

Wycombe District Local Plan Examination – Stage 2

Statement by Berkeley Strategic (966) - August 2018

Introduction

1. This Statement is submitted by Berkeley Strategic ('Berkeley') in relation to Matters 9 and 10 of the Wycombe Local Plan examination (Stage 2). Berkeley controls two sites at Chapman Lane, Bourne End (Ref: SBE0048) and Heath End Farm, Flackwell Heath (Ref: SWC0070).
2. Berkeley's previous consultation response on the Regulation 19 Proposed Submission Local Plan (November 2017) raises concerns about the soundness of the Local Plan with particular regard to the issues of the spatial strategy, housing supply and Green Belt. Berkeley also submitted hearing statements in June 2018 in relation to Stage 1 of the examination for Matters 1,2,3 and 6. A particular concern raised previously relates to the proposed approach of the Council to deliver a significant proportion of Wycombe's housing requirement in Aylesbury Vale District where unprecedented rates of housing delivery are relied upon.
3. Within the Stage 1 Hearings, the Council maintained that it is releasing all the Green Belt land that it can, based on the Green Belt Part Two Assessment, despite the significant concerns about the robustness of the assessment process and its outcomes raised by multiple parties. The Council's position is that, despite having reviewed around 80 sites within the Green Belt Part Two Assessment, only a small handful of sites, capable of delivering 1,139 homes, have exceptional circumstances meaning that they are capable of being released.
4. It is clear that the Council's overall strategy in preparing the Local Plan has been to minimise the amount of sites that it is allocating within its own district area in a way that is 'constraints-led', contrary to the NPPF paragraph 157. With such a limited amount of Green Belt land to be released, the Local Plan also fails to establish Green Belt boundaries capable of enduring beyond the plan period in accordance with NPPF paragraph 85.

5. Evidence submitted to the examination by multiple parties indicates there is additional capacity for sustainable development within Wycombe. Berkeley's view, shared by others, is that the Green Belt and site selection evidence prepared by the Council – including the SA - is inconsistent in its assessment of individual sites. In the case of Berkeley's sites at Bourne end and Flackwell Heath, these sites are in sustainable locations (Tier 2 and Tier 3 settlements respectively) outside the highly sensitive AONB.

6. In this context specific comments are made below in relation to selected sites that the Council is proposing to allocate in the Rural Areas and in in Marlow, Bourne End & Wooburn. These comments serve to illustrate where the Council's selection and assessment of these sites is inconsistent (therefore not soundly based) and where there is further potential to release land in sustainable locations, which performs as well if not better than a number of the proposed allocations, to ensure the Local Plan will deliver as much as possible of the housing requirement within the district.

Matter 9: Development Framework – Rural Areas

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

g) RUR7 – Land off Clappins Lane, Naphill

7. This site, which has an estimated capacity of around 64 dwellings, currently forms part of the Green Belt and is located in the AONB, which the NPPF states in paragraph 115 has *'the highest status of protection in relation to landscape and scenic beauty'*. The site is surrounded on three sides by existing housing development. The fourth side of the site is adjacent to an area of open countryside to the north-east of Naphill. Beyond this is North Dean, a small hamlet.
8. Whereas land off Clappins Lane, Naphill is located in the highly protected AONB, close to a Special Area of Conservation (SAC) and woodland, and in a relatively rural part of the district, Berkeley's site at Chapman Lane is not located in the AONB and is in a Tier 2 settlement. Flackwell Heath is in a Tier 3 settlement close to High Wycombe, also outside the AONB. Both Berkeley's sites are therefore in more sustainable locations compared to Clappins Lane.
9. As set out in Berkeley's previously submitted landscape evidence dated July 2016 by fabrik (p12), Land at Clappins Lane has similar characteristics in terms of its contribution to Green Belt purposes to Berkeley's sites at Chapman Lane, Bourne End and Flackwell Heath, which are also surrounded by existing development and/or landscape features on multiple sides. Whilst the land at Clappins Lane arguably benefits from a greater degree of enclosure through the presence of an existing vegetation on its fourth side compared Berkeley's sites, the scoring that the land at Clappins Lane is given in the Council's Green Belt Part Two Assessment (p281) is nevertheless skewed towards a positive conclusion, whereas the assessment of Berkeley's sites is skewed negatively.
10. For example where Clappins Lane scores zero in relation to Green Belt purpose / criterion 2 *'to prevent neighbouring towns from merging'* Berkeley's site at Chapman Lane scores 3. As a result of the site at Chapman Lane being largely enclosed by existing development, development in southern part of the site would not impact the gap between settlements and a score of 3 is therefore inconsistent, when considered against

the score given to the Clappins Lane site. Similarly in relation criterion 3, relating to safeguarding the countryside from encroachment, a score of 2 for the Clappins Lane site versus 4 for Chapman Lane Bourne End is a significant disparity given the Clappins Lane site's location within the AONB.

11. Therefore there appears to be a disparity in the way the Clappins Lane site has been judged in the Council's Green Belt Assessment versus Berkeley's site at Chapman Lane which exhibits similar characteristics in terms of the contribution to the purposes of the Green Belt and potential for development, but is in a more sustainable and less sensitive location.
12. The exceptional circumstances that the Council has put forward in relation to the Clappins Lane site could equally apply to Berkeley's sites at Chapman lane and Flackwell Heath and it is clear that the site selection process and definition of exceptional circumstances should include giving greater weight to sustainable locations outside the AONB in accordance with paragraph 84 of the NPPF.

h) Policy RUR8 – Land South of Mill Road, Stokenchurch

13. This site, which is stated by the Council to have capacity for 100 dwellings, is located outside the Green Belt but within the AONB. As acknowledged in the Local Plan this is a sensitive location for development.
14. Given that the Council already accepts exceptional circumstances exist to release Green Belt Land in the district, Berkeley is concerned that the Council has not balanced the issues of AONB and Green Belt appropriately in selecting this site over other sites in more sustainable locations outside the AONB, such as Bourne End and Flackwell Heath.
15. The allocation of this site is clearly indicative of a flawed approach to site selection which has not prioritised sustainable patterns of development.

i) Policy RUR9 – Land at Wood Farm, Stokenchurch

16. The land at Wood Farm is also beyond the Green Belt but it too is located in the highly protected AONB in what the Council acknowledges in draft Local Plan is a '*scenic and rural position*' (p306).
17. As with the land south of Mill Road, the selection of this site in preference to sites that are more sustainably located, albeit in the Green Belt, is inappropriate when considering the need to plan for sustainable patterns of development in accordance with paragraph 84 of the NPPF.

k) RUR11 – Heavens Above, 16 High Heavens, Marlow Bottom

18. The suitability of this site for release from the Green Belt largely relates to its existing use as a house and garden in combination with the sites degree of enclosure from surrounding woodland.
19. Berkeley does not object to the allocation of the site in principle but notes, as acknowledged in the Green Belt Part Two Assessment (p206), that it is not in a sustainable location.
20. Berkeley's sites at Chapman Lane, Bourne End and in Flackwell Heath also benefit from enclosure, particularly the less sensitive southern parts of both sites that are suitable for development, but, in contrast to Marlow Bottom, both sites are in more sustainable locations: Bourne End being a Tier 2 settlement and Flackwell Heath being a Tier 3 settlement.
21. Accordingly the exceptional circumstances for releasing Berkeley's sites are considered to be as strong if not stronger than those ascribed to the Heavens Above site by the Council.

Conclusion

27. An analysis of allocations proposed in the draft Local Plan serves to highlight some of the problematic aspects of the Council's site selection process and Part Two Green Belt Assessment as previously raised.
28. The proposed allocations in the Local Plan are in general scored very favourably in the Council's Green Belt evidence, whereas certain other sites, including Berkeley's sites at Bourne End and Flackwell Heath, are scored very negatively despite sharing many similar physical characteristics to the proposed allocations, in terms of their contribution to Green Belt purposes. Furthermore Berkeley's sites are not located in the AONB but on the contrary are in sustainable locations (Tier 2 and 3 settlement close to High Wycombe). These issues raises a significant doubt about the robustness and objectivity of the Council's evidence and site selection process which has a clear implication for the soundness of the proposed allocations in these locations.
29. The Council should accordingly be asked to revisit its Green Belt evidence and site selection process, including the SA as previously argued, and identify additional land for development. This exercise would identify additional sites capable of release from the Green Belt and enable the Council to meet a greater proportion of its own housing needs over the Local Plan period instead of relying so heavily on unprecedented rates of housing delivery in Aylesbury Vale.