
**WYCOMBE DISTRICT LOCAL
PLAN EXAMINATION**

Matter 7 – High Wycombe

Hearing Session: Tues 4th September 2018

STATEMENT PREPARED BY:



Woolf Bond Planning
Chartered Town Planning Consultants

On behalf of:

**Persimmon Homes Ltd (North
London) and Redrow Homes Ltd**



August 2018

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

(d) HW7 – Terriers Farm and Terriers House

Introduction

- 1.1. This Statement has been prepared on behalf of Persimmon Homes Ltd (North London) and Redrow Homes Ltd who have a controlling interest in and own part of the majority of the Terriers Farm site allocated under Policy HW7.
- 1.2. That part of the Terriers Farm allocation controlled by our clients is edged red on Plan No. 15.016.1000B (attached) and extends to approximately 23ha¹.
- 1.3. Based upon the masterplan approach undertaken for the site to date, we are of the view that the HW7 allocation can provide in excess of the ‘approximately’ 500 suggested in the Local Plan and we have been working on a figure of around 540 dwellings.
- 1.4. Whilst we continue to support the allocation of the site for housing, including for the reasons set out in our representations upon the Regulation 19 consultation, we continue to object to certain of the DM policies. We are also seeking amended wording to Policy HW7 in accordance with those representations and on the basis of the content set out below.

Planning Context for the Site

- 1.5. The principle of developing the site for housing has long been established including as a result of saved policy H2 of the 2004 adopted Local Plan. This was carried forward under Policy C8 of the adopted 2008 Core Strategy, with the site identified as one of five reserve sites to be brought forward to meet the future need for housing.

¹ As confirmed at Table 11 of the Local Plan, the HW7 allocation extends in total to approximately 24.6ha with an indicative capacity of 500 dwellings (which is less than the 540 dwellings mooted for the land controlled by Persimmon and Redrow.

- 1.6. The Wycombe Local Plan was adopted in 2004 and a specific policy (H2) was included in the Plan identifying the site as a reserve site for housing development subject to the Council identifying a need for the site to be released to meet housing needs during the plan period.
- 1.7. The Wycombe Core Strategy was subsequently adopted in July 2008 and sets out the overall development strategy for the district up until 2026. Policy CS8 'Reserve Location for Future Development' carries forward the five reserve site allocations; Terriers Farm being one of those.
- 1.8. On 17th November 2014, the Council's Cabinet resolved to release all of the reserve housing sites to help meet the identified need for housing and, in particular, the need to demonstrate a five year supply of deliverable housing land. Without these sites the Council cannot demonstrate a five year supply of deliverable housing land. This an important aspect of the tests of soundness at paragraph 182 of the NPPF.
- 1.9. Following the Council's resolution to release the reserve sites for housing, we commenced work on a collaborative basis with the LPA in order to prepare a site-specific Development Brief, the content of which is intended to inform the preparation of a subsequent planning application and overarching masterplan approach.
- 1.10. The Matter 3 Hearing Session considered the five year housing land supply position and the delay to certain of the reserve sites that was brought about in part by the lengthy Development Brief process.
- 1.11. At that Session the Council reiterated their belief that the reserve sites remained deliverable. We support that assessment in so far as it relates to the Terriers Farm site.

The National Planning Policy Framework

- 1.12. The revised National Planning Policy Framework ("NPPF") was published last month (after the stage 1 hearing sessions but prior to the stage 2 hearings).
- 1.13. Paragraph 214 makes it clear that the policies of the previous NPPF (March 2012) will apply for the purpose of examining local plans, where those plans are submitted on or before 24 January 2019. We have prepared our response(s) on

this basis and apply the provisions and tests contained in the previous NPPF in assessing the soundness of the submitted Local Plan.

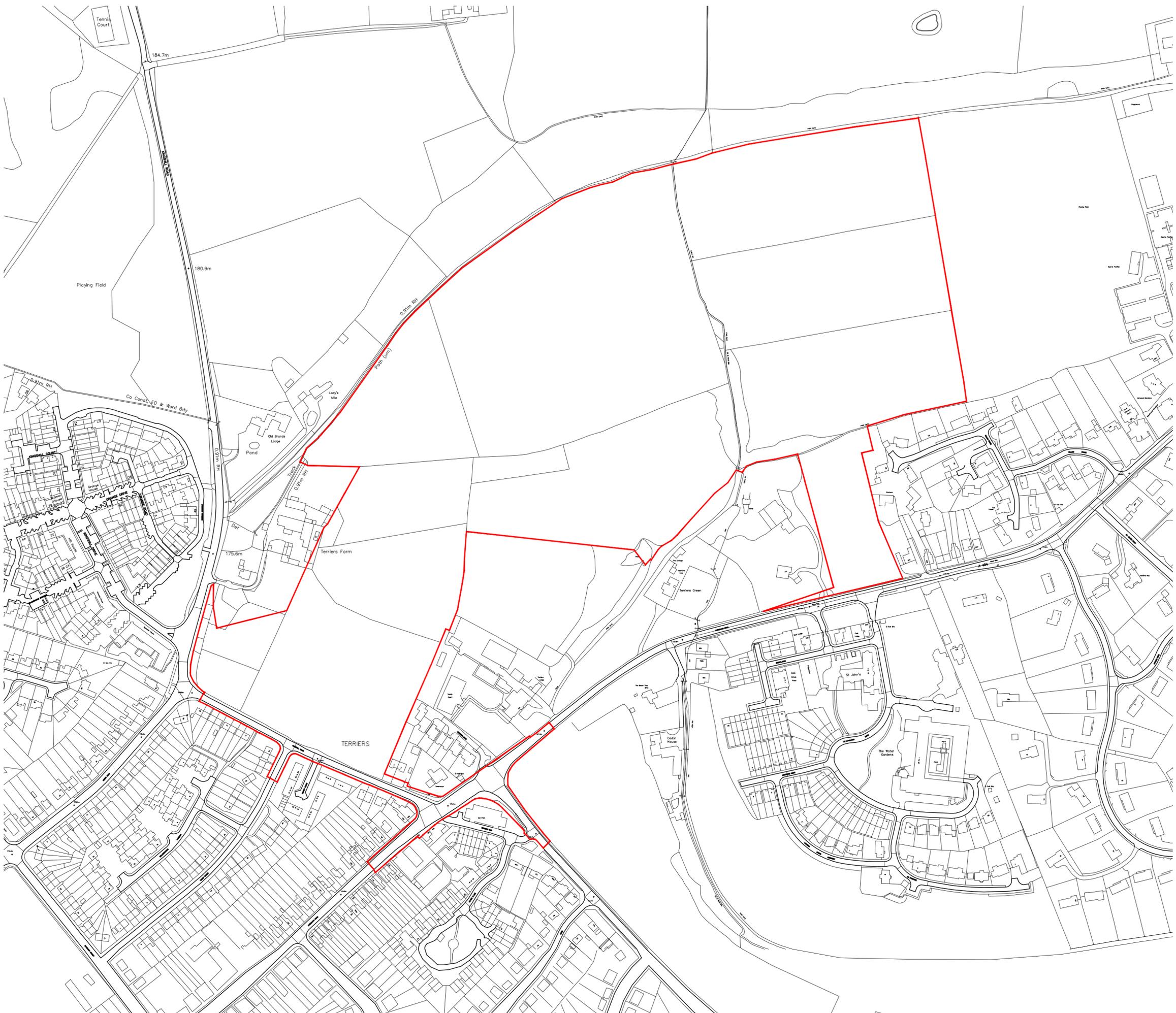
Viability

- 2.1. Save for in relation to our general comments relating to the form and content of certain of the DM policies and their impact upon scheme viability generally, we wish to make a specific comment in relation to the requirement for the Terriers Farm site to accommodate strategic open space needs arising from the Gomm Valley allocation (HW6), with the Gomm Valley allocation providing for a new primary school, which will meet demands arising from the Terriers Farm allocation.
- 2.2. An explanation of the strategy/approach is set out at paragraphs 5.1.50 and 5.1.57 of the submission Local Plan.
- 2.3. It is suggested that due to the topography of the Gomm Valley site, it is not suitable to accommodate all of the formal open space needs on-site. It is stated that this need will be accommodated at Terriers Farm. It is stated that the Terriers Farm allocation will contribute towards meeting wider strategic open space needs in lieu of making on-site education provision which will be made on the Gomm Valley and Ashwells site.
- 2.4. Whilst we have no in-principle objection to this approach, we do have an objection to the practicalities of the policy wording and the financial implications arising including in relation to the resultant net developable area.
- 2.5. Policy HW7 sets out the requirement for the site to provide for strategic open space, including to meet needs arising from the Gomm Valley allocation. However, Part 5(a) of Policy HW7 also requires a commensurate financial contribution towards securing primary school places as part of the Gomm Valley allocation. Conversely, whilst Gomm Valley is expected to provide land for the primary school, they are not required to make a financial contribution towards the provision of strategic POS on the Terriers Farm site.
- 2.6. We are expected to provide POS to serve the needs arising from the Gomm Valley allocation as well as making a financial contribution towards education.

- 2.7. There is no corresponding requirement for the Gomm Valley and Ashwells allocation at Policy HW6 to make a contribution towards the provision of strategic open space at Terriers Farm.
- 2.8. This approach does not seem either fair or equitable. As such, it cannot be said to represent a sound basis for the policy wording.
- 2.9. The Policy HW6 allocation at Gomm Valley is for approximately 520 dwellings, whilst that for Terriers Farm (HW7) is 500. The combined total is 1,020 dwellings.
- 2.10. At an average of 2.4 persons per household, the schemes could generated a combined total of around 2,448 persons.
- 2.11. The Terriers Farm Development Brief was considered by the Council's Cabinet on 12 March 2018, where it was agreed that the Brief should be adopted for subject to minor changes.
- 2.12. Para 6.92 of the Brief states that half an additional hectare of on-site strategic open space will be provided at the Terriers Farm allocation to compensate for a school being provided at Gomm Valley.
- 2.13. Paragraph 6.18 adds that the exact amount of strategic open space required will depend upon the proposed population of the whole development based on 3.3ha per 1,000 population.
- 2.14. At approximately 1,200 persons (500 dwellings x 2.4 persons), the Terriers Farm site should provide a maximum of 3.96ha of strategic open space to serve the 500 dwellings plus a further 0.5ha to compensate for a school being provide at Gomm Valley. As such, the HW7 allocation should require a maximum of 4.46ha of strategic open space.
- 2.15. The POS requirement should be specifically set out and addressed in the policy and /or supporting text in order to provide for clarity.

Deliverability

- 3.1. Matters were progressing on a collaborative basis, but matters stalled as a result of the work undertaken in relation to the Development Brief. This included disagreements relating to the form and content of the Brief, including in so far as it related to the proposed access arrangements.
- 3.2. Pursuant to the delay in bring the site forward for development, the trajectory at Appendix 7 of the Council's HELAA (September 2017) which assumes 420 completions by 2023 is not likely to be realised.
- 3.3. Persimmon and Redrow are in the process of agreeing a joint approach to bringing the site forward potentially in the form of a hybrid application, with a detailed first phase. It is expected that an application in this form could be submitted in mid-2019, with a view to obtaining planning permission end 2019. Allowing for discharging pre-commencement conditions and making a start of site, to include the necessary infrastructure works, first completions totalling around 20 dwellings could be expected in 2020/21. Thereafter, completions at 100dpa could be achieved in 2021/22 and 2022/23. This could result in a total of approximately 220 completions within the five year period to 2023.
- 3.4. On the basis of the EIA Screening Opinion received from the Council in January 2016 (Ref: P115/02026/Misc3), the subsequent technical work undertaken in order to inform the content of the Development Brief and the content of the Jacobs Highway Model, there are no technical constraints to bringing the site forward and realising completions during the five year period to 2023.



NOTES:
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 2. This drawing must be read in conjunction with all relevant drawings, documents and information prepared by the Architects, other Consultants and Specialists.
 3. Any discrepancy on the drawing must be referred to the Architects and clarification obtained before any action by others and prior to commencement of works.
 4. All dimensions must be checked on site before any action by others and prior to commencement of work or the preparation of Specialists drawings.
 5. The copyright of this drawing remains with the Architect.
 6. If in doubt ask!

REVISIONS

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PROJECT:	TERRIERS FARM		
DWG TITLE:	FIG.1-SITE LOCATION PLAN		
SCALE:	1:2500@A2	DRAWN:	PNH
		CHECKED:	
DWG NO:	15.016.1000	REV:	B
		DATE:	13.04.15