



**Wycombe District Local Plan Examination**

**Matter 9: Development Framework – Rural Areas**

**August 2018**

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

## Introduction

1.0 This matter sets out the detailed information with regards to specific site allocations in the rural areas. Questions dealing with the site selection process and methodology when assessing reasonable alternatives are dealt with in Matters 1-6. The introduction to Matter 7 provides an overview of key issues that are also relevant here.

### 1a. RUR1 – Land South of Finings Road, Land End

#### *Existing Assessment*

1.1 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **SFRA Level 2** – site ref: RUR1/63<sup>1</sup>
- **Flood Risk Sequential Test report**<sup>2</sup>
- **AONB report** – site ref: SLE0017 (Part)<sup>3</sup>
- **Sustainability Appraisal** – site ref: SLE0017a/98<sup>4</sup>
- **HELAA** – site ref: SLE0017<sup>5</sup>
- **Revised Habitats Regulations Assessment report**<sup>6</sup>

---

<sup>1</sup> FRW2.2 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 1, pp. B70-B73

<sup>2</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 27

<sup>3</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 59-62 and pp. 73-74. See also AONB1.1 AONB Site Assessment Report - Appendix 1 Stage 2 Suitability Pro Formas, pp. 10-13

<sup>4</sup> Table III F in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. III 37-III 41

<sup>5</sup> HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, p.30

<sup>6</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018

### ***Suitability***

- 1.2 The site is located in the Tier 3 settlement of Lane End, within walking distance of the village centre that contains all key services and a higher-order service (pharmacy).
- 1.3 It is in the AONB, but not the Green Belt, and comprises part of a narrow field between existing housing and Finings Wood, an extensive area of ancient woodland to the west. There is a Grade II Listed Building directly adjoining the site to the east (Westwood, formerly Star Cottage, or White Gable Cottage) and the Lane End Conservation Area runs along the west side also. There are no flood risk issues affecting this site.
- 1.4 The landscape assessment of the RUR1 concluded that the site may be able to accommodate some development, but the extent of development would be severely constrained by the need to avoid any adverse impact on the landscape character, informed by the adjoining ancient woodland, ancient field pattern, and undulating topography. Any development must also have regard to the setting and form of the adjoining conservation area.
- 1.5 The southern boundary for the site is consistent with the topographical character of the site, which undulates in the southern portion.
- 1.6 The AONB assessment concluded that the proposed allocation would not be likely to result in major development in the AONB, due to the lack of any significant major impacts and the scale of development in the context of Lane End as a whole.<sup>7</sup>
- 1.7 The policy requirements seek to ensure that the development does not have adverse impacts on the historic environment and Listed Buildings. Detail on how this will be achieved will be elaborated at the planning application stage.

---

<sup>7</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 73-74

### ***Indicative Capacity***

- 1.8 The indicative number of dwellings for this site is 19 dwellings.
- **Net density:** 56dph; net developable area 0.34ha
- 1.9 This capacity takes account of the constraints on the site and in particular the need to ensure a substantial buffer to the ancient woodland and to the adjoin conservation area and listed building.

### ***Viability/Feasibility***

- 1.10 The best match notional scheme in VIA1 Appendix 12B Table 4 would be 25 units, 30dph, value point 2, 40% affordable housing, which shows a residual value (after policy requirements) of circa £1.51M / HA, against a benchmark land value of £0.4M.
- 1.11 The 15m buffer between the development and the surrounding ancient woodland is needed to mitigate adverse impacts, but this does not impose additional costs.

### ***Deliverability***

- 1.12 Land and Partners (ID 0801) responded to the consultation on the Regulation 19 version of the Plan in support of the allocation of this area. Their 2016 HELAA form indicated that the landowners have signed an agreement with Land & Partners for the promotion of the site.

### ***Further information***

- 1.13 Current phasing assumed for this site is:<sup>8</sup>
- 2020-2021 – 10 dwellings
  - 2021-2022 – 9 dwellings

---

<sup>8</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 18

## 1b. RUR2 – Land Between Chalky Fields and Marlow Road, Lane End

### *Existing Assessment*

1.14 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **Urban Design Assessment Development Capacity AONB and Green Belt sites report<sup>9</sup>**
- **SFRA Level 2 – site ref: RUR2/58<sup>10</sup>**
- **Flood Risk Sequential Test report<sup>11</sup>**
- **AONB report – site ref: SLE0027<sup>12</sup>**
- **Sustainability Appraisal – site ref: SLE0027/103<sup>13</sup>**
- **HELAA – site ref: SLE0027<sup>14</sup>**
- **Revised Habitats Regulations Assessment report<sup>15</sup>**

### *Suitability*

1.15 The site is located within the Tier 3 settlement of Lane End. The site is located within 0.5KM of the village centre containing all key services and a higher-order service (pharmacy).

1.16 The site is located within the AONB but is outside the Green Belt. The AONB report concluded that there appear to be no significant adverse impacts or other reasons to identify this allocation as major development in the AONB.<sup>16</sup>

---

<sup>9</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites, p. 4, pp. 30-31

<sup>10</sup> FRW2.2 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 1, pp. B62-B65

<sup>11</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 27

<sup>12</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 63-66 and pp. 74-75. See also AONB1.1 AONB Site Assessment Report - Appendix 1 Stage 2 Suitability Pro Formas, pp. 26-28

<sup>13</sup> Table IIIF in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. III 37-III 41

<sup>14</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.131

<sup>15</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018

<sup>16</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 74-75

- 1.17 Although the site is relatively open to views from nearby roads, it was less visually sensitive and landscape impacts were likely to be in the immediate vicinity of the site only. To mitigate against this, policy requirements seek to create a strong boundary to the south, and not develop past Cutlers Farm on the opposite side of Marlow Road. This will assist in the creation of a logical settlement boundary, in line with the existing settlement pattern. Overall the AONB study concluded that the site was capable of accommodating some development, and noted that there were some urban influences around the site.
- 1.18 Policy requirements for this proposed allocation seek to ensure that the development does not extend beyond the existing built form on the opposite side of Marlow Road, and provide opportunities for new landscape structures and screening to ensure a defensible boundary. At the recommendation of the highway authority, access is proposed to be served from the adjoining development at Chalky Field.

### ***Indicative Capacity***

- 1.19 The indicative number of dwellings for this site is 27 dwellings.
- **Net density:** 37 dph ; **net developable area:** 0.74 ha
- 1.20 This is just beyond the upper end of the range set out in the Urban Design Assessment of Capacity report,<sup>17</sup> and takes account of the need to create a strong southern boundary to the site.

### ***Viability/Feasibility***

- 1.21 The best match notional scheme in VIA1 Appendix 12B Table 4 would be 25 units, 30 dph, value point 4, 40% affordable housing, which shows a residual value (after policy requirements) of circa £2.75M / HA, against a benchmark land value of £0.4M.

---

<sup>17</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites

### ***Deliverability***

1.22 The site is owned by Lane End Parish Council who have indicated that the site is available.<sup>18</sup>

### ***Further information***

1.23 Current phasing assumed for this site is:<sup>19</sup>

- 2023-2024 – 14 dwellings
- 2024-2025 – 13 dwellings

## **1c. RUR3 – Land at Sidney House, Lane End**

### ***Existing Assessment***

1.24 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **SFRA Level 2** – site ref: RUR5/138<sup>20</sup>
- **Flood Risk Sequential Test report**
- **Green Belt Part Two** – site ref: SLE0020<sup>21</sup>
- **AONB report** – site ref: SLE0020<sup>22</sup>
- **Sustainability Appraisal** – site ref: SLE0013+20/104<sup>23</sup>
- **HELAA** – site ref: SLE0020 + SLE0013<sup>24</sup>

---

<sup>18</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.125

<sup>19</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 18

<sup>20</sup> FRW2.3 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 2, pp. B209-B212

<sup>21</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, pp. 169-174

<sup>22</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, p. 71 and pp. 75-76. See also AONB1.1 AONB Site Assessment Report - Appendix 1 Stage 2 Suitability Pro Formas, pp. 26-28

<sup>23</sup> Table III F in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. III 37-III 41

<sup>24</sup> HELS1.3 Housing and Economic Land Availability Assessment – Appendix 3 Rejected Housing Sites

- **Revised Habitats Regulations Assessment report<sup>25</sup>**

### ***Suitability***

- 1.25 The site is located in the Tier 3 settlement of Lane End, within 1KM of the village centre which has access to all key services and a higher-order service (pharmacy).
- 1.26 The site is comprised of Sidney House, a former residential block of flats offering accommodation to the elderly that has been vacant for some time, and an undeveloped field to the rear which is bounded by existing development and the M40. This undeveloped field is located within the Green Belt. This green field forms a logical extension to the previously developed portion and a comprehensive development of both the field and Sidney House is sought.
- 1.27 The site is located within the Green Belt and AONB. The Green Belt Part Two concluded that the site scores relatively weakly against Green Belt purposes, as the site is bounded by development on four sides. The M40 serves as an effective and enduring Green Belt boundary consistent with the northern edge of Lane End.
- 1.28 Whilst no additional dwellings are counted in the housing land supply and this site would effectively be treated as a small windfall site, removal of the land from the Green Belt would help facilitate the redevelopment of a vacant housing area that has stood vacant for many years, and hence make an overall contribution to housing delivery.
- 1.29 The AONB report concluded that development on the undeveloped portion of the site would be unlikely to result in major development in the AONB, assuming a proposal of 20 dwellings (gross) or fewer.<sup>26</sup>
- 1.30 Like other proposed allocations within close proximity to the M40, the motorway noise is likely to affect the type of development acceptable on the site. Appropriate measures would need to be taken to ensure

---

<sup>25</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018

<sup>26</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 76-77



adequate noise levels. This, along with protection against light pollution, is a requirement of the policy.

- 1.31 The existing access at Sidney House is proposed to serve the development, this has been accepted in principle by the highway authority. The land to the rear is currently landlocked and would not be supported for development in isolation.
- 1.32 In weighing the contribution the area makes to the Green Belt against the contribution it could make to meeting development needs in the plan period, the Council considers that exceptional circumstances exist to remove this area from the Green Belt.

### ***Indicative Capacity***

- 1.33 Because it is likely that the redevelopment of Sidney House and the adjoining land will result in less than 5 dwellings net due to net losses at Sidney House, the site does not appear in the housing trajectory. Any dwellings achieved will come forward as windfall.<sup>27</sup>

### ***Viability/Feasibility***

- 1.34 The development of the wider site including the Green Belt land should assist in the redevelopment of Sidney House.

### ***Deliverability***

- 1.35 The Sidney House portion of the site has planning permission (ref 17/06891/FUL) for demolition of existing buildings and development of 19 new-build houses, although this has not yet been implemented as of the submission of this statement.

---

<sup>27</sup> HELS1.3 Housing and Economic Land Availability Assessment Appendix 3 – Rejected Housing Sites

## 1d. RUR4 – Little Marlow Lakes Country Park

### *Existing Assessment*

1.36 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **SFRA Level 2** – site ref: RUR6/70<sup>28</sup>
- **Flood Risk Sequential Test report**<sup>29</sup>
- **HELAA** - site ref: SWC0086<sup>30</sup>
- **Revised Habitats Regulations Assessment report**<sup>31</sup>

### *Suitability*

1.37 The site is suitable for use as a country park. It is midway between Marlow and Bourne End, and adjoins the village of Little Marlow. It is bounded by the A4155 which provides access to Marlow and connections to the A404.

1.38 The site has an existing range of formal and informal recreational and sporting uses, public rights of way and permissive paths. This is felt to meet the principal purpose of a country park as defined in the Countryside Act (1968): *“to provide or improve opportunities for the enjoyment of the countryside by the public.”*

1.39 The allocation is also consistent with the NPPF, with particular regard to “Protecting Green Belt land”, “Promoting healthy communities”, and “conserving and enhancing the natural environment”. It demonstrates precisely the sort of positive vision for the Green Belt that the government describes in NPPF 81:

---

<sup>28</sup> Section 3.8 in FRW2 Level 2 Strategic Flood Risk Assessment (SFRA), pp. 79-88

<sup>29</sup> Table 9 in FRW1 Flood risk sequential test report, pp. 53-54

July 2008 and Delivery and Site Allocations Plan July 2013), pp. 134-136

<sup>30</sup> HELS1.4 Housing and Economic Land Availability Assessment - Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p. 187

<sup>31</sup> Paragraphs 7.42-7.48 in WDLP3A Revised Habitats Regulations Assessment Report - July 2018, pp. 151-154

*“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

- 1.40 RUR4 is entirely within the Green Belt and falls within the setting of the AONB. It was assessed in the Part One Buckinghamshire Green Belt Assessment,<sup>32</sup> which concluded that the site scores strongly in Green Belt terms, preventing development that would significantly (visually or physically) reduce the distance between the settlements of Marlow, Little Marlow, and Bourne End, and performing moderately in preventing urban sprawl. Only 5% of the general area is covered by built form, and the relatively flat topography of the land contributes a sense of openness. The existing boundaries around the site, consisting of A-roads to the north and west and the river Thames to the south, were noteworthy in providing robust and defensible Green Belt boundaries.
- 1.41 Smaller areas of land promoted for alternative development within RUR4 were also assessed (under reference BL0001, and ASE2-ASE7), and the assessment concluded that the areas score moderately against almost all NPPF purposes (as a whole and as sub-divided areas) and development would likely result in significant harm to the surrounding landscape.<sup>33</sup>
- 1.42 There are various areas at risk of flood from fluvial, surface and groundwater flooding across the allocation; provided that a sequential approach within the site is taken when locating elements such as a car park or café, the site can remain safe for the lifetime of the development. A site specific FRA will need to be done for any

---

<sup>32</sup> Parcels 60 and 67 in GB2.5 Buckinghamshire Green Belt Assessment Annex Report 1E - General area assessment pro-formas, pp. 44-47 and pp. 82-86

<sup>33</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, pp. 1-6 and WDLP10.21 SoC Appendix 21 - Site assessment work arising from Regulation 19 Representations, pp. 108-156

development proposed, implementing the recommendations of the Level 2 SFRA.

### ***Viability/Feasibility***

1.43 It is proposed that the Country Park be delivered through a combination of CIL, developer contributions (some have already been secured from other developments) and through bids to other funding organisations.

### ***Deliverability***

1.44 On 18 September 2017 WDC's Cabinet agreed a decision to provide a country park on the site under s.7(1) of the Countryside Act 1968.<sup>34</sup>

1.45 Mineral extraction on the site ceased fairly recently in 2012/13, and the former gravel pits are being restored to lakes for future recreational use or wildlife habitat. Other land is being restored to wetland, woodland or arable land. There are already a range of recreational uses available to the public on open spaces and the extensive rights of way network within the Country Park. This makes the longstanding policy aspiration<sup>35</sup> to deliver the country park more realistic and deliverable than pre-2013. Further improvements have been proposed and are subject to discussion between the Little Marlow Country Parks Community Partnership and landowners to facilitate wildlife habitat and visitor facility improvements, for delivery over the plan period.

1.46 Several environmental improvements have already been achieved on the site. These include:

- Maintenance of habitat areas (reedbeds and wetland spit areas) at Spade Oak Lake and the management of five Tern nesting rafts.

---

<sup>34</sup> CAB3 Cabinet - New Wycombe District Local Plan, Little Marlow Country Park and CIL Receipts 18 September 2017

<sup>35</sup> Policy RT19 - DPD6 Local Plan (as saved and extended (2007) and replaced by the adopted Core Strategy July 2008 and Delivery and Site Allocations Plan July 2013). The 1995 Local Plan recognised the site's capability to deliver outdoor recreation and wildlife interest. The 2004 Local Plan formally allocated the site for outdoor recreational use consistent with its status as land in the Green Belt and in the setting of the AONB, with an aspiration to deliver a country park on the site. Both policies recognised the ongoing mineral extraction works which were taking place on the site at the time.

- Creation of a new permissive path, “Spinny Path”, which links the public right of way between Marlow and Westthorpe Park to the Thames Path.
- Agreement in 2014 to create a large area of new wetland habitat as an extension to the Spade Oak Nature Reserve at the former Spade Oak Quarry minerals site.

1.47 Funding has also been secured to help facilitate the delivery of the country park. This includes:

- Approximately £33,000 S106 funding for country park facilities include Thames-side fishing platforms, signage, way-marking and interpretation boards.
- £25,000 S106 funding towards management and maintenance costs.
- Allocation of £120,000 CIL receipts to further facilitate the delivery of the country park, including part funding of a dedicated delivery officer.

1.48 Further improvements are being planned by the Little Marlow Country Parks Community Partnership to enable wildlife habitat and visitor facility improvements. These will be delivered over the plan period.

1.49 The Revised Habitats Regulations Assessment (HRA) report concludes that large developments within Bourne End and Wooburn may have an adverse effect on the integrity of the Burnham Beeches SAC in nearby South Bucks District if they do not mitigate their recreational effects by way of alternative green space provision. The revised HRA notes the beneficial effects of the existing Country Park in contributing to attenuate the recreational impacts of new development within the vicinity of Burnham Beeches SAC,<sup>36</sup> by providing alternative recreational opportunities. This benefit is recognised by Natural

---

<sup>36</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018

England. As a mitigation measure to the development at Hollands Farm, and in addition to implementing DM16 requirements for open space on site, an s106 contribution will be sought to improve the country park and its access.<sup>37</sup>

## 1e. RUR5 – Longwick-Cum-Ilmer Parish

1.50 Policy RUR5 was drafted in tandem with work being carried out by Longwick-cum-Ilmer Parish Council, whose neighbourhood plan was undergoing independent examination at around the same time as the regulation 19 consultation on the Wycombe District Local Plan.

### *Existing Assessment*

1.51 This policy has been informed by the following evidence documents:

- **HELAA** – sites ref: SLK0004 , SLK0006, SLK0008, SLK0010<sup>38</sup>
- **Sustainability Appraisal**<sup>39</sup>
- **Revised Habitats Regulations Assessment**<sup>40</sup>
- **Longwick-cum-Ilmer Neighbourhood Plan** (March 2018)

### *Suitability*

1.52 The parish area to which the policy applies includes the Tier 4 settlement of Longwick which has access to all but one key service (it does not have a GP) and limited access to public transport. Growth within the parish is directed to Longwick village.

1.53 The developments allocated in the neighbourhood plan have the potential to “enhance Longwick’s compact linear shape and retain its relationship with the open countryside around it”.<sup>41</sup>

---

<sup>37</sup> Paragraph 5.4.25 WDLP1 Wycombe District Local Plan

<sup>38</sup> HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version pp. 34-36

<sup>39</sup> WDLP2 Sustainability Appraisal (SA) of the publication (regulation 19) draft of the Wycombe District Local Plan

<sup>40</sup> WDLP3A Revised Habitats Regulations Assessment report

<sup>41</sup> DPD10 Longwick-cum-Ilmer Parish Neighbourhood Plan 2017–2033, p. 5

- 1.54 The parish area lies outside of the Green Belt and AONB.
- 1.55 The neighbourhood plan SA tested different levels of growth at Longwick. The SA findings show that the preferred growth strategy yields higher levels of growth than the other options. It is deemed the most appropriate in terms of sustainable development, showing most potential to meet environmental, social and economic objectives. It does have likely significant negative environmental effects under the Transport objective (SA objective 7) and under the Water and Flooding objectives (SA objective 4) but these effects are capable of being mitigated.<sup>42</sup>
- 1.56 An increase of 300 homes represents a very large increase in the size of the parish, and in particular Longwick – this would represent a 70% increase<sup>43</sup> of the village dwellings number. In combination with 160 dwellings at Kimble, this amounts to nearly half of the housing proposed in all Tier 3 and 4 settlements. This is a reflection of their location partially outside of the key Green Belt and AONB areas.<sup>44</sup>
- 1.57 Longwick is also located a short distance from the Tier 2 settlement of Princes Risborough, which offers all key and higher order services. Once the expansion area develops, Longwick will benefit from access to the services within the expansion. There will also be a new regular bus service linking the village to key destinations in Princes Risborough.
- 1.58 In terms of its relationship with the proposed Princes Risborough Expansion Area (PREA), it is important for the village identity and sense of place that a green buffer is kept between Longwick and the PREA to maintain separation. The Council's statement on matter 8 provides further details on this buffer. There is also the need for more public

---

<sup>42</sup> There are some groundwater and surface water flood risk areas within Longwick settlement which have been taken into account when locating development.

<sup>43</sup> DPD10 Longwick-cum-Ilmer Parish Neighbourhood Plan 2017–2033, p. 5

<sup>44</sup> Paragraph 5.55 in TP1 Topic Paper 1 The Strategy p. 34

transport improvement to support the growth that is proposed in the NDP. These are key elements of the Local Plan policy.

### ***Viability/Feasibility***

- 1.59 Longwick-cum-Ilmer Parish was designated as a neighbourhood area in March 2015.
- 1.60 In August 2017 the Parish Council submitted the Neighbourhood Plan for examination. Following the successful examination a referendum was held on 8 March 2018 with a positive outcome (over 90% yes votes), which meant that the Neighbourhood Plan was “made” by the Council on 27 March 2018.
- 1.61 This policy provided a framework for the emerging neighbourhood plan.

### ***Deliverability***

- 1.62 The Longwick-cum-Ilmer Neighbourhood Plan identifies six sites in Longwick village (one divided into two parcels) to help meet the total allocation of 300 dwellings set out in policy RUR5.
- 1.63 Many of these sites now have a permission, and some of them are already under construction. As such the policy requirement for 300 dwellings is considered to be deliverable. Table 1 below sets out in more detail the current position on the delivery of these sites. Further information is set out in Appendix A.

*Table 1 Site allocations in the Longwick-cum-Ilmer Neighbourhood Plan*

<b>Site</b>	<b>NDP policy reference</b>	<b>Application reference</b>	<b>Number of dwellings</b>	<b>Current Status</b>	<b>Source of dwelling numbers</b>
Land at Thame Road/ Bar Lane	L1	17/06562/REM	43	Site under construction	Full planning application



Land off Barn Road	L2	17/06691/REM	160	Site under construction	Full planning application
Land off Thame Road to the south of Chestnut Way Junction	L3	15/07817/OUT	15	Outline permission	Outline Planning Application
Land at Rose Farm frontage	L4a		3	Allocated in NDP	Adopted Longwick-cum-Ilmer Neighbourhood Plan
Land at Rose Farm south	L4b	16/06673/OUT	65	Outline permission	Outline planning application
Land adjacent to Red House Farm	L5		6	Allocated in NDP	Adopted Longwick-cum-Ilmer Neighbourhood Plan
Land adjacent to Anderdons Farm	L6		5	Allocated in NDP	Adopted Longwick-cum-Ilmer Neighbourhood Plan

## 1f. RUR6 – Great and Little Kimble-Cum-Marsh Parish

1.64 The Parish of Great and Little Kimble-cum-Marsh is located in the northern part of the District and contains the villages of Smokey Row, Great Kimble, Little Kimble, Marsh and Kimblewick. The Parish have recently completed a call-for-sites consultation as part of working towards a neighbourhood plan.

### *Existing Assessment*

1.65 The approach to Great and Little Kimble-cum-Marsh Parish has been assessed through the following evidence documents:

- **Kimble Landscape Assessment** – site ref: Parcel 1a, 5, 7a<sup>45</sup>
- **HELAA** – site ref: SRD0198 , SRD0196 and SRD0190<sup>46</sup>
- **Sustainability Appraisal** – Appendix V<sup>47</sup>

### *Suitability*

1.66 Great and Little Kimble is a Tier 4 settlement which has access to many key services (including a primary school), and public transport – both rail and road.

1.67 The requirement for the delivery of 160 new homes within the parish consists of:<sup>48</sup>

- 14 units completed between 2013 and 2016;
- 4 units on small sites either under construction or not yet started;
- 5 units windfall allowance; and

---

<sup>45</sup> LAN2 Landscape Sensitivity & Capacity Study: Kimble area

<sup>46</sup> HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, pp.32-34

<sup>47</sup> Appendix V in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. V 1- V 12

<sup>48</sup> Paragraph 71 in HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, p. 34

- 137 units to be identified by the neighbourhood plan.
- 1.68 The 137 homes target was derived based on the findings of the Kimble Landscape Assessment<sup>49</sup> which identified three parcels of medium to high development capacity, which following assessment were found to be potentially suitable without significant harm to the landscape or the setting of the AONB.<sup>50</sup>
- 1.69 Applying an assumption of 60% of the site area being developable land with a density of 25 dwellings per hectare led to an indicative delivery of 137 dwellings across the three parcels. These assumptions were based on the rural nature and environmental qualities of the area.<sup>51</sup>
- 1.70 This represents a 40% increase in the size of the existing communities within the parish.

### ***Viability/Feasibility***

- 1.71 The policy sets out key requirements for the delivery of the new homes to guide either a neighbourhood plan or that should be applied in the absence of a plan being produced.
- 1.72 The Parish Council have agreed to produce a neighbourhood plan to identify sites and policies in line with the overall target set out in the Local Plan.<sup>52</sup>
- 1.73 Neighbourhood plans allow communities to develop a vision for their communities and to shape the development and growth of their local area. A particular advantage that they offer to small and medium sized villages is to more readily promote smaller scale allocations which can more effectively integrate into the local community. Integration of new development was a particular issue identified in the Sustainability

---

<sup>49</sup> LAN2 Landscape Sensitivity & Capacity Study: Kimble area

<sup>50</sup> Paragraphs 68 – 69 in HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, p. 33

<sup>51</sup> Paragraph 70 in HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, p. 34

<sup>52</sup> Paragraph 12.12 in HELS5 Response to Aylesbury Vale Review of Housing Capacity, p. 26

Appraisal when considering the growth options for Great and Little Kimble-Cum-Marsh Parish.<sup>53</sup>

- 1.74 A key issue identified in discussions with the Parish Council was the scale and size of any housing sites, and an aspiration that they should be in keeping with the size and nature of the parish and small villages that it contains. Neighbourhood plans offer the opportunity to identify small and medium sites to effectively integrate the new development into the community.

### ***Deliverability***

- 1.75 Great and Little Kimble-Cum-Marsh Parish was designated as a neighbourhood area for the purposes of bringing forward a neighbourhood plan in November 2017.
- 1.76 A Neighbourhood Plan Group has been set up which consists of members of the Parish Council and volunteers from within the community. The Neighbourhood Plan Group are currently developing their neighbourhood plan. A call for sites exercise was carried out in January-February 2018 which led to 29 sites being identified. The Neighbourhood Plan Group reduced this to a shortlist of 10 sites, based on the requirements of Policy RUR6.
- 1.77 The Neighbourhood Plan Group consulted on these 10 site options between 24 June and 6 August 2018.
- 1.78 The Council is satisfied with the progress that the Neighbourhood Plan Group has made so far in identifying sites for development and bringing forward a neighbourhood plan.

### ***Further information***

- 1.79 The Neighbourhood Plan Group suggested a number of proposed wording changes to Policy RUR6. It is proposed that, as far as possible, a statement of common ground is drawn up between the Council and

---

<sup>53</sup> Appendix V in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. V 1- V 12

the Neighbourhood Plan Group to consider these changes in more detail.

## 1g. RUR7 – Land off Clappins Lane, Naphill

### *Existing Assessment*

1.80 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **Urban Design Assessment Development Capacity AONB & Green Belt Sites**<sup>54</sup>
- **Green Belt Part Two** – site ref: SNH0019<sup>55</sup>
- **AONB report** – site ref: SNH0019<sup>56</sup>
- **Sustainability Appraisal** – site ref: SNH0019/59<sup>57</sup>
- **HELAA** – site ref: SNH0019<sup>58</sup>
- **SFRA Level 2** – site ref: RUR7/51<sup>59</sup>
- **Flood Risk Sequential Test report**<sup>60</sup>
- **Revised Habitats Regulations Assessment report**<sup>61</sup>

### *Suitability*

1.81 This site is within current Green Belt boundaries and the Chilterns AONB on the edge of the Tier 3 settlement of Naphill & Walters Ash. The site is located within 0.8KM of the village centre with access to

---

<sup>54</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites, p.4 and pp. 20-22

<sup>55</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, pp. 279-285

<sup>56</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 84-85

<sup>57</sup> Table IIIg in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, p. III 43

<sup>58</sup> HELS1.4 HELAA - Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), pp.154-155

<sup>59</sup> FRW2.2 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 1, pp. B46-B49

<sup>60</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 27

<sup>61</sup> WDLP3A Revised Habitats Regulations Assessment Report

many key services (including a primary school), and has fair availability of public transport. Its location means it passes Step 1 of the Green Belt assessment as a location that can contribute to a sustainable pattern of growth.

- 1.82 The site is also within 500m of a SSSI and the Chiltern Beechwoods Special Area of Conservation. There are indicators that the eastern edge of the site is affected by surface water flood risk, although this does not impact the essential suitability of the site.
- 1.83 Step 2 of the Green Belt Part Two concluded that the site scores relatively weakly against Green Belt purposes, particular with regard to the relationship between the area and development which surrounds it on three sides. Although clearly separate neighbourhoods and communities, Naphill and Walters Ash are physically merged along Main Road, forming a continuous connected built-up area. In Green Belt terms there are not two separate settlements and there is no existing separation between Naphill and Walters Ash to be protected. The site would form a rational extension to the existing built-up area, whilst the existing boundary of hedgerows and trees results in an acceptable and robust Green Belt boundary to the east. Step 3 considers whether the site is otherwise developable.
- 1.84 The AONB report concluded that this allocation would not be likely to result in major development in the AONB. This assessment was agreed at the joint workshop with the Chilterns Conservation Board.<sup>62</sup>
- 1.85 The initial landscape assessment within the Green Belt review noted that due to the urban context and limited visibility into the site from the AONB, capacity for development within the site was unlikely to cause significant harm to the local landscape character.<sup>63</sup> These conclusions were reviewed in AONB1 page 106 – 110.

---

<sup>62</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 85-86

<sup>63</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, pp. 282-283

1.86 The highway authority confirmed that the proposed access to the site off Clappins Lane was acceptable in highway terms, subject to the addition and connection of a footway and carriage improvements by site frontage. The site also benefits from being within walking distance of a high frequency bus route and local services.<sup>64</sup>

### ***Indicative Capacity***

1.87 The indicative number of dwellings for this site is 64 dwellings.

- **Net density:** 35 dph (on 1.84 ha or 82% of the site area)

1.88 This is based on the Urban Design Assessment Development Capacity of AONB and Green Belt sites, for which the upper end of the density range was selected.<sup>65</sup> This is in keeping with the density of the surrounding document, and the lack of constraints on the majority of the site. This includes provision of 0.17ha of open space.

1.89 The requirements of the policy aim to limit the impact of development on the AONB, as well as provide suitable access between the settlement of Naphill and Walters Ash to the surrounding countryside. The provision of a green infrastructure link aims to provide biodiversity enhancement opportunities from the west side of the village at Naphill Common to the woodlands on the east. As the site is within 500m of a SSSI and SAC, the policy also requires that development should have no adverse impact on the Chiltern Beechwoods SAC; although the Habitats Regulations Assessment has concluded that development would result in no likely significant effects in relation to recreational pressure, water quality and resources, and no adverse effects in relation to air pollution.<sup>66</sup>

1.90 Therefore, in weighing the contribution the area makes to the Green Belt against the contribution it could make to meeting development

---

<sup>64</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, p. 285

<sup>65</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites, pp. 20-22

<sup>66</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018, p. 263

needs in the plan period, the Council considers that exceptional circumstances exist to remove this area from the Green Belt.

### ***Viability/Feasibility***

1.91 The best match notional scheme in VIA1 Appendix 12B Table 4 would be 50 units, 30 dph, value point 4, 40% affordable housing, which shows a residual value (after policy requirements) of circa £2.71M / HA, against a benchmark land value of £0.4M. This is more than adequate to support the limited site specific requirements in RUR7

### ***Deliverability***

1.92 Dandara Ltd (ID 0418) responded to the consultation on the Regulation 19 version of the Local Plan in support of the allocation and the proposed dwelling numbers. Dandara Ltd have also submitted statements for this Examination under Matters 2, 3, 5, and 6; indicating the support, availability, and promotion of the site.

### ***Further information***

1.93 Current phasing assumed for this site is:<sup>67</sup>

- 2022-2023 – 32 dwellings
- 2023-2024 – 32 dwellings

1.94 Naphill Estates Limited commented in the 2016 HELAA form that the delivery of a site of this scale could potentially be completed within 15 months of planning permission being granted. The phasing set out above takes into consideration the dependency on removing the Green Belt designation and subsequent lead-in times to the first completions.

---

<sup>67</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 19



## 1h. RUR8 – Land South of Mill Road, Stokenchurch

### *Existing Assessment*

1.95 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **Urban Design Development Capacity AONB and Green Belt sites**<sup>68</sup>
- **SFRA Level 2** – site ref: RUR8/54<sup>69</sup>
- **Flood Risk Sequential Test report**<sup>70</sup>
- **AONB report** – site ref: SSC0035<sup>71</sup>
- **Sustainability Appraisal** – site ref: SSC0035+37+05/80<sup>72</sup>
- **HELAA** – site ref: SSC0005, SSC0035, SSC0037<sup>73 74</sup>
- **Revised Habitats Regulations Assessment report**<sup>75</sup>

### *Suitability*

1.96 Stokenchurch is a Tier 3 settlement. The site is located roughly 0.8 km from the village centre via an unlit footbridge that crosses the M40 (or 2.4 km via the road network) Improvements to the footbridge could improve connectivity between the two sides of the settlement.

1.97 The site is washed over by the AONB and comprises of undeveloped land to the north, and a salvage yard to the south. To the west is a strip

---

<sup>68</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites, p.4 and pp. 25-27

<sup>69</sup> FRW2.2 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 1, pp. B54-B57

<sup>70</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 27

<sup>71</sup> Paragraphs 5.21-5.33 in AONB1 Area of Outstanding Natural Beauty Site Assessment Report, and pp. 48-50. See also AONB1.1 AONB Site Assessment Report - Appendix 1 Stage 2 Suitability Proformas, pp. 35-37, and pp. 47-49

<sup>72</sup> Table IIIH in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. III 44-III 49

<sup>73</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.135, 139, 141

<sup>74</sup> HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, pp.30-31

<sup>75</sup> WDLP3A Revised Habitats Regulations Assessment Report

of undeveloped land that connects to Mill Road. To the north of the site is a pedestrian footbridge over the motorway that connects to the northern part of the settlement. Whilst no eastern boundary exists for the northern portion of the site, the allocation boundary conforms to the topographical profile of the field.

- 1.98 The AONB report assessed the site as 4 separate parcels (SSC0005, SSC0035, SSC0037, and SSC0038), these were proposed for allocation in the Regulation 18 draft Local Plan under policy reference RUR12. Following the consultation, the Council decided to reduce the allocation to parcels SSC0005, SSC0035 and SSC0037. This was because the larger allocation, including land to the south of the salvage yard, could clearly be categorised as ‘major development’ in the AONB in discussion with the Chilterns Conservation Board, AVDC, CDC/SBDC and Natural England.<sup>76</sup>
- 1.99 In discussion with the Chilterns Conservation Board, AVDC, CDC/SBDC and Natural England regarding the methodology for assessing what constitutes major development in the AONB, the Council decided that a reduced allocation, excluding the southern-most parcel, would not be major development. This is agreed in the findings of the AONB assessment.<sup>77</sup>
- 1.100 The landscape sensitivity assessment within the AONB report notes that although the settlement edge is not strong on the eastern side, the landscape has already been intruded by the Salvage Yard which form the southern half of the allocation. The site is also unlikely to impact on views from the wider AONB. The assessment found that the site is able to accommodate development, providing it has regard to the setting and

---

<sup>76</sup> Paragraphs 13.1 and 13.22 in HELS5 Response to Aylesbury Vale Review of Housing Capacity, pp. 26-27, see also AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 48-49

<sup>77</sup> Paragraphs 5.49-5.51 AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 48-49

form of existing settlement and is sensitive to the adjacent landscape character areas.<sup>78</sup>

- 1.101 To ensure the highway concerns are adequately addressed, the policy requires development proposals to overcome the poor visibility at the Mill Road / Ibstone Road junction, provide multiple access points to the site, and facilitate a footpath to the existing footbridge.
- 1.102 There is no fluvial flood risk. There is a significant area of low or very low localised surface water flood risk, which would be addressed via a site specific FRA and appropriate SuDs design at application stage.
- 1.103 Other policy requirements seek to ensure that a landscape-led, comprehensive approach to the site is undertaken to integrate the site into the existing residential area.

### ***Indicative Capacity***

1.104 The indicative number of dwellings for this site is 100 dwellings.

- **Net density:** 30 dph (73% of site or 3.32 ha)

1.105 This is based on the Urban Design assessment Development capacity of AONB and Green Belt sites.<sup>79</sup> It includes allowance for structural landscape to screen development from the Chilterns AONB as well as open space.

### ***Viability/Feasibility***

1.106 The best match notional scheme in VIA1 Appendix 12B Table 4 would be 100 units, 30 dph, value point 2, assuming 40% affordable housing, which shows a residual value (after policy requirements) of circa £1.10M / HA, against a benchmark land value of between £0.4M and £0.95M (the site is part greenfield / part brownfield). There are limited policy requirements.

---

<sup>78</sup> Paragraphs 5.23-5.26 AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 34-35

<sup>79</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites

### ***Deliverability***

1.107 Site is in single ownership with Land and Partners promoting the site for development. 2016 HELAA form responses from Land and Partners indicate that the owner is in a binding agreement to dispose of the site on the grant of planning permission.

1.108 Land and Partners (ID 0801) responded to the Regulation 19 consultation in support of the allocation, indicating the availability and suitability of the site for development.

1.109 Parcel SSC0005 (the proposed access from the development to Mill Road), has extant planning permission for 3 dwellings.

### ***Further information***

1.110 Current phasing assumed for this site is:<sup>80</sup>

- 2020-2021 – 30 dwellings
- 2021-2022 – 40 dwellings
- 2022-2023 – 30 dwellings

1.111 Given that there is no need to remove this land from the Green Belt for development to come forward and there is interest in the site it is considered that the site could come forward for development within the first 5 years.

## **1i. RUR9 – Land at Wood farm, Stokenchurch**

### ***Existing Assessment***

1.112 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

---

<sup>80</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 19

- **Urban Design Development Capacity AONB and Green Belt sites**<sup>81</sup>
- **SFRA Level 2** – site ref: RUR9/129<sup>82</sup>
- **Flood Risk Sequential Test report**<sup>83</sup>
- **AONB report** – site ref: SSC0034<sup>84</sup>
- **Sustainability Appraisal** – site ref: SSC0034 west/78<sup>85</sup>
- **HELAA** – site ref: SSC0034<sup>86</sup>
- **Revised Habitats Regulations Assessment report**<sup>87</sup>

### **Suitability**

1.113 Stokenchurch is a Tier 3 settlement. This site is within 0.5 km of the village centre with access to all key services, fair public transport, and a higher-order service (dentist). It also has direct access to the M40 motorway.

1.114 The site is located within the AONB that washes over the settlement of Stokenchurch. It was assessed as part of a larger area SSC0049 in the draft version of the report produced to support the Regulation 18 draft Plan, which did not pass the initial suitability assessment due to landscape quality and topography issues. However, an eastern plateau

---

<sup>81</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites, p.4 and pp. 23-24

<sup>82</sup> FRW2.3 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 2, pp. B197-B200

<sup>83</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 28

<sup>84</sup> Paragraphs 5.16-5.20 in AONB1 Area of Outstanding Natural Beauty Site Assessment Report, and pp. 50-51. See also AONB1.1 AONB Site Assessment Report - Appendix 1 Stage 2 Suitability Proformas pp. 32-34

<sup>85</sup> Table IIIH in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. III 44-III 49

<sup>86</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.132

<sup>87</sup> WDLP3A Revised Habitats Regulations Assessment Report

section of the parcel was recommended for further landscape assessment under reference SSC0049 east.<sup>88</sup>

1.115 The detailed landscape assessment for the eastern plateau portion concluded that it was not deemed suitable due to visibility from the AONB, its role in a historic field pattern (dating from 1870s), and strong visual connection to the north.<sup>89</sup>

1.116 In response to this consultation the landowner promoted a smaller site area comprising of existing farm buildings for consideration in the western half of the site.<sup>90</sup> This particular site extent had not been considered in previous assessments, and so was assessed in the version of the study supporting the Regulation 19 Local Plan. The detailed landscape assessment concludes that the site has capacity to accommodate areas of new development, providing it has regard to setting and form of existing settlement and sensitivity of landscape character areas. It is the Council's view that whilst the larger site area would not be suitable for development, redevelopment of the previously developed farm yard in isolation would have little or no risk of resulting in major development in the AONB.<sup>91</sup>

1.117 It is not considered appropriate to reconsider the assessment for the wider Wood Farm area in the context of redeveloping the farm yard, as this would result in the adverse impacts identified in the initial suitability assessment of parcel SSC0049.

1.118 The highway authority confirm that a smaller quantum of development is acceptable in highway terms as access is proposed directly from Oxford Road. This is subject to having only one sole point of access, internal parking and turning area/s.

---

<sup>88</sup> Initial Suitability Assessments – Stokenchurch, AONB1 Area of Outstanding Natural Beauty Site Assessment Report, p. 19

<sup>89</sup> Paragraphs 5.14-5.15 in AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 26-27

<sup>90</sup> Representation by Land and Partners in Regulation 18 (draft Plan) consultation (ID DNLP 2452)

<sup>91</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 50-51

1.119 There are no flood risk issues.

1.120 The policy requirements of this proposal seek to ensure a landscaped approach whilst seeking opportunities to improve the relationship between the built-up area of Stokenchurch in defining a strong edge to the settlement) and western connections by acting as a gateway. The policy stresses the importance of reflecting the existing rural farm character of the site and reinforce the rural edge of the village.

### ***Indicative Capacity***

1.121 The indicative number of dwellings for this site is 28 dwellings.

- **Net density:** 47 dph ; net developable area : 0.60

1.122 This is based on the Urban Design assessment Development capacity of AONB and Green Belt sites.<sup>92</sup> It includes allowance for structural landscape to screen development from the Chilterns AONB as well as open space.

### ***Viability/Feasibility***

1.123 The best match notional scheme in VIA1 Appendix 12B Table 4 would be 25 units, 50 dph, value point 2, 30% affordable housing, which shows a residual value (after policy requirements) of circa £1.83M / HA.

1.124 Policy RUR9 contains several requirements to reinforce the settlement edge, and improve connectivity between the western end of the village to the east. The Council do not believe these requirements affect the feasibility or viability of the site, but use the redevelopment as an opportunity to increase connectivity and strengthen the character of the village.

### ***Deliverability***

1.125 Land and Partners (ID 0801) responded to the regulation 19 consultation on the plan supporting the allocation of the area for development, although they are seeking a larger allocation. The site is

---

<sup>92</sup> HELS4 Urban Design Assessment Development Capacity AONB & Green Belt Sites

in single ownership and promoted by Land and Partners. A binding agreement has been signed with the owners to dispose of the site on the grant of planning permission.<sup>93</sup>

### **Further information**

1.126 Current phasing assumed<sup>94</sup> for this site is:

- 2020-2021 – 14 dwellings
- 2021-2022 – 14 dwellings

1.127 As the site does not need to be taken out of the Green Belt and there is interest in bringing the site forward it is considered that this site could come forward within the first 5 years.

## **1j. RUR10 – Land rear of Stokenchurch Business Park, Ibstone Road, Stokenchurch**

### **Existing Assessment**

1.128 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **SFRA Level 2** – site ref: RUR10/97<sup>95</sup>
- **Flood Risk Sequential Test report**<sup>96</sup>
- **AONB report** – site ref: SSC0043<sup>97</sup>
- **Sustainability Appraisal** – site ref: SSC0043<sup>98</sup>
- **HELAA** – site ref: SSC0043<sup>99</sup>

---

<sup>93</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p. 138

<sup>94</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 19

<sup>95</sup> FRW2.3 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 2, pp. B155-B158

<sup>96</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 28

<sup>97</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 41-44 and pp. 47-48. See also AONB1.1 AONB Site Assessment Report - Appendix 1 Stage 2 Suitability Pro Formas, pp. 62-64

<sup>98</sup> Table IIIJ in WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan, pp. III 60-III 62

<sup>99</sup> Appendix 4 – HELAA Site Assessment Proforma (Housing, Economic and Retail), p.140



- **Revised Habitats Regulations Assessment report**
- **Wycombe Commercial Assessment<sup>100</sup>**

### ***Suitability***

- 1.129 This is a 3ha site located within the Tier 3 settlement of Stokenchurch, which is identified in the Wycombe Commercial Assessment as having very good strategic road access, due to being located immediately adjacent to junction 5 of the M40. This provides good accessibility to High Wycombe, Oxford and London.
- 1.130 The proposed allocation is to the rear of the existing Stokenchurch Business Park, which is a mixed employment area that is fairly new and is successful with low vacancy levels. This location was identified as being the best location commercially for new employment development.
- 1.131 A locally based commercial property agent has also confirmed that there is likely to be market interest in this location and that the site is suitable for allowing locally based companies to fulfil their expansion plans without compromising the need to be located close to the motorway network. The consultants also consider that the development could act as a catalyst to attract new companies to the area from along the M40 corridor, such as Park Royal and Greenford, bringing the associated economic benefits including jobs and new investment to the area.
- 1.132 In terms of local accessibility, the site is 1.7 kilometres from the village centre with access to all key services, fair public transport, and a higher-order service (dentist). The site directly adjoins the rear of Stokenchurch Business Park and is connected via a public footpath, allowing movement between the two.
- 1.133 Stokenchurch is located within the Chilterns AONB and as such this is a key constraint in terms of allocating the site. Although the commercial assessment report focussed on commercial attractiveness it identifies

---

<sup>100</sup> Section 9 in HELS12 Wycombe Commercial Assessment, pp. 109-122

that the proposed allocation is tucked behind the existing developed area and the M40 and therefore could be less visually intrusive than other sites considered.

1.134 The AONB report identified that this site has low landscape sensitivity and a MEDIUM/HIGH capacity for development which means that it is able to accommodate development, subject to development being designed to take account of the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas. The report further identifies that the site is contained by boundary features and existing development and due to being located adjacent to the M40 and the business park the site is not considered a significant part of the adjacent wider landscape.

1.135 The AONB report further assessed if development of the site would be major development in the AONB, and concluded that it would not be major. In terms of the scale of development, this site would represent a 2% overall increase in the built up area of Stokenchurch. Development in this location would also be in keeping with the historic settlement form, in that it would be located along the Chilterns ridge. This is further supported by the assessment that the development of this site would not have any significant adverse impacts on the AONB. There are some nearby footpaths that could be affected, but these could be mitigated for.

1.136 There are no ecological habitats on the site and although there is a SSSI and SAC nearby, there is unlikely to be any significant impacts on them.

### ***Viability/Feasibility***

1.137 This site is identified as being commercially the best area in Stokenchurch for new employment development. The Commercial Sites Assessment identifies that the opportunity to provide greater scalability

and clustering in association with the existing business park makes this the best location.<sup>101</sup>

- 1.138 This is supported by the recent completion of 5 B1c/B8 units on the business park of 5,263 sq m. All of these units were sold off-plan to small local companies who are already based or have a connection in the area demonstrating that there is market interest in this location, especially as all 5 units were sold off-plan. This along with the viability assessment and commercial property consultant's advice (see para. 1.130 above) supports the feasibility and viability of delivering new commercial development at this allocation.
- 1.139 Development at this site would fulfil a localised demand, 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 business parks in and around High Wycombe and Marlow.
- 1.140 The Wycombe Commercial Assessment identifies<sup>102</sup> that over the next 10 years the site could deliver a scheme which fulfils a demand for units and uses broadly similar to what currently exists on Stokenchurch Business Park. However, given the fact that locally based developers, Manor Park Construction, have instructed an agent to prepare and submit a pre-application submission for the site, it is considered extremely likely that the site could come forward much earlier than this and, most likely, within the next five years.
- 1.141 The highway authority identify that in principle this location is suitable in terms of access from the local road network. Highways England have raised no concerns in relation to the site and have confirmed in writing that due to the size, scale and location (distance from M40) of proposed Local Plan growth, the impacts on the M40 would unlikely to be significant (see Appendix B to this statement).

---

<sup>101</sup> HELS12 Wycombe Commercial Assessment p, 113

<sup>102</sup> HELS12 Wycombe Commercial Assessment para. 9.44 p, 120.

1.142 The Commercial sites report identifies that access from the Business Park would need to be over third party land, and the Council is in discussions with both an agent and the landowners to deliver access. The viability assessment includes an allowance of 15% of build costs to account for the potential cost of seeking current landowner agreement in achieving access to the site and its construction along with other possible external works.

1.143 The total allocation of 3ha is sufficient to deliver the scale of investment identified in the Wycombe Commercial Assessment (up to 6,000sqm) with some additional scope to deliver more (potentially to 12,000sqm.s. This offers a longer term commercial opportunity where further local employment demand could be supported by new housing growth should it come forward at Stokenchurch.

### ***Deliverability***

1.144 The site is currently owned by two landowners. Constructive discussions have taken place between the parties involved in the site, as is demonstrated by the fact that it has been confirmed in writing to the Council that the site has now been secured by a locally based developer, Manor Park Construction, who have an agreement in place to bring forward this site, including an access to the site, and they have instructed their agents to prepare and submit a pre-application submission for the site.

## **1k. RUR11 – Heavens Above, 16 High Heavens, Marlow Bottom**

### ***Existing Assessment***

1.145 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **SFRA Level 2** – site ref: RUR11/133<sup>103</sup>

---

<sup>103</sup> FRW2.3 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 2, pp. B205-B208

- **Flood Risk Sequential Test report**<sup>104</sup>
- **Green Belt Part Two** – site ref: SMA0080<sup>105</sup>
- **AONB report** – site ref: SMB0080<sup>106</sup>
- **HELAA** – site ref: SMA0080<sup>107</sup>
- **Revised Habitats Regulations Assessment report**<sup>108</sup>

### ***Suitability***

1.146 The site is located within the Tier 3 settlement of Marlow Bottom. The site is located 1.2KM from the village centre, with access to a wide range of key services (including a primary school), fair public transport links, and some higher-order facilities (including a pharmacy and dentist).

1.147 The site is located within the Green Belt and AONB. The Green Belt Part Two assessment concluded that the site scores weakly against Green Belt purposes, particularly in relation to its urban character. The site is also fully enclosed by a mixture of residential development and ancient woodland which forms a strong and enduring Green Belt boundary.<sup>109</sup>

1.148 The landscape assessment in the Green Belt Part Two assessment concluded that development is likely to only have a low impact upon landscape character and visual amenity, this results in a high capacity for development.<sup>110</sup>

---

<sup>104</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 29

<sup>105</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, pp. 200-206

<sup>106</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, pp. 83-84

<sup>107</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.178

<sup>108</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018

<sup>109</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, p. 202

<sup>110</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, p. 204

- 1.149 The AONB report concluded that with consideration of existing screening and within the context of Marlow Bottom, the Council does not consider that the allocation would result in major development in the AONB.<sup>111</sup>
- 1.150 The highway authority confirm that, due to the quantum of development and existing residential development, access can be provided from the existing cul-de-sac of High Heavens Wood.<sup>112</sup>
- 1.151 There is no fluvial flood risk affecting the site. There is a surface water drainage path which runs through the site which would affect site layout and SuDs design at the planning application stage.
- 1.152 The woodland surrounding the site is designated Ancient Woodland and Biological Notification Site, and is protected as Green Infrastructure under policy DM11 of the adopted Delivery and Site Allocations Plan.<sup>113</sup> Policy requirements aim to minimise disturbance to the adjoining ancient woodland and surrounding woodland. Development seeks to provide an opportunity to enhance the biodiversity of these woodlands. Whilst no set figure is proposed for the buffer to the ancient woodland, the reasoned justification indicates that 15m (excluding residential gardens) is required and satisfactory for mitigating adverse impacts.
- 1.153 In weighing the contribution the area makes to the Green Belt against the contribution it could make to meeting development needs in the plan period, the Council considers that exceptional circumstances exist to remove this area from the Green Belt.

### ***Indicative Capacity***

- 1.154 The indicative number of dwellings for this site is 20 dwellings.
- **Net density:** 23 dph, based on net developable area of 0.87 ha.

---

<sup>111</sup> AONB1 Area of Outstanding Natural Beauty Site Assessment Report, p. 83

<sup>112</sup> GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, p. 206

<sup>113</sup> DPD1 Adopted Delivery and Site Allocations Plan for Town Centres and Managing Development

1.155 The net developable area takes account of the need to protect the surrounding woodland and enhance biodiversity opportunities.

### ***Viability/Feasibility***

1.156 The best match notional scheme in VIA1 Appendix 12B Table 4 would be 25 units, 25 dph, value point 3, 40% affordable housing, which shows a residual value (after policy requirements) of circa £2.26M / HA, against a benchmark land value of circa £2M.

1.157 Policy RUR11 requires developments to protect the surrounding woodland and enhance biodiversity opportunities of the ancient woodland. The Council do not believe that these requirements impact the viability of the allocation.

### ***Deliverability***

1.158 The site was promoted to the Council in response to the Regulation 18 (draft Plan) consultation in June 2016. Discussions with the agents promoting the site indicate support for the allocation of the site.

1.159 Correspondence with landowners and trustees of the Trust who previously owned the site confirm that there is no objection to developing the site. Likewise, they have confirmed that a restrictive covenant on the site will not affect proposals to develop the site.<sup>114</sup>

### ***Further information***

1.160 Current phasing<sup>115</sup> assumed for this site is:

- 2023-2024 – 10 dwellings
- 2024-2025 – 10 dwellings

---

<sup>114</sup> This correspondence is attached under appendix C to this statement.

<sup>115</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 18

## 11. RUR12 - Uplands Conference Centre, Four Ashes

### *Existing Assessment*

1.161 This site has been assessed through the following evidence documents and has been found suitable, available and deliverable:

- **SFRA Level 2** – site ref: RUR12/101<sup>116</sup>
- **Flood Risk Sequential Test report**<sup>117</sup>
- **HELAA** – site ref: SRD0148<sup>118</sup>
- **Revised Habitats Regulations Assessment report**<sup>119</sup>

### *Suitability*

1.162 The site is in open countryside to the north of High Wycombe. The nearest settlement is the High Wycombe Urban Area, which is in Tier 1 of the Settlement Hierarchy. There is limited availability of public transport, and limited access to key services and facilities.

1.163 The site is previously developed land within the Green Belt and AONB and includes a Grade II listed building.

1.164 The site is not proposed for removal from the Green Belt but a policy for the site is retained in the Plan should revised proposals come forward for the site in this sensitive location, in particular to ensure that the redevelopment of the site properly takes account of the Grade II heritage asset located on the site and its significance, and to secure a pedestrian footpath to improve the connection of the site to Cryers Hill.

1.165 It is proposed that development on the site will not exceed the existing building envelope, and the Council feels that this means the allocation

---

<sup>116</sup> FRW2.3 Level 2 Strategic Flood Risk Assessment (SFRA) - Appendix B Lower risk sites assessment 2, pp. B159-B162

<sup>117</sup> Table 1 in FRW1 – Flood Risk Sequential Test report, p. 28

<sup>118</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.182

<sup>119</sup> WDLP3A Habitats Regulations Assessment of the Wycombe District Local Plan - July 2018



would not impact on the openness of the Green Belt<sup>120</sup> or the landscape quality of the AONB.<sup>121</sup>

1.166 The site also has substantial numbers of protected trees and is adjacent to ancient woodland. The Council feels that these features will be suitably conserved by keeping development to the existing built envelope, and that the redevelopment of the site will serve to enable the maintenance of the woodland.

### ***Indicative Capacity***

1.167 The indicative number of dwellings for this site is 59 dwellings.

1.168 This is based on the level of development permitted under planning application 16/05053/FUL.

### ***Viability/Feasibility***

1.169 Policy RUR12 requires the retention of the existing listed building and its setting in a way that is sympathetic to its significance, the retention and management of the landscaped grounds and woodland, and the provision of a footpath to Cryers Hill. The Council do not believe that these requirements impact the feasibility or viability of the allocation.

### ***Deliverability***

1.170 Full planning permission for the site was granted on 19 August 2016 following the signing of a s106 planning obligation (case reference: 16/05053/FUL). Uplands High Wycombe LLP submitted planning application for conversion of former Conference Centre to provide 59 residential units with demolitions and redevelopment of former coach house and associated works. Delivery of the site is subject to Section 106 contribution.<sup>122</sup>

---

<sup>120</sup> Paragraph 89 of the NPPF (2012)

<sup>121</sup> Paragraph 115 of the NPPF (2012)

<sup>122</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.182

1.171 The Listed Building Consent (16/05054/LBC) for the associated residential development was permitted on 26 September 2016.<sup>123</sup>

1.172 Savills, who acted on behalf of the application for the 2016 planning permission, indicated in their response to the 2016 HELAA update that they were not aware of constraints that might prevent development.

***Further information***

1.173 The current phasing assumed for this site is:<sup>124</sup>

- 2018-2019 – 25 dwellings
- 2019-2020 – 34 dwellings

1.174 The phasing has been based on the responses from the agent, Savills, in their 2016 HELAA response.

---

<sup>123</sup> HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), p.182

<sup>124</sup> Table 3.2 Housing Supply – 2017 base date in HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices, p. 14

## Appendix A – Matter 9 - RUR5 - Further information

1.1 The following section is to be read in conjunction with Table 1 in Matter 9 RUR5 Longwick-cum-Ilmer. The aim is to provide a summary of sources of phasing for the Longwick sites.

1.2 Phasing for the total allocation in the Local Plan is not currently known, however the sites allocated in the ‘made’ Longwick cum Ilmer Neighbourhood Plan includes sites for which we know the phasing.

1.3 Land at Thame Road (SLK0004)<sup>125</sup>

- 2018-2019 – 20 dwellings
- 2019-2020 – 23 dwellings
- For Land at Thame Road (SLK0004), a reserved matters application has been submitted since the last HELAA update (September 2017). The phasing is therefore adjusted to reflect the status of the planning application. Croudace Homes submitted reserved matters application (17/06562/REM) to deliver 43 units on site with 40% affordable units (an estimation of 17 affordable units). The site is currently under construction and WDC estimate that the site will be built out by 2020.

1.4 Land off Barn Road (SLK0006)<sup>126</sup>

- 2018-2019 – 30 dwellings
- 2019-2020 – 35 dwellings
- 2020-2021 – 35 dwellings
- 2021-2022 – 30 dwellings
- 2022-2023 – 30 dwellings
- Gladman Developments have secured outline planning permission at appeal (14/06965/OUT and appeal ref APP/K0425/W/15/3018514) and

---

<sup>125</sup> Source: Developer information

<sup>126</sup> Source: Developer information

reserved matters application (17/06691/REM) for development on land off Barn Road (SLK0006) for 160 dwellings. This has been approved since the base date of HELAA 2017 update. Having considered the timings of the approved reserved matters application, the start of delivery of units is anticipated in 2018/19. The indicative phasing is based on the number of housebuilder on site with responses as indicated by Gladman. It indicated they considered delivery of site within 5 -6 years. Built rate of 25-30 units per annum with one housebuilder and 35-40 units per annum with two housebuilder. The site is currently under construction and WDC estimated site will be built out by 2023.

1.5 Rose Farm (SLK0008)<sup>127</sup>

- 2019-2020 – 25 dwellings
  - 2020-2021 – 25 dwellings
  - 2021-2022 – 15 dwellings
- Rose Farm’s (SLK0008) indicative phasing is based on the response from agent, Frampton’s Planning who is acting on behalf of the Walker Family, in the 2016 HELAA update. Their response in 2016 confirmed the requirement of discharge of pre-commencement conditions for outline planning application will be overcome from the 12 months of the grant of planning permission.

1.6 Land off Thame Road to the south of Chestnut Way Junction (SLK0010)<sup>128</sup>

- 2019-2020 – 15 dwellings
- Prior to the determination of the outline planning application (15/07817/OUT) for Land off Thame Road to the south of Chestnut Way Junction (SLK0010), Bernard Smith Associates Ltd indicated, as

---

<sup>127</sup> Source: Developer information

<sup>128</sup> Source: Developer information

part of the 2016 HELAA update, a timeframe of 12 months to allow for the determination of reserved matters application and another 12 months for starting on the site. With this in mind, the delivery of the site is estimated from 2019-2020 onwards.

1.7 Longwick remainder<sup>129</sup>

- 5 dwellings are anticipated to come forward in 2023-2024;<sup>130</sup> as shown in Table 1, the neighbourhood plan is allocating 3 infill sites for 14 dwellings.

1.8 The following site in Longwick also contributes to the supply:

- Land at Ivy Farm – 9 dwellings

Outline planning application (ref: 15/07209/OUT) has been previously allowed at appeal (appeal ref: APP/K0425/W/17/3166948) for 9 dwellings. Reserved matters application (ref: 18/06522/REM) has been recently submitted by Rectory Homes Limited and is under consideration. The proposal consists of mixed 3-bed and 4-bed units with 40% affordable housing (4 units).

1.9 Another site in the small hamlet of Owlswick may potentially provide some dwellings as applications have been submitted for residential development.

- Former Shoulder of Mutton, Owlswick – 6 dwellings;
- Full planning applications (ref: 18/06164/FUL and 18/06277/FUL) have been submitted for residential development, both proposed for 6 units on site. Part of the site consists of a Village Green. Applications are now under consideration.

---

<sup>129</sup> Table 11 in HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, p.35

<sup>130</sup> Table 3.2 in HELS7.1 Wycombe Monitoring Report - Technical Appendices, pp. 19-20

- 18/06164/FUL proposed for change of use of part ground floor of A4 public house to C3/D1 (café and meeting room), with first floor change of use to one 5-bed flat and erection of 5 dwellings.
- 18/06277/FUL proposed for change of use of A4 Public House to one 6-bed flat on the first floor and to erect 5 detached dwellings on site.

## **Appendix B – Correspondence with Highways England**

**Appendix C – Correspondence re covenant in respect of High Heavens  
from Paul Morrison**