

**Wycombe Local Plan Hearing Statement  
Matter 9 - Development Framework - Rural  
Areas**

Land at Westthorpe Park, Marlow

Representor ID: 1244

SEGRO Plc

August 2018

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August 2018



# 1. Introduction

- 1.1 This Statement has been prepared on behalf of our Client, SEGRO Plc, in relation to Matter 9 of the Wycombe District Council ('WDC') Local Plan Examination.
- 1.2 Our Client has promoted 'Land at Westhorpe Park, Marlow' through the emerging Local Plan and we have attended the relevant Hearing Sessions on Matters 1 -6 of the Inspector's published Matters and Issues. At these sessions, we further clarified the position set out within our Hearing Statements in that we consider that the WDC Submission Local Plan is not legally compliant and fails the tests of soundness under paragraph 182 of the Framework.
- 1.3 We further note that the Inspector to the Milton Keynes Local Plan Examination, which is on-going, has issued some initial findings on the associated Sustainability Appraisal. A number of the matters raised by that Inspector are also pertinent to this Examination, given the lack of clarity contained with WDC's Sustainability Appraisal to justify the decision making process that has occurred to inform the Submission Local Plan. Given the comments made in previous submissions, and the substance of our concerns in this statement regarding the selected sites, we felt it pertinent to notify the Inspector of these parallels, and respectfully request that she draws similar conclusions to her colleague. As an overarching comment, it is apparent that WDC has not used its SA to appropriately inform its site selection choices.
- 1.4 We do not wish to repeat the detailed submission made at Regulation 19 nor the comments raised in relation to Matters 1 - 6 of the Examination, albeit wish to demonstrate that WDC's evidence base to support a number of the proposed allocations is unsound. We therefore respond to the Inspector's specific questions regarding this topic.

## 2. Matters to be examined

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

### RUR4 - Little Marlow Lakes Country Park

- 2.1 Whilst the site has been long identified for a country park, it is clear that through the new Local Plan that part of this area is now available for alternative uses and has continued to be promoted for employment and part of a new country park - a matter which has been continually overlooked by Officer's through the Local Plan process.
- 2.2 We note that the proposed country park was not identified as such through the Regulation 18 Local Plan, merely for recreation, and was only been added through the Regulation 19 Local Plan given WDC now state that Natural England has requested that in order to offset any recreational pressure on the Burnham Beeches SAC arising from proposed housing allocations (specifically Bourne End). Our recent response to the updated Habitats Regulation Assessment (appended at **Appendix 1**) shows that this is in fact a complete fallacy and it is not needed for purposes of mitigation for the Burnham Beeches SAC.
- 2.3 Our Regulation 19 submissions make detailed comments on this matter, which we summarise below.

Officer Justification	Turley Comment
<i>The 1968 Countryside Act provided power for local councils to provide country parks</i>	We question whether there is a requirement for the Country Park as part of the emerging Local Plan. In addition, given the complexity of ownership across the area proposed for allocation, we do not consider this the most appropriate way to deliver the country park in any event.
<i>The land that is proposed to be provided as the Country Park is entirely within the Green Belt. It therefore has very limited development potential. Virtually all of the land is in private ownership (paragraph 46)</i>	Whilst the site is within the Green Belt, this does not mean that the only potential use is for a Country Park. The Council has clearly accepted that there are exceptional circumstances for Green Belt release through the Local Plan, and our Clients site is the favoured site within the evidence base to deliver this employment need. Our Client has committed to delivery 3 parcels of land for supporting the country park including the provision of a car park. The Council has been

	<p>unwilling to engage to understand the opportunities for his part the site especially given the entire area is in private ownership which has clearly stifled the delivery of the Country Park historically.</p>
<p><i>The proposal for the area to be a country park was first made over a decade ago ( paragraph 48 )</i></p>	<p>The proposals have failed to be delivered since its allocation and therefore alternative mechanisms should be considered.</p>
<p><i>Natural England has identified that Burnham Beeches - a Site of Special Scientific Interest, a National Nature Reserve and a Special Area of Conservation - is subject to increasing levels of visitor pressure. (paragraph 48)</i></p>	<p>The Habitats Regulations Assessment Screening Report (as amended) does not support this stance.</p> <p>The Burnham Beeches SAC is located entirely in South Bucks District and covers 382.76 hectares – almost as large as the proposed allocation.</p> <p>The access to existing Green Spaces and to the wider Chilterns AONB all around High Wycombe urban area, Princes Risborough and near Bourne End/Wooburn area in particular means that any increased pressure for recreation (walks etc.) would be dispersed (paragraph 4.96).</p> <p>It is our view that both Slate Meadow and Hollands Farm will include substantial on-site strategic open space, in accordance with policy DM16 of the adopted Delivery and Site Allocations Plan and with policies BE1 and BE2 of the emerging Wycombe District Local Plan, and that this will ensure that there will be no substantial additional further pressure on Burnham Beeches SAC (paragraph 4.100). In addition, there are outstanding objections to the proposed allocation at Hollands Farm and the capacity of the site being considered at Examination in any event.</p> <p>In many instances recreational pressures are not the key issue in relation to maintaining or improving the standard of the SAC, or where it is measures are being proposed or considered to manage visitor pressure. At this stage, no likely significant effects on the SACs due to recreational</p>

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pressure as a result of the plan alone or in combination with other plans and programmes are foreseen.

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*In light of this the Council has secured agreement from Natural England that a satisfactory solution to this is that the Council seeks contributions to increase the accessibility to the country park to off-set impacts on Burnham Beeches. (paragraph 49)*

No reference has been made within the Habitat Regulations 2017 Screening Report that the Country Park is required to offset any recreational impacts. In fact, from the above, it is clear that the two allocations in Bourne End will provide strategic open space on site to address any recreational pressures.

With regard to South Bucks and Chiltern emerging Local Plan, paragraph 5.22 of the 2017 HRA sets out '5.22. *Chiltern and South Bucks are currently looking at a strategic solution to deal with Burnham Beeches but this will not involve Wycombe District.*'

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*A policy for the country park was included in the draft Local Plan consultation in 2016 (paragraph 65)*

The draft Local Plan (2016) identified the site as RUR6 albeit was allocated for outdoor recreation. We provided representations to the Local Plan stating that our Clients site could deliver commercial development alongside contributing towards the delivery of a new country park.

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*There are three options available to members:*

- i. To provide for the Park as recommended by this report;*
- ii. to modify the boundary of the Park*
- iii. To not provide the Park*

*Options (i) is recommended. Option (ii) would lead to a delay in the Plan, because of the consequential changes required. Option (iii) would retain the policy proposal for the area shown on the plan above, but not 'provide for the Park. This may lead to an objection form Natural England, and reduce future funding opportunities. (paragraph 74 and 75)*

No further information was provided to Councillor's and we consider that reference to '*This may lead to an objection form Natural England, and reduce future funding opportunities*' is misleading on account of the findings of the Council's evidence confirming that there would be no recreational impact on the SAC arising from the quantum of development proposed through the emerging Local Plan.

Paragraph 4.26 of Topic Paper 7 (The Natural Environment) states that the provision being made at Little Marlow for the country park corresponds '*in terms of capacity to the provision of 16,450 dwellings*'. Officers accept that '*this is more than the whole plan delivery to*

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- 2.4 We further understand that MOU6 within the evidence base has been issued between Chiltern and South Bucks Council in relation to Wycombe District offsetting future recreational impacts on Burnham Beeches arising from development these neighbouring Districts.
- 2.5 We do not consider it appropriate given that Chiltern/ South Bucks have indefinitely delayed the preparation of its Joint Local Plan with no confirmation on the quantum of development that the two authorities is likely to deliver. We consider this position to be premature with no evidence to demonstrate that this position is justified, and no related correspondence from Natural England, no stated locational or size requirements or delivery mechanisms.

#### **Opportunities at Westhorpe Park**

- 2.6 Our Clients have been promoting the site for commercial and recreational development since the 2016 consultation, with a range of technical evidence to support the suitability and deliverability of the site.
- 2.7 The proposals have always recognised and appreciated the Council's long term aspiration for the site with regard to the delivery of a Country Park and are keen to work with the Council to begin realising this aspiration after 12 years since its allocation whilst delivery employment opportunities in one of the most appropriate locations for economic growth within the District (supported by the Council's own employment evidence).
- 2.8 The opportunities to utilise parcels 3, 4 and 5 of our Clients' site will deliver on all these elements and provide access to the general public on land which is in private ownership (much like the entire area proposed as the Country Park). We consider that the delivering of part of the country park is a significant public benefit of the overall site, and would assist in not only meeting the Council's employment needs but also its aspirations for delivering a Country Park.
- 2.9 A supporting Development Framework Document was submitted which set out opportunities for delivery 14 ha of the new country park with the potential delivery of a car park for use by country park visitors alongside additional enhancements to increase public access to the site.



## RUR10 – Land to the rear to Stokenchurch Business Park, Ibstone Road, Stokenchurch

The Site Assessment Table is enclosed at **Appendix 2**. A summary of the table is as follows:

- The site is wholly within the AONB and would constitute Major Development within the AONB as supported by the Chiltern AONB Board who question whether B8 uses are appropriate;
- The promoted site has not been secured by developer and will rely on third party land for access
- The Council’s evidence identifies that the site will only deliver a localised employment need and not strategic employment requirements
- Limited evidence supports the capacity for the proposed allocation of the site especially given constraints alongside how the building heights for B8 uses would be accommodated.

In light of the above and Appendix 2, we do not consider that the proposed allocation is sound in line with paragraph 182 of the Framework (2012) on account of the following:

Not positively prepared	The allocation of the site will not deliver the strategic employment needs identified within the HEDNA Update (July 2017) with HELS13 clearly only considering the site attractive for meeting more localised demand trends.
Not justified	Within the SA it is considered greater consideration should be given to landscape and countryside impacts, given the site’s location within the AONB alongside its fails to reflect that the site is within a car dominant location and away from the centre of Stokenchurch. As such, we do not consider that the site has been assessed consistently against reasonable alternatives. Given the scale of the development proposed and that the site falls entirely within the AONB, it must be considered to constitute ‘major development in the AONB’ contrary to para. 115 of the Framework. There are outstanding objections from the Chiltern AONB Board on this matter and no consideration has been given to how development of particular B class uses could be accommodated on site given the sensitivity of the landscape in this location. Whilst AONB1 considers landscape impact can be considered at detailed application stage, we do not consider this appropriate, and it should have been considered more robustly in considering the suitability of the site.
Not effective	We understand that there is no developer on-site and the site has issues of access. As such, we do not understand how the capacity of each B class uses has been derived and whether

Not consistent with National Policy	there is a realistic opportunity of the site to come forward given constraints.
	It is not considered that WDC has identified a site which will 'meet the development needs of business and support an economy fit for the 21 <sup>st</sup> century' and nor it is a strategic site that will meet the specific needs identified within the HEDNA over the plan period.

## **Appendix 1: Turley Response to HRA (July 2018)**

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## Response in relation to the Wycombe District Local Plan – Revised Habitats Regulations Assessment Report

Consideration of matters Relevant to the creation of Little Marlow Lakes Country Park, Pursuant to Land at Westhorpe Farm

1<sup>st</sup> August 2018

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In November 2017 Ecology Solutions was commissioned by SEGRO Plc to undertake a review of Wycombe District Council's (WDC) proposal to deliver the Little Marlow Lakes Country Park. Specifically, Ecology Solutions was asked to consider the extent to which the delivery of a 329ha Country Park can be justified in the context of planned housing growth and potential impacts on the Burnham Beeches Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). That review was reported within the document titled "Wycombe District Local Plan Examination in Public - Consideration of matters Relevant to the creation of Little Marlow Lakes Country Park, Pursuant to Land at Westhorpe Farm" (dated November 2017).

Subsequently Ecology Solutions was commissioned by SEGRO Plc to undertake a review of the document titled "Wycombe District Local Plan – Revised Habitats Regulations Assessment Report" (dated July 2018) (hereinafter referred to as the "Revised HRA"). The focus of the review is on matters concerning recreational pressure at the Burnham Beeches SAC, the extent to which mitigation is required and more specifically, whether the creation of Little Marlow Lakes Country Park (at the scale proposed) can be justified as required mitigation for perceived effects on the Burnham Beeches SAC.

This note details Ecology Solutions' conclusions in relation to that review.

### Burnham Beeches SAC baseline condition

The baseline conditions associated with the SAC are described at paragraphs 3.18 to 3.26 of the Revised HRA. Ecology Solutions concurs with the reporting of the relevant features of interest, the Conservation Objectives and information relating to management regimes, ownership and current pressures. This information accords with that cited in Ecology Solutions' submission of November 2017.

Ecology Solutions draws attention, in particular, to the information contained at paragraph 3.24 of the Revised HRA dealing with the SAC Site Improvement Plan, specifically bullet point 2 which states:

***"Public access / Disturbance: This issue needs to be addressed by continuing the access management strategy of the National Nature Reserve. The delivery***

*bodies for this are the City of London Corporation, Natural England, and South Bucks District Council.”*

From the available information<sup>1</sup> Ecology Solutions consider that it can be concluded that existing threats to the favourable condition of qualifying interest features of the SAC / SSSI habitats are related to a lack of habitat management as opposed to impacts from recreational pressures, with agreed measures are already in place to mitigate existing recreational pressure and Natural England’s advice has been that these measures are continued.

### Likely Significant Effects

Paragraph 6.2 of the Revised HRA, references the application of the Precautionary Principle. Ecology Solutions agrees with the second limb of this paragraph where in essence relevant jurisprudence is summarised. However a footnote provides a link to the document titled “Communication from the Commission on the precautionary principle” (dated 2000). The citing of that document is considered important, but crucially the content and guidance provided within the Communication from the Commission is not discussed. Key points are discussed below.

The Communication from the Commission provides useful guidance in relation to the application of the Precautionary Principle in relation to European sites issues. Paragraph 6, sets out the six key matters for consideration when applying the Precautionary Principle. Paragraph 6 states:

*“Where action is deemed necessary [emphasis added], measures based on the precautionary principle should be, inter alia:*

- *proportional to the chosen level of protection,*
- *non-discriminatory in their application,*
- *consistent with similar measures already taken,*
- *based on an examination of the potential benefits and costs of action or lack of action (including, where appropriate and feasible, an economic cost/benefit analysis),*
- *subject to review, in the light of new scientific data, and*
- *capable of assigning responsibility for producing the scientific evidence necessary for a more comprehensive risk assessment.”*

In accordance with the Communication from the Commission it is clear that when they are deemed necessary, risk reduction measures should be proportionate and must not aim at zero risk. It is stated at section 6.3.1 of the Communication from the Commission that:

*“The measures envisaged must make it possible to achieve the appropriate level of protection. Measures based on the precautionary principle **must not be disproportionate** to the desired level of protection and **must not aim at zero risk**, something which rarely exists. However, in certain cases, an incomplete assessment of the risk may considerably limit the number of options available to the risk managers.”*

*[Emphasis added]*

With reference to not aiming “at zero risk” the judgement of the Appeal Court in the case of *Morge vs Hampshire County Council* [2010] EWCA Civ 608 is relevant. Lord Justice Ward

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<sup>1</sup> Revised HRA (July 2018) and Ecology Solutions submission dated November 2017  
Revised HRA Response

considered what the level of disturbance was required in the Article 12(1)(b) and at paragraph 35 he described the level or risk of threatened habitat and species stating that<sup>2</sup>:

*“... It must be certain, that is to say, identifiable. It must be real, not fanciful.”*

Ecology Solutions takes this to mean that for the level of risk to be real and identifiable, it must be based upon objective evidence to substantiate the risk.

Turning back to the Revised HRA and the identified likely significant effects on the Burnham Beeches SAC, arising from increased recreational pressure, it can be seen that evidence does not point to (potential) harm.

Recreational pressure is discussed at paragraphs 6.89 to 6.103. Paragraph 6.91 states:

*“However, overall the increasing population should not result in a significant increase in indirect pressures (e.g. from informal recreation) on the SACs in most cases, as the majority of the population of Wycombe District is concentrated in urban areas, away from Wycombe’s SACs, and alternative outdoor recreation already exists and will be expanded with future developments (see also Chapter 7).”*

Paragraph 6.92 states:

*“As explored in the previous chapter it is unlikely that the SACs will see a significant increase in footfall (e.g. from dog walkers), even if there will be an increase in house building to accommodate extra households. Dog walkers tend to mostly walk their pet within their immediate neighbourhood. For example, a survey conducted in May 2014 at Burnham Beeches shows that although around 56% of the visitors are dog walkers, these are mostly people living in the South Bucks and Slough area.”*

Paragraphs 6.94 to 6.98 discuss the policy requirements in relation to open space and green infrastructure delivery within new developments, confirming requirements in relation to both on-site and (off-site) strategic provision. In addition, paragraphs 6.101 and 6.102 discuss existing green spaces and the expectation that continued use will disperse recreational impacts. In particular, paragraph 6.101 states

*“The District as a whole is a very green area and many green spaces are available for the public to enjoy. The access to existing Green Spaces and to the wider Chilterns AONB all around High Wycombe urban area, Princes Risborough and near Bourne End/Wooburn area in particular means that any increased pressure for recreation (walks etc.) would be dispersed.”*

In the light of the evidence presented, it is hard to reach a conclusion that specific mitigation is required in relation to increased recreational pressure effecting Burnham Beeches SAC. Indeed, it is noted that paragraph 6.104 confirms that:

*“We are taking a cautious approach in doing an Appropriate Assessment of these.”*

### Appropriate Assessment

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<sup>2</sup> It is acknowledged that this case went before the Supreme Court [2011] UKSC 2 where Lord Brown was not in agreement with all parts of Lord Justice Wards’ judgement, but nevertheless did not expressly disagree with paragraph 35.

Paragraph 7.29 of the Revised HRA confirms that:

*“Through ongoing discussion, Natural England has identified that the developments planned around Bourne End and Wooburn, in particular Slate Meadow and Hollands Farm, could potentially lead to likely significant effects if they do not mitigate the increase in recreational need.”*

It remains therefore, far from certain that a likely significant effect will arise, but in taking a precautionary approach, as is required under relevant jurisprudence, Natural England has stated that mitigation is required. Paragraph 7.29 of the Revised HRA goes on to confirm that Natural England has advised that high quality open space should ideally be provided at a level of 8ha/1000 people for sites within 5km of the SAC. Such provision should be at a closer and more convenient location than the SAC.

Paragraphs 7.35 and 7.36 of the Revised HRA (when read together) confirm that all but proposed allocations at Slate Meadow and Hollands Farm have been screened out of the assessment process.

Paragraphs 7.37 to 7.41 of the Revised HRA discuss the green space provision associated with each development. It is confirmed that for Slate Meadow there is an over provision in terms of open space requirements, when viewed against Natural England’s advice that 8ha/1000 new population would be sufficient to mitigate any adverse effect on the Integrity of the SAC. For Hollands Farm, paragraph 7.41 of the Revised HRA confirms that the recommended amount of mitigation land is not delivered and Ecology Solutions has calculated the shortfall to be 4.15ha.

Noting this shortfall, the Revised HRA goes on to state (Paragraph 7.41) that the proximity of the proposed Little Marlow Lakes Country Park is of relevance. The Revised HRA reports that the Country Park will deliver recreational opportunities for new residents associated with the Hollands Farm development, being approximately 2km away. Ecology Solutions concur that should the Country Park be delivered, there is a good chance that new residents associated with the Hollands Farm development would use it. This would serve to dilute any additional pressure on the SAC, however the extent to which any adverse effect on the Integrity of the SAC would arise in the absence of delivering the Country Park is far from clear in light of the evidence base.

#### Specific consideration of Little Marlow Lakes Country Park

The Little Marlow Lakes Country Park as currently proposed (allocated under policy RUR4 in the Wycombe District Local Plan) is 329ha in size.

As already discussed, there is a purported need to secure an additional 4.15ha of good quality open space, at an appropriate location in order to mitigate increased recreational effects on the SAC, arising from the future development at Hollands Farm. It would also be expected that an element of mitigation land would be required in order to mitigate potential adverse effects from windfall development during the plan period. No other SAC mitigation land requirement has been justified in the Revised HRA and even where mitigation has been described, it has been made clear that the assessment process has been based on a highly precautionary approach. To be clear, provision of open space on the scale as proposed for the Country Park would be sufficient to deliver SAC / SSSI mitigation (open space) well in excess of that required for the whole of the Local Plan housing allocation, even in the fanciful situation where all new residential development was delivered within 5km of the SAC.

No case can be made for the required delivery of 329ha of open space for use as mitigation land in respect of effects arising from the Local Plan on the Burnham Beeches SAC. It follows that 329ha is a very significant overprovision and that if the size of the Little Marlow Lakes Country Park were to be reduced, this would have absolutely no bearing on the Local Plan being able to demonstrate compliance with the tests of the Habitats Regulations. It was previously confirmed to Ecology Solutions by Natural England (Marc Turner *pers comm* 28th November 2017) that the required size of the Country Park was not set by Natural England and that it would have no concerns regarding a reduction in size as long as the remaining land still provided sufficient mitigation.

Under SEGRO Plc's proposals for land at Westhorpe Farm, just under 19ha would be removed from the proposed Little Marlow Lakes Country Park, with the removed land forming one contiguous block in the northwest of the proposed Country Park (i.e. there will be no fragmentation impacts). This loss is a negligible area in the context of a proposed 329ha site. A reduction on this scale would therefore leave 310ha of land potentially available for the creation of the Country Park. Importantly, three parcels of land under SEGRO's control could be made available for enhancement in line with the Council's aspirations to create Little Marlow Lakes Country Park.

At a reduced 310ha, the proposed Little Marlow Lakes Country Park would not only clearly meet any requirements in relation to mitigating potential significant effects on the Burnham Beeches SAC arising from the Local Plan allocations, but it would also retain significant headroom capacity. This headroom capacity could (where appropriate) be relied upon by windfall developments and moreover, developments where contributions towards off-site open space are deemed necessary in line with the development plan.

As is stated at paragraph 7.48 of the Revised HRA, in combination effect are not likely on the basis that other (e.g. neighbouring) planning authorities will be assessing their own potential effects on the SAC through their plan making process (as they are required to do by law) and provision would need to be made for any required mitigation within those development plans.

### Summary conclusions

Ecology Solutions concur that the Wycombe District Local Plan would not be likely to give rise to an adverse effect on the integrity of the Burnham Beeches SAC in light of increased recreational pressure, when the plan is considered both alone and in combination.

Moreover, given the level of green space mitigation which will be delivered through policy DM16, coupled with a reliance on existing recreation resources and the proposed delivery of the Little Marlow Lakes Country Park, it is not surprising that Natural England have not raised any further concerns regarding implications for Burnham Beeches SAC as a result of the Local Plan. That is however, a very different scenario to the delivery of the Little Marlow Lakes Country Park being a required part of any mitigation package for the SAC.


A country park of reduced size, in line with that proposed by SEGRO Plc, would still be more than appropriate (very significantly so) to mitigate any perceived effects on the Burnham Beeches SAC.

It is considered that any attempt to justify delivery of the Little Marlow Country Park at anything like the scale proposed (329ha) on the basis of potential implications for the Burnham Beeches SAC, is wholly disproportionate, aims at zero risk and ignores the very



clear advice from the European Commission in relation to the application of the precautionary principle.

## Appendix 2: RUR10 – Land to the rear to Stokenchurch Business Park, Ibstone Road, Stokenchurch- Site Assessment Table

Employment Sites	
<b>Site Name</b>	RUR10 - Land to the rear to Stokenchurch Business Park, Ibstone Road, Stokenchurch
<b>Site Area</b>	2.9 ha
	
<b>Ownership Position</b>	Site considered by WDC. Site is owned by 2 landowners and not developer controlled. 1 landowner expressed interest in development and selling.
<b>Promotion Position</b>	Not actively promoted
<b>WDC Local Plan (2033) -Site Capacity</b>	7,500 sqm (1,500sqm B1/b, 3,000 sqm B1c/B2, 3,000sqm B8)
<b>Delivery Timescales</b>	6 -10 years
<b>References within WDC Local Plan (2033)</b>	No specific capacity identified. Para 5.5.68 identifies 2.9 hectare site.
<b>Sustainability Appraisal (SA1)</b>	The SA identifies a minor negative

	against Landscape and Countryside alongside Accessibility.
<b>Flood Risk (EA Map)</b>	Flood Zone 1
<b>GB/AONB Designations</b>	AONB
<b>Other known constraints</b>	Located within 2km of SAC Part of site contains stables No existing access to the site available
<b>Settlement Tier</b>	Tier 3 (although HEELA states Tier 2)
<b>HEELA (2017) Review (HELS1)</b>	SSC0043
<b>GB Assessment Part 2 - 2016</b>	N/A
<b>GB Assessment Part 2 - 2017 (GB1)</b>	N/A
<b>AONB Study (AONB1)</b>	<ul style="list-style-type: none"> <li>- Reduction of characteristic landscape features</li> <li>- Impact on views from the wider AONB depends on building heights</li> <li>- Some effect on close views from PROW to south and south-west</li> <li>- The quality of proposed development and associated landscaping can be adequately controlled at detailed planning stage. As such it is not considered that this proposed allocation would result in major development in the AONB. (At the workshop, the Conservation Board noted a minority view that this was still nonetheless major development.)</li> </ul>
<b>Wycombe District Employment Land Review (HELS16)</b>	<p>Para 4.247 'Stokenchurch is the district's only M40 junction outside High Wycombe and in previous plans was identified for modest employment growth, partly as older sites in the village have been redeveloped for new uses. Any motorway junction is a strategic asset and will attract some market interest. But here the junction is isolated from the main settlements and lacks good accessibility other than to the M40 itself. So any market demand is likely to remain local. The area is also constrained due to the AONB.'</p> <p>4.248 'However, some modest development may be feasible, to offset</p>

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the release of existing sites elsewhere. This is unlikely to require more than 2-3 ha of land for mixed employment uses'.

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**Commercial Assessment Review (HELS13)**

Stokenchurch currently scores highly for motorway access but does not score strongly on any of the other key commercial drivers (Page 8). It is also lacking in supporting services and facilities such as shops/cafes.

Therefore, unless there is significant housing planned for the town, any further employment land is likely to increase in-commuting by road.

Stokenchurch is not ideally placed to benefit from national and regional growth trends for large flexible floor plates;

Any future employment allocation is more suited to fulfilling more localised demand trends and providing better quality floor space and parking provision for existing local businesses and spill over demand from other areas within the District whose needs will not be met by the large business parks in and around High Wycombe and Marlow.

We think a possible employment allocation in this location would garner market interest for up to 6,000 sqm comfortably and possibly up to 10,000 sqm should local employment floor space need increase on the back of new housing delivery in the area

For an employment allocation to be successful at Stokenchurch it will require critical mass. (Page 113)

Para 9.40 concludes that 'up to 1.5ha of lad is more appropriate should no residential development

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come forward. This would generate 6,000sqm of floorspace. Only 2.63ha (10,000sqm) is said to be considered appropriate if 'significant new housing' is proposed.

Para 9.50 states 'Looking forward the major issue for delivering new employment floor space in this location is competition from better located employment areas within the district namely the Westhorpe site in Marlow and sites within the vicinity of a proposed new Junction 3a on the M40.'

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**Viability Assessment (VIA1)**

Not considered within any viability report

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**Turley Landscape Evidence**

Development of the site would result in the loss of two agricultural fields and potential effect the historic field pattern within the AONB.

Development would intensify employment land within a small extension of Stokenchurch which is likely to have an adverse effect on the character of the surrounding area.

Although the hedgerow structure provides containment to the site, it is considered likely that employment development within the site would be clearly visible above the hedgerow in views from the public right of way running through the wider AONB. The existing fields currently provide a visual buffer to the existing Business Park.

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**Any relevant consultation responses to Reg 19 Local Plan**

Chiltern AONB Board:

The plan need to do more to deliver on this, by:

- 1) deleting proposals for major development in the AONB and
- 2) identifying as an infrastructure delivery theme funding for enhancing the natural beauty of the

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Chilterns and people's access to it.

The site is too large, a smaller site may be acceptable.

In terms of uses, the Chilterns Conservation Board would recommend removing B8 uses from the policy, as these would be likely to involve large warehouses with a greater landscape

impact (potentially constituting major development), and draw unsuitable HGVs through access via the Chilterns Business Park. The access should not be through the rural green lane and footpath. The triangle of farmland north of the track should be removed from the allocation as large buildings here would be visible from the footpath and attractive open countryside to the west. No vehicular access should be through the lane with footpath.

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