

Wycombe District Local Plan Examination

Matter 6 - Green Belt Session

Examination Statement by Nexus Planning on behalf of Inland Homes

1. These statements have been prepared by Nexus Planning on behalf of Inland Homes. In addition to draft housing allocations HW8 and HW9, Inland Homes is promoting two omission sites, being land at Penn Road, Hazlemere and land at Burleighfield House, Loudwater.

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?

Question 1: Are the Green Belt Assessments (GB1 and GB2) soundly based, justified and consistent with national policy?

a) Can the need for housing and employment development be accommodated on deliverable sites within settlement without releasing land from the Green Belt?

2. WDLP2 outlines that there is only sufficient deliverable land outside the Green Belt to provide approximately 9,800 dwellings over the Plan period. This is significantly below the full objectively assessed needs ("OAN") identified within HEDN2 for the District and substantially below the OAN identified within our Regulation 19 representations and our Matter 3 Statement.
3. Paragraph 47 of the NPPF seeks to boost significantly the supply of housing and for Local Plans to meet the full OAN for market and affordable housing in the housing market area. Whilst the ONS housing affordability data for 2017 reveals that Wycombe District is one of the least affordable places to live in the Country. The most sustainable settlement in the District, High Wycombe, is surrounded by Green Belt.
4. The Council is already adopting a strategy which fails to even accommodate its demonstrably too low OAN within the District without the need for releasing land from the Green Belt. Reducing housing delivery within the District or relocating it to less sustainable parts of the District to avoid releasing land from the Green Belt would fundamentally fail to address clear housing market and affordable housing pressures in the District and/or result in an unsustainable pattern of growth, contrary to the Framework.
5. Inland Homes therefore agrees with the Council that it is necessary to remove land from the Green Belt to meet development needs.

b) Has the capacity of areas within settlement to accommodate growth been robustly assessed and what were the conclusions?

6. The Council has carried out an assessment of all available sites within the District as part of the Housing and Economic Land Availability Assessment ("HELAA"). Furthermore, following a request from Aylesbury Vale District Council, HELS5 identifies that the Council further reviewed densities on brownfield sites proposed for allocation within the Local Plan to maximise the efficient use of land.

7. It is therefore considered that the Council has struck the appropriate balance between maximising the use of brownfield land within existing settlements, whilst ensuring that development protects existing character and heritage assets.

Question 2: Is the approach to amending Green Belt boundaries to release sites for development soundly based and is it consistent with the conclusions of the review in respect of their contribution to Green Belt purposes?

8. Whilst Inland Homes supports the conclusions of GB1 and GB2 in respect of a number of sites, the Council has failed to consider the release of land at Burleighfield House from the Green Belt despite the HELAA 2017 (HELS1) identifying in Appendix 2 (HELS1.3) that the site (ref. SLW0031) is deliverable, comprises previously developed land and can accommodate 11 dwellings (it actually benefits from prior approval for 13 dwellings).
9. Appendix 4 (HELS1.4) identifies that that site was assessed as part of a bigger Green Belt parcel (SLW0025) in GB1, however this is an error as the map associated with this site demonstrably excludes site ref. SLW0031. Therefore not only does GB1 fail to consider the release of this site from the Green Belt, it is failing to consider the release of a PDL site from the Green Belt, which is already identified as an existing commitment within HELS1 – a glaring oversight then the Council on any account, but particularly where it has signed an MoU requiring it to only identify unmet needs if it is “impossible” to accommodate such needs within its own area (WDLP8.1).
10. One of the core planning principles of the Framework is to encourage the effective use of land that has been previously developed, which is further echoed at paragraph 111 and based upon the above it cannot be currently concluded WDLP1 complies with the Framework in this regard and therefore whether the approach to amending Green Belt boundaries is sound.
11. Appendix 1 of our Regulation 19 representations to Policy CP8 demonstrate that the site performs weakly against the purposes of including the land within the Green Belt, using the methodology outlined within GB2. We also provided a masterplan to demonstrate how the site could accommodate circa 38 apartments.
12. The Inspector should also note that the site in question was recently subject to a planning application (ref. 18/05349/FUL) for 33 apartments. The application was refused by the Council on 18th May 2018 but considerations for this application are of course different to those of a Local Plan allocation. In the context of Green Belt release, the matter of note is that the Council consider that the site is within an important gap separating High Wycombe from Beaconsfield and the loss of openness on this site will be an incremental erosion into this gap.
13. The site lies within a gap of some 1.5km between High Wycombe and Beaconsfield, although an array of development is contained within this gap already. The site itself is some 150m wide and very well contained by woodland. Furthermore, a Tesco superstore is located on the opposite side of the road, closer to Beaconsfield, as is a row of housing. It cannot therefore be concluded that

developing the site would lead to a merging of settlements or any discernible reduction in separation over the present situation.

14. The second and final matter of relevance are a range of urban design comments. Upon review by the appointed architect, it is considered that these issues are not insurmountable and could be addressed without a material impact upon development capacity.
15. Given the above, it is clear that no technical issues also exist to prevent the delivery of the site. Accordingly, site SLW0031 should have been considered within GB1 and assessed as a reasonable alternative within the Council's SA (WDLP1). Until this has been completed, it cannot be concluded that the Council's approach to amending Green Belt boundaries to release sites for development is soundly based, as further sites could sustainably be released.
16. Our comments in respect of the Council's failure to consider a smaller part of land at Penn Road, Hazlemere for release from the Green Belt (despite GB1 concluding the wider site is appropriate for release) is addressed in our Matter 1 Statements.