumstances exist to justify removing from the Green Belt the sites allocated for housing in the plan to the north of Abingdon and at Radley and Kennington (sites 1, 2, 3 and 4).\* I deal below with the other parcels of land at Abingdon, Radley and Kennington which are proposed for deletion from the Green Belt.
- 8.4 It is the desirability of providing for housing needs in the Abingdon-on-Thames and Oxford Fringe sub-area, in close proximity to Abingdon and Oxford City, that is fundamental to my conclusion that exceptional circumstances exist to justify removing from the Green Belt the sites indicated above. However, in addition, the plan proposes to delete from

the Green Belt some 15 or so other parcels of land at Botley, Chawley, North Hinksey, Cumnor, Wootton and Appleton; land which would not be allocated for any particular use. Whilst there is interest in developing some of these parcels of land for housing it has not been argued that any could accommodate the plan's minimum threshold of 200 dwellings. My conclusion on the appropriateness of this threshold is set out section 13 below.

- 8.5 Given their distance from housing allocation sites 1,2,3 and 4 it cannot reasonably be argued that deletion of land from the Green Belt at Botley, Cumnor, Wootton and Appleton would be necessary to ensure logical, defensible and permanent Green Belt boundaries at Abingdon, Radley and Kennington.
- 8.6 I am also unconvinced by the Council's contention that these are all parcels of land which make little or no contribution to the purposes of including land in the Green Belt as, if nothing else, it appears to me that many of them prevent encroachment of the countryside. Moreover, based on the limited reasoning set out in the Green Belt Review, it is unclear to me why some parcels of land at/adjacent to specific settlements are proposed to be removed from the Green belt whilst other, apparently similar, parcels of land at/adjacent to the same settlements are not.
- 8.7 The Council has argued that, whilst not currently identified for housing, these parcels of land could potentially come forward for such use as part of the 1000 dwellings which policy CP4 indicates will be allocated through Neighbourhood Plans or the Local Plan Part 2, and/or to meet unmet needs from other districts. I note that the plan does not identify these parcels of land as "safeguarded land" and nor do I consider that they could be so classed given the statement in the Framework that such land is to meet longer-term development needs stretching well beyond the plan period. Secondly, based on what I have read and heard, it appears to me unlikely that many such allocations would come forward through Neighbourhood Plans. Furthermore, the Council has accepted that the total amount of land proposed to be deleted from the Green Belt across these parcels of land would be likely to far exceed that required to meet the Vale's yet to be allocated housing land. However, retaining these parcels of land in the Green Belt now would not prevent the deletion from Green Belt of any of them through the Part 2 plan if the necessary exceptional circumstances could be demonstrated at that time.
- 8.8 Moreover, in finding the plan's overall approach to addressing unmet housing needs from other districts sound, I concur with the Council's fundamental argument that such needs cannot be soundly planned for when their total amount and appropriate distribution are yet to be agreed. In this context I am therefore unconvinced by the confidence expressed by the Council at the hearings that the land proposed to be deleted from the Green Belt at Cumnor, Botley, Appleton and Wootton would be sufficient to provide for the yet to be allocated Vale's own housing needs

and the yet to be agreed share of unmet needs from other districts to be accommodated in the Vale. Until the Growth Board agrees the distribution of any unmet needs between the Oxfordshire districts it will not be possible to determine how much land in the Vale will be required to meet these needs. Consequently, the 15 or so parcels of land proposed to be deleted from the Green Belt might prove to be either insufficient or more than is required.

- 8.9 Policy CP2 indicates that a full strategic review of the whole Oxford Green Belt will be undertaken as part of the Oxfordshire Growth Board's work in respect of addressing unmet housing needs and identifies that any resulting alterations to the Green Belt boundary would be progressed through a full or partial review of the Local Plan or separate DPD. The Council is now proposing a modification to make clear that the Part 2 plan will allocate sites to meet the Vale's share of unmet housing needs.
- 8.10 Having regard to the Framework it is not ideal for a Local Plan to include alterations to Green Belt boundaries and also an indication that further alterations may be necessary during the plan period. However, any such alterations could only come forward through a new or reviewed Local Plan and I conclude that this approach is much preferable to deleting land from the Green Belt and not allocating it for any purpose when there is a significant risk that the land would be either insufficient, or more than is needed, to meet yet to be determined housing needs. For these reasons I conclude that, at the present time, the exceptional circumstances necessary to justify removing from the Green Belt the parcels of land at Botley, Cumnor, Wootton and Appleton do not exist.
- 8.11 The plan also proposes the removal from the Green Belt of the built-up area of the 'smaller' village of Farmoor, such that it would be 'inset' within the Green Belt. Whilst this would bring Farmoor in line with the already 'inset' settlements of Appleton, Botley, Cumnor, Kennington, Radley and Wootton, I have seen no detailed evidence to justify this particular change. Moreover, it is unclear to me why Farmoor should be an 'inset' village when other 'smaller' villages (as defined by policy CP3), including Dry Sanford, Shippon, South Hinksey, Sunningwell and Wytham would remain 'washed-over' by the Green Belt. If and when a subsequent review of the Green Belt takes place it would make sense to consider the appropriateness of each of these villages as being either 'inset' or 'washed-over' by the Green Belt. However, at the current time, I conclude that the exceptional circumstances necessary to remove Farmoor from the Green Belt do not exist.
- 8.12 A representation has argued that the plan should remove from the Green Belt the Harcourt Hill Campus of Oxford Brookes University. The parcel of land concerned is already substantially built-up and it appears to me that it is likely to be only through redevelopment at a much greater height than currently exists that new building would materially reduce the openness of the Green Belt or affect the setting of Oxford City. Moreover,

the effect on Oxford's setting would be much the same if tall buildings were to be developed at the immediately adjacent parts of Harcourt Hill and Botley which are not within the Green Belt, not that I have read or heard anything to suggest that this is likely. Policy CP9 specifically seeks to prevent development at the campus which would harm the setting of Oxford and this would apply whether or not the campus is in the Green Belt. On the other hand, removing the campus from the Green Belt would leave an awkward, and undesirable in planning terms, 'island' of Green Belt at Raleigh Park. To this extent it would make sense to consider the case for the campus's removal from the Green Belt if and when the Green Belt boundary in the Botley area is more widely reviewed, as indicated above. In the meantime, and having regard to the flexibilities set out in national policy in terms of infilling/redevelopment of previously developed sites in the Green Belt together with the requirements of policy CP9, I conclude that the campus's continued inclusion within the Green Belt is unlikely to significantly prejudice or make difficult appropriate redevelopment at the campus. The retention of the site within the Green Belt for the present time is therefore soundly based.

- 8.13 In addition to housing allocation sites 1, 2, 3 and 4 several other parcels of land at Abingdon, Kennington and Radley are proposed to be deleted from the Green Belt but not allocated for any purpose. In terms of the land at Abingdon and Kennington I can see some sense in its removal from the Green Belt, in the context of the removal of housing sites 1,2,3 and 4 and the desirability of producing logical and permanent Green Belt boundaries. I also note that there is potential for housing development on the land at Radley, although, as detailed in section 13 below, there is not an identified need for this at the present time. Given the prospect of a further Green Belt boundary review, permanence of the submitted plan's Green Belt boundary at Abingdon, Kennington and Radley cannot currently be guaranteed. It would therefore make sense to retain these parcels of land in the Green Belt until either a further Green Belt review has taken place or there is some certainty that such a wider review will not be necessary. On this basis I conclude that the exceptional circumstances necessary to remove land from the Green Belt only exists in relation to housing allocation sites 1, 2, 3 and 4.

**Requested response 1: I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to retain the existing Green Belt boundaries, other than in respect of housing allocation sites 1, 2, 3 and 4.**

9. *Housing Allocations in the North Wessex Downs AONB (sites 12 and 13)*
- 9.1 The Plan envisages that housing allocation sites 12 and 13, which are located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), would be developed for around 550 and 850 dwellings respectively. This would be major development, which the Framework indicates should be refused except in exceptional circumstances and where it can be demonstrated it is in the public interest. The Framework advises that in considering applications for such development assessment should be made of the need for the development and its impact on the local economy, the scope for developing elsewhere outside the AONB or meeting the need for the development in some other way, and any detrimental effect on the environment, the landscape and recreational opportunities.
- 9.2 In determining whether or not these allocations in the plan are soundly based I have therefore considered whether it is likely that the exceptional circumstances necessary to permit applications for housing development on the sites would reasonably be considered to exist.
- 9.3 Whilst it is not specifically referred to in the plan itself, in terms of need for housing development in the AONB it has been argued that to fully realise the economic growth potential of Harwell Campus, which itself is of national importance, it needs to evolve from a science and innovation park to a world class campus environment offering a 'work-live-play community'. The integration of housing with the employment function at the campus is contended as being essential to this and reference has been made to a number of locations across the world where such communities exist.
- 9.4 I recognise the importance of Harwell Campus to the local, regional and national economy and do not doubt that some existing or potential employees at the campus would wish to live there. However, there is little, if any, evidence to support the contention that this is essential to the realisation of the employment growth which the plan and the Oxfordshire Strategic Economic Plan (SEP) envisage taking place at Harwell in the period to 2031. Whilst I note that the Oxfordshire LEP (and some others) strongly supports the housing allocations, its SEP of March 2014 makes no reference to the 'work-live-play community' of the scale now proposed. It does however refer to the development of the Research Village at the campus involving the creation of the "...feeling of a campus-based university with 5 accommodation blocks (each with up to 40 bedrooms with shared kitchen facilities on each floor and 5 self-contained apartments for those visiting for longer periods)...." I understand that planning permission already exists for such a development.
- 9.5 The written evidence proposing/supporting the 'work-live-play community' approach to the development of the campus mostly post-dates the publication of my questions for the relevant part of the Examination and

none of it quantifies, in terms of likely job creation, the economic importance of either permitting or refusing housing development in the AONB. Moreover, despite a specific request from me at the hearing for evidence on the point no details have been provided of any organisations who have indicated that they would only, or even be more likely to, locate at Harwell if it were to be developed as a 'work-live-play community'. The Oxford and Oxfordshire City Deal and the Oxfordshire Innovation Engine Report: Realising the Growth Agenda and evidence in the form of "third party validations" refer to the need for convenient and affordable housing (particularly to rent) although there is nothing to suggest that this could not be appropriately provided a short distance from the campus outside the AONB. The validation from a university professor does refer to the value of on-campus accommodation although specifies the need for affordable rooms and apartments for several days to carry out experiments or for longer periods for the training of PhD students. This would appear to indicate a need for the campus-based university style accommodation referred to in the SEP and for which permission already exists.

- 9.6 Other evidence indicates that 25% of those currently employed at Harwell would consider moving to the campus if dwellings to rent were available there. However, clearly these people have been attracted to work at Harwell notwithstanding the lack of housing at the campus and I have seen no convincing evidence to indicate that any existing or new employers at Harwell would, in the future, not be equally successful in attracting people to work there as long as there is sufficient suitable housing within the Science Vale area generally.
- 9.7 I therefore conclude that the need for a 'work-live-play community' at Harwell, and thus housing on sites 12 and 13 within the AONB, has not been demonstrated. Moreover, there is no convincing evidence to indicate that refusing such development would have an adverse effect on the local economy.
- 9.8 Turning to alternative sites I recognise that the proposed 'work-live-play community' at Harwell could not be delivered by development outside of the AONB. However this matters little given the lack of a demonstrated need for such a form of development. Nonetheless, the 1400 dwellings are also intended to contribute towards the Science Vale's element of the district's objectively-assessed need for housing. There is little to suggest that, if this housing is needed (see paragraph 9.12 below), alternative sites for it, outside the AONB but within Science Vale, could not be found. However, I appreciate that housing on sites 12 and 13 could be accommodated without the need for significant highways infrastructure upgrades which might be necessary if the housing were to be provided for elsewhere outside the AONB. Moreover, notwithstanding the lack of evidence of need for housing of the scale proposed at the campus, I recognise that, were it be provided, there would potentially be

sustainability benefits in terms of shorter journeys to work (which would also be more likely to be made on foot/by cycle) for residents working at the campus.

- 9.9 In terms of the landscape and recreational opportunities I consider that, subject to very careful design and landscaping, housing development on sites 12 and 13 would not be prominent when viewed from the surrounding higher ground, most notably the Ridgeway path to the south. Moreover, it would be seen in the context of the much larger and more prominent existing Harwell Campus development. However, the developments would be very prominent from the roads and footpaths which bound sites 12 and 13. I understand that the footpaths which bound the north and east sides of site 13 are well used by residents of Harwell and Chilton villages in particular. Whilst landscaping might substantially obscure views of the dwellings themselves it would also all but eliminate the current, attractive wide open views across agricultural fields to the Downs beyond from these footpaths. Harm would thus be caused to the landscape of this particular part of the AONB and to the recreational opportunities it currently provides.
- 9.10 In summary the need for development of sites 12 and 13 for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers. Nonetheless, and given that the campus will become an increasingly large centre for employment, there would potentially be some highway infrastructure and travel-to-work sustainability benefits in locating housing at sites 12 and 13 as opposed to elsewhere. The Framework's exceptional circumstances and public interest test would be ultimately applied as part of the consideration of planning applications for housing on these sites, having regard to the evidence available at the time. However, balancing my findings in respect of all that I have read, heard and seen at this point in time, I consider it unlikely that the exceptional circumstances necessary to approve such applications would reasonably be considered to exist. Consequently, the plan's housing allocations on sites 12 and 13 are not soundly based.
- 9.11 An alternative proposal to housing allocation site 13 has been put forward, involving the development for housing within the northern part of the Harwell Campus itself. This would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously-developed land. However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus. Moreover, and fundamentally, given that the need for housing in the AONB has not been demonstrated I conclude that the exceptional circumstances necessary to approve such a development would also be unlikely to exist.

9.12 I conclude that modification of the plan to delete sites 12 and 13 is thus necessary. As detailed in section 13, even without these sites the plan would provide for a five year supply of deliverable housing land, and sufficient dwellings district-wide for the plan period as a whole. However, it would reduce the potential supply of housing in the South East Vale and the Council may wish to consider the need to allocate replacement sites in this area through the Part 2 plan. However, there would be little reason to delay adoption of the Part 1 plan by seeking to allocate replacement sites at this stage.

**Requested response 2: I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to delete housing allocation sites 12 and 13.**

10. *Housing Allocation site 6, East Hanney*

10.1 I understand that since the submission of the plan the mobile library service at East Hanney has been withdrawn meaning that, in terms of the findings of the Town and Village Facilities Study (2014), the settlement would no longer be classed as a larger village. Moreover, the Council has recently refused permission for an application for housing on site 6, comprising slightly less than the 200 dwellings which the plan envisages for this site, raising, amongst other matters, concerns about the density of the development.

**Requested response 3: in order to assist my determination of whether or not this allocation is soundly based I would be grateful if the Council would formally consider if, in the light of a review of current evidence, housing development of the scale envisaged in the plan is appropriate in East Hanney and if the site 6 housing site allocation is deliverable.**

11. *Other Housing Allocations*

11.1 Subject to modifications to the relevant policies and plan appendices as discussed at the hearings, I am satisfied that housing allocation sites 5, 7, 8, 9, 10, 11, 14, 15, 16, 17, 18, 19, 20 and 21 are soundly based. \*

12. *Housing Requirement*

12.1 Having regard to the sites included in the Council's housing trajectory for the plan period (see section 13 below) and all that I have read, heard and seen, I conclude there are no constraints which would justify the housing requirement for the district being below the objectively-assessed need.\* Consequently, the new housing requirement for the Vale for the plan period of 20,560 dwellings is soundly based. However, as detailed in

section 4 above, the housing requirement for the district may need to be increased if, in due course, the Oxfordshire Growth Board determines that there are unmet housing needs from other districts which should be provided for within the Vale.

13. *Five Year Supply of Deliverable Housing Land and "Omission" Sites*

- 13.1 Having regard to all that I have read and heard on the issue, I conclude that the evidence (updated to 31 March 2016, doc PHD2) indicates that, on the Council's preferred measure, a 7.2 years supply of deliverable housing land can realistically be demonstrated across the district as a whole.\* This calculation (set out in Appendix 1 of this letter) excludes housing allocation sites 12 and 13, in accordance with my conclusions set out in section 9 above.
- 13.2 The Council's approach to measuring housing supply applies a 20% buffer to account for past under-delivery and assumes that the shortfall in delivery would be addressed across the rest of the plan period (the 'Liverpool method') in the housing supply ring fence area but within the next five years (the 'Sedgefield method') in the rest of the district. However, even applying the 'Sedgefield method' to the district as a whole (and excluding sites 12 and 13), a 5.9 years supply exists, albeit that within the ring fence area alone only a 4.3 year supply exists. Nonetheless, I am satisfied that it is appropriate for the Council to apply the Liverpool method to calculation of supply in its "self-imposed" ring fence area and in the application of policy CP5 (also giving a supply of 5.9 years excluding sites 12 and 13), given that across the district as a whole a supply well in excess of 5 years exists when calculated on the more demanding Sedgefield method. Moreover, given that some concern has been raised about the possibility of saturation of the housing market in the South East Vale sub-area, it is questionable whether the number of dwellings required to provide a five year supply using the Sedgefield method in this sub-area could be delivered.
- 13.3 The plan's housing allocations in addition to existing completions and commitments and a minimal allowance of about 4% for windfalls would provide for approximately 102% of the full plan period housing requirement. Given this and that the current supply of deliverable housing land is well in excess of 5 years I consider there to be no need to allocate more sites for housing in advance of the Part 2 plan and/or Neighbourhood Plans. I recognise that the 200 dwelling threshold for the inclusion of housing allocations in the Part 1 plan is somewhat arbitrary and that, in terms of achieving projected delivery, there is a benefit in the housing supply comprising a mix of site sizes. However, in addition to 23 or so sites of 200 dwellings or more, the current supply of deliverable housing land includes more than 660 dwellings on sites of less than 10 units and over 100 sites of between 10 and 199 dwellings. I am satisfied that this provides an appropriate portfolio of site sizes and that, thus,

there is not a need for the Part 1 plan to allocate more sites for housing of either less than or more than 200 dwellings. The precise figures indicated above may vary dependent upon the Council's response to my questions about housing allocation site 6 (East Hanney). However, I am satisfied that whatever the outcome in respect of this site, there will not be a need to allocate more sites for housing in the Part 1 Plan.

14. Botley Central Area

14.1 Policy CP11, concerning Botley Central Area, was discussed at some length at the hearings and I have since had the opportunity to visit the area and look again at the submitted written evidence.

**Requested response 4: in order that I can reach a view on whether or not the policy is soundly based I would be grateful to receive further comments from the Council in respect of policy CP11, having particular regard to:**

- (a) The lack of any indication in the policy or its supporting text of the amount of retail floorspace which would be required at Botley Central Area to meet the objectively-assessed needs;**
- (b) The exclusion from the boundary of the Central Area, as defined in Fig 5.3 of the plan, of a bank and a church, given their inclusion within the Botley Centre SPD Site Boundary.**
- (c) The inclusion of existing residential development within the Fig 5.3-defined Central Area without a policy requirement that it is replaced, noting in particular that part (iii) of the policy does require that the library and Baptist Church also included in the defined area are replaced. Whilst the SPD is not formally before me for consideration I also note that the Sustainability Appraisal Report of the SPD scores housing provision as a significant beneficial effect when neither policy CP11 nor the SPD itself require the provision of housing as part of the scheme.**

15. Other elements of the plan

15.1 Subject to modifications along the lines of those discussed at the hearings I am satisfied that all other aspects of the plan are likely to be capable of being found to be soundly based.\* I will contact the Council separately with comments on its draft proposed modifications and the alterations to them which I believe are likely to be necessary for the plan to be sound.

16. Conclusions

- 16.1 I trust this letter is helpful in setting out my interim findings on the plan and I am pleased, at this stage, to be able to conclude that, subject to modification, I am likely to be able to find that the plan is sound. However, once again I emphasise that this is not my final report on the Examination and circumstances may result in changes to these findings.
- 16.2 I would now be grateful if the Council would advise me as soon as possible of the likely timescale for a response to my highlighted requests.
- 16.3 Finally, in terms of the Community Infrastructure Levy Examination it appears to me that it would be most sensible to hold this once there is a more definitive list of the likely modifications to the plan; potentially during the period of formal consultation on them.

Yours sincerely

*Malcolm Rivett*

INSPECTOR

## Appendix 1

Five Year Housing Land Supply Outcome assuming deletion of housing allocation sites 12 and 13 from the plan.

	<b>Ring Fence, using 'Liverpool Method'</b>	<b>Rest of District, using 'Sedgefield Method'</b>
<b>Five Year Housing requirement for each supply area 2016-2021</b>	4336	2755
	<b>Whole District</b>	
<b>Total Five Year Housing Requirement</b>	7091 (4336 +2755)	
<b>Housing Supply</b>	10260 (10910 – 650)	
<b>Number of Years Deliverable Supply</b>	<b>7.2</b>	
<b>Over/Under Supply</b>	<b>+3169</b>	

## **Appendix 2: Turley LVIA Review of Proposed Site Allocations**

# Part 2 - Outline Landscape and Visual Analysis of Residential Sites

## Land off Holtspur Avenue, Wooburn Green

November 2017

### Introduction

1. This note provides analysis on landscape and visual matters in relation to providing residential development at land off Holtspur Avenue, Wooburn Green. It compares this site with others that have been allocated for residential development in the Wycombe District Council draft New Local Plan, publication version.
2. This has been further informed by an additional high level field study of the Holtspur Avenue site, the Stokenchurch site and the Holland Park site by a chartered landscape architect from Turley on the 1st November 2017. It should be noted that access could not be gained to the Stokenchurch and Holland Park sites, so assumptions have been made based on the visibility from surrounding public highways and rights of way, alongside available aerial images and OS data.
3. To provide further high level analysis of similarly constrained sites that are coming forward in the draft Local Plan, a series of other sites are compared with Holtspur Avenue. These sites were not visited so findings are based on available desktop information.

### Comparison of residential sites

4. There are eight sites within the Wycombe District Local Plan that have been identified for residential use, that are considered comparable to the site at Holtspur Avenue. All of the sites have identified sensitivities in terms of Green Belt or the Chilterns AONB. It is noted that a large number of sites are identified in the Chilterns AONB, a landscape that should be afforded the highest status of protection in relation to landscape and scenic beauty alongside National Parks and the Broads. Natural England's response to the Wycombe Local Plan consultation states:

*'Natural England are pleased to see that cherishing the Chilterns is one of the key objectives of this document. However we are of the opinion that this objective could go further from a Landscape perspective. We would ask you to give very careful consideration to the views and advice of the Chilterns AONB Conservation Board on this matter, and take into account the aims and objectives of the Chilterns AONB Management Plan.*

*That said, Natural England currently does not consider the evidence outlined in this suite of documents to be sufficiently robust to justify the scale of impact of homes upon the Chilterns AONB. There are alternative solutions available including discharging larger areas of Green Belt which aren't in the AONB, or allocating houses in areas outside of both Green Belt and AONB. We are concerned that with high housing numbers in this locality of the AONB, the environmental limits will be reached with regard to impacts on the AONB. We would wish to see clear justification that all reasonable alternatives have been considered'.*

5. The following analysis provides a comparison of the Holtspur Avenue site with allocated sites to consider their suitability for development in landscape and visual terms.

### **Abbey Barn North**

6. The Abbey Barn North site is allocated under Policy HW4 for residential development. The narrative in the local plan describes it as a '*sloping and elevated site that is visible from the opposite side of the Wye Valley and is covered by a mix of scrub and woodland*'. The site falls outside of the Green Belt and is a 'reserved site for future development'.
7. The policy guidance states that development would need to be sensitively designed to accommodate the 'bowl' shaped topography and sloping nature of the site. It also states that development must ensure there is no loss or deterioration to Deangarden Wood; ensure any increase in use of this woodland does not lead to a negative ecological impact; minimise impact upon wider views over and through the valley from the surrounding landscape; retain a wooded backdrop to the settled valley floor; retain mature woodland to the eastern corner; and, minimise the removal of young woodland along Abbey Barn Lane.

### **Abbey Barn South and Wycombe Summit**

8. Policy HW5 identifies Abbey Barn South and Wycombe summit as an allocated site for residential led mixed use development. It is described as a '*flat area which is mainly farmland with a significant Ride running through the site*'. The policy provides an illustrative layout accommodating 505 dwellings. The site is not within the Green Belt or the AONB.
9. The guidance for development within the site includes the need to improve public accessibility to the Ride and Deangarden and Keep Hill Woods; retain the Ride as open space; manage and maintain the Ride and Deangarden Wood to retain their landscape character and maximise their biodiversity value; and, provide new tree planting to create a wooded skyline and sylvan character when viewed across the valley.

### **Land of Amersham Road Trallee Farm**

10. Land off Amersham Road including Trallee Farm, Hazlemere is allocated for residential use and the site is currently a mix of farmland and woodland located adjacent to the A404. The site is within the Green Belt but outside the AONB.
11. The policy guidance states that development of the site would be required to maintain the sense of separation between Hazlemere and Holmer Green. In terms of Green Infrastructure, the development must retain and protect the existing orchard to the northeast of site; retain the woodland to the southeast corner; provide a link between these two features; and retain the field boundaries within the site.
12. An illustrative plan is included within the policy demonstrating these features and the site is proposed to be taken out of the Green Belt. The green infrastructure corridor is intended to provide a sense of separation between the two communities of Hazlemere and Holmer Green.

### **Green Farm, off Glynswood, High Wycombe**

13. Policy HW9 allocates part of Greens Farm, Glynswood, Green Hill in High Wycombe for residential use with an indicative capacity of 50 dwellings. This site falls within both the Green Belt and the Chilterns AONB. The policy guidance requires development to be landscape-led to limit the impact on the AONB and avoid adverse impacts on long distance views from Hughenden Park and Manor.

14. It is proposed that the site would be taken out of the Green Belt. The narrative associated with the policy states:

*‘The Council’s initial analysis suggests that there is scope for some residential development on the part of the site without significant visual harm. The topography steeply rises giving long distance views towards the Chilterns Area of Outstanding Natural Beauty and Hughenden Park and Manor. A more detailed assessment is required by the developer in the form of a landscape and visual impact assessment to determine the impact, particularly in relation to longer distance views, including those from Hughenden Park and Manor’.*

15. The illustrative masterplan indicates residential development across most of the site with proposed planting and footpath connections shown to the peripheries.

### **Slate Meadow, Bourne End**

16. Slate Meadow is a 10ha site in Bourne End and Wooburn located between the A4094 and the former High Wycombe to Bourne End railway. The site is not within the Green Belt or the AONB
17. Policy BE1 requires development to retain an undeveloped area between Bourne End and Wooburn and retain the existing village green within the site. In terms of Green Infrastructure and landscape, requirements include the need to provide a semi-naturally landscaped and accessible corridor beside the River Wye; retain views up to the valley sides to the north and south both from within the site and from outside the site across/ through the developed areas within it; and, provide a layout, scale and appearance of the development that minimises the impact on views down from the valley sides.
18. The narrative states that access needs to be created in a way that does not have a negative impact on the surrounding residential areas.

### **Hollands Farm, Bourne End**

19. Hollands Farm is allocated for residential development under Policy BE2. The site is outside the AONB but falls within the Green Belt in a gap between Bourne End and Hawks Hill and is a 23.7 ha greenfield site.
20. Development is required to adopt a landscape-led approach to design and layout to limit its impact on the landscape; not have an impact on the setting of the Hedsor Road and Riverdale Bourne End and Wooburn Conservation Area; and, maintain a sense of separation between Harvest Hill and the development.
21. An illustrative layout is provided for the site which provides open space to the western boundary, reduced density development to the eastern edge and tree belts adjacent to Harvest Hill.

### **Land between Chalky Field and Marlow, Lane End**

22. This site is in the Chilterns AONB and situated to the southeast of Lane End. Policy RUR2 states that development must not extend beyond the boundary of Cutlers House, Marlow Road; create a landscape structure for the southern boundary; and, maintain and enhance screening from Marlow Road into Lane End.
23. The illustrative layout provides for 27 dwellings and the narrative states that development must form a clear landscaped edge that is consistent with the clear edge to the village defined by the prominent Cutlers House on the north side of Marlow Road.

### **Land off Mill Road, Stokenchurch**

24. Policy RUR8 allocates land south of Mill road, Stokenchurch for residential development. The site is located in the Chilterns AONB but does not lie within the Green Belt.
25. The policy requires development of the site to adopt a landscape-led approach to limit its impact on the AONB and mitigate the visual impact along the existing residential boundary. The Green Infrastructure requirements include providing a landscaped edge along the eastern boundary and southern boundaries and providing green infrastructure with north south links.
26. The illustrative layout provides open space to the northeast corner and tree planting along the southeast and southwest boundaries.
27. **Tables 1-7** set out on the following pages summarise the evidence base material for each of the sites in relation to landscape character, the openness of the Green Belt, the Chilterns AONB and visual amenity. Commentary is then provided by Turley on these findings with consideration of how development in these sites may affect these factors. A comparison is then provided of these effects between the sites and that of Holtspur Avenue.

### **Conclusion**

28. Each of the sites have a varying degree of landscape and visual sensitivities. The analysis of the Holtspur Avenue site and the accompanying Suggested Design Plan identifies the potential to accommodate residential development whilst enhancing the existing settlement edge and making contributions to the Green Infrastructure network.
29. It is recognised that several of the other sites have greater visual enclosure than the Holtspur Avenue particularly the 'Land off Amersham Road, Trallee Farm'; Hollands Farm; and, Green Farm, off Glynswood, High Wycombe. However, several of the sites have a comparable level of visual enclosure or less visual enclosure than the Holtspur Avenue. The Abbey Barn North site is a similarly sloping site, with views towards it across the Wye Valley which would be affected by the removal of trees to accommodate development. The Slate Meadow site would be seen on the valley floor from public rights of way on elevated land to the north. Development here would be read in context with existing development on the valley floor, although is likely to influence the perceived separation between Bourne End and Wooburn. Development within the Stokenchurch and Land between Chalky Field and Marlow sites would be seen in views from public rights of way within the Chilterns AONB and the latter is likely to influence the historic setting of Lane End.
30. In terms of landscape character, the Holtspur Lane site falls within a LCA that is identified to be of moderate strength of character and intactness in the Wycombe District Landscape Character Assessment. The other sites falls within landscapes that vary in strength of character from moderate to strong. Urbanising influences of surrounding development and roads are noted in all of the sites and there is a varied amount of landscape features present within them. Of particular note is the Ancient and Semi-Natural woodland that surrounds the Abbey Barn North site and the Abbey Barn South and Wycombe Summit sites. Other areas of sensitivity include the location of the land between Chalky Field and Marlow Road site on the approach to the historic settlement of Lane End and the Green Wood site in close proximity to Hughenden Manor and Registered Park and Garden.

31. The analysis of the sites demonstrates that all locations would have landscape and visual constraints to overcome to successfully integrate residential development within the landscape. It is considered that given the large amount of sites that have been allocated within the Chilterns AONB which would be likely to result in a cumulative impact on its scenic beauty and character, sites in potentially less sensitive locations in terms of landscape value should be considered. The site at Holtspur Avenue can demonstrate that with landscape mitigation measures, landscape features associated with the site can be retained and enhanced and development could be accommodated with minimal effects on the character of the surrounding landscape. Furthermore, the development on the site provides the opportunity to bring some local green infrastructure benefits.
32. In conclusion, it is recommended that the Holtspur Avenue site should therefore be considered alongside these draft allocated sites as a suitable place, in landscape and visual terms, for residential development.

**Table 1: Abbey Barn North (Policy HW4)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
<b>Green Belt</b>	The site is not located within the boundary of the Green Belt.	N/A	Holtspur Avenue falls within the Green Belt, the most recent assessment states it performs strongly against the NPPF purposes and the former states it performs moderately.
<b>Chilterns AONB</b>	N/A - The site does not fall within the Chilterns AONB.	The site is visually enclosed from the AONB.	Holtspur Avenue is similarly enclosed from the AONB.
<b>Landscape Character</b>	<p>The site is located within 'LCA 19.1 High Wycombe Settled River Valley' in the Wycombe District Landscape Character Assessment. The description references the settled valley floor that is contained by largely undeveloped valley slopes with some significant blocks of ancient beech and yew woodland (e.g. Kingswood and Deangarden Wood). The relevant key characteristics include:</p> <ul style="list-style-type: none"> <li>• <i>Large blocks of ancient beech and yew woodland occur on valley slopes in the north. Woodland is sparse in the rest of the area with small blocks interspersed with farmland or along valley tops.</i></li> <li>• <i>Views are from either side of the valley to the other, to development climbing up the valley sides in the west and wooded and convex farmed slopes in the east. The valley slopes in the south and east, including woodland, farmland and parkland provide an important setting to High Wycombe which extends along the valley floor.</i></li> </ul> <p>The strength of character and intactness is identified as moderate. Despite the presence of settlement, the undeveloped valley slopes in the east retain a rural character. The</p>	<p>The site falls adjacent to Deangarden Wood which is Ancient and Semi-Natural Woodland which are classed as irreplaceable in the NPPF. Any development within the site would need to be sufficiently offset from this to avoid any loss of deterioration to the woodland.</p> <p>The policy states that Abbey Barn Lane would need to be realigned in order to accommodate access into the site, which would change the character of the wooded approach to High Wycombe. The policy notes that providing access to the site would be 'problematic', 'expensive' and 'complex'</p> <p>A key element of landscape character is the views across the Wye Valley to wooded and farmed slopes. It is considered that removing the</p>	<p>The transport and accessibility analysis for the Holtspur Avenue site has described vehicular access as readily available from Holtspur Lane. This would be far easier than for the Abbey Barn North site with significantly less potential effects on the character of the surrounding road network. The access requirements would have minimal impact on existing trees and hedgerows.</p> <p>Holtspur Avenue is also located on an undeveloped valley slope which is a key element of the landscape character. It does not have the sensitivity of ancient woodland enclosing it or woodland within it and is better connected to the main</p>

	<p>landscape character assessment identifies Landscape Guidelines. The following are considered relevant to development within the Abbey Barn North site:</p> <ul style="list-style-type: none"> <li>• <i>Conserve the remaining undeveloped valley sides in the south and east which contain and form a setting to the developed valley floor. Resist incremental development which would alter the character of the valley</i></li> <li>• <i>Conserve and manage woodlands to maintain visual containment and promote biodiversity value.</i></li> <li>• <i>Conserve views from each side of the Wye Valley, across the valley to wooded and farmed slopes.</i></li> <li>• <i>Maintain the rural character of roads, avoiding road improvements and widening which would alter their character.</i></li> </ul>	<p>establishing woodland (that is currently surrounded by Ancient and Semi-Natural Woodland on the valley slope) from the site to accommodate development is likely to result in the development become a prominent feature in views from across the valley.</p>	<p>town and road network.</p>
<b>Visual Amenity</b>	<p>The local plan references the existing views of the site from the opposite side of the Wye Valley.</p>	<p>The removal of woodland within the site to accommodate development would form a noticeable change to views across the valley.</p>	<p>Both sites would be visible in views across the Wye Valley from public rights of way and highways on the opposite valley slopes.</p>
<b>Green Infrastructure</b>	<p>The guidance for Policy HW16 states that appropriate boundary landscaping must be provided. Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p>	<p>Despite the policy guidance requiring the retention of mature woodland to the eastern corner, minimising the loss of young woodland along Abbey Barn Lane and the retention of a substantial area of chalk grassland. It is still likely that to accommodate development and access, a number of landscape features would be lost which in the short term would affect the green infrastructure network.</p>	<p>There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.</p> <p>Both sites provide the opportunity to enhance Green Infrastructure although the information on the Abbey Barn North site does not provide an illustrative</p>

		Development may put pressure on the Deangarden Wood Ancient and Semi-natural Woodland.	layout.
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**Table 2: Abbey Barn South and Wycombe Summit (Policy HW5)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
<b>Green Belt</b>	The site is not located within the boundary of the Green Belt.	The site falls adjacent to the edge of the Green Belt.	Holtspur Avenue falls within the Green Belt, the most recent assessment states it performs strongly against the NPPF purposes and the former states it performs moderately.
<b>Chilterns AONB</b>	N/A - The site does not fall within the Chilterns AONB.	<p>The site is separated from the AONB by mature vegetation associated with the M40 corridor and the sloping landform is likely to prevent views from the AONB to the site.</p> <p>The illustrative layout locates employment development adjacent the boundary with the AONB and dependant on building heights could affect the setting.</p>	Holtspur Avenue does not fall within the AONB or its setting.
<b>Landscape Character</b>	<p>The site is located with 'LCA 18.1 Great Marlow Rolling Farmland' in the Wycombe District Landscape Character Assessment and the character description includes:</p> <p><i>'A large scale landscape with a varied geology, giving rise to a rolling landform. Dominated by large arable fields, with pasture on steeper chalk slopes and woodland,</i></p>	<p>The policy guidance to improve access to Deangarden Woods may have an adverse effect on this Ancient and Semi-Natural Woodland</p> <p>The illustrative layout sets out features that would</p>	Holtspur Avenue is also located on an undeveloped valley slope which is a key element of the landscape character. It does not have the sensitivity of ancient woodland enclosing it or woodland within

	<p><i>much of which is ancient, interspersed throughout. Woodland included broadleaved, mixed, and coniferous with small areas of acid marshy and calcareous grassland designated as SSSIs or local wildlife sites... Away from the M40 corridor, the sweeping landform, prominence of woodland cover and limited settlement, creates a tranquil landscape, with a uniform and balanced character'.</i></p> <p>The strength of character and intactness is described as moderate. Although key characteristics are strongly conveyed, evidence of human impact alongside the M40 corridor and A404 reduce the distinctiveness of character. The landscape character assessment identifies Landscape Guidelines. The following are considered relevant to development within the Abbey Barn South and Wycombe Summit:</p> <ul style="list-style-type: none"> <li>• <i>Conserve and appropriately manage areas of woodland for biodiversity and recreational benefits.</i></li> <li>• <i>Conserve open views across arable farmland to woodland and longer views out to adjacent landscapes.</i></li> <li>• <i>Ensure that new buildings and development are sensitively integrated into the landscape through careful siting and design.</i></li> <li>• <i>Conserve the character of rural roads.</i></li> <li>• <i>Promote appropriate management of farmland, to help generate a wildlife rich habitat, and visually attractive landscape.</i></li> </ul>	<p>enhance elements of landscape character.</p> <p>Development in this location would have adverse effects on the rural character of the approach to Wycombe on Abbey Barn Lane.</p>	<p>it and is better connected to the settlement and road network.</p>
<p><b>Visual Amenity</b></p>	<p>The policy states:</p> <p><i>'The site is on the hill top, and it is important that lessons are learned from previous generations' development of hill top locations in the town to achieve a greater sensitivity to the Chilterns valley setting in which the town lies'.</i></p>	<p>Views towards the site from across the Wye Valley are likely to be possible albeit glimpsed.</p> <p>There would be an adverse effect on existing views across agricultural farmland from Abney</p>	<p>Development of the Holtspur Avenue site would have a greater effect on visual amenity although the presence of built development would be seen in context with development within Wooburn</p>

		Barn Lane.	Green.
<b>Green Infrastructure</b>	<p>The guidance for Policy HW5 states: ‘a significant feature of the site is the woodland ride and the neighbouring Deangarden Wood which provide both a setting and context for a quality new development offering opportunities to create accessible public spaces as well as enhancing green infrastructure and habitats both on and adjacent to the site’.</p> <p>Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p>	<p>The retention of the Ride within the scheme as illustrated in the illustrative layout would provide a strong Green Infrastructure link.</p> <p>Development may put pressure on the Deangarden Wood Ancient and Semi-natural Woodland.</p>	<p>There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.</p> <p>Both sites provide the opportunity to enhance Green Infrastructure.</p>

**Table 3: Land off Amersham Road, Trallee Farm (Policy HW8)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
<b>Green Belt</b>	<p>In the GBA Part 1, the site is assessed under sub-area RSA-9 and has a medium score against the NPPF purposes. It describes the wider area as having a strong visual and functional connection with the wider countryside, but the site as being physically severed with a strong sense of enclosure and a visually prominent urban edge. It states that the rurality of the area has been diminished and the area has suffered encroachment along the A404.</p> <p>In the GBA Part 2 the site is assessed under Site reference SHZ0035. It is said to be largely enclosed by a single built-up area which does not serve as a barrier against sprawl. The site is said to comprise only a very small part of the gap between High Wycombe, Amersham and Beaconsfield and makes no discernible contribution to separation. It is described as having a semi-urban character containing 10% built form</p>	<p>From google images, built form looks to be contained to the peripheries.</p> <p>Query whether the rural elements of the character have been downplayed; Site contains open fields with established hedgerows and tree belts and Traditional Orchard (priority habitat inventory) which enclose the built form. (scored as 2)</p> <p>The policy guidance states that development of the site would need ensure the retention of a sense of separation between Hazlemere and</p>	<p>The site performed weakly against the NPPF purposes and the latest version of the GBA states that Holtspur Lane performs strongly. The previous version of the assessment states it performed moderately.</p> <p>Inconsistencies in how gaps between sites are assessed with Holtspur Avenue scoring 5 in comparison with this site scoring 0.</p>

	<p>with buildings being sporadic and inconsistent.</p> <p>The site is said to perform weakly against the NPPF purposes. Landscape mitigation measures to the eastern boundary would be dependent on whether adjoining land within Chiltern District Council is also removed. It is said to be capable of removal from the Green Belt.</p> <p>In consideration of whether it is otherwise developable, the assessment states that there is a traditional orchard identified as a UK BAP priority habitat to the northeast and some TPO trees and woodland. The landscape appraisal states:</p> <p><i>'The perception of the site from the public realm is that of an enclosed site, where its contribution to open countryside is not evident. There appears to be a strong capacity for residential development without significant adverse impacts upon landscape character, visual amenity or the openness of the Green Belt, provided that perimeter screening is retained and enhanced and the former orchard is protected. There are strong internal boundaries defined by mature hedgerows that would allow natural subdivision and/or a basis for phased development'.</i></p> <p>The assessment concludes the site is capable of removal from the Green Belt and is otherwise developable.</p>	Holmer Green.	
<b>Chilterns AONB</b>	N/A - The site does not fall within the Chilterns AONB.	The site falls within the setting of the Chilterns AONB and shares two boundaries with it.	Holtspur Avenue does not fall within the AONB or its setting.
<b>Landscape Character</b>	<p>The site is located within 'LCA 18.2 Penn Rolling Farmland' in the Wycombe District Landscape Character Assessment. The relevant key characteristics include:</p> <ul style="list-style-type: none"> <li><i>Large arable fields delineated by an intact network of hedgerows. There are smaller fields of rough grazing, pasture, paddock, pig farms located closer to settlement. Woodland often provides a backdrop to</i></li> </ul>	Elements considered to have a strong landscape character present in the site include the historic field boundaries and the Traditional Orchard.	Holtspur Avenue is located within a LCA said to be of moderate strength of character and this site falls within a LCA with a strong character.

	<p><i>open fields</i></p> <ul style="list-style-type: none"> <li><i>The sweeping topography and farmland land cover with limited settlement contributes to a well-balanced and uniform landscape.</i></li> </ul> <p>The strength of character and intactness of LCA 18.2 is described as strong with prominent key characteristics and a lack of intrusive features making it a visually and physically intact landscape. The landscape character assessment identifies Landscape Guidelines. The following are considered relevant to development within the land of Amersham Road, Trallee Farm site include:</p> <ul style="list-style-type: none"> <li><i>Conserve the areas of woodland which provide enclosure and form an important character of the area, and provide invaluable biodiversity benefit and recreational resource.</i></li> <li><i>Conserve and manage the network of dense hedgerows, and hedgerow trees. Consider replanting hedgerows which have been lost.</i></li> <li><i>Promote appropriate management of farmland, to help generate a wildlife rich habitat, and visually attractive landscape.</i></li> <li><i>Ensure that new buildings and development is sensitively integrated into the landscape through careful siting.</i></li> <li><i>Conserve historic elements, such as archaeological monuments and their setting; conserve early field enclosures, which provide evidence of past use of the land.</i></li> </ul>		
<b>Visual Amenity</b>	The landscape assessment in the GBA Part 2 identifies that there are no public views towards the site but it is overlooked by adjoining dwellings and commercial units.	The site is enclosed from public viewpoints. There are likely to be views from residential properties within both Holmer Green and Hazlemere.	There site is more visually enclosed than Holtspur Avenue.

<p><b>Green Infrastructure</b></p>	<p>The guidance for Policy HW16 states that appropriate boundary landscaping must be provided.</p> <p>Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p>	<p>The existing landscape framework is retained within the illustrative layout and looks to provide enhancements to green infrastructure through the creation of a new green corridor.</p>	<p>There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.</p> <p>Both sites provide the opportunity to enhance Green Infrastructure.</p>
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**Table 4: Green Farm, off Glynswood, High Wycombe (Policy HW9)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
<p><b>Green Belt</b></p>	<p>In the GBA Part 1, the site falls within GA 25a which is said to perform strongly against the NPPF purposes. The assessments states that the area performs moderately in terms of preventing sprawl and maintaining separation between High Wycombe and Hughenden Valley and strongly in preventing encroachment of the countryside. The area is within the AONB and forms part of the setting to Hughenden Manor.</p> <p>In the GBA Part 2 (2017) the site is assessed under Site Reference SHW0663. The site is described as a semi-natural green space which is set apart from the surrounding farmland and enclosed by housing on two sides. The site is part of the transition between the town and countryside but its small scale and enclosure result in a semi-urban character. In consideration of whether the site is capable of removal from the Green Belt the assessments states:</p> <p><i>‘Yes – In the 2016 draft assessment the site included a further triangle of land to the east of the footpath. However this was shown to be undevelopable (with regards to immediate landscape impacts, and possible ecology impacts) and the inclusion of this area is not needed to achieve a rational Green Belt amendment’.</i></p>		<p>It is recognised that development of the site would have little influence on the wider function of the Green Belt. In this regard it is less constrained in Green Belt terms than the Holtspur Avenue site.</p>

	<p>The assessment concludes that the site is capable of removal from the Green Belt and is otherwise developable. As such the potential for exceptional circumstances should be considered further.</p>		
<p><b>Chilterns AONB</b></p>	<p>The site is assessed under reference SHW0633 in the AONB assessment. It lies to the southern edge of the Hughenden Chalk River Valley and comprises rough grassland and scrub with occasional garden extensions. It states:</p> <p><i>'The site is low-lying and well contained with a strong urban influence from the adjacent housing, resulting in capacity for residential development without significant adverse impacts upon wider visual amenity – a landscape and visual impact assessment would need to assess any proposed development'.</i></p> <p>The assessment describes the visual sensitivity as medium due to open views from adjacent public right of way and housing and long distance views confined to high ground to the west /northwest contained elsewhere by nearby topography, trees and settlement. It has a low landscape sensitivity due to it being cut off from the surrounding Hughenden Manor Estate and no longer in agricultural use. The wider landscape character sensitivity is medium/high and the overall landscape capacity is medium.</p> <p>The potential impacts of housing include:</p> <ul style="list-style-type: none"> <li>• <i>Enclosure to one side of existing public right-of-way (PRoW) adjoining site</i></li> <li>• <i>Extension of urban edge to adjoin Hughenden Manor Estate</i></li> <li>• <i>Loss of existing 'field', though not in agricultural use</i></li> <li>• <i>Reduced views westwards from adjoining PRoW</i></li> <li>• <i>Significant change to existing rural outlook from neighbouring private</i></li> </ul>	<p>The site falls fully within the Chilterns AONB. Policy DM30 states that development in the Chilterns AONB would need to:</p> <ul style="list-style-type: none"> <li>• <i>Conserve and where possible enhance, the natural beauty of the Chilterns AONB</i></li> <li>• <i>Be appropriate to the economic and social wellbeing of the local communities within the AONB, or to promote the understanding or enjoyment of the AONB</i></li> <li>• <i>Deliver the highest quality design which respects the natural beauty and built heritage of the Chilterns and enhances the sense of place and local character.</i></li> </ul> <p>The NPPF states that <i>'great weight should be given to conserving landscape and scenic beauty in National Parks, the broads and AONB, which have the highest status of protection in relation to landscape and scenic beauty.'</i></p> <p>It is recognised that this site is influenced by</p>	<p>Holtspur Avenue does not fall within the AONB or its setting. The exceptional landscape value of the AONB, and the need for its protection, suggests that undesignated sites with potential for residential development should be considered first.</p>

	<p><i>residences</i></p> <ul style="list-style-type: none"> <li>• <i>Slight / imperceptible change to views from Hughenden Park</i></li> <li>• <i>Unlikely to feature significantly in views from the wider AONB</i></li> <li>• <i>Minor extension of the urban area into an isolated field at the edge of the AONB</i></li> </ul>	<p>surrounding urban development. However, development would still be cutting into the AONB and would have an urbanising influence on the surrounding designated landscape.</p>	
<b>Landscape Character</b>	<p>The site is located within 'LCA 13.3 Hughenden Chalk River Valley' in the Wycombe District Landscape Character Assessment. The key characteristics include:</p> <ul style="list-style-type: none"> <li>• <i>Field boundaries defined by hedgerows and hedgerow tree lines with woodland boundaries on upper slopes providing more sinuous field boundaries.</i></li> <li>• <i>Hughenden Park is a Registered Historic Park, in the lower section of the valley. The open parkland with scattered trees allows views over the surrounding valley and back towards High Wycombe town, and contributes to the character of this area.</i></li> <li>• <i>Local footpaths run along the valley floor along and up valley slopes.</i></li> <li>• <i>A tranquil landscape with a rural character, away from busier roads.</i></li> </ul> <p>In reference to Hughenden Manor it states: '<i>the parkland of Hughenden Manor is prominent on the western side of the Hughenden Stream extending southwards to the edge of High Wycombe and contributing to historic character</i>'.</p> <p>The strength of character and intactness is described as strong. The landscape character assessment identifies Landscape Guidelines. The following are considered</p>	<p>The site is located in close proximity to Hughenden Park Registered Park and Garden and is likely to be seen in views from the wider rural landscape. However, it is recognised that the site is influenced by the surrounding residential development and separated in character from the rural landscape.</p>	<p>The site falls within an LCA of strong character. The LCA that Holtspur Avenue is located in is of moderate strength of character.</p>

	<p>relevant to development within the Green Farm, off Glynswood site:</p> <ul style="list-style-type: none"> <li>• <i>Conserve the mosaic of land use and land cover within the valley. Maintain the contrast between the smooth valley side and wooded slopes/tops. Promote appropriate management of farmland, to encourage and create more biodiverse habitats, as well as agriculturally productive landscapes.</i></li> <li>• <i>Maintain views to and from valleys sides. Ensure the built townscape of High Wycombe continues to be integrated by managing tree cover.</i></li> <li>• <i>Conserve the historic parkland and landscape setting of Hughenden Manor.</i></li> </ul>		
<b>Visual Amenity</b>	<p>The landscape assessment in the GBA Part 2 references views towards the site from rear/upper floors of adjacent houses, long distance views from elevated ground to the west/northwest and a later note references views from Disraeli monument to the west side of the valley.</p> <p><i>‘Sensitive visual receptors are likely to be adjacent residents, local public footpath users and possibly visitors to Hughenden Park nearby. The western half of the site is relatively low-lying and well contained with a strong urban influence from the adjacent housing, where there is capacity for residential development without significant adverse impacts upon wider visual amenity – a landscape and visual impact assessment would need to assess any proposed development’.</i></p>	N/A	The visual receptors to the Green Farm site are potentially of higher sensitivity due to the presence of historic designations than the Holtspur Avenue site.
<b>Green Infrastructure</b>	<p>The guidance for Policy HW16 states that appropriate boundary landscaping must be provided. Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p>	N/A	There are greater opportunities to enhance green infrastructure within the Holtspur Avenue site due to scale.

	<p>The guidelines for development provided in the AONB assessment state the need to:</p> <ul style="list-style-type: none"> <li>• <i>Establish/reinstate native hedgerow and trees along PRoW at eastern site boundary to screen adjacent development and maintain sense of a rural green corridor;</i></li> <li>• <i>Incorporate landscaped boundaries with existing housing and with the adjoining Hughenden Manor Estate;</i></li> <li>• <i>Provide tree planting through site to provide setting for housing and help diversify habitats;</i></li> <li>• <i>Use low level lighting strategy to avoid light pollution to the remaining dark landscape;</i></li> <li>• <i>Use building styles and materials that complement existing housing and allow new development to recede into the landscape where seen from the adjoining AONB and Hughenden Manor Estate.</i></li> </ul>		
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**Table 5: Slate Meadow (Policy BE1)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
<b>Green Belt</b>	The site is not located within the Green Belt.	N/A	Holtspur Avenue falls within the Green Belt, the most recent assessment states it performs strongly against the NPPF purposes and the former states it performs moderately.

<b>Chilterns AONB</b>	N/A - The site does not fall within the Chilterns AONB.	N/A.	N/A
<b>Landscape Character</b>	<p>The site is located within 'LCA 19.1 High Wycombe Settled River Valley' in the Wycombe District Landscape Character Assessment. The relevant key characteristics include:</p> <ul style="list-style-type: none"> <li>• <i>Chalk river valley cutting the dipslope and containing the River Wye between High Wycombe and Bourne End where it flows into the Thames.</i></li> <li>• <i>The River Wye is hidden in the wider landscape by settlement and is often culverted, although is prominent at The Rye where the river and valley setting forms a distinctive part of the townscape.</i></li> <li>• <i>Interspersed arable and pasture farmland comprising medium sized fields delineated by hedgerows. In the south arable dominates the west facing slopes and pasture the east.</i></li> <li>• <i>Views are from either side of the valley to the other, to development climbing up the valley sides in the west and wooded and convex farmed slopes in the east. The valley slopes in the south and east, including woodland, farmland and parkland provide an important setting to High Wycombe which extends along the valley floor.</i></li> </ul> <p>The strength of character and intactness is described as moderate. The landscape character assessment identifies Landscape Guidelines. The following are considered relevant to development within the Slate Meadow site:</p> <ul style="list-style-type: none"> <li>• <i>Conserve and enhance the water quality and flow of the River Wye. Consider opening up the river where possible to create more of a feature</i></li> </ul>	<p>The site has a rural character and provides a break between Bourne End and Wooburn Green.</p> <p>On the approach to Wooburn Green on the A4094 there are views across the grazing land to the elevated slopes of the Wye Valley. The Wye Valley runs through the eastern side of the site.</p>	<p>Development of both sites would have some adverse effects on landscape character. However, both sites have provided illustrative layouts that would provide enhancements to landscape features.</p>

	<ul style="list-style-type: none"> <li>Conserve views from each side of the Wye Valley, across the valley to wooded and farmed slopes.</li> </ul>		
<b>Visual Amenity</b>	N/A	From a review of aerial information and OS data it is considered that there would be views of the site from residential properties within Bourne End and Wooburn Green. There would also be views across the site from public rights of way on elevated land to the north.	Development of both sites would have an effect on views from public rights of way within the rural landscape. In these views, development would be seen in context with surrounding development and areas of open space would be retained.
<b>Green Infrastructure</b>	<p>The guidance for Policy HW16 states that appropriate boundary landscaping must be provided.</p> <p>Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p>	N/A	<p>There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.</p> <p>Both sites provide the opportunity to enhance Green Infrastructure.</p>

**Table 6: Holland Farm, Bourne End (Policy BE2)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
Green Belt	<p>In the GBA Part 1 the is located within GA 58a which is described as being enclosed within the settlement footprint of Bourne End/Wooburn with little connection to the wider countryside and a semi-urban character. It scores medium in the overall summary against the NPPF purposes.</p> <p>In the GBA Part 2 (2017) the site is assessed under Site Reference SBE0027 and SBE0028. The assessment states that the site does not provide a gap between</p>	In the Policy BE2 the guidance states that the site is located within a gap between Bourne End and Hawks Hill and that separation should be provided between Hawks Hill and the development. As these settlement areas are both within the Green Belt it suggests that the site should score higher than 0 against the purpose of preventing towns	The site performed moderately against the NPPF purposes. Holtspur Avenue falls within the Green Belt, the most recent assessment states it performs strongly against the NPPF purposes and the former states it performs moderately.

	<p>settlements and makes no discernible contribution to separation. In terms of removal from the Green Belt it states:</p> <p><i>'Site is bounded on three sides by built-up areas of non-green belt land at Bourne End and Hawks Hill. It would form a rational built-up area appropriate to the general extent of the Green Belt'.</i></p> <p><i>'The new boundary would be Hedsor Road to the south. No additional mitigation would be required'.</i></p> <p>The site is said to perform moderately against the NPPF in the GBA Part 2. The conclusion is that it is capable of removal from the Green Belt. The landscape appraisal states:</p> <p><i>'The landscape lacks notable special qualities but benefits from a 'wooded' outlook over rising ground to the east and views to low hills to the north. The northern half of the site, particularly the most northerly field, has a high capacity for development where the site is relatively enclosed and the landscape is most heavily influenced by neighbouring development. The southern half of the site is more open and rural in character but with significant urban influences from the industrial estate to the west and the rear of dwellings along Hedsor Road. Low-density housing within mature and wooded gardens also occurs on higher/rising ground to the east and, to some degree, overlooks the site. The southern part of the site has a moderate to high capacity for development provided the outlook from neighbouring residential areas (dwellings to the east and Hedsor Road Conservation Area) is addressed by way of layout/character areas, buffering and/or screening'.</i></p>	from merging.	Based on the illustrative layouts, development would result in gaps of under 100m between the development and Hawks Hill formed by proposed planting. The break between development within the Holtspur Avenue site and Beaconsfield would be approximately 400m at its closest point with a number of existing physical features forming the separation.
<b>Chilterns AONB</b>	N/A - The site does not fall within the Chilterns AONB.	N/A	Both sites would not affect the AONB or its setting.
<b>Landscape</b>	The site is located within the urban area in the Wycombe District Landscape Character.	Development would partly abut the Hedsor Road and Riversdale Bourne End Conservation Area	Both sites would result in the loss of agricultural landscape, thus affecting the

<b>Character</b>		and is likely to influence the character of Hedsor Road.	landscape character of the area. The rural landscape of the Holland Farm site is important to the setting of Hawks Hill and the separation between it and Bourne End. The Holtspur Avenue site has stronger connections with the existing road network and main settlement edge.
<b>Visual Amenity</b>	The landscape assessment in the GBA Part 2 references that the site is overlooked by neighbouring dwellings and is likely to be visible in potential views from footpaths on the higher ground to the north and east. From within the site there are long distance views to elevated countryside to the north and there is a wooded outlook over rising ground to the east.	There would be views form residential properties within Bourne End and Hawks Hill.	There are likely to be visual impacts arising from development on both sites.
<b>Green Infrastructure</b>	The guidance for Policy HW16 states that appropriate boundary landscaping must be provided.  Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.	N/A	There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.  Both sites provide the opportunity to enhance Green Infrastructure.

**Table 7: Land between Chalky Field and Marlow, Lane End (Policy RUR2)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
<b>Green Belt</b>	N/A - The site is not located within the Green Belt.	N/A	Holtspur Avenue is within the Green Belt and said to perform strongly against the

			NPPF.
<b>Chilterns AONB</b>	<p>In the AONB site assessment, the site is reviewed under reference SLE0027 and is located at the eastern end of Lane End. It is formed of two fenced paddocks which form part of a larger group of fields. The boundaries are formed of post and wire fencing and have no historic relevance or associated vegetation. The site is overlooked by housing to the north and allotment gardens.</p> <p>The assessment describes the visual sensitivity as low stating it is contained to the north and east by housing and vegetation, open to the south and west but visually contained in longer views by woodlands and landform and glimpsed views possible from public rights of way to the southeast. The landscape sensitivity is described as medium/low due to it being part of a larger characteristic field, influences by surrounding development and the shallow valley topography. The wider landscape sensitivity is medium due to the sites role in the setting to Lane End and the shared characteristics with the wider countryside. The overall landscape capacity is considered medium.</p> <p>The potential impacts on housing include:</p> <ul style="list-style-type: none"> <li>• <i>Reduction of characteristic landscape feature (agricultural field)</i></li> <li>• <i>Unlikely to impact on views from the wider AONB</i></li> <li>• <i>Some effect on views from housing to north and potentially from PRow to southeast</i></li> <li>• <i>Some potential effect on setting of Lane End</i></li> <li>• <i>Loss of part of a characteristic field in AONB</i></li> </ul>	<p>It is considered the visual sensitivity of the site has been underplayed with it described as low despite the views on the approach to Lane End from the south and the overlooking from the properties and allotments to the north.</p> <p>Policy DM30 states that development in the Chilterns AONB would need to:</p> <ul style="list-style-type: none"> <li>• <i>Conserve and where possible enhance, the natural beauty of the Chilterns AONB</i></li> <li>• <i>Be appropriate to the economic and social wellbeing of the local communities within the AONB, or to promote the understanding or enjoyment of the AONB</i></li> <li>• <i>Deliver the highest quality design which respects the natural beauty and built heritage of the Chilterns and enhances the sense of place and local character.</i></li> </ul> <p>The NPPF states that <i>'great weight should be given to conserving landscape and scenic beauty</i></p>	<p>Holtspur Avenue does not fall within the AONB or its setting. The exceptional landscape value of the AONB, and the need for its protection, suggests that undesignated sites with potential for residential development should be considered first</p>

	<p>The site is described to have capacity to accommodate areas of new development in some parts providing it has regard to the setting and form of the existing settlement and the adjacent landscape character areas.</p>	<p><i>in National Parks, the broads and AONB, which have the highest status of protection in relation to landscape and scenic beauty.'</i></p> <p>It is recognised that this site is influenced by surrounding urban development. However, development would still be cutting into the AONB and would have an urbanising influence on the surrounding designated landscape.</p>	
<p><b>Landscape Character</b></p>	<p>The site is located with 'LCA 16.1 Stokenchurch Settled Plateau' in the Wycombe District Landscape Character Assessment. The key characteristics include:</p> <ul style="list-style-type: none"> <li>• <i>A mosaic of arable fields, rough grazing, paddock and pasture are defined by hedgerows and wooden fencing, and interlocked with areas of woodland which create a landscape of both openness and enclosure. Smaller fields of paddock are often closely associated with settlement edge.</i></li> <li>• <i>Settlement is concentrated in the north and south of the area, at Stokenchurch and Lane End, respectively. Modern development dominates these villages. Smaller rural villages, and isolated properties /farmsteads, with a strong historical character, are dispersed along roads.</i></li> <li>• <i>Pre 18th century irregular field enclosures and 20th century enclosures dominate, with areas of 19th century enclosure and extended fields. Extensive boundary loss is often closely associated with development.</i></li> <li>• <i>Limited rights of way network and few roads away from main transport corridors. Small rural roads and lanes are often lined and enclosed by hedgerows. The M40 cuts through the landscape, creating a noticeable</i></li> </ul>	<p>The site is occupied by grazed pasture and forms part of a wider agricultural field, separated by post and wire fencing.</p> <p>The landscape has a role in preserving the rural setting to Lane End.</p>	<p>It is considered that the Holtspur Avenue site is more strongly influenced by the surrounding urban edge and settlement.</p> <p>The Chalky Field site has stronger rural characteristics and reduced associations with the main settlement. Development in this location would have an impact on the character on the approach to the village.</p>

	<p><i>audible and visual impact.</i></p> <ul style="list-style-type: none"> <li><i>Views are often confined by woodland, with some long views across open fields to a wooded or open skyline. Important views across the Hambleden Valley,</i></li> <li><i>A simple and legible landscape, with a tranquil character away from settlement areas and transport corridors.</i></li> </ul> <p>The strength of character and intactness is described as moderate. The landscape character assessment identifies Landscape Guidelines. The following are considered relevant to development within the Land between Chalky Field and Marlow site:</p> <ul style="list-style-type: none"> <li><i>Promote appropriate management of arable farmland, rough grazing, pasture and paddock, to help generate a wildlife rich habitat, and visually attractive landscape</i></li> <li><i>Conserve common land and common edge settlement, and ensure proper management of these spaces. Conserve the loose settlement character preventing infilling and nucleation</i></li> <li><i>Maintain the rural character of roads, avoiding road improvements (e.g. widening) which would alter their character.</i></li> </ul>		
<p><b>Visual Amenity</b></p>	<p>The narrative in the AONB assessment states the site contributes to the rural setting of Labe End in views on the approach from the southeast.</p>	<p>Development would be visible on the approach to Lane End on the Marlow Road. There are also likely to be views from public rights of way in the wider landscape.</p>	<p>The view of Holtspur Lane would be seen in context with development on the existing settlement edge. Development at the Chalky Field site would become visible at the rural approach to the village where there is only a small</p>

			amount of existing development.
<b>Green Infrastructure</b>	<p>The guidance for Policy HW16 states that appropriate boundary landscaping must be provided. Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p> <p>Landscape guidelines provided in the AONB site assessment states the need to:</p> <ul style="list-style-type: none"> <li>• <i>Establish mixed native vegetation along south and west boundaries including trees, to strengthen the settlement edge, provide screening from the south east, and to create a landscape structure which contributes towards creating links with existing hedgerow and woodland network.</i></li> <li>• <i>Provide tree planting through site to provide setting for housing and contribute to habitat diversity</i></li> <li>• <i>Take account of the adjoining pond in considering new landscape structure and link to other habitats</i></li> <li>• <i>Retain roadside vegetation and incorporate into new landscape structure</i></li> </ul>	N/A	<p>There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.</p> <p>Both sites provide the opportunity to enhance Green Infrastructure.</p>

**Table 8: Land off Mill Road, Stokenchurch (Policy RUR8)**

	Summary of Evidence base documents	Turley Comments	Comparison with Holtspur Avenue
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<b>Green Belt</b>	N/A - The site is not located within the Green Belt.	N/A	Holtspur Avenue is within the Green Belt and said to perform strongly against the NPPF.
<b>Chilterns AONB</b>	<p>The site falls within the Chilterns AONB and has been assessed under site references SSC0037 &amp; SSC0035. The initial description of Rear of Mill Road states:</p> <p><i>'The settlement edge is weak on this side, broken by outbuildings and a salvage yard that encroach out into the countryside. Near to the settlement edge the topography is flatter and there are no public footpaths giving access. A lost historic field boundary and the existing rear boundaries of the salvage yard and outbuildings combine to offer a logical extent to a settlement extension'.</i></p> <p>The description for SSC0035 references the flat, open, arable farmland located to the south-western edge of Stokenchurch and southern side of the M40. There is no public access but a footpath runs along part of the northern boundary connecting with the M40 footbridge. The site boundaries are formed by a variety of closed and open fencing, hedges and outbuildings. The eastern boundary is open following the line of a former historic field boundary. The visual and landscape sensitivity is described as low due to the influence of adjacent development, noise from the M40, the containment in wider views due to woodland, and glimpsed views from the Chiltern Way. Despite the shared physical characteristics with the wider countryside the poor settlement edge leads to a medium/low wider landscape sensitivity. This combined with a medium/high landscape value leads to a medium/high landscape capacity.</p> <p>The potential impacts of housing on the site are:</p> <ul style="list-style-type: none"> <li>• <i>Reduction of characteristic landscape feature (agricultural field)</i></li> <li>• <i>Replacement of historic field boundary on eastern side</i></li> </ul>	<p>Policy DM30 states that development in the Chilterns AONB would need to:</p> <ul style="list-style-type: none"> <li>• <i>Conserve and where possible enhance, the natural beauty of the Chilterns AONB</i></li> <li>• <i>Be appropriate to the economic and social wellbeing of the local communities within the AONB, or to promote the understanding or enjoyment of the AONB</i></li> <li>• <i>Deliver the highest quality design which respects the natural beauty and built heritage of the Chilterns and enhances the sense of place and local character.</i></li> </ul> <p>The NPPF states that <i>'great weight should be given to conserving landscape and scenic beauty in National Parks, the broads and AONB, which have the highest status of protection in relation to landscape and scenic beauty.'</i></p> <p>It is recognised that this site is influenced by surrounding urban development. However,</p>	<p>Holtspur Avenue does not fall within the AONB or its setting. The exceptional landscape value of the AONB, and the need for its protection, suggests that undesignated sites with potential for residential development should be considered first.</p>

	<ul style="list-style-type: none"> <li>• <i>Unlikely to impact on views from the wider AONB</i></li> <li>• <i>Some effect on views from PRow to south-east and north</i></li> <li>• <i>Loss of part of a characteristic field in AONB</i></li> </ul> <p>Site SSC0037 is a salvage yard which is also described to have a medium/high landscape capacity. The site is described as incongruous with adjacent land uses, heavily influenced by urban fringe uses and is not an important part of the adjacent wider landscape into which it protrudes. There are similar conclusions reached in the assessment, with additional effects highlighted referencing an increase in evening activity and lighting.</p>	<p>development would still be cutting into the AONB and would have an urbanising influence on the surrounding designated landscape.</p>	
<p><b>Landscape Character</b></p>	<p>he site is located with 'LCA 16.1 Stokenchurch Settled Plateau' in the Wycombe District Landscape Character Assessment. The key characteristics include:</p> <ul style="list-style-type: none"> <li>• <i>A mosaic of arable fields, rough grazing, paddock and pasture are defined by hedgerows and wooden fencing, and interlocked with areas of woodland which create a landscape of both openness and enclosure. Smaller fields of paddock are often closely associated with settlement edge.</i></li> <li>• <i>Settlement is concentrated in the north and south of the area, at Stokenchurch and Lane End, respectively. Modern development dominates these villages. Smaller rural villages, and isolated properties /farmsteads, with a strong historical character, are dispersed along roads.</i></li> <li>• <i>Pre 18th century irregular field enclosures and 20th century enclosures dominate, with areas of 19th century enclosure and extended fields. Extensive boundary loss is often closely associated with development.</i></li> </ul>	<p>Development would result in the loss of an characteristic agricultural field that is connected to the wider rural landscape.</p>	<p>Development within the Holtspur Avenue site would be contained within an existing framework of residential development and roads which therefore gas a reduced connection with the wider rural landscape.</p>

	<ul style="list-style-type: none"> <li>• <i>Limited rights of way network and few roads away from main transport corridors. Small rural roads and lanes are often lined and enclosed by hedgerows. The M40 cuts through the landscape, creating a noticeable audible and visual impact.</i></li> <li>• <i>Views are often confined by woodland, with some long views across open fields to a wooded or open skyline. Important views across the Hambleden Valley,</i></li> <li>• <i>A simple and legible landscape, with a tranquil character away from settlement areas and transport corridors.</i></li> </ul> <p>The strength of character and intactness is described as moderate. The landscape character assessment identifies Landscape Guidelines. The following are considered relevant to development within the Land between Chalky Field and Marlow site:</p> <ul style="list-style-type: none"> <li>• <i>Promote appropriate management of arable farmland, rough grazing, pasture and paddock, to help generate a wildlife rich habitat, and visually attractive landscape</i></li> <li>• <i>Conserve common land and common edge settlement, and ensure proper management of these spaces. Conserve the loose settlement character preventing infilling and nucleation</i></li> <li>• <i>Maintain the rural character of roads, avoiding road improvements (e.g. widening) which would alter their character.</i></li> </ul>		
<b>Visual Amenity</b>	The AONB assessment states that there are views towards the site from the Chiltern Way to the south and near Coopers Court Farm.	The eastern boundary of the site is open which would result in prominent visual effects on views in the short term while any new boundary planting is establishing.	Views of development within the Holtspur Avenue site would be seen in context with the existing framework of roads and development. The Stokenchurch site is connected to the

		In views from the footpath to the north, open agricultural fields would be replaced with residential development.	settlement edge but is also open to the surrounding rural landscape to the east, within the wider AONB.
<b>Green Infrastructure</b>	<p>The guidance for Policy HW16 states that appropriate boundary landscaping must be provided. Policy DM34 in the draft Local Plan states that all development is required to protect and enhance green infrastructure features and networks both on and off site. A requirement includes the need for all out of town centre sites over 0.5ha need to achieve a future canopy cover of at least 25%.</p> <p>The guidelines for development in the AONB assessment include the need to:</p> <ul style="list-style-type: none"> <li>• <i>Establish native hedgerow and tree planting along eastern boundary to reinstate historic field boundary and provide screening from PRow in south east.</i></li> <li>• <i>Create safe and pleasant pedestrian link to footbridge linking with centre of Stokenchurch</i></li> <li>• <i>Investigate use of non-visually intrusive features to reduce noise pollution from M40</i></li> <li>• <i>Retain an undeveloped area adjacent to M40 as a buffer to the motorway and for green infrastructure purposes</i></li> <li>• <i>Enhance remaining boundaries with mixed native planting to contribute towards creating/reinstating links with nearby hedgerows and ancient woodland</i></li> <li>• <i>Provide tree planting through site to provide setting for housing and help diversify habitats</i></li> </ul>	N/A	<p>There would be minimal loss of existing landscape features to accommodate development within the Holtspur Avenue site.</p> <p>Both sites provide the opportunity to enhance Green Infrastructure.</p>

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