

HEARING SESSION STATEMENT 1 BY THE NORTH BUCKS PARISHES PLANNING CONSORTIUM

MATTER 7: DEVELOPMENT FRAMEWORK – HIGH WYCOMBE

North Bucks Parishes Planning Consortium is particularly concerned about the proposed significant under-delivery of new housing on the several large sites allocated for housing development in the High Wycombe urban area.

The 5 largest sites allocated for housing development in High Wycombe amount to 157 hectares and the Wycombe District Local Plan only proposes a total housing delivery figure of 1,985 from these sites. This equates to an average gross figure of 12.6 dwellings per hectare. Consider if the dwellings per hectare figure were to average 20, this would generate an additional 1,160 new homes – **more than 50% of the WDLP unmet need!** As is mentioned in detail later, it is very informative that the developer of one of these sites submitted a planning application earlier this year to deliver 40% more dwellings than that which is proposed in the WDLP.

At the EiP during Session 5, we heard the District Council indicating that it was quite proud of the net dwellings per hectare figures it was expecting to deliver on these sites, in defence of the criticisms raised concerning Policy DM 34 and in particular the demand for *canopy cover of at least 25%* on such sites. Pointedly, it did not attempt to explain or justify how such small proportions of these large sites were allocated for housing. The failure by the District Council to recognise that, under current circumstances, it is irrational to stipulate this minimum level of canopy cover for urban extensions, when it has a responsibility to maximise housing delivery and such delivery cannot be achieved with this overly generous level of canopy cover, is of very considerable concern.

Looking individually in detail at some of these sites, NBPPC makes the following observations.

HW4 – Abbey Barn North

Paragraph 5.1.15 of the WDLP advises that *Abbey Barn North is an 11ha site that is located off Abbey Barn Lane, it is 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.*

This 11.32 hectare site is all designated for residential development. However, it is planned to deliver only 100 new homes at 8.8 dwellings per hectare (dph). It is noteworthy that this is the only large site which lacks a development brief and map to explain this extremely low figure, which is unacceptable.

Appendix 2 of the Housing and Economic Land Availability Assessment details 26 dph for the 'net developable land,' which therefore confirms that only 3.85 hectares are considered

‘suitable’ for housing development. **So 66% of the site is being proposed for uses other than housing.** Without a development brief and map, a full explanation for this anomaly is very difficult to fully understand.

There are however indications of possible reasons in the WDLP. Policy HW4 paragraph 3 d) of the WDLP advises that the site’s development will - *Retain and secure long term management of a substantial area of the chalk grassland habitat.* But the above description of the site makes no mention of chalk grassland and it appears that, rather than developing scrubland for housing, the WDLP proposes development of a very large area of chalk grassland. This must surely be rationally viewed as a luxury too far when the Government’s guidance to LPAs is unequivocally to build significantly more homes.

Policy HW4 paragraph 4 a) advises the need to - *Minimise impact upon the wider views over and through the valley from the surrounding landscape.* The site lies on the outskirts of the High Wycombe conurbation, with nearby good infrastructure and high density housing. The restrictions on housing density proposed for this site are based on concerns about the impact on views that are not even from an AONB site. However, there is already a prominent electricity pylon behind the site and there are plans to build apartments within half a mile and in direct sight from any view on the Abbey Barn North site.

Paragraph 5.1.19 of the WDLP advises that - *Providing access will be complex and could be expensive. Subject to detailed design considering site access options, it would be highly beneficial, and avoid abortive work, for the site access to implement part of the realignment of Abbey Barn Lane.* This must surely raise questions of viability for this site, with only a third of the area being proposed for development for housing. Affordable housing will be required at a rate of 40% of the total gross internal area. This is consistent with policy DM24 and must further make the viability of this site extremely doubtful.

HW5 – Abbey Barn South and Wycombe Summit, High Wycombe

Paragraph 5.1.27 of the WDLP advises that - *Abbey Barn South is a 34 ha site that is located on the southern side of High Wycombe, off Abbey Barn Lane close to the M40, it is a flat area which is mainly farmland with a significant Ride running through the site.*

This 34.3 hectare mixed use site has 1.6 hectares allocated for employment. This means that the 475 new homes planned for the remaining 32.7 hectares is at a rate of 15.4 dph. It appears that too little of the developable area of this ‘flat’ site is allocated for housing and too much as green space.

Appendix 2 of the Housing and Economic Land Availability Assessment details for Abbey Barn South a rate 30 dph for the ‘net developable land,’ which therefore confirms that only

15.8 hectares are considered suitable for housing development, meaning that 52% of this site is devoted to non-housing uses.

At the EiP Session on 24th July, it was interesting to be directed by the representor for Berkley Strategic Planning to their planning Application 18/05363/FUL for this site for up to 670 dwellings, 41% more than the indicative number for the site in the WDLP. This just proves that, even with the significant development constraints being imposed on this site in the WDLP, commercial common sense has been applied by the developer.

HW6 – Gomm Valley and Ashwells, High Wycombe

Paragraph 5.1.36 advises that *the Gomm Valley and Ashwells site is a 74 ha site, located between High Wycombe and Tylers Green to the north of the High Wycombe to Marylebone railway line. It is a hillside location that is a mix of arable land, chalk grassland and woodland.*

This mixed use site has 1.2 hectares allocated for employment. Only 530 new homes are planned for the remaining 72.8 hectares at a rate of 7.3 dph. Again, the developable area for housing has not been maximised, in fact quite the reverse.

Appendix 2 of the Housing and Economic Land Availability Assessment details for Gomm Valley and Ashwells a rate 29 dph for the 'net developable land,' which therefore confirms that only 18.3 hectares are considered suitable for housing development. **This means that 75% of this site, which is far and away the largest in the High Wycombe urban area, is being proposed for uses other than housing.**

Policy HW6 paragraph 1 b) stipulates the need to - *Establish an appropriate urban edge to High Wycombe and Tylers Green and avoid the coalescence of the two settlements, leaving an undeveloped gap of approximately 200 metres or more at their closest point, informed by landscape impact, ecological requirements and character issues.* Obviously this 'undeveloped gap' is the major factor in the site delivering only 7.3 dwellings per hectare.

Nowhere in the WDLP, or the support documentation, is there a detailed justification for the adoption of such a generous undeveloped gap of 200 metres to avoid coalescence. Surely an undeveloped gap of 100 metres would more than meet the needs of this situation?! Without a robust justification, this aspect of Policy HW6 must be considered unsound.

HW7 – Terriers Farm and Terriers House

Paragraph 5.1.52 advises that the - *Terriers Farm area is a 24ha plus site located on the northern side of High Wycombe between Terriers and Hazlemere off the Kingshill Road. The site is mainly fields currently used for grazing. It also includes Terriers House, the adjacent disused cricket field and an area of woodland to the East opposite DeHavilland Drive.*

Why the lack of precision regarding the area of this site, unlike other sites? Appendix 2 of the Housing and Economic Land Availability Assessment details for Terriers Farm a rate 34 dph for the 'net developable land,' which therefore confirms that, with an indicative dwellings number of 500, only 14.7 hectares are considered suitable for housing development. This means that 39% of the site is proposed for other uses.

As the development brief map shows, there are appreciable areas of strategic formal open space (6) and informal open space (7) and beyond 6 and 7 there is a further significant area, pale yellow in colour, which one assumes is further open space but this is not made clear. Policy HW7 in paragraph 3 c) stipulates that development of the site should - *Protect the former cricket pitch associated with Terriers House as open space unless alternative additional open space provision is provided elsewhere on the site.* Once again, one sees Policy DM 34 at work in the overprovision of green space and the under-provision of essential homes.

HW8 – Land off Amersham Road including Tralee Farm, Hazlemere

Paragraph 5.1.59 advises that - *The site of 12.87 ha is located on the edge of High Wycombe urban area in Hazlemere, adjacent to the district border. It is currently a mix of farmland and woodland and adjacent to the A404.*

Appendix 2 of the Housing and Economic Land Availability Assessment details for Land off Amersham Road a rate 35 dph for the 'net developable land,' which therefore confirms that, with an indicative dwellings number of 350, 10 hectares are considered suitable for housing development. This means that 23% of the site is proposed for other uses. However, the development brief map on page 118 of the WDLP clearly shows that the total area of proposed open space, proposed tree belts and existing trees/woodland is appreciably more than 23%

Policy HW8 in Paragraph 3 a) stipulates that development of the site should - *Provide access to and retain the existing orchard within the north east of the site.* NBPPC would argue that to retain a, presumably non-commercial, orchard is a luxury that cannot be justified when new homes should be the priority.

NBPPC would contend that Wycombe District Council has demonstrably been in denial about how wasteful it has been in under-delivering housing on the large sites in High Wycombe in the Local Plan by blinkering itself when considering site densities only on a net density basis.

In paragraph 117 of the HELAA it is explained that - *Site densities have now been considered on a net density basis, not gross density. For example, a number of sites in the HELAA are part of mixed use proposals, where part of the site is reserved for employment purposes –*

the density on the housing part of the site is considered. Similarly where there are site constraints that limit the developable area of the site, these are factored into identifying a net developable area and hence a net density.

Our organisation finds this explanation extremely unconvincing, particularly when Table 13 of the HELAA claims that the average **net** density for Tier 1 (High Wycombe) settlements is 126 dwellings per hectare. The same table confirms that for greenfield sites, the average is 31 dph for High Wycombe. Policy CP4 of the WDLP confirms that the planned delivery of new homes for High Wycombe is 6,350. Taking the average dph given in Table 13 of 126 for High Wycombe, this would indicate only 50.4 hectares of land being developed for housing.

There is obviously an error somewhere because for the 5 sites considered above, the total net developable land is 62.65 hectares with a total indicative new home delivery of 1,955.

Undoubtedly Table 13 is both erroneous and totally misleading.