

Wycombe District Local Plan Examination

Matter 7: Development Framework - High Wycombe

Examination Statement by Nexus Planning on behalf of Inland Homes

August 2018

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1. This Examination Statement has been prepared by Nexus Planning on behalf of Inland Homes in support of draft site allocations HW8 and HW9.

Question 1 - Are the following allocations soundly based and is there evidence that the development of the sites is viable and deliverable?

e) HW8 - Land off Amersham Road, including Tralee Farm, Hazlemere

Overview

1. Inland Homes controls the northern portion of draft allocation HW8 (as illustrated in Appendix 1 of our Regulation 19 representations to Policy HW8).
2. This parcel of land is currently served by its own vehicular access off Wycombe Road and as shown in Figure 14 of WDLP1, it is expected by the Council that a vehicular access will be retained in this location, albeit enhanced – a position we support.
3. The parcel of land controlled by Inland Homes is remote from the Chiltern District draft allocation off Earl Howe Road.
4. The site forms part of the High Wycombe area, the only Tier 1 settlement within the District (see Policy CP3), offering by far the best range of services, facilities, access to jobs and to public transport (para. 4.27 of WDLP1) and is therefore rightly a prime focus for growth.

The Council's Evidence base

5. As outlined within our Matter 3 Examination Statement with respect to this draft allocation, the Council's Housing and Economic Land Availability Assessment ("HELAA") - Site Proformas (HELS1.4) identifies this allocation as site reference SHZ0035. The HELAA concludes that the site is suitable for development subject to its removal from the Green Belt. Inland Homes supports this conclusion.
6. Whilst exceptional circumstances surrounding the release of the site from the Green Belt was addressed under Matter 6, it is helpful to note that GB1.1 demonstrates that the allocation scores weakly against the purposes of including land within the Green Belt. Key points are as follows:
 - site is largely enclosed by a single built-up area, and therefore does not serve as a barrier to sprawl;
 - the site comprises only a very small part of the wider gap between High Wycombe, Amersham and Beaconsfield, and makes no discernible contribution to this separation;
 - there are a small number of agricultural, residential and riding school buildings situated on the site, with the storage of caravans in the north. Overall, the site exhibits a semi-urban character; and
 - the site does not abut an identified historic settlement core nor impact historic features.

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7. Inland Homes fully supports the above conclusions and agrees that exceptional circumstances exist that justify the release of the site from the Green Belt.
8. GB1.1 also includes a Landscape Assessment and outlines at page 143 that the site is not within a designated landscape and that there are no public views into the site. It concludes that the site makes no evident contribution to open countryside and has strong capacity for residential development. It also details that the mature hedgerows that define the internal boundaries of the site allow natural subdivision and phasing of development.
9. Furthermore, GB1.1 confirms that the development of the site would have no impact upon heritage assets, the site is not at risk of fluvial flooding and that only a narrow surface water flow exists across the site.
10. Our comments relating to the Council's Sustainability Appraisal (WDLP2) ("SA") in respect of this allocation can be found within our Matter 1 Examination Statement.

Preparation of a Planning Application

11. As highlighted within our Matter 3 Examination Statement in relation to draft allocation HW8, Inland Homes has held pre-application discussions with Development Management Officers at the Council and has carried out a public consultation event.
12. Inland Homes is therefore in the final stages of preparing a planning application on the parcel of land within their control, and this will be submitted ahead of the Stage 2 Examination hearing sessions.
13. The planning application would only be approved upon the removal of the site from the Green Belt following the adoption of the Local Plan. However, the preparation of this planning application has required the completion of an extensive range of technical work, to support the soundness of the allocation, as set out below:
14. **Landscape and Visual Impact** - A Landscape and Visual Impact Assessment ("LVIA") has been prepared in support of the planning application, which concludes that there will be no impact on landscape designations from the delivery of the site and the proposed development can be readily assimilated into its local context. It is therefore clear that landscape considerations would not prevent the delivery of the allocation.

Ecology - An Ecological Impact Assessment of the site has been prepared which includes targeted species surveys. This has informed the proposed layout and the scheme which, will deliver ecological enhancements. In light of this, biodiversity does not represent an undue constraint to the development of the site.

15. **Highways** - The planning application will be accompanied by a Transport Assessment. This concludes that the site is within walking and cycling distance of a range of services and facilities,

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as well as public transport connections. Moreover, the site access junction is illustrated to have sufficient capacity to accommodate the traffic associated with the proposed development and suitable visibility splays can be achieved. Trip generation associated with the development of the site is also demonstrated to have a no material impact on the highway network. It is therefore clear that highway considerations would not prevent the delivery of the allocation.

16. **Flood Risk and Drainage** - The Flood Risk Assessment and Drainage Strategy has been prepared, which demonstrates that the site is situated within Flood Zone 1 and that a suitable sustainable urban drainage system is available to effectively manage surface water. It is therefore clear that flood risk and drainage considerations would not prevent the delivery of the allocation.
17. **Arboriculture** – The Arboricultural Assessment demonstrates that the development of the site will result in an overall benefit through new planting, and the retention and improved management of the woodland/ orchard.
18. Given the above, it is clear that there are no constraints that would prevent the delivery of housing on the site.

Delivery

19. The Council's HELAA identifies that the draft allocation is expected to come forward during years 6-10 of the plan period. However, Inland Homes has repeatedly (including at the Regulation 19 stage) identified that land controlled by Inland Homes is available now and that the site is deliverable, having regard to Footnote 11 of the NPPF. The very fact a planning application has been submitted to the Council goes some way to demonstrate this.
20. We can only conclude that the reason the Council is only expecting the site to come forward so slowly, is due to a current requirement of Policy HW8 to prepare a development brief, which Inland Homes consider is unsound. This matter is addressed below.

Development Brief Requirement

21. Policy HW8 sets a number of requirements to be delivered through the development of the site. Inland Homes has no objection to these save for criterion 1c), which requires a comprehensive development of the allocation. Furthermore, supporting text paragraph 5.1.63 states that the preparation of a development brief is essential and will be used to inform any planning application.
22. One of the core planning principles within the NPPF is to ensure that local plans provide a framework such that decisions on planning applications can be made with a high degree of "predictability and efficiency". Whilst, paragraph 153 states that supplementary planning documents (which would include development briefs) "should not be used to add unnecessarily to the financial burdens on development". The Ministerial Foreword to the NPPF states that "Development that is sustainable should go ahead without delay and Paragraph 47 stipulates that there is a need to "boost significantly the supply of housing". Furthermore the 'Fixing our

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broken housing market' Housing White Paper (February 2017) identifies the second big problem within the housing market to be that "the pace of development is too slow".

23. Land subject to Policy HW8 is, in strategic planning terms, only modest in scale. The Site does not suffer from complicated technical constraints or development management considerations, nor does it require the co-ordinated delivery of significant infrastructure improvements, other than public open space. The need for a development brief therefore places an unnecessary temporal and financial burden upon the developers of the Site, which will only serve to delay the pressing need for additional housing in the District. Indeed, the parcel of land controlled by Inland Homes comprises a logical and distinct phase with its own access that can come forward in isolation at an early stage of the plan period.
24. Helpfully, we need to look no further than WDC's Core Strategy Reserve Sites to see how development briefs can delay development. Five reserve sites were released in November 2014 and the development briefs for three of these sites (Abbey Barn South, Gomm Valley, Terriers Farm and Slate Meadow) were adopted in July 2016, July 2017, March 2018 and May 2018, respectively. This demonstrates a delay of up to three and a half years before a planning application could be submitted, let alone housing delivered. In fact the delivery of the sites in question has yet to commence, which has significantly restricted the delivery of much needed market and affordable housing in the District.
25. The policy, as worded, is therefore unsound having regard to para 182 of the NPPF, namely that is not justified, effective or consistent with national policy.
26. The requirement for development briefs was considered by the Inspector that examined the recently adopted Warwick Local Plan and one of the Main Modifications that the Inspector recommended as necessary to make that plan sound was to build in flexibility to a policy which concerns the development of significant housing sites (Main Modification (MM) 47), by enabling sites to submit a Layout and Design Statement alongside an application if a development brief wasn't in place. Given the WDLP has no flexibility in housing delivery, it must at the very least allow such an approach.
27. Furthermore, in the recent examination of the Vale of Aylesbury Local Plan ("VALP"), the issue of masterplans / development briefs were repeatedly raised and the Inspector requested that the Council consider incorporating additional wording into policies to avoid the need for such tools. We would wholly support this approach in respect of Policy HW8.

Conclusion

28. Inland Homes, an established regional housebuilder, controls the northern parcel of land within draft allocation and has been promoting it for development through the local plan process. A planning application is on the verge of being submitted for a residential development (including a policy compliant level of affordable homes) on this parcel, clearly demonstrating that development would be viable. Furthermore, the wide-range of technical work prepared in support

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of the planning application, in conjunction with the Council's evidence base, demonstrates that the site is suitable for development.

29. Subject to the removal of the requirement for a development brief, or at least the introduction of flexibility, we consider Policy HW8 is sound.

f) HW9 - Part of Greens Farm, Glynswood, Green Hill, High Wycombe

Overview

1. Inland Homes controls this draft allocation. The site forms part of the High Wycombe area, the only Tier 1 settlement within the District (see Policy CP3), offering by far the best range of services, facilities, access to jobs and to public transport (para. 4.27 of WDLP1), and is therefore rightly a prime focus for growth.

The Council's Evidence Base

2. As outlined within our Matter 3 Examination Statement with respect to this draft allocation, the Council's Housing and Economic Land Availability Assessment ("HELAA") - Site Proformas (HELS1.4) identifies this allocation as site reference SHW0633. The HELAA concludes that the site is suitable for development subject to its removal from the Green Belt. Inland Homes supports this conclusion.
3. Whilst exceptional circumstances surrounding the release of the site from the Green Belt was addressed under Matter 6, it is helpful to note that GB1.1 demonstrates that the allocation scores weakly against the purposes of including land within the Green Belt. Key points are as follows:
 - i. the site is almost entirely enclosed by the built form of High Wycombe, and the site therefore makes little contribution to preventing sprawl;
 - ii. the site does not extend any further towards the next settlement (Hughenden Valley) than the existing ribbon development along Hughenden Road and makes no contribution to separation;
 - iii. the site forms part of the transition from the urban area into the countryside, and but is small scale and its enclosure results in a semi-urban character; and
 - iv. the site does not abut an identified historic settlement core nor impact heritage features.
4. Inland Homes fully supports the above conclusions and agrees that exceptional circumstances exist that justify the release of the site from the Green Belt.
5. GB1.1 also includes a Landscape Assessment and outlines at page 104 that housing backs onto the site along the southern and western boundaries, which has a strong urbanising influence. Further, 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.

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6. The Site is also assessed within the Council's AONB Site Assessment Report (AONB1) which finds the site to have medium capacity for development, which means it is able to accommodate development, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas (para 7.13). AONB1 also concludes that the site's location within the urban fringe of High Wycombe and its scale results in it not comprising major development. Inland Homes supports this conclusion.
7. Our comments relating to the Council's SA in respect of this allocation can be found within our Matter 1 Examination Statement.

Planning Application

8. As highlighted within our Matter 3 Examination Statement in relation to draft allocation HW9, Inland Homes has held pre-application discussions with Development Management Officers at the Council and has carried out a public consultation event.
9. Inland Homes is therefore in the final stages of preparing a planning application on the parcel of land within their control, and this will be submitted ahead of the Stage 2 Examination hearing sessions.
10. The planning application would only be approved upon the removal of the site from the Green Belt following the adoption of the Local Plan. However, the preparation of this planning application has required the completion of an extensive range of technical work, to support the soundness of the allocation, as set out below:
11. **Landscape and Visual Impact** - A Landscape and Visual Impact Assessment has been prepared which concludes that the site is not prominent in the landscape, its development will not impact on the special qualities of the AONB, and opportunities exist to provide improved landscaping through the sites development. It is therefore clear that landscape considerations would not prevent the delivery of the allocation.
12. **Ecology** - An Ecological Appraisal accompanies the planning application, which concludes that the identified habitats and species would not represent an in-principle constraint to the development of the site. Moreover, the development of the site provides opportunities to enhance ecological habitats.
13. **Highways** - The Transport Assessment that accompanies the planning application demonstrates that the site is within walking distance of a range of services and facilities, as well as public transport connections and employment opportunities. Furthermore, it is illustrated that the visibility splays at the Glynswood/ Green Hill junction are appropriate, and that the trip generation from the proposed development will have a minimal impact on the local highway network. As such, highway matters would not prevent the delivery of the allocation.
14. **Heritage** – The Heritage Statement concludes that due to a lack of inter-visibility between heritage assets and the site, and the site's relationship with the adjoining built form, it will not

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result in any harm upon the setting of heritage assets. Accordingly, there are no heritage grounds that would prevent the delivery of the allocation.

15. **Arboriculture** - The Arboricultural Assessment identifies that there are no high quality trees located within the site. Moreover, it concludes that new planting across the site will more than compensate for the loss of a small number of low quality trees.
16. **Flood Risk** - A Flood Risk Assessment will accompany the planning application. This confirms that the site is in Flood Zone 1 and demonstrates that a suitable sustainable urban drainage system can be provided to ensure that surface water is effectively discharged from the site. In light of this, drainage matters would not prevent the delivery of this allocation.

Delivery

17. Appendix 7 of the Council's HELAA (HELS1.7) identifies that the allocation is expected to come forward within the first five years of the plan period. Inland Homes can confirm that the site is available now and is deliverable, as illustrated by the submission of a planning application ahead of the Stage 2 Examination hearing sessions.

Conclusion

18. Inland Homes, an established regional housebuilder, controls draft allocation HW9 and has been promoting it for development through the local plan process. A planning application is on the verge of being submitted for the development of the site (including a policy compliant level of affordable homes), clearly demonstrating its development would be viable. The wide-range of technical work prepared in support of the planning application, in conjunction with the Council's evidence base, clearly demonstrates that the site is suitable for development and that the allocation is sound.