

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION
KEEP BOURNE END GREEN
HEARING STATEMENT IN RELATION TO MATTER 6

1. Keep Bourne End Green (“KBEG”) is concerned by the Local Plan’s release of Green Belt at Bourne End, through the release and allocation of the Green Belt land known as Hollands Farm, and the Local Plan’s interlinked distribution of some 800 homes to what the Local Plan terms “Bourne End and Wooburn”.
2. KBEG has the support of over 3,000 local residents, by way of signed mandates. The vast majority are from the immediate locality (over 2,600 from the wards of: Bourne End-cum-Hedsor; The Wooburns; and Flackwell Heath and Little Marlow) and the rest almost all from areas nearby (such as High Wycombe, Taplow, Beaconsfield).
3. KBEG submitted representations on the Regulation 19 publication version Local Plan in relation to: the Sustainability Appraisal underpinning the Local Plan [WDLP2] (“the WDLP SA”); Policy CP2; Policy CP3; Policy CP4; Policy CP8; and Policy BE2. Some of the representations (concerning the WDLP SA and Policies CP3 and BE2) were made by Pegasus Group (planning and environmental consultants) on behalf of KBEG (representor ID 1347), some of the representations (concerning Policies CP2, CP4 and CP8) were made by KBEG direct (representor ID 1265). The representations relied on a substantial evidence base prepared by independent experts, Appendices 1-8 of the representations made by Pegasus for KBEG, and references to appendices are to those (i.e. Appendix 1 is the Pegasus Sustainability Assessment Review of Hollands Farm).
4. This Hearing Statement is concerned primarily with Matter 6: Questions 1-4. As those Questions all concern the overarching Issue, KBEG addresses that Issue and Questions 1-4 holistically.

Issue: Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries and can the need for housing and employment development be accommodated without releasing land from the Green Belt?

5. In answer to the first part of the Issue, no.
6. In answer to the second part of the Issue, yes.
7. The exceptional circumstances test set by the NPPF is an exacting one. Identifying the difference between it and the “very special circumstances” test that applies to decision-making is an exercise in dancing on the head of a pin. What matters is that exceptional circumstances is a high bar: the circumstances must be exceptional, which of itself includes necessity and mere suitability for housing is insufficient (the *Gallagher Homes* and *Calverton PC* cases cited in KBEG’s representation concerning Policy CP8).

8. Wycombe District is a classic Green Belt district. The need for housing in Wycombe District cannot be an exceptional circumstance justifying release from that (supposedly permanent) Green Belt, let alone release of greenfield non-PDL sites.
9. In any event, the Council has not done enough to explore other options, not least considerably higher densities on sites in the District's three towns: beginning with High Wycombe, then moving to Princes Risborough and Marlow, and also higher density and increased rates of delivery in existing built-up areas generally.
10. The Council has also failed to recognise that the HELAA has dramatically and unjustifiably underestimated rates of housing delivery without the need for Green Belt release. The KBEG HLA Assessment appended to KBEG's representations (particularly concerning Policy CP4) explained the detail of this on the basis of the information available at the time those representations were made. The KBEG HLA Assessment has now been updated to reflect the information now available (and is appended to KBEG's Hearing Statements).
11. The Council's Green Belt Assessments are neither soundly based, justified nor consistent with national policy, certainly if their approach to Hollands Farm is illustrative of their general approach (as it appears to be).
12. Appendices 4 and 7 (both prepared by independent experts instructed by KBEG) contain a detailed critique of the Council's Green Belt Assessments by reference to Hollands Farm and show them to be fundamentally flawed exercises, as does the related landscape character and visual impact work at Appendices 5 and 8 (again, both are prepared by independent experts instructed by KBEG).
13. In brief:
 - The authors of the Council's Green Belt Assessments apparently visited some 19 different sites on the day (10 March 2016) that they visited Hollands Farm, which allowed for no more than superficial consideration of Hollands Farm and resulted in an obviously inadequate assessment.
 - As a result, the authors of the Council's assessments mischaracterised Hollands Farm. Contrary to their appraisal, Hollands Farm is not effectively enclosed by the nearby settlement areas, it is part of the "wider countryside" and possesses strong rights of way linkages to the contiguous countryside to the north. Nor is Hollands Farm "more semi-urban", as the authors of the Council's assessments assert, as its overriding character is very rural and highly attractive countryside. Nor is it 'almost completely enveloped by built form', as the authors of the Council's assessment also claim. Had the authors of the Council's Green Belt Assessments adequately considered Hollands Farm "on the ground", they would have appreciated all of this, and their view would have been (or ought to have been) very different.
 - It is a source of great regret that KBEG had to spend scarce resources having independent experts consider the Council's Green Belt assessment and Hollands

Farm's performance as Green Belt in order to correct the Council's erroneous assessment.

- The Council's Green Belt Assessments as regards Hollands Farm were also not assisted by the fact the Council had not (and has not) carried out a site specific landscape character and/or visual impact assessment, of importance to any Green Belt assessment given the visual element of Green Belt. There too, KBEG has been forced to spend scarce resources commissioning independent experts to do the necessary work (Appendices 5 and 8).
 - Based on their inadequate assessment and flawed characterisation, the authors of the Council's Green Belt Assessments then proceeded to misunderstand Hollands Farm's performance against the Green Belt purposes, at least in part because of the mischaracterisation of Hollands Farm.
14. By contrast with the Council's Green Belt Assessments, the independent experts who have had the time to adequately assess Hollands Farm have reached a radically different view, finding that Hollands Farm performs strongly across the Green Belt purposes. The release of Hollands Farm is not sound, and if the Council's treatment of Hollands Farm is illustrative it calls into question the soundness of the Council's approach more generally.

Keep Bourne End Green

29 June 2018