

REPRESENTOR ID WDLP19 0917

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION

STATEMENT ON BEHALF OF MPAC (FORMERLY MOLINS PLC) IN CONNECTION WITH MATTER 7 – DEVELOPMENT FRAMEWORK – HIGH WYCOMBE

This document is part of the response by Mpac (formerly Molins plc) to the Inspector's request for further written statements on questions identified by her in the Schedule of Matters, Issues & Questions. This statement relates to *Matter 7- Development Framework – High Wycombe*.

Different matters identified by the Inspector overlap with one another. In order to avoid as much duplication as possible, we have attempted to address each issue in only one of our statements and, where relevant, in other statements just to cross-refer to the document in which the issue is addressed.

Introduction

1. It is clearly established that, to be sound, the Plan should meet as much of its OAN within its own administrative boundary as is realistically achievable. In those circumstances, the Plan should release the former Mpac (Molins) Sports Ground from the Green Belt and allocate it for residential development
2. In our response to Question 13 (*Implementation of the Plan's Strategy*) Matter 1 (*Legal Compliance and Duty to Co-operate*) we referred to the following failings of the Plan:
 - making insufficient provision to ensure a 5-year supply of housing throughout the plan period; and
 - failing to allocate deliverable sites within the district despite them being readily available to contribute towards tackling the district's unmet need for more housing.
3. In terms of meeting housing needs, the spatial strategy is not flexible and is unable to respond to changing circumstances. There is a very real prospect that there will be an urgent need for the release of additional sites to provide a significant number of units during the plan period. The Plan has no strategy for dealing with this eventuality.
4. It is against this background that we comment on the viability and deliverability of some of the proposed housing sites in the High Wycombe area (covered by Policies HW4 to HW15).

HW4 - Abbey Barn North;

HW5 - Abbey Barn South and Wycombe Summit

HW6 - Gomm Valley and Ashwells

HW7 - Terriers Farm and Terriers House

5. The Council envisages in its Housing Trajectory these 4 sites in High Wycombe providing 1,275 dwellings between 2018 and 2023.
6. These 4 sites comprise strategic development sites identified in the adopted Core Strategy (2008) as Reserve Locations for Future Development (“former reserve sites”). They were released by the Council in November 2014 (together with a fifth site – Slate Meadow, Bourne End & Wooburn – Policy BE1) ahead of production of the new Local Plan with the intention that they should contribute towards meeting the Council’s housing needs and, in particular, its then parlous 5-year land supply position.
7. However, since that time – over 3.5 years ago – no planning permissions have been granted on any of these sites. There is currently an outstanding application on 1 of the sites¹ which is subject to technical and other objections that need to be resolved. There are no planning permissions or outstanding applications for development at the other 3 “reserve sites”.
8. Almost 4 years on from release no development has commenced on any of these sites. The Council conceded in the Hearing on Matter 3 that the Development Briefs took longer to produce than anticipated. The issues that have caused delay in the early delivery of these 4 sites are seemingly still unresolved. Therefore, it is very likely that, whilst the Housing Trajectory suggests that these 4 “reserve sites” in High Wycombe will provide 1,605 dwellings between 2018 and 2025, the reality is that the timescale for completion will be longer and the number of units will be much lower.
9. There are significant matters that need thorough assessment with each of these 4 sites:

HW4 – Abbey Barn North – Natural England have commented that the site is “*ecologically rich*” and “*given the capacity of dwellings it is unlikely development will be able to provide sufficient mitigation for loss of biodiversity*”²

- HW5 - Abbey Barn South and Wycombe Summit – Historic England³ have stated that the Policy should clearly state no development will be allowed opposite the group of grade II listed buildings at Abbey Barn Farm to protect the rural setting of this farmstead and this, together with the woodland ride referred to at 3 (a) of Policy HW5, reduces the developable area and limits the capacity to around 500 dwellings⁴ as indicated in paragraph 5.1.28 of the Local Plan. At Annex 1 we summarise the position regarding the current

¹ Planning application 18/05363/FUL for up to 550 dwellings plus 120 extra care units on land at Abbey Barn South

² See p57 Summary Responses to Regulation 19 Consultation October – December 2017

³ See p60 Summary of Responses to Regulation 19 Consultation October – December 2017

⁴ See Aylesbury Vale District Council’s representations submitted to Regulation 19 Consultation October – December 2017

outstanding planning application (which proposes far more dwellings than indicated in the Local Plan) appertaining to this site from which it will be apparent that the submitted scheme will need further modifications and consultation responses before it can be formally determined by the Council. This, of course, inevitably leads to delay. In addition, the pre-commencement conditions that are likely to be applied to any permission granted will also delay the start of construction. The Council's Housing Trajectory envisages a start on site sooner rather than later with 175 dwellings completed by 2021. This is looking extremely unlikely and adds to the reasons why other suitable sites, such as the former Mpac Sports Ground at Monks Risborough which is deliverable in the short-term, should be allocated.

- HW6 – Gomm Valley and Ashwells – This site includes the Gomm Valley SSSI and lies within the Gomm Valley Biodiversity Opportunity Area. AVDC recognises⁵ that the capacity of the site is limited by its characteristics and location to 400 dwellings at Gomm Valley and 120 at Ashwells as indicated in the justifying text of the Local Plan (paragraph 5.1.37) to Policy HW6. In the Hearing on Matter 3 the owners of Gomm Valley (Aviva) argued that a development of 400 dwellings was unviable and that a scheme of 800 houses would ensure economic viability. This clearly requires further assessment by the Council and the developer before any viable scheme can be submitted. It remains entirely to be seen whether it is possible to devise a scheme which is both viable and sensitive to the site's constraints. At the least, there will be further delay in this site coming forward.
 - HW7 – Terriers Farm and Terrier's House - Scottish and Southern Electricity⁶ has indicated a requirement for *"multiple distribution substations due to the size of the development"* and Thames Water has referred to the need for strategic drainage infrastructure to ensure sufficient capacity is brought forward ahead of the development which has an indicative capacity of 500 dwellings (paragraph 5.1.53 of the Local Plan). The proximity of the Terriers Farm/House site to the AONB and its characteristics limit development to the capacity identified and this, like Gomm Valley referred to above, may involve delay regarding viability.
10. Aylesbury Vale District Council⁷ has indicated to Wycombe that **all** the above *"reserve sites have a lot of restrictions and therefore less than half of the site areas are suitable for building, making the use of this land inefficient"*.

HW8 - Land off Amersham Road including Tralee Farm, Hazlemere.

11. This site, allocated for 350 dwellings, is proposed to be released from the Green Belt.

⁵ See Aylesbury Vale District Council's representations submitted to Regulation 19 Consultation October – December 2017

⁶ See p69 Summary of Responses to Regulation 19 Consultation October – December 2017

⁷ See, inter alia, p58 - Summary of Responses to Regulation 19 Consultation October – December 2017

⁸ See p21 Chiltern & South Bucks District Councils Green Belt Development Option Appraisals (November 2017)

12. Adjoining land to the north-east within Chiltern District was also being considered for release from the Green Belt but was rejected on the basis of “*major adverse impact*” on the AONB.⁸
13. The Wycombe Local Plan recognises that development of this site requires a new vehicular access from the A404 to the south with further highway impact assessments on the local network. Developer contributions for off-site highway improvements will be needed and the site also contains deciduous woodland habitat and agricultural buildings potentially providing suitable habitat for bats. In addition, paragraph 5.1.65 of the Plan notes that “*a badger assessment may be necessary*”.
14. Whilst these matters do not necessarily prevent development, should the Inspector confirm the allocation, they could reduce the actual number of dwellings to well below the Council’s anticipated 350.

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

15. The site is located on the northern urban edge of High Wycombe between Hughenden Road and Green Hill on the edge of the Green Belt within the AONB. There is a public right of way through the centre of the site and the north-west edge is an area of surface water flooding. It is within 0.5km of Millfield Wood SSSI. Highways access is an issue that needs to be resolved.
16. The site is visible from longer distance higher ground to the west and north west. The eastern half of the site lies on higher ground with wider views to the surrounding countryside, where development is likely to be more prominent and have an adverse visual impact.
17. The Plan allocates the site for 50 dwellings notwithstanding the fact that originally the Council envisaged a development of 39 dwellings⁹. The site may ultimately be deliverable if matters such as highways, flooding and visual impact can be satisfied - but for a number of dwellings substantially less than the 50 currently envisaged. Undoubtedly these issues will be assessed in appropriate detail at the planning application stage.

HW10 - Horns Lane, Booker, High Wycombe

18. The site is located on the urban fringe of Booker, High Wycombe, adjoining the M40 motorway on the western boundary, residential development to the east and allotments, on the northern boundary. The site is within 1.2km of Widdenton Park Wood SSSI. The current allocation is for 64 dwellings.
19. Access is envisaged from Horns Lane. The Plan requires the existing perimeter vegetation, including the hedgerows between the site and the adjacent allotments, to be protected and the existing footpath crossing through the centre of the site to be retained.

⁹ Wycombe District Council Green Belt Site Assessments Development Capacity June 2016

¹⁰ See p.71- Summary of Responses to Regulation 19 Consultation October – December 2017

20. Development needs to take account of noise from the M40 motorway. Thames Water¹⁰ has raised a concern that the water network capacity may be unable to support demand from the development. Therefore, there are detailed matters to be addressed that will determine the deliverability of the site.

HW11 - Clay Lane, Booker, High Wycombe

21. The site adjoins the AONB and therefore the Plan requires development to be landscape led to ensure minimal impact. The Plan also requires the planting of a 10-metre tree belt along the northern and eastern boundary to ensure that a long term defensive Green Belt boundary is established.
22. More importantly, the proximity of the M40 motorway means that this could be a significant constraint to development in terms of the living conditions of future residents and this may well be a key-determinant in the number of dwellings developed.
23. Notwithstanding the above, the Council is proposing to release the site from the Green Belt with an indicative capacity of 30 dwellings.

HW13 - Former Bassetsbury Allotments, Bassetsbury Lane

24. The former Bassetsbury Allotments is a greenfield site owned by the Council in the urban area.
25. The Plan envisages a development of 30 dwellings but recognises the constraints – e.g. contaminated land, Grade II listed buildings (Funges Farm and Harvest Barn), conservation area, flooding, biodiversity and highways.
26. Notable representations have been made by Thames Water and the Environment Agency. The former is concerned that the water network may be unable to support anticipated demand and local upgrades to the existing infrastructure may be required ahead of the development. The latter has indicated that due to flood risk the site may be undeliverable on the basis that: *“the SFRA level 2 is not sufficient to be sure that the site passes the second part of the Exception Test. The flood risk modelling is not of sufficient quality to be sure this is possible”*.¹¹

HW15 - Land to the rear off Hughenden Road, High Wycombe

27. This allocation is unsound for the following reasons:
28. Firstly, the Plan (paragraph 5.1.105) does not indicate the number of dwellings because of the complex nature of this development and the multiple landownerships involved. The Council proposes that the potential housing delivery from the site will be reviewed in the Monitoring Report.

¹¹ See p74 - Summary of Responses to Regulation 19 Consultation October – December 2017 for both responses by Thames Water and the Environment Agency

29. Secondly, the Council recognises (paragraph 5.1.106) there are a number of physical and policy constraints, including flood risk issues from all sources, access, geometry of the site and the need to ensure a satisfactory relationship between any new development and existing properties on the frontage.
30. Thirdly, Buckinghamshire County Council recommended that the site should not be allocated due to high risk of flooding from all sources and the impact this has on the viability of development.¹²
31. Fourthly Buckinghamshire County Council has advised that, whilst the site allocation does not have housing numbers associated, given the level of risk the number would be low and given *“the level of work required to demonstrate that the site is developable could make it undesirable to developers.”*¹³
32. Finally, Buckinghamshire County Council as highways authority¹⁴ is of the view that:
- “it may prove difficult to provide satisfactory access to this site unless sufficient land is available on Hughenden Road to construct a radii access and achieve the requisite visibility splay onto an A road.”*
33. In light of the above there appears to be no justification whatsoever for retaining this allocation in the Plan.

Conclusions

34. It is clear from the foregoing that there are deliverability issues with some of the allocated housing sites in High Wycombe that need to be addressed.
35. There is a very real prospect that there will be an urgent need for the release of other sites to provide a significant number of units during the plan period. The Plan has no strategy for dealing with this eventuality. Additional allocations are therefore required.

¹² See p76 - Summary of Responses to Regulation 19 Consultation October – December 2017

¹³ See p77 - Summary of Responses to Regulation 19 Consultation October – December 2017

¹⁴ See p77 - Summary of Responses to Regulation 19 Consultation October – December 2017

ANNEXE 1

SUMMARY OF OUSTANDING PLANNING APPLICATION AT ABBEY BARN SOUTH AS AT 4 JULY 2018

A planning application (18/05363/FUL) for up to 550 dwellings plus 120 extra care units on land at Abbey Barn South was submitted to the Council on 8 February 2018 by Berkley Homes Western Ltd.

This application has a number of identifiable constraints.

Flooding / drainage issues have seemingly been overcome.

The County Council has recommended refusal (12 June 2018) on highways grounds:

“Insufficient information has been submitted with the planning application to enable the traffic implications on the development upon the Daws Hill Lane/Marlow Hill/Marlow Road junction to be fully assessed. From the information submitted, it cannot be satisfactorily concluded that the additional traffic generated by the proposal would not adversely affect the safety and flow of users of the road network in the aforementioned area, contrary to Policy CS20 (Transport and Infrastructure) of the Wycombe Development Framework Core Strategy (adopted July 2008) and the National Planning Policy Framework (2012)”

Sport England has issued a “holding objection.” It is concerned that the applicants have failed to consider the impact of 550 dwellings on the demand generated on sporting provision where existing provision in the area may not be able to accommodate the increased demand without exacerbating existing and/or predicted future deficiencies.

The County Council (Adult Care) stated in its response that the priority for extra care development is in Aylesbury district and in the north of the County.

NHS Buckinghamshire (8 June 2018) has advised Wycombe that the proposed *“development will significantly impact delivery of primary care services in this area.”*

The District Council’s Natural Environment Officer has requested further information from the applicants on ecological issues on the basis that:

“.....the impact that the proposed development will have on ecology has not been assessed with any rigour and therefore the opinions which are given on the impacts are not backed up with any real justification”.

The District Council’s Urban Design / Landscape Officer has commented inter alia, that:

- *“There remains a poor relationship between The Ride open space and adjacent development area, physically and visually separate in places.*

- *The layout and building elevations convey only a limited degree of variation that does not always embrace the name or design intent of character areas.*
- *There is no indication of how the site might be integrated with Wycombe Summit in terms of permeability for pedestrians/cyclists as a minimum.*
- *Green links and permeability in the south-eastern quarter of the site remain weak/incomplete, risking an isolated 'dead space' at the end of the Ride.*
- *There is almost no incidental green space within streetscapes, lacking in The Village character area and in the parking courts in particular".*

The Council's Natural Environment Officer is not in a position to make any recommendations on the basis that the submitted Arboricultural Impact Assessment and Tree Condition Survey is "*inadequate*"

The County Council's Archaeology Officer has noted that the site contains potential heritage assets and has requested appropriate conditions be attached to any planning permission granted for archaeological investigations to be undertaken

None of the above matters will necessarily prevent development. It is clear, however, that the application will need further modifications and consultation responses before it can be formally determined by the Council. This, of course, inevitably leads to delay. In addition, the pre-commencement conditions that are likely to be applied to any permission granted will also delay the start of construction.

The Council's Housing Trajectory envisages, however, a start on site sooner rather than later with 175 dwellings completed by 2021.