

CAPREON (UK) Limited
HOLLANDS FARM (JACKSONS FIELD)
PRE-APPLICATION CONSULTATION

16th April 2021 to 6th May 2021

KEEP BOURNE END GREEN
CONSULTATION RESPONSE

3rd May 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 Capreon (UK) limited (“Capreon”) pre-application consultation on its outline proposals for the northern part of Policy BE2 site at Hollands Farm (the “Site”). This response also contains comments concerning Catesby Estates plc (“Catesby”) pre-application consultation as their items relate to yours and of course it is one site rather than two separate sites.
- 1.2 Firstly, it is a **fundamental criticism** that the scheduling of Capreon’s 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. As far as we are aware, the responses from that consultation and follow-on actions are still being processed by the Council, though in any event the Development Brief has not yet been adopted. The same criticism was levelled at the prematurity of Catesby’s pre-application consultation for the southern part of Policy BE2 site at Hollands Farm. Both promoters have amply demonstrated a 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 The Planning Performance Agreement (the “PPA”) between Wycombe District Council and Catesby and Mr Leopold Noé (now represented by Capreon) set the overarching framework for delivery of a development brief for the site. This agreed the site promoters would necessarily carry out a public consultation on their development proposals, though the timing was not envisaged to fall before the Development Brief had been adopted.
- 1.4 When it is eventually adopted, the Development Brief will form a Supplementary Planning Document (“SPD”) which has the specific role to provide material guidance through a series of principles and objectives for how the Site must be developed, adding detail to existing policy found in the National Planning Policy Framework (the “NPPF”) and the LP. The Development Brief is a vital planning tool that will bridge the gap between policy and the Site to provide the necessary vision and important site-specific advice to inform the future development proposals including to affect the potential housing capacity.
- 1.5 It speaks volumes that Capreon has chosen to promote a hasty timetable for its pre-application consultation, and therein the **premature proposals** (including Draft Masterplan) which are unsupported by an adopted Development Brief. It is unsurprising that KBEG has urged the Council to question the validity of this prematurely timed consultation and meagre information which claims to represent Capreon’s considered proposals for the delivery of housing at the Site. To this end, it is

a further **fundamental criticism** of Capreon’s approach that the pre-application consultation has been treated without the reasonable weight it deserves for the development of this sensitive site: There is scant information on the consultation website (www.jacksonsfield.co.uk) of any merit for the public to comment on; the consultation material which is provided on the ‘seven boards’ can only be described as a box ticking exercise to meet the bare minimum possible requirements as to pass the process without being of any meaningful value.

- 1.6 It is a matter of public record that Catesby signed and contracted to a Statement of Common Ground¹ (the “Common Ground”) submitted to the Examination Inspector 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 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 southern part of the site.
- 1.7 **KBEG recommends the Capreon’s consultation scheme 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.**
- 1.8 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 Capreon’s 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, *inter alia*, regard to net available land; housing density; landscape and character; coalescence of communities; open space; school site; 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 in 2018 the Common Ground asserted “*the promoters have prepared assessments of the local highway network, which includes traffic counts, existing junction assessments and traffic modelling*”.
- 1.9 In parallel with Catesby’s earlier consultation in March this year, KBEG undertook a survey² of various matters raised by Catesby’s outline pre-application proposals for Hollands Farm. Our survey, which ran for 7-days, received 684 responses from people

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 KBEG – Online survey between 1st March 2021 and 8th March 2021 promoted via our Facebook page, newsletters, and word of mouth.

aged 18 and over, with around 82% of responders living within Bourne End and Wooburn (58% of these having lived here for more than 15 years), and around 13% living in adjacent villages. Unsurprisingly, over 95% of people thought it unacceptable for a pre-application consultation to be scheduled before the site-specific Development Brief is adopted. The outcome of the survey reinforces our following comments.

1.10 Notwithstanding the overarching criticism of the pre-application consultation, there are significant issues found in Capreon’s (and Catesby’s where relevant) consultation scheme which are commented below (in no particular order):

- An **outline application** is not a suitable planning vehicle for the Site which benefits from policy designation for residential development and (in the future) will have site-specific SPD guidance contained in the adopted Development Brief. Over 82% of our survey responders supported this view. An outline planning application which seeks permission for 75 homes that is void of necessary detail such as landscape, spaces, design, biodiversity, or precise layout should not have a reasonable prospect of success;
- Instead, a full planning application is required that must adequately demonstrate the proposal will meet all the development principles and objectives set out in the SPD which consequently and necessarily will affect the potential housing capacity for the Site. The Danish urban designer, Jan Gehl, summarised the landscape-led approach as “*First life, then spaces, then buildings. The other way around never works*”. In other words, start with people and how they live, then the spaces and places to support this, and only then the buildings. The alternative approach, as proposed by Capreon, omits this detail and starts from the wrong end putting the cart before the horse. The pre-application consultation provides no detailed information; promotes an outline scheme for a high scale of development before the site-specific SPD is adopted; is likely unsupported by a transport assessment (not shared for the public in the consultation); and doesn’t intend to reveal important detail about the development until after permission is secured for the number of houses Capreon wants to build.
- The Council’s most recent evidence-base determined an **indicative supply** of ‘up to 467 homes’ at Hollands Farm³ albeit from a very high-level capacity assessment which suggested a probable range of between 321 and 467 homes. However, this indicative supply was never intended by the Council to be taken forward as a soundly based development target and plainly forewarned “*further assessment work*”

³ Wycombe District Council - Urban Design Assessment Development Capacity AONB & Green Belt Sites (September 2017)

will be required to confirm the conclusions reached". In that regard, there is no firm basis or policy justification for the level of housing supply assumed over the Site. Being aware of the Hollands Farm site and its surroundings and various complex issues, nearly 98% of our survey responders (669 people) considered 467 homes was too many for the site;

- Since the high-level capacity assessment was completed, a landscape-led approach for the whole site has emerged and site-specific constraints, issues, and planning matters supplementary to NPPF and LP policies have been identified which are currently being drawn together in the emerging Development Brief. This current progress means it was impossible for the Council's capacity work in 2017 to have accurately or soundly predicted the indicative supply upon which both Catesby and Capreon rely. No further capacity assessment has been undertaken by the Council for Hollands Farm to inform the SPD, though (when adopted in the future) the Development Brief will set the principles and objectives for the landscape-led development which must be applied holistically to the whole site (not just Capreon's part) in order to determine the appropriate capacity for new housing. Capreon is looking down the wrong end of the telescope to ignore the vital role of the emerging Development Brief and the impact which it has in determining the scale of development. Capreon should resist setting its own agenda divorced from the SPD that seeks the maximum housing supply possible from Jackson's Field, which adverse strategy is plainly presented in the brevity of its consultation material that, *inter alia*, is:
 - premature of the adopted SPD;
 - underdelivers on the required principles and objectives set out in the emerging Development Brief, and;
 - proposes an outline planning application for approximately 75 houses without demonstrating the scheme fully addresses all site constraints, issues, and planning matters set out in the adopted Development Brief.
- Capreon must **recalibrate** its strategy to submit a fully detailed planning application in the first instance (in concert with Catesby's proposals) which can demonstrate full compliance with the Development Brief. This is the only practical course of action to establish the net developable land available for housing on the site. It is the logical and right way to proceed which avoids the erred assumption that the left-over space after the buildings have been counted will somehow meet the landscape-led brief or provide a meaningful backdrop to the village setting and daily life; which of course, it will not. To pursue an outline application for a

(commercially led) scale of development risks achieving the development principles and objectives necessary for a successful outcome of this sensitive site in Bourne End and Wooburn.

- For the avoidance of doubt, given there was some misunderstanding in Catesby’s consultation videos, and Capreon’s consultation material has no substance to it, it is the function of the SPD to address site constraints, issues and planning matters in concert with NPPF and LP policies and to provide site-specific guidance that will establish the principles and objectives for the development. This applies to development on-site as well as off-site measures and mitigation necessary to deliver the site for housing. It is not the role of Capreon or Catesby or subsequent planning applications to “*set the principles of the development*”⁴ which have not been subject to community involvement or are different to those embodied in the Development Brief.
- It is of great discomfort to the local community that the applied approach to developing the Development Brief has permitted Catesby and Capreon undue influence, including that the PPA allows the Council to discuss its own public consultation responses in private with the site promoters and in advance of making any amendments to the Brief (rather than with the Liaison Group, which would be the logical body to engage should additional consultation be required). This behind-closed-doors discussion is materially unnecessary and prejudiced which raises concern whether a soundly justified development will result at Hollands Farm and Jackson’s Field or one that is driven to deliver both Capreon’s and Catesby’s commercial interest. The community is awake to the current assertive and adverse strategies.
- KBEG commends that adopted Policy DM24 requires 48% of Hollands Farm will deliver **affordable housing** which acknowledges that house prices in Bourne End and Wooburn (and the south-east in general) are higher than the UK average costing more than 18 times UK median full-time wages. However, Capreon’s consultation boards fail to mention affordable housing let alone to confirm that affordable housing will be delivered at an ‘affordable’ level or confirm the number of affordable dwellings proposed. In this regard it is envisaged the affordable homes required by policy will result in delivery of expensive housing largely based on local open market prices albeit linked to government schemes such as affordable rented or shared ownership. This does not solve the problem of ‘affordability’ - people will still be unable to fully own their homes while subject to fractional

⁴ Catesby Estates plc – Consultation flyer delivered to some local residents (February 2021)

ownership that places financial burden on having to pay both a mortgage and an increasing monthly rent. Our survey found over 48% of people think £1,200 per month is unaffordable for affordable rent schemes and 76% believe that shared ownership (requiring a 5% deposit and likely 40/60 owned-to-rent ratio) with monthly costs starting from around £1,150 equally unaffordable. Both Capreon and Catesby should commit to price caps linked to UK average salary for the proposed affordable homes and if necessary.

- House builders generally use a different grade of materials and finishes when constructing homes allocated to affordable housing schemes compared to market housing. We understand both Capreon and Catesby are only the land promoters and will go away once planning permission has been granted for the Site and the land sold to a developer, though it would be welcomed if assurances could be given that all houses will be built to the same standard; over 84% of our survey responders considered this important.
- Spatial policies for housing delivery in the LP set a **capacity growth target of 800 homes** for Bourne End and Wooburn (increased from 750 in the draft LP). This housing target is also adopted in the emerging local Neighbourhood Development Plan. Nearly 96% of our survey responders considered this level of housing inappropriate for the existing villages. Moreover, accounting for existing completions and commitments in the local housing supply, the total **amount of growth** in Bourne End and Wooburn (including an assumed supply of 467 homes at Hollands Farm) would result in an estimated 40% increase in the population of these villages (over 200 homes more than the capacity target), which was not considered a sustainable growth option, or tested by the Council during plan-making, or publicly reviewed during the Examination in Public. Capreon's proposed supply of 75 homes (which is inappropriate for the site in any regard) would fall below the growth target when added to the existing completions and commitments, but critically this northern part of BE2 cannot be delivered independently of the southern part. The demands to fulfil Policy BE2 means the site is a package deal, and in concert with Catesby's proposed supply of 400 homes, will altogether exceed the sustainable growth target for Bourne End and Wooburn. This is a material planning consideration requiring the total indicative housing supply at Hollands Farm to be reset at 'up to 250 homes' to ensure growth remains broadly within the sustainable capacity target for the villages.
- To achieve the proposed supply of 75 homes over the illustrative net developable area demands an average **housing density** higher than the average density for the surrounding residential areas at Bourne End and Wooburn and at adjoining Hedsor

Parish to the south (a Tier 6 settlement). The proposed density would be in significant contrast with Hawks Hill character area that abuts the Site to the east which has a density of just 1.3 dpa. The proposed density will preclude the scale of development from being cohesive or well-integrated within the context of the existing village setting, however a lower quantum of development might be able to better achieve these SPD principles and objectives. KBEG notes Capreon will not confirm matters such as site layout, design, buildings or housing density until the reserved matters applications stage which comes after outline planning permission has been secured, by which point it would be too late to reasonably resist underperformance against the Development Brief guidance, including for a cohesive and well-integrated development. The current proposed order of things has the greatest risk of an adverse outcome – not least that the Council will find itself having to compromise on development principles and objectives considered important or vital for the Site – and that the development would likely result in a poor outcome for future residents and existing local residents.

- Capreon’s assessment and proposed Draft Masterplan is divorced from **Hollands Farm** with seemingly no development agreement between them. This situation provides no guarantee the cumulative development will deliver the intended vision and objectives, including a Principal Route. Perversely, progressing a separate development scheme for the northern part of BE2 in isolation of the southern part might adversely impact delivery of the larger part of the BE2 site given the small deficit in housing supply that would remain for Bourne End and Wooburn. This weighs heavily against Capreon’s pre-application proposal since, should the southern part of Hollands Farm not come forward as part of a holistic scheme (or at all), Capreons’s northern site will, by itself, fail to deliver key requirements of the policy designation. Our survey found 98.9% of people considered that a holistic proposal requiring a full planning application incorporating both the northern and southern parts of Hollands Farm would be appropriate; after all, planning permission *runs with the land* and not with the site promoter.
- No transport strategy is provided, and the proposal entirely stakes over routing a two-way bus service over the Principal Route, including along Princes Road which is not currently part of an existing bus route. Indeed the consultation maps provided suggest Jackson’s Field is adequately serviced by an existing bus route with stops at Brookbank with no indication or acknowledgment for the burden placed on a rerouted service. In that regard, the consultation material fails to recognise or demonstrate how it proposes to resolve **width restrictions along Princes Road** which carriageway is less than the 6.5m width requirement for two buses or HGVs

to pass each other at the same time. The proposal is also skates over to the adverse issues already present on Princes Road which narrow carriageway necessitates existing vehicle movements to reverse blindly back into the junction head to turn around which location would coincide with the proposed Principal Route.

- It is of great concern that Capreon advances an incomplete strategy for the Principal Route and seemingly suggests “*major road improvements are not required*” which provides a clear warning shot that Capreon intend to dodge the **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 that plan-makers heralded as benefits arising from the Hollands Farm site. Inevitably Princes Road will need to be widened to allow free flowing traffic and to preserve the existing Public Right of Way, but the Highways and Transport design concept fails to mention or address this issue (or include assessment of adverse impact on the setting, potential loss of green space or where the land take will come from). These are required improvements which form part and parcel of the necessary mitigation package to deliver the Site (contrary to claims in the Common Ground, Hollands Farm cannot be delivered without one) including the Principal Route and the proposal suffers since it lacks any detail in this regard.
- A transport assessment jointly commissioned by Wooburn and Bourne End Parish Council and KBEG has been submitted to the Council which 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 land from designated Green Space at ‘Brookbank’), and at Upper Hedsor Road an appropriate new junction to highway standards or widening of the existing highway cannot be delivered within the boundaries of the Policy BE2 site requiring land take from the adjacent building, a heritage asset within the Conservation Area, and/or Green Belt that will altogether have adverse effects on the important heritage setting or be contrary to policy.
- For pedestrians and cyclists, 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, rather the distance is likely to promote car journeys contrary to the claimed sustainable merits of the scheme.
- Bourne End and Wooburn already suffers with considerable **car parking** issues from displaced parking of shoppers; out-commuters using the railway station; in-commuters to local offices; and from inadequate car parking provision in other

residential developments forcing residents to park on streets. The consultation provides no information how it proposes to address parking provision on-site and avoid displaced parking off-site.

- No building detail is provided in the Draft Masterplan, though it is stated elsewhere the design will comprise two and a half storey houses, which of course in reality are houses with **three-storeys of accommodation**. The prevailing built form across the existing settlements are two-storey dwellings followed by a smaller number of single-storey bungalows/chalet-bungalows. Proportionately there are very few purpose-built three-storey houses, and where they do exist are generally mansard roof schemes. The cumulative effect from high-rise buildings will fail to preserve or enhance the existing local character and will result in unacceptable harm to the local character of the immediate locality and wider settlement context. The proposed compressed layout of the site also raises significant concerns over privacy and overlooking which matters can only be determined from building details revealed in a full planning application. Development should respect the surrounding character of the area; Bridgestone Drive / Hellyer Way, for example, is one of the densest existing character areas in Bourne End and Wooburn but this mainly comprises one- and two-bedroom two-storey maisonettes where the buildings are no greater than 8m height and would be overshadowed by 10m+ tall 3-storey buildings (or two-and-a-half storey buildings by another name).
- No **green buffer zones** are proposed to provide substantial physical or visual separation between Hawks Hill/Harvest Hill as required by the emerging Development Brief – and should in any case be no less than 50 metres in depth. Our survey found over 90% of people considered the proposed green buffers at Hawks Hill / Harvest Hill were unacceptable.
- No **green buffer zones** are proposed to safeguard existing residential areas at Cores End (including Hellyer Way and Bridgestone Drive) which abut the Site, or the cul-de-sac at the end of Bridgestone Drive which front onto Jackson's Field. Our survey found nearly 95% of people considered the absence of any green buffer at this boundary was unacceptable.
- Our survey found that over 47% (325 people) who replied thought a 50m green buffer encapsulating the site would be acceptable, and a further 36% (252 people) that it should be greater still. Just 3% (22 people) thought a 10m or less green buffer would be acceptable. Most responded that the green buffer should comprise woodland and open space mix (72%, 494 people) while the next most popular choice was woodland (18%, 128 people).

- Bourne End and Wooburn 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 proposals provide no meaningful improvement to address the existing deficiency, and together with Catesby’s proposal, fails to meet the minimum provision.
- The consultation documents do not demonstrate a net gain in **biodiversity** will result on the Site or in the immediate area. The proposal seemingly overlooks that the existing area is a greenfield site of which around 95% of the area goes to contribute to biodiversity so there is already a very high bar to overcome.
- It is a fundamental criticism the proposals avoid making any specific commitments that the proposed development will promote **zero-carbon future** which is at the core of building sustainable homes. We say this is yet another limb which weighs heavily against the proposals which unnecessarily skips over committing to implement zero-carbon measures when the technology is readily available today. There are many exemplar developments, including affordable housing schemes⁵, which are already built that deliver smart home systems, ground source heating, battery storage, and solar generation. The only credible way to assure such low-carbon measures are delivered is to incorporate them as part of the original build. Of course, we could be mistaken over Capreon’s intention, but as has already been a criticism of the pre-application consultation, the proposal lacks detailed design to know for sure. Our survey found over 90% of people considered the development should adopt construction principles, materials and technologies that will deliver net zero carbon homes. **Sadly, the omission of any detail on zero-carbon homes from the consultation proposals reflect that Capreon perhaps could not be bothered to provide the community or other stakeholders with any relevant or meaningful information over its intended scheme, or on many other material design elements which were unnecessarily omitted, ignored, glossed over.** The approach instead proffers consultation materials which make unsubstantiated claims and provides nothing of great substance beyond general rhetoric which has likely been pedalled many times before to many other development sites. The lack of attention, due diligence, concern or investment in a robust scheme for pre-application consultation process is perhaps fair warning to the Council and local stakeholders (including the local community) of the arrogance exhibited by Capreon (and Catesby) which cues up the likely compromises, under delivery, and inadequate outcome that should be expected from this Site.

⁵ Parc Eirin, Cardiff delivers low-carbon technology in 225 homes. Read more at the development website <https://www.parceirin.co.uk/technology> or watch <https://www.youtube.com/watch?v=ul7wxNtrorQ>

- 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*”. The PPA [at Objective 8] requires the development “*ensure that Rights of Way are retained and improved, and new public footpaths are provided through the site to integrate the site with the wider network*”, though it is plain from the Masterplans the existing public rights of way will be adversely affected.
- Neither Catesby nor Capreon has **any legal standing whatsoever to divert, reduce or adversely affect the existing public Rights of Way** which crosses over the site. In this regard, the public Rights of Way at the existing Hollands Farm entrance extends over the full width of the 5.5m untarred track; 3m over the open fields (increasing to 9m total width with 3m buffers either side), and; 5.5m width of untarred track at Princes Road - any proposed diversion or amendment must retain the same amount of width which is not demonstrated in the Draft Masterplan. Nearly 95% of our survey responders considered the proposals to divert and reduce the width of the established public Rights of Way would result in adverse impact on their use.
- The consultation documents are noticeably silent on the location, quality or quantity of **self-build** plots (5% of the total housing supply) required by Policy DM22. By 30th October 2019, the Council had reported to the UK Government that 333 individuals and 22 groups were recorded on the local self-build register for the Wycombe Area yet only 39 plots had been offered (zero in the period 31 October 2016 – 30 October 2018). Our survey found there is good local support for self-build housing which provides a credible alternative way to home ownership.
- The Draft 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)*”.

1.11 It is of great concern that signatories to the **Common Ground** [at 4.3] committed and agreed “*the Hollands Farm site is suitable, available, deliverable and developable*” and “*the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development*”. This declaration influenced the planning judgment of the Examination Inspector when she considered the exceptional circumstances for the release of Hollands Farm from the Green Belt. However, it now transpires the declaration was misleading on several counts, *inter alia*, as set out:

- The identified Principal Route is undeliverable without widening the road or technical mitigation packages and further land take beyond the site boundary. There are physical width restrictions at both ends - at Princes Road and along Upper Hedsor Road – which fall below required standards and prevent safe two-way traffic of buses and HGVs and other large vehicular traffic while also maintaining safe pedestrian footpaths and cycle facilities;
- 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 which presents a technical constraint. This in itself could lead to accidents resulting in injuries or even **fatalities**;
- The junction improvement required at Cores End Roundabout / Princes Road with a new four-arm roundabout cannot be achieved to required highway standard (with or without loss of designated Green Space at ‘Brookbank’) that requires loss of existing buildings outside the site boundary;
- The principal access routes at Upper Hedsor Road and the junction of Princes Road / Cores End Roundabout are both subject to flood impact, and;
- There is a legal impediment which prevents the loss, reduction or diversion of any public Rights of Way by the development which exist at Princes Road, across the open fields, and along the Hollands Farm track.