

CATESBY ESTATES
HOLLANDS FARM
PRE-APPLICATION CONSULTATION

18th February 2021 to 11th March 2021

KEEP BOURNE END GREEN
DRAFT CONSULTATION RESPONSE

1st March 2021

Keep Bourne End Green (“KBEG”) is a Charitable Incorporated Organisation (charity no. 1169057) that was set up in 2016 to conserve and improve the natural and physical environment and to promote sustainable development within Bourne End and its surrounding areas.

KBEG actively campaigned during preparation of the Wycombe District Local Plan (the “LP”) and afterwards to resist the unnecessary release of land from the Green Belt. During this period, KBEG received signed mandates from over 3,000 residents and households to represent their interests in pursuit of our charitable objectives.



1 **Response**

- 1.1 This response is provided in reply to Catesby Estates plc (“Catesby”) pre-application consultation on its outline proposals for the southern part of Policy BE2 site at Hollands Farm (the “Site”).
- 1.2 Necessarily, the first order of business is to address the **fundamental criticism** and overarching matter that the scheduling of this pre-application consultation is prematurely timed following the Buckinghamshire Council (the “Council”) public consultation on the draft Development Brief for Hollands Farm which concluded on 17th February 2021 - the day before this Catesby consultation opened. It is unwelcomed that Catesby has afforded no breathing room following the Council’s consultation which resulted in confusion amongst the local community as Catesby actively promoted its own consultation in parallel with the Council’s consultation. This recent course of action has amply demonstrated Catesby’s scant regard for the principles and important role which the Development Brief and local community play for the successful development of Hollands Farm.
- 1.3 When it is eventually adopted, the Development Brief will form a Supplementary Planning Document (“SPD”) which has the specific role to provide guidance through a series of principles and objectives for how the Site must be developed, adding detail to existing the policy found in the National Planning Policy Framework (the “NPPF”) and the LP. The Development Brief is a vital planning tool that will provide the necessary vision and important site-specific advice to inform the future development proposals.
- 1.4 It speaks volumes that Catesby has chosen to promote a hasty timetable for its pre-application consultation, and therein the **premature proposals** (including Access Plan, Framework and Illustrative Masterplans) are unsupported by an adopted Development Brief. Indeed, many of the consultation documents are timestamped to around autumn 2020 or earlier. Overlooking the warm assurances made by its ambassador in consultation videos, which are generally unsubstantiated by the consultation documents, it is a matter of fact that the timing of pre-application proposals cannot reasonably reflect the considered principles for Hollands Farm. This strategy, which is plainly done, is unwelcomed and reflects **an insensitive approach** by the site promoter to developing this sensitive site. It is unsurprising that KBEG has urged the Council to question the validity of this prematurely timed consultation.

- 1.5 It is a matter of public record that Catesby signed and submitted to a Statement of Common Ground¹ (the “Common Ground”) during plan-making which provided assurances, agreements, and commitments within a legal framework over Hollands Farm, and in that regard both Catesby and Mr Leopold Noé (now represented by Capreon the site promoters for Jacksons Field) committed to joint working to bring the Policy BE2 site forward [at paragraph 5.1], though this cooperation is not currently demonstrated in the present consultation which excludes the north part of the site.
- 1.6 **KBEG recommends the Catesby consultation is withdrawn until a holistic scheme can be brought forward for consultation as result of joint working by both site promoters which can adequately demonstrate proposals for all of Hollands Farm in response to the adopted Development Brief.**
- 1.7 In the interim period, having reviewed the consultation documents alongside the LP and its evidence base and recent updates, KBEG recommends proposals for the whole site, including the Catesby part, are modified to deliver a reduced capacity of dwellings in line with the overall sustainable growth target set for Bourne End and Wooburn. This adjustment will materially address core adverse issues found in the outline scheme having regard to net available land, housing density, landscape and character, coalescence of communities, open space and green buffers. Critically, a detailed traffic assessment has not been published with the consultation documents to support the proposed access for the Principal Route even though the Common Ground asserts “*the promoters have prepared assessments of the local highway network, which includes traffic counts, existing junction assessments and traffic modelling.*”
- 1.8 Notwithstanding the overarching criticism of the pre-application consultation, there are significant issues found in the Catesby scheme which are commented below (in no particular order):
- An **outline application** is not a suitable planning vehicle for the Site which has policy designation for residential development and (in the future) will have site-specific SPD guidance in the adopted Development Brief. For the avoidance of doubt, it is this site-specific guidance that will establish the principles and objectives for the development – it is not the role of Catesby or its outline application to “*set the principles of the development*”² which have not been subject to community involvement or are different to those embodied in the Brief. The

¹ Wycombe District Local Plan – Statement of Common Ground: BE2 Hollands Farm (3rd September 2018) between Wycombe District Council, Buckinghamshire County Council, Catesby Estates plc, and Mr L Noé.

² Catesby Estates plc – Consultation flyer delivered to some local residents (February 2021)

community is awake to the current assertive and adverse strategies proposed by Catesby to deliver its own commercial interest;

- The extent of the Site identified in **the red-line plan** does not marry with the site area identified in Policy BE2 and is therefore not supported by the current Draft Development Brief;
- The stated purpose for the Council's **indicative supply** for Hollands Farm was to provide a high-level capacity assessment (which proposed a possible range of between 321 and 467 homes) and this was not intended to be taken forward as a soundly based development target. In that regard, there is no firm basis or policy justification for the high level of housing supply proposed over the Site. A detailed housing supply site assessment must either be produced by the Council and incorporated within the Development Brief, or demonstrated through a detailed full planning application which addresses all the site constraints, issues, and planning matters set out in the Development Brief;
- Accounting for existing completions and commitments in the local housing supply, the total **amount of growth** in Bourne End and Wooburn from 467 homes built on the BE2 site would be a 40% increase in the population of these villages, which was not considered a sustainable growth option during plan-making. Significantly greater growth in Bourne End and Wooburn was not tested by the Council during plan-making or publicly reviewed during the Examination in Public. The indicated housing supply of 400 homes from this part of the Site will exceed the sustainable growth target for Bourne End and Wooburn adopted in the LP and embodied in the emerging Neighbourhood Development Plan;
- Further, to achieve the indicated supply over the proposed net developable area demands an average **housing density** much higher than the surrounding residential areas that precludes the amount of proposed development from being cohesive or well-integrated within the existing context;
- Catesby's assessment and proposed Framework and Illustrative Masterplans are divorced from **Jacksons Field** and therefore offer no guarantee the whole BE2 site will fully deliver the vision and objectives, including a Principal Route. This weighs heavily against Catesby's scheme since, should Jacksons Field not come forward immediately for development, the Site by itself will fail to deliver key element of the policy designation.
- The proposed **new junction at Upper Hedsor Road** illustrated in the Access Plan is an isolated drawing void of any supporting information to otherwise demonstrate

it provides safe two-way access route for buses and HGVs and other large vehicular traffic, or will deliver safe pedestrian footpaths and cycle facilities. It fails to demonstrate how it will preserve the existing 5.5m width public right of way found here along Hollands Farm entrance track;

- Further, the Council’s highway standard requires at least a right hand filter lane and preferably a roundabout, though this would require further land take beyond the BE2 site boundary and beyond Catesby’s red-line site boundary and likely have the adverse result in the loss ‘Southfields’ as well as substantial modifications to the Upper Hedsor Road junction with Ferry Lane.
- The transport strategy includes routing a two-way bus service over the Principal Route, including along Upper Hedsor Road which is not currently part of an existing bus route. The Access Plan is void of any information to demonstrate how it proposes to resolve **width restrictions at Upper Hedsor Road** which is less than the 6.5m wide carriage way requirement for two busses or HGVs to pass each other at the same time. Inevitably Upper Hedsor Road will need to be widened to allow free flowing traffic, but the Access Plan fails to mention or address this issue (or include assessment of adverse impact on the heritage setting or where the land take will come from). The proposed access is therefore undeliverable without necessary mitigation work (a further undisclosed impediment in the Common Ground).
- The Framework Masterplan shows pedestrian access to **Millboard Road** which the Illustrative masterplan upgrades to an alternative vehicular access route (albeit is obfuscated by vegetation though plainly evident once these layers are stripped away in the PDF). Millboard Road is unadopted and in private ownership (contrary to some assertions, this road is not owned by Mr No  ); the business stakeholders have stated their disagreement to a proposed access route over this private land which they do not intend to bring up to adoptable standard and, regardless of the private ownership issue, the industrial estate brings road safety concerns resulting from regular HGV vehicular movements which invariably must reverse in/from the road to the business premises. This road is considered undeliverable as an access route and is unsafe for the school location;
- Moreover, the Council has stated “*Millboard Road is not required for the site*” and raised significant concern that to introduce access to the site via Millboard Road may erode or completely remove the advantages of having a link road through the site as it will encourage more traffic and consequent congestion through Bourne End. The Council stated “*it is **heavily** forewarned that the use of Millboard Road as part of the access strategy for the Hollands Farm development could actually*

prove to be detrimental to traffic flow within the centre of Bourne End based upon the modelling data commissioned by the council to support the site's inclusion within the Wycombe Local Plan.”

- The Access Plan neglects to address that the Hollands Farm development requires **off-site junction improvements** including along Upper Hedsor Road, at Hedsor Road / Ferry Lane, a new four arm roundabout at Princes Road, and elsewhere in the local network. These are required to deliver the Site including the Principal Route and the Access Plan suffers since it lacks any detail in this regard.
- A transport assessment jointly submitted by Wooburn and Bourne End Parish Council and KBEG to the Council concludes it is not possible to deliver a new four arm roundabout at Princes Road that will comply with highway standards (either with or without taking from designated Green Space at ‘Brookbank’), and an appropriate new junction or widening the existing highway cannot be delivered at Upper Hedsor Road within the boundaries of the Policy BE2 site requiring land take from adjacent heritage asset and/or Green Belt that will altogether have adverse effects on the important heritage setting (as demonstrated by the Access Plan);
- The Access Plan provides no information over the proposed emergency services access route into the site, including how this will be safeguarded from general day-to-day use since Heavens Lea is not a suitable principal access route to the Site;
- The site location and access routes (considered deliverable in the proposed scheme) are demonstrated to be **greater than 800m distance** which will not provide easy walking or cycling access to the services provided at the village centre;
- Bourne End already suffers from considerable **car parking** issues from residents parking on streets and displaced parking of shoppers; out-commuters using the railway station; in-commuters to local offices; and from inadequate provision in other residential developments. The consultation provides no information how it proposes to address parking provision on-site and avoid displaced parking off-site;
- The **housing density** required to deliver the indicated supply will be out of character with all existing residential areas surrounding the site at Hawks Hill/Harvest Hill (1.3 dpa), Hedsor and Riversdale Conservation Area (4 to 18 dph), Bourne End (12.9 dph), and Cores End (32 dph). The proposed ‘Sub-Urban Character Areas’ described in the Design Rationale Summary are envisaged to introduce peak housing densities unlike anything else in Bourne End;

- While no specific detail is provided in the outline Masterplan, the higher density residential ‘Sub-Urban Character Areas’ will comprise a significant proportion of **three-storey houses and flats** that will be out of character with the existing character areas surrounding the site; Brigestone Drive / Hellyer Way, for example, is the most dense existing character area adjacent to the site but this mainly comprises two-storey maisonettes where the buildings are 8m height and would be overshadowed by 10m+ tall 3-storey buildings;
- The ‘Hillside Character Area’ proposes “*predominately 2 storey*” but this is contrary to emerging guidance in the Draft Development Brief which requires low rise 1.5 storey buildings;
- Proposed **buffer zones** to the east are inadequate which do not provide substantial physical or visual separation between Hawks Hill/Harvest Hill – in fact they entirely omit to provide any meaningful buffer to an important part of Hawks Hill which abuts the Site – and should in any case be no less than 50 metres in depth;
- The proposed buffer zones to the south fail to achieve substantial physical or visual separation with the heritage setting at Hedsor and would result in the effective coalescence of Bourne End (including Cores End) settlement and Wooburn settlement with Upper Hedsor Road which is part of the Hedsor settlement;
- It is a criticism that no buffer zone is proposed in the illustrative Master Plan to safeguard existing residential areas at Cores End which abut the Site, or the cul-de-sac at the end of Bridgestone Drive which front onto Jacksons Field;
- Bourne End and Wooburn combined has a significant **deficiency in open space** requirements which falls below standard – the proposed scheme does not meet the demands placed upon it by the Draft Development Brief;
- The proposed scheme fails to deliver two youth **football pitches** identified as requirement in the Draft Development Brief, and the location of the single proposed pitch is not only tightly squeezed to the west boundary with the industrial estate that it provides no practical buffer or surrounding amenity space but is also smaller than the minimum size required by the draft Development Brief for each pitch (97 x 61 metres);
- The consultation documents do not demonstrate a net gain in **biodiversity** will result on the Site or in the immediate area;
- The Common Ground agreed [at 4.5] that “*the existing public rights of way crossing the site would be incorporated into any residential development on the Site*”

and retained for the benefit of the new residents and the wider community”, though it is plain the existing public rights of way will be adversely affected;

- Catesby has **no legal standing whatsoever to divert, reduce or adversely affect the existing public rights of way** which cross over the site. In this regard, the public right of way at the existing Hollands Farm entrance extends over the full width of the 5.5m untarred track and 3m over the open fields (increasing to 9m total width with 3m buffers either side) - any proposed diversion or amendment must retain the same amount of width neither of which are demonstrated in the Illustrative Masterplan;
- The proposed location of the **primary school** is in an area of identified surface water flooding which adverse location is contrary to Council guidance, and is adjacent to the busy industrial estate on Millboard Road with frequent HGV vehicle movements that raise safety concerns and concerns over adverse effects from noise and pollution;
- The amount of land allocated for the primary school is less than half that at St. Paul’s Church of England Combined School in Wooburn (also a one-form entry primary school). The government guidelines for new school sites ensure sufficient space in dense urbanised city environments, though a village setting should afford greater opportunity for open space rather than meeting the bare minimum;
- The Common Ground [at 2.5] agreed delivery of a one-form entry primary school which requirement was adopted in Policy BE2 policy designation as the “*provision of a 1 form entry primary school*”. On plain reading this requirement envisages delivery of the school, and although it does not specify how, it is assumed either through direct construction or via full funding for its construction, rather than ringfencing an area of land for such use. No concerns over viability were raised [at 3.2, 9.1] over meeting this requirement and physical delivery of the school should be firmly incorporated into the proposals;
- The consultation documents plainly refer to market housing and affordable housing though it is noticeably silent on the location or quality of twenty **self-build** plots (5% of the total housing supply) required by Policy DM22.
- The Illustrative Masterplan fails to identify land for **Policy BE3** which envisages “*a new health centre could be facilitated on the housing allocations at ... Hollands Farm (BE2)*”.

- In other matters related to the pre-application consultation, it is a matter of fact that Catesby is wrong to assert no affordable housing has been built in Bourne End since 2003. This reflects Catesby has a superficial grasp of local knowledge and misrepresents the rural village context. Moreover, it demonstrates Catesby’s scant appetite for detail – something also exhibited in the Illustrative Masterplan which fails to show actual progress of residential development in the surround area.

1.9 It is of considerable concern that the **Common Ground** demonstrated [at 4.3] the parties committed and agreed “*the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development*”, but this transpires was misleading on several counts, inter alia, as set out:

- access routes to the site (including Millboard Road identified as an access road on the Catesby illustrative Master Plan) are in private ownership and undeliverable;
- the identified Principal Route has physical width restrictions at Princes Road and Upper Hedsor Road that prevent two-way traffic of buses and HGVs and other large vehicular traffic while also maintaining safe pedestrian footpaths and cycle facilities without a technical mitigation package;
- the end of the existing Princes Road is a narrow residential track that requires all but the very smallest of vehicles to reverse back and onto at the existing Princes Road junction which forms part of the proposed Principal Route;
- required junction improvement at Upper Hedsor Road cannot be implemented within the identified Policy BE2 site boundary;
- required junction improvement at Cores End / Princes Road with a four-arm roundabout cannot be achieved to national standards (with or without loss of designated Green Space);
- the principal access routes at Upper Hedsor Road and the junction of Princes Road / Cores End Roundabout are subject to flood impact, and;
- legal impediment prevents the loss, reduction or diversion of any public rights of way at Princes Road, across the open fields, and along the Hollands Farm track by the proposed development;