



**The BEACONSFIELD SOCIETY**

# The Local Plan

## The Consultation Process...

### WEB VERSION:

Text size has been reduced and explanatory notes added to allow easy comprehension without a verbal commentary

Where appropriate, we have included links to South Bucks District Council's own Plan and evidence base so that the public can be assured of the facts. Links are outlined like this. The full plan is available for download at <https://www.southbucks.gov.uk/planning/localplan>

**Presented by members of The Beaconsfield Society  
on November 28<sup>th</sup> 2019**

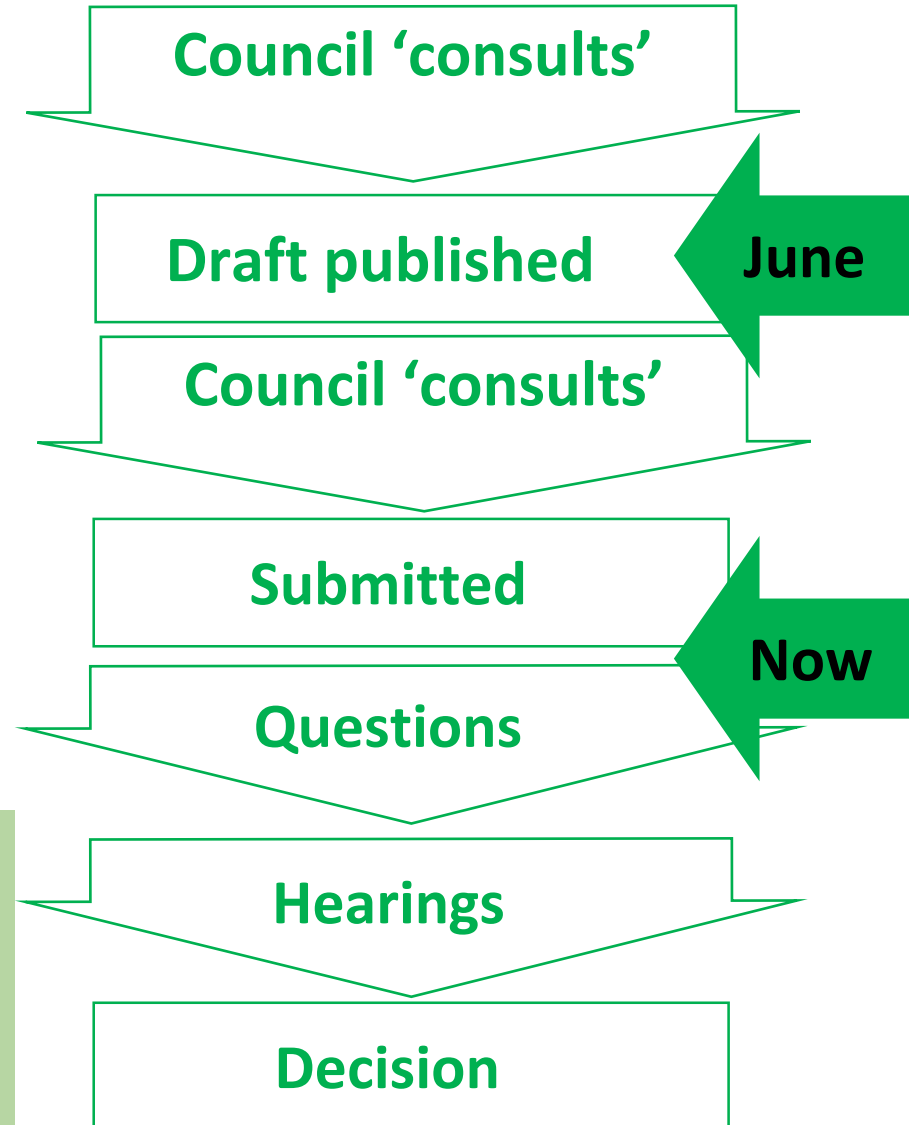
# Agenda

- The fact that this meeting needed to take place at all is tragic. For a community to be forced to hire consultants and a QC to defend itself against its own elected representatives is a damning failure of our political system.
- The Beaconsfield Society acknowledges the housing crisis and would support responsible, proportionate development which is sustainable by the local infrastructure. Across Buckinghamshire that can be achieved without the release of a single acre of Green Belt.
- Chiltern and South Bucks District Councils' (C&SBDC) draft Plan does little to address the issue of affordability, but puts houses where they aren't needed, on Green Belt that we do. It will condemn Beaconsfield to a choking gridlock of traffic.
- This plan is not about social need, it's about developer profit and together we can ensure the Planning Inspector rejects it.

- Welcome
- The political context
- The Draft Plan
- Analysis
- Developer/landowner submissions
- Campaign financials
- The next steps
- Q&A

# Plan Stages

- **Token ‘consultations’**
- **Private and consultant representations made**
- **Planning Inspector appointed**
- **Inspector’s ‘Matters, issues, and questions’ pending**
- **Hearings require formidable preparation**
- **Adverse decision open to judicial review**

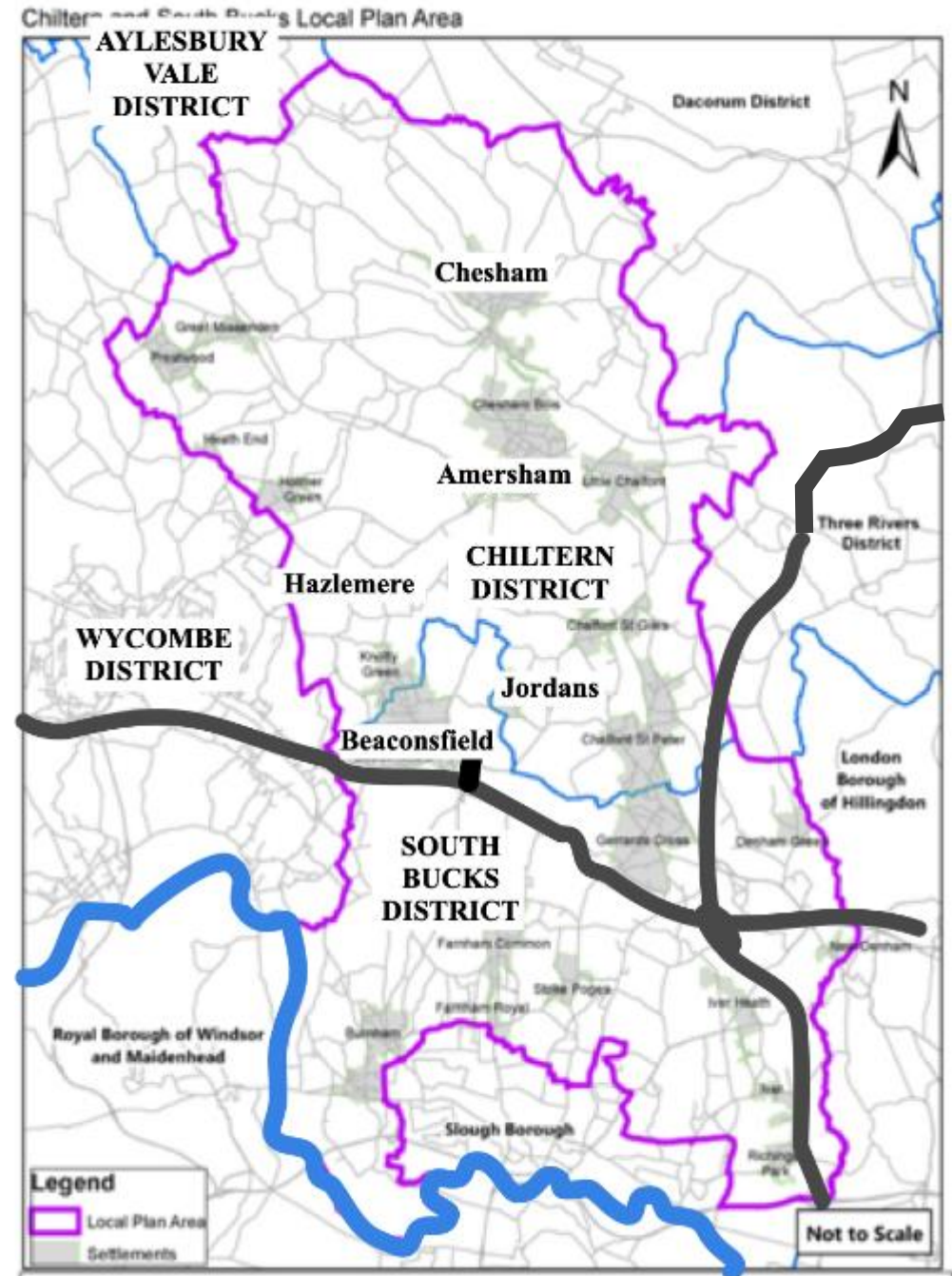


The Planning Inspector has been appointed, and has issued the first questions to the District Councils. We await the Inspectors full 'Matters, Issues, and Questions'. These will require meticulous responses by our consultants. We must have funds in place to commission this work; there will be only a few weeks' notice of the hearing dates. At the hearing our case will be presented by consultants and our QC.

# Political Context

- Plan is statutory requirement
- DISTRICT plan primarily about BUILT environment
  - but must be 'sustainable'
- Unitary Council from Apr 2020
- UNITARY plan would include transport, schools, healthcare
- SBDC pressing for early hearings and decision before Unitary

- Chiltern & South Bucks District Councils (C&SBDC) will cease to exist in April 2020, when the new Buckinghamshire Unitary Authority will be created.
- C&SBDC's plans are primarily about new homes and commercial space, not about traffic, transport, and infrastructure.
- C&SBDC are pushing for early hearings.
- Even if the Unitary decide C&SBDC's plans are not viable, a decision to release Green Belt is highly unlikely to be reversed.
- This appalling plan must be fought now. We can not rely on the Unitary and hope for common sense to prevail.



# C&SBDC Plan: 'Housing Need'

- 'Housing need' is calculated by a standard methodology. That says C&SB need another 10,880 homes by 2036 to address forecast population growth. That's more than two new towns the size of Beaconsfield.
- Because C&SB is an expensive area for housing, C&SBDC are planning to allow 40% more houses than we need, specifically to drive down house prices. A 10% buffer is then added, so C&SBDC are planning for nearly 6,000 more homes than the community 'needs'.
- Since 87% of South Bucks is Green Belt, all these homes don't fit, so C&SBDC are planning to put 5,200 of them on Green Belt.
- However Government guidelines permit alternative methodologies for calculating 'housing need' under 'exceptional circumstances'.
- We have seen no evidence that C&SBDC have tested whether the need to destroy Green Belt constitutes 'exceptional circumstances'.

<b>Community Need<sup>[L]</sup><sub>[SEP]</sub> (per plan)</b>	<b>10,880</b>
<b>Affordability premium</b>	<b>40%</b>
<b>Buffer</b>	<b>10%</b>
<b>Assessed 'need'</b>	<b>16,786</b>
<b>Excess</b>	<b>5,906</b>
<b>Green Belt sites</b>	<b>5,200</b>

**Alternative methodologies permissible under 'exceptional circumstances'**

C&SBDCs' calculations are from page 21 of the Chiltern and South Bucks Housing and Economic Needs Assessment 2019. <https://www.southbucks.gov.uk/planning/hedna>

# A Plan Not Fit For Purpose

- 'Affordable' housing is not 'cheap' housing: 80% market value
- Does not address affordability
- 5 year supply of housing land can be demonstrated **without Green Belt release**
- Bucks CC confirm **Green Belt release unnecessary**

- C&SBDC's plan does not address the affordability issue. Government guidelines are complex, but essentially 'Affordable Homes' means 80% of market value. In Beaconsfield that's still out of reach for most people. And by their own methodology, even this number of houses won't reduce Beaconsfield prices to 'average'.
- District Councils do have to show a 5 year supply of land for new homes. C&SBDC can do that without the release of Green Belt.
- Even Buckinghamshire County Council agree that the release of Green Belt is unnecessary.



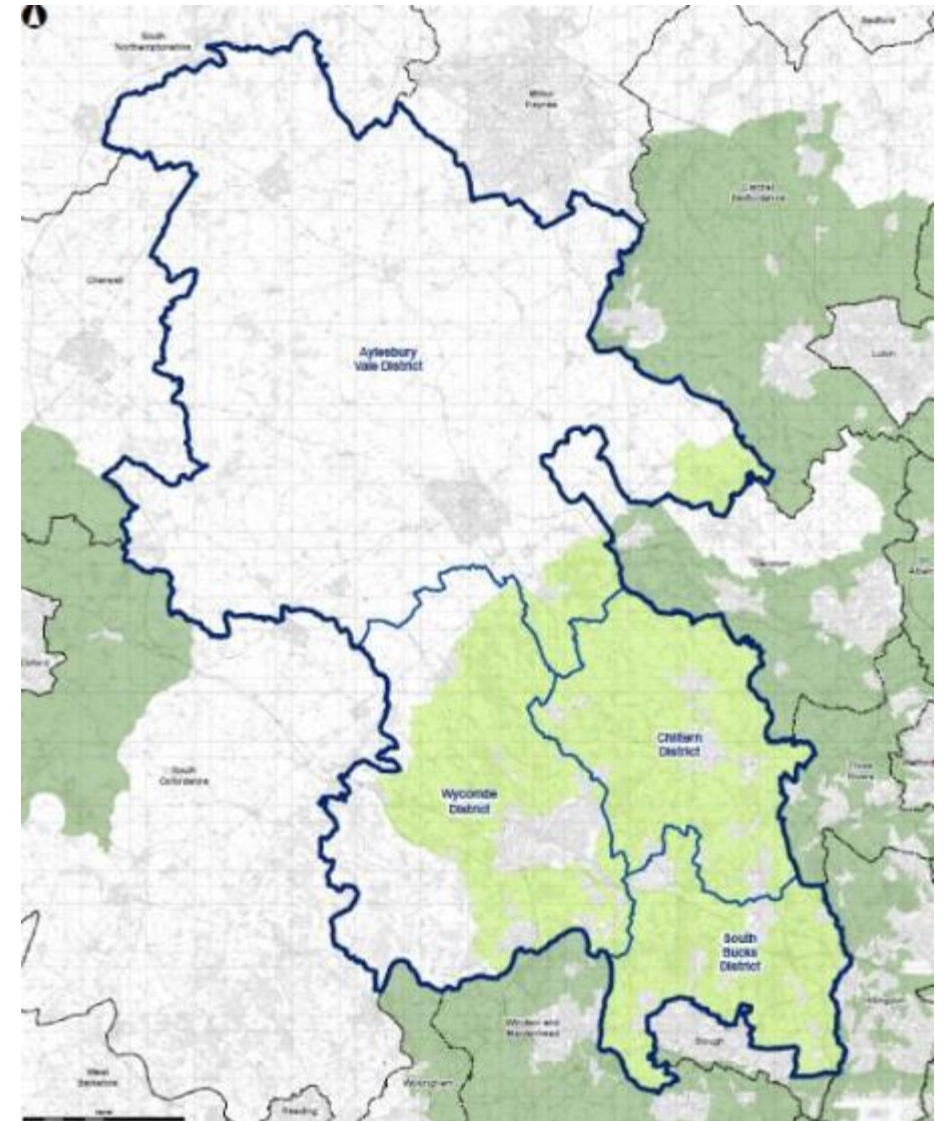


# A Plan Not Fit For Purpose

## Bucks County Council:

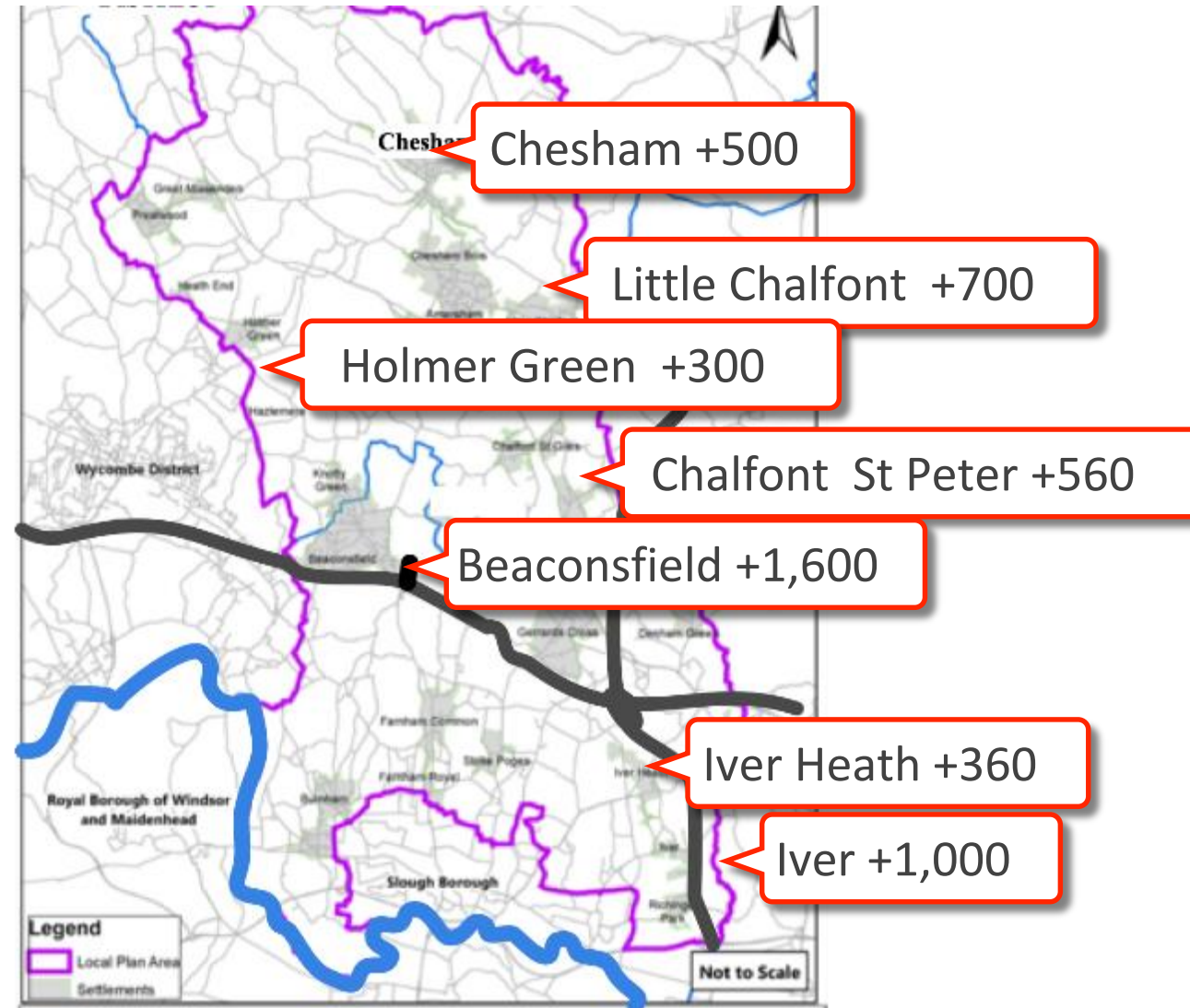
*“There is sufficient land outside the Green Belt suitable for development within the Housing Market Assessment to meet need and so **no exceptional circumstance for Green Belt change.**”*

- Bucks County Council’s response to consultation



# C&SBDC Plan – number of new homes on Green Belt

- Beaconsfield has the largest allocation of new homes on Green Belt in Chiltern & South Bucks
- It would represent a roughly 35% growth in the town, choking our roads and infrastructure

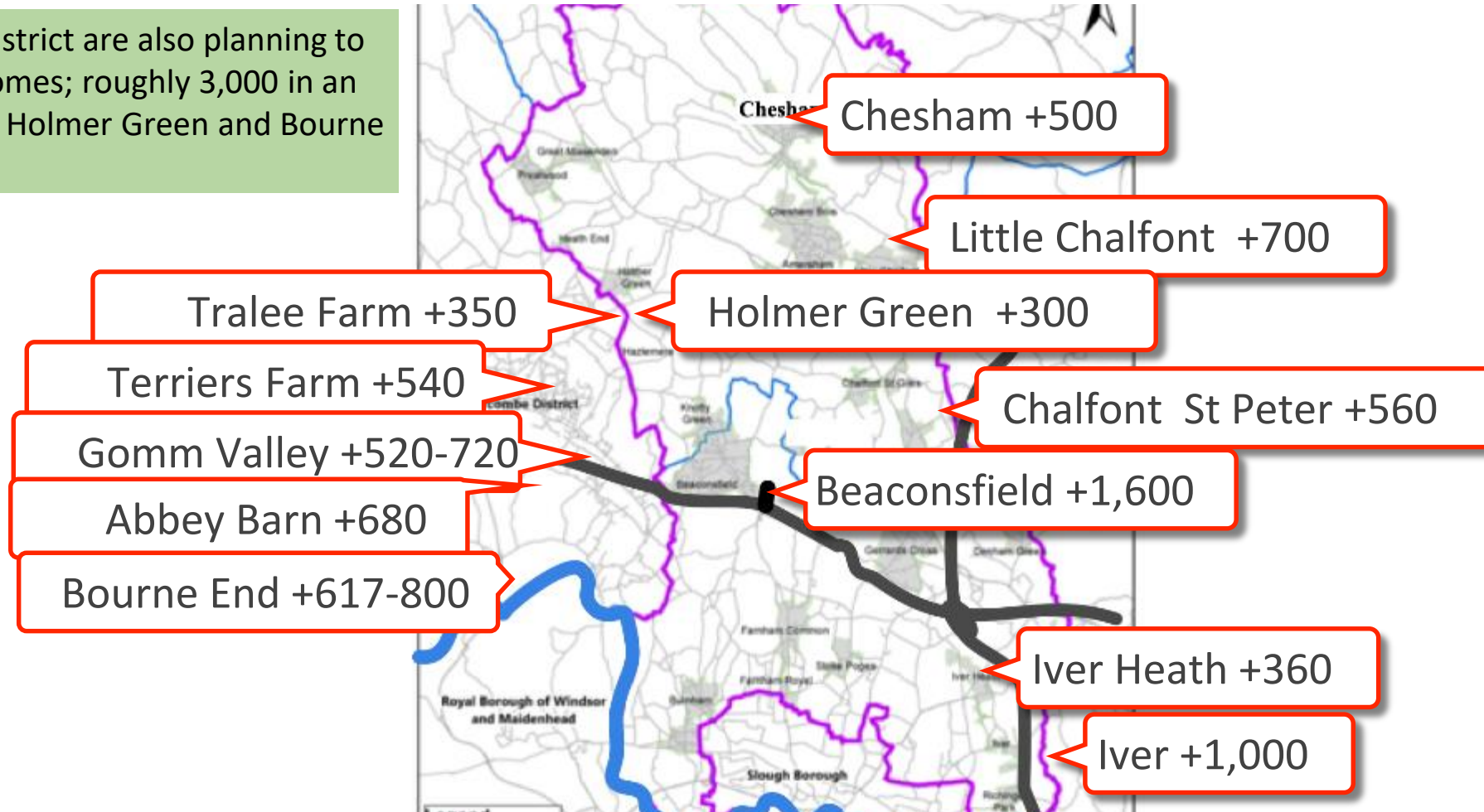




# Plus Wycombe District

Additional **3,000 new homes** impacting on Beaconsfield's traffic

- Wycombe District are also planning to build new homes; roughly 3,000 in an arc between Holmer Green and Bourne End.



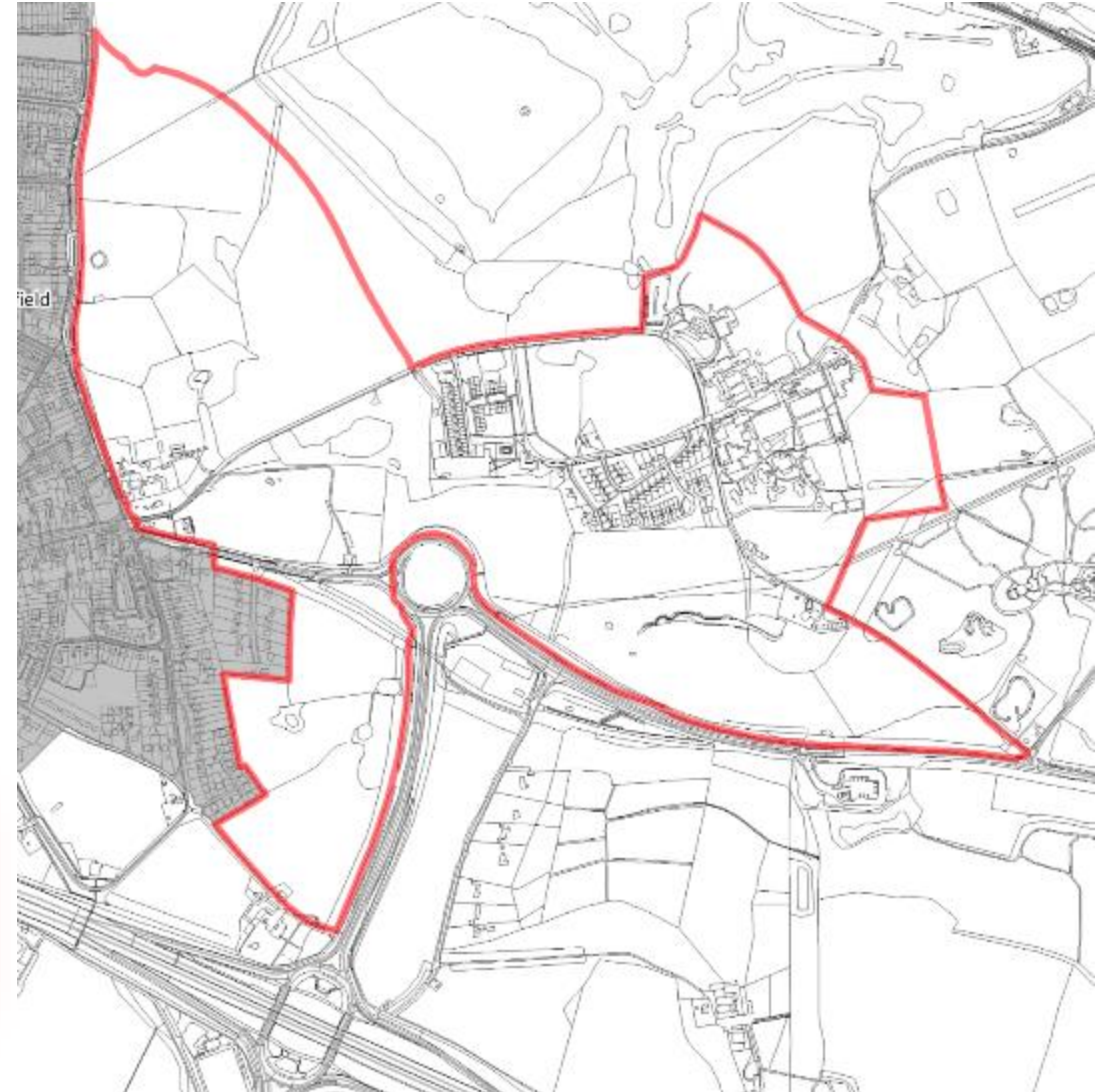
Conservatively, **at least 50% growth** in Beaconsfield traffic volumes

# Beaconsfield detail

- 1,600 homes, including 304 on Wilton Park estate
- 20,000 sqm commercial space
- 2 acres / 0.75 ha travellers' pitches
- Burkes Road car park is potential supermarket site
- Approx 35% growth in town
- 'Needs mitigation...'

- There is existing planning approval for 304 new homes on Wilton Park. C&SBDC want to expand this to 1,600 over a much wider area, and add commercial space and a travellers' site.
- the plan glibly talks about the need for 'mitigation' to reduce the effects of all the extra traffic, but there is no mitigation on earth that will handle the volume. This is planned gridlock.

Beaconsfield's detail is policy 'SP BP9' starting at page 178 of the draft Plan. It can be downloaded at <https://www.southbucks.gov.uk/planning/localplan>



# 'The Beaconsfield Cluster': Additional sites

- +236 homes
- Identified in 'Sustainability Assessment'

• Buried in the plan's detail are some frightening proposals. Within the 'Sustainability Assessment' (a crucial part of the plan) C&SBDC list sites within the town that are earmarked for future (or current) development.

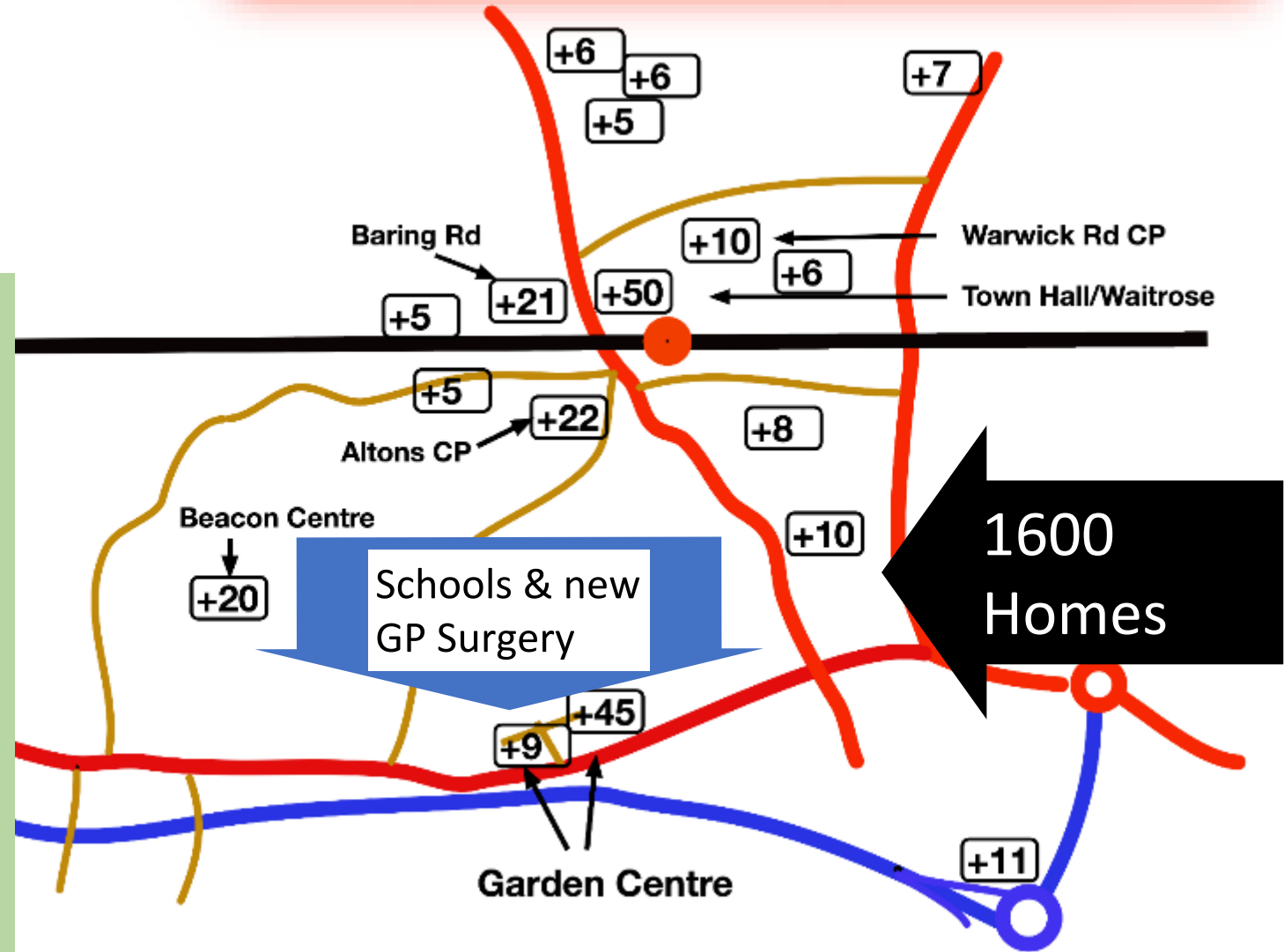
• These include the Warwick Road Car Park, Waitrose Car Park and the Town Hall, Altons Car Park, and the Beacon Centre.

• The Garden Centre, we are told, could handle 45 homes in addition to the 9 already being built next door.

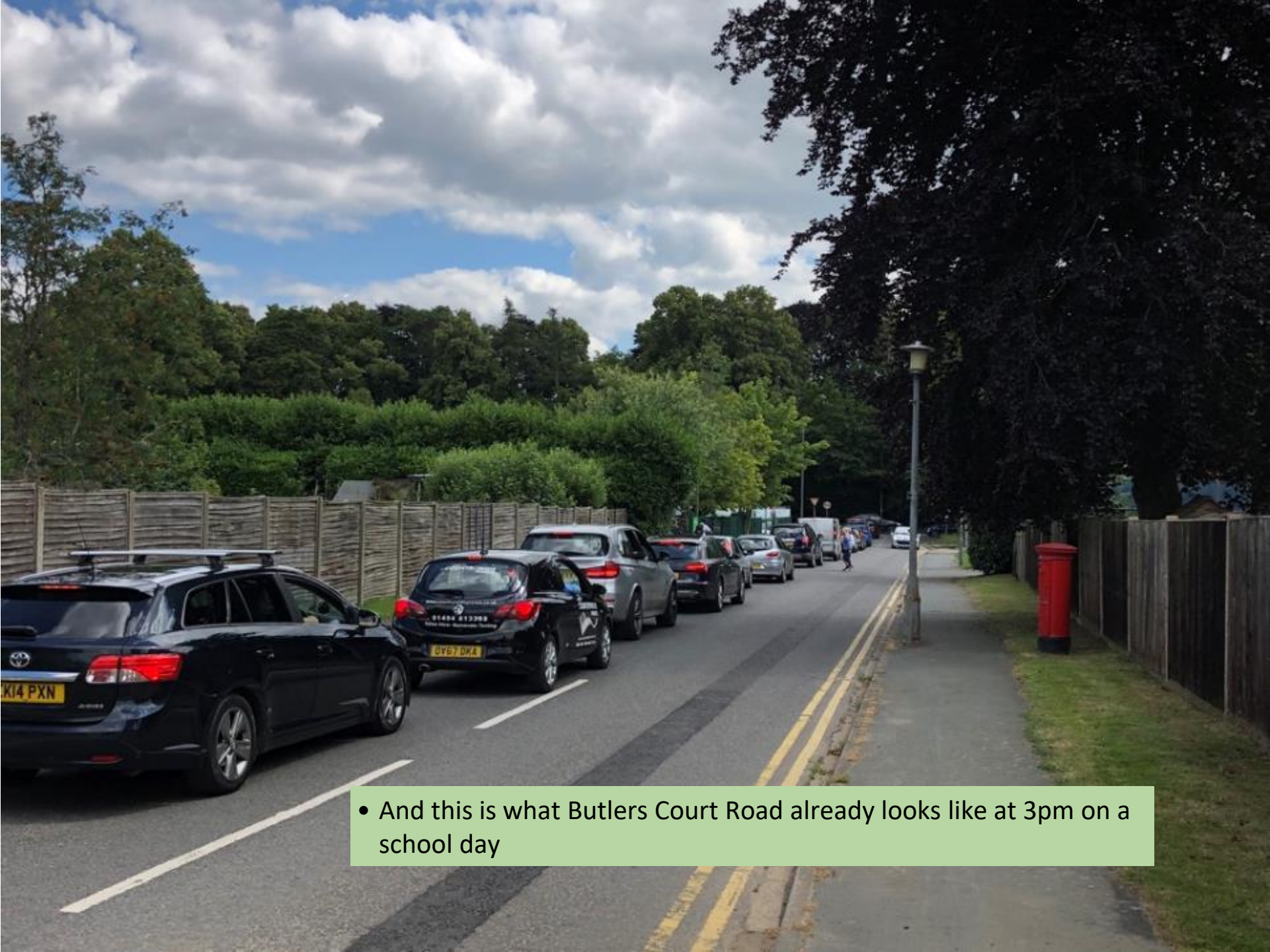
• This is also where the new GP surgery will be built.

• The 1,600 new homes to the East of the town will also need access to schools in Holtspur and Wattleton Road; the cross-town traffic will be horrendous.

See page C117 onwards of the Sustainability Assessment Appendices, which can be downloaded at <https://www.southbucks.gov.uk/planning/localplan>







- And this is what Butler's Court Road already looks like at 3pm on a school day

# Impact on the Villages



## Removed from Green Belt:

- Jordans
- Winchmore Hill
- plus 10 villages

**‘Windfall development’ allowed**

## Villages adjoining Green Belt:

- Penn
- Penn St
- Coleshill
- plus 17 other villages

**‘Infill development’ allowed**



# SBDC railroading the Plan through

“Within this context, and with the creation of the new Buckinghamshire Council in April 2020, we consider it vitally important to maintain momentum with the preparation of the Plan. **To that end, we would like to request that the initial hearing sessions for the public examination be held in December 2019.**”

- During the last ‘Consultation’ C&SBDC received 6,316 comments from 2,653 respondents. They summarised the main issues to the Planning Inspector in 3 paragraphs
- ‘Sustainability’ comments were presented statistically
- C&SBDC are desperately trying to push this plan through before they cease to exist in April 2020

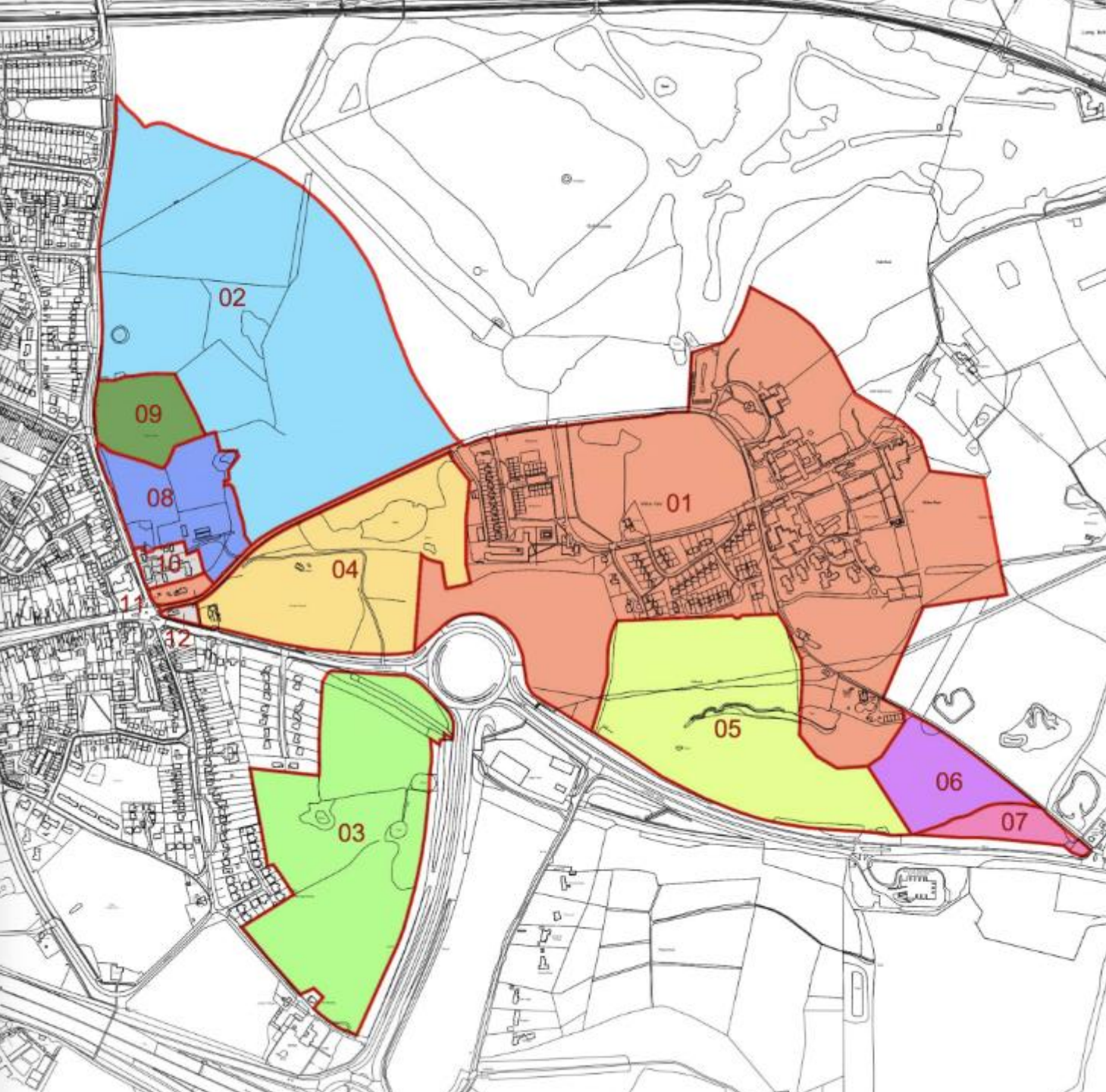
Table 4: Key issues arising from the Sustainability Appraisal

Local Plan - adverse effects	Total
Air quality	2
AONB	5
Biodiversity	6
Built environment	1
Climate change	3
Distance to services and facilities	4
Emergency services	1
Green Belt	10
Health and wellbeing	2
Heritage	1
Natural environment	6
Public transport capacity	2
Recreation	1
School capacity	2
Services and facilities	1
Settlement character	4
Site access	1
Traffic	15
Utilities capacity	2
Water quality	1
<b>SA</b>	<b>Total</b>
Fails to inform and influence the plan	7
Methodology and findings	14
Mitigation	2
Reasonable alternatives	14
<b>Policy</b>	<b>Total</b>

# 42 Questions from the Inspector to SBDC

- The Planning Inspector responded with 42 initial questions to C&SBDC:

- Provide more information regarding ongoing discussions with Slough re a "Northern Extension" to Slough.
- What exactly is the spatial strategy? How has the scale and distribution of growth been determined? What alternative strategies have been considered?
- What evidence is there to substantiate the conclusion that the proposals in the submitted Plan are an appropriate strategy given the reasonable alternatives available?
- Have all reasonable alternatives been considered?
- How does the strategy respond to conclusions on the importance of strategic gaps acting as a means of preventing coalescence and preserving the setting and special character of historic towns?
- What is the justification for removing the villages from the green belt?
- Is the requirement for office and storage and distribution space justified by up to date evidence? What alternative employment sites have been considered?
- How have earlier representations been taken into account?



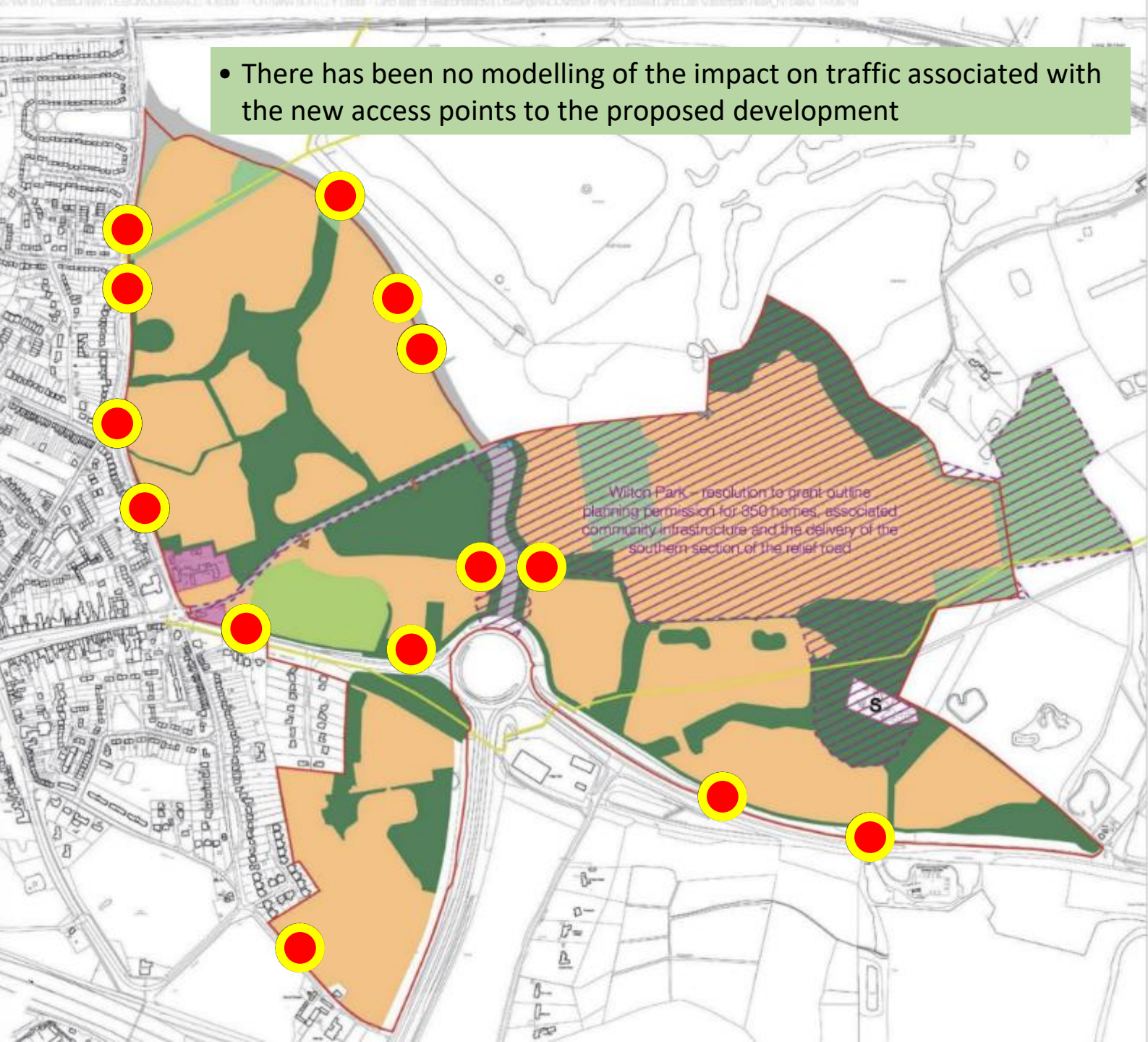
## Land ownerships within draft Policy Area SP BP9 (East and South of Beaconsfield)

01	Inland Homes	39.92 ha
02	Portman Burtley Estate	24.44 ha
03	Hall Barn Estate	12.78 ha
04	Beaconsfield Cricket Club	9.09 ha
05	Jellybaby Ltd	11.38 ha
06	Jones and Vaux	2.80 ha
07	Kelaita	1.14 ha
08	Berkeley Homes	3.66 ha
09	Nesbit and Bates	2.13 ha
10	Private Landowners	0.61 ha
11	Inland Homes	0.33 ha
12	Private Landowner	0.15 ha



• There has been no modelling of the impact on traffic associated with the new access points to the proposed development

# Potential Development Areas



- Legend
- Allocation boundary
  - Relief road (partially under construction)
  - Existing access
  - Potential new access
  - Permitted Wilton Park access
  - Retained public right of way
  - Existing woodland and new planting
  - Landscaped amenity and recreation area
  - Potential development areas\* (c.70.56ha)
  - Beaconsfield cricket club
  - Existing residential uses assumed for retention (subject to confirmation otherwise)
  - Existing sewage treatment works
  - Wilton Park planning application (resolution to grant outline planning permission)
  - Proposed traffic access point







# TRAFFIC CONGESTION GROWTH WITHOUT MITIGATION

- This is C&SBD's own data, produced by their traffic consultants
- Don't be fooled by the green lines; they mean 'only up to 50%' increase in congestion rates
- Red means 4 x congestion rates
- Remember that the access points to the new development were not available when this was done, so the impact could not be accurately modelled.

## BEACONSFIELD

<https://www.southbucks.gov.uk/article/7368/Countywide-Local-Plan-Transport-Modelling>

C&SBD's detailed transport modelling can be downloaded from <https://www.southbucks.gov.uk/article/7368/Countywide-Local-Plan-Transport-Modelling>

### Congestion Ratio

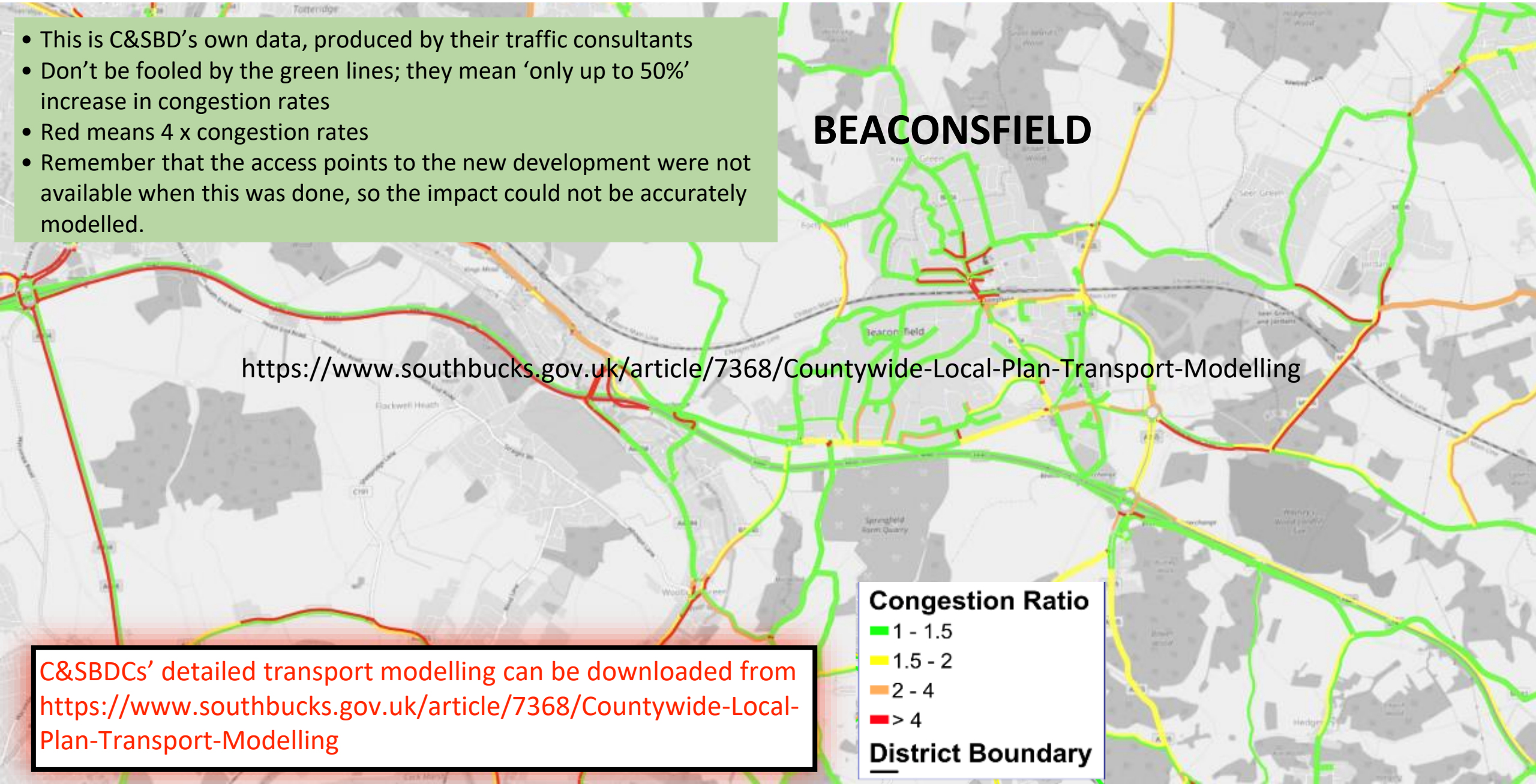
1 - 1.5

1.5 - 2

2 - 4

> 4

### District Boundary





# TRAFFIC CONGESTION GROWTH WITH MITIGATION

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## BEACONSFIELD

### Congestion Ratio

- 1 - 1.5
- 1.5 - 2
- 2 - 4
- > 4

### District Boundary

C&SBDs' detailed transport modelling can be downloaded from <https://www.southbucks.gov.uk/article/7368/Countywide-Local-Plan-Transport-Modelling>

# A LARGE gap in funding for the Plan

**Table 4 – Residual Funding Gap – entire Local Plan area**

Aggregate funding gap of infrastructure	£179.38 - £231.02m	A
Projected CIL income	£21.02m	B
Residual Funding Gap	£158.36 – £210m	A-B

## “Other Funding Sources

26. Clearly other sources of funding will be required in order to progress infrastructure projects identified to support growth set out in the emerging local Plan. **Some of the higher-level costs will need to be supported through government funding bids.** Other more localised costs will need to be funded by service or utility providers.”

- The Councils can't afford their own plan. The net result will be new houses and massive congestion while even the minimal mitigation they 'plan' is delayed or cancelled for lack of funds.

# Developers collaborating

The parties who have signed this joint consultation response (the 'landowners and developers' are:

- The Hall Barn Estate
- The Portman Estate
- Inland Homes
- Berkeley Homes
- Jellybaby Ltd.
- Beaconsfield Cricket Club
- Private landowners (Nesbit and Bates and Jones and Vaux)

- These developers and landowners are collaborating, and working with C&SBDC to shape the allocations and policy wording, and to create a 'framework masterplan' for the Beaconsfield development.
- A Freedom of Information request by the Beaconsfield Society to see the minutes of meetings with the Council was refused as 'commercially sensitive'.
- What IS clear from their submissions is that none of them want unprofitable car parks or schools on their land. They're all keen to build houses or offices, where they make big profits.



# Hall Barn



- IN ADDITION to the development in the draft plan, Hall Barn are seeking the release of additional lands from Green Belt for commercial and housing development; these include parcels between the A40 and the motorway, and a large area to the East of the motorway spur



SITE F - NEW JOBS

## INDICATIVE SKETCH VIEWS

# Hall Barn

- Hall Barn want to build a massive commercial development on the land to the East of the motorway spur.



*Overview of Headquarters Building and New Offices*



# Hall Barn

- They have also submitted plans for the fields West of the motorway spur

**Hedgerley Lane**



**Pyebush Roundabout**

# Inland Homes

- Inland Homes want to put even more houses on the Wilton Park site. They call it 'Intensification'.
- And there is no profit in a sports pitch. Let's get rid of those!

## Increased density of housing at Wilton Park

“we believe that through intensification of the existing site, there is scope to deliver **some 300 further homes** (so a total capacity for some 600 homes overall).

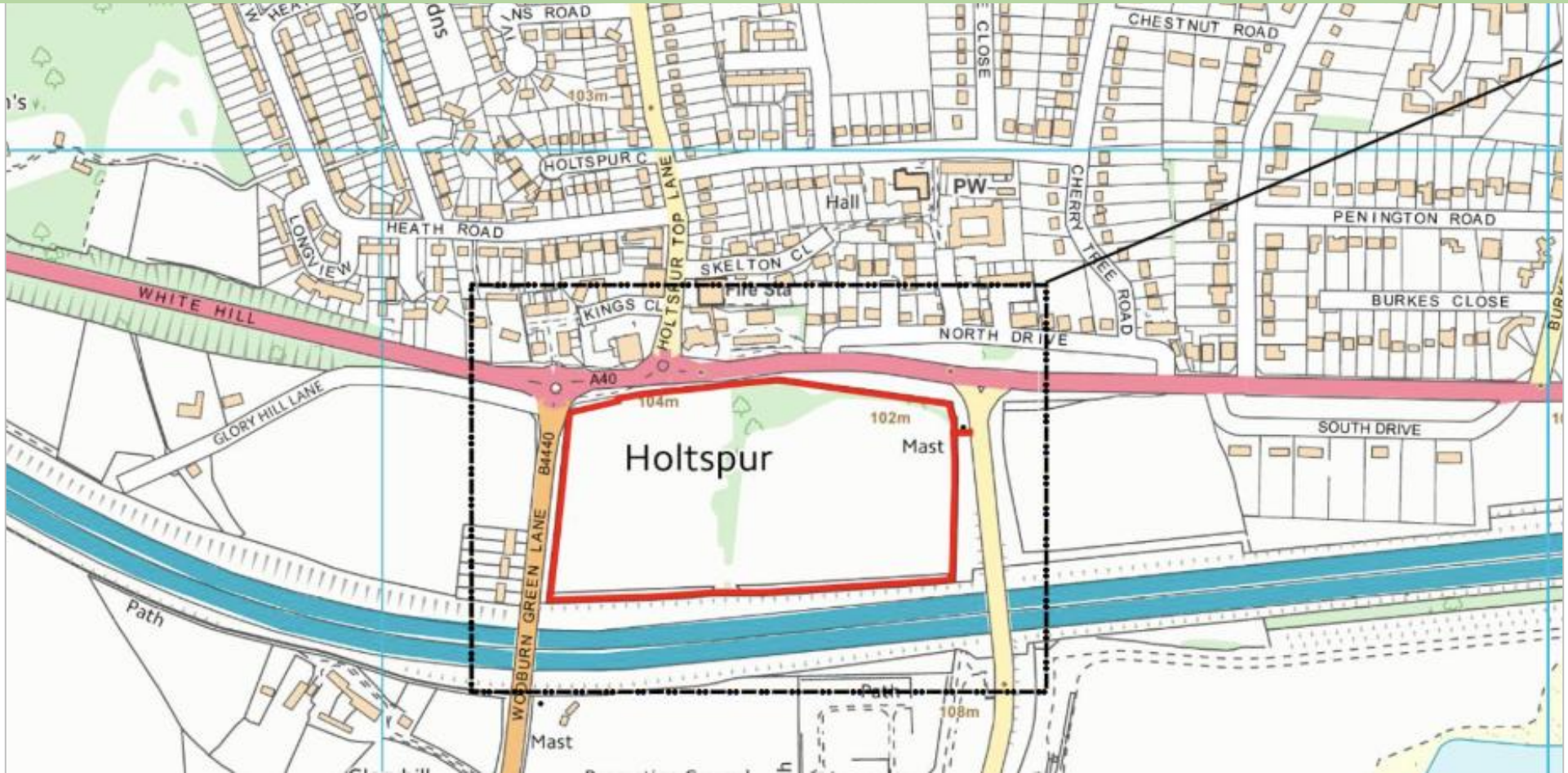
## Removal of sports pitches to 'other' land

“relocate the proposed new sports pitches, potentially onto nearby Green Belt land. The provision of new sports pitches is acceptable on Green Belt land, and **this would allow the more efficient use of the land removed from the Green Belt.**”



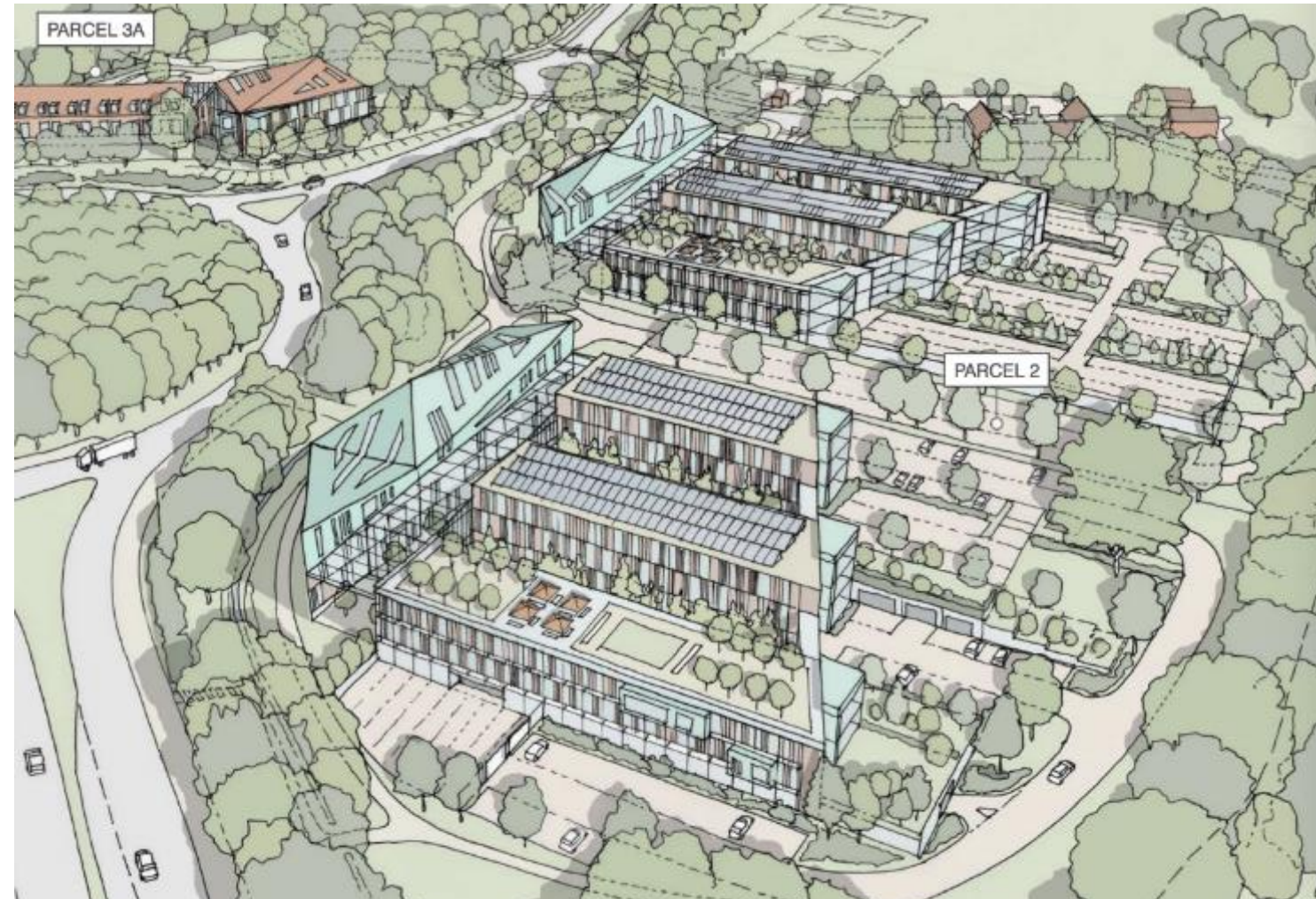
# Inland Homes - Holtspur

- Inland Homes have their sights on Holtspur, as well





# Inland Homes – Pyebush Roundabout



- Their vision for the fields around the Pyebush roundabout is grim:



# Inland Homes – Cricket club



- And as for the Cricket Club, how about some blocks of flats overlooking the pitches?

# Farmglade

“Farmglade represents companies with landholdings in Beaconsfield directly to the south east of the junction on the A355 at Longbottom Lane, which are **not allocated in this plan**, but which are believed to offer a future **development opportunity in this area and which would expand upon the development growth** to the East of Beaconsfield and could assist in the delivery of upgraded infrastructure to facilitate this.”





# Identified **Negative** impacts of the Local Plan

• Issues flagged in C&SBD's Sustainability Assessment

- 1. Local Air Quality**
- 2. Fluvial Flood Risk**
- 3. Increased emissions of greenhouse gases**
- 4. Impact on the Chilterns AONB**
- 5. Discord with local landscape character**
- 6. Alteration of views**
- 7. Increase risk of coalescence and/or urban sprawl**
- 8. Loss of tranquility**

# Sustainability Issues

- **Pollution**
  - **Water supply**
  - **Burnham Beeches SSSI**
  - **Transport & traffic**
  - **Healthcare, schools**
  - **Appraisal too late to inform Council**
- The 'Sustainability Appraisal' is a required supporting document to the plan. Its statutory objective is to assure Councillors that the draft plan is Sustainable.
  - The Appraisal, over 1,000 pages long, was issued in the same week as the Councils met to approve the draft plan, too late to achieve its statutory purpose
  - It contains significant errors, both of fact and logic, for example as rating the Beaconsfield development positively for its transport links, but failing to note that the Chiltern line and Marylebone Station are already at capacity.
  - Chiltern Rail's own strategic plan says significant growth could only be accommodated with a new London terminus.

Sustainability Appraisal of the  
Chiltern and South Bucks  
Local Plan

Regulation 19 SA Report  
Volume 2 of 2: Appendices

June 2019



**LEPUS CONSULTING**  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

## Beaconsfield Town Council response

**“It is the view of BTC that the draft Local Plan is **not sound, not sustainable** and the release of greenbelt is **not justified** for the reasons we detail in the attached document. BTC objects most strongly to the draft plan and **request that this plan is not adopted.**”**



# Save Our Green Belt Funds 2018 - 2019

• Figures correct as of 28/11/19

## Income

## Expenditure:

QC

Green Belt Review

Landscape Consultant

Planning Consultant

Transport Consultant

Meetings/Leaflets/Advertising etc

Fundraising Quiz

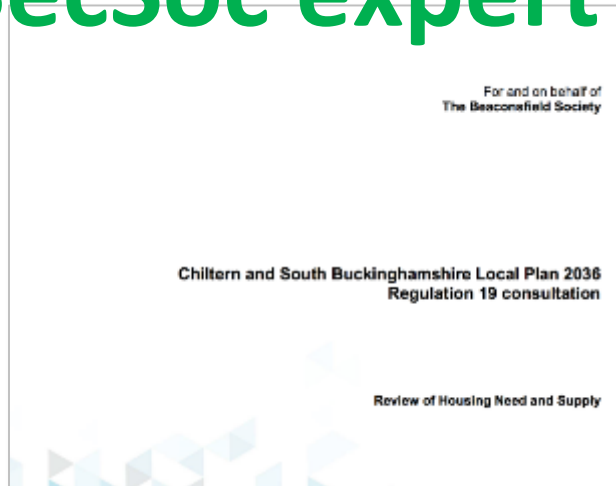
**Total Expenditure**

**Net**

	To Sept '18	Oct - Sept '19	Oct - Nov 19	Total
<b>Income</b>	<b>32,933.58</b>	<b>61,183.05</b>	<b>5,627.30</b>	<b>99,743.93</b>
<b>Expenditure:</b>				
QC		9,840.00		9,840.00
Green Belt Review		5,857.78		5,857.78
Landscape Consultant		8,400.00		8,400.00
Planning Consultant		22,730.70		22,730.70
Transport Consultant		10,435.44		10,435.44
Meetings/Leaflets/Advertising etc	2,950.35	3,124.00	513.00	6,587.35
Fundraising Quiz			634.00	634.00
<b>Total Expenditure</b>	<b>2,950.35</b>	<b>60,387.92</b>	<b>1,147.00</b>	<b>64,485.27</b>
<b>Net</b>	<b>29,983.23</b>	<b>795.13</b>	<b>4,480.30</b>	<b>35,258.66</b>

- We have received nearly £100,000 in donations. Thank you, Beaconsfield!
- We have spent £64,500 so far, mainly on Planning Consultants, Transport Consultants, and briefing the QC
- We have £35,000 left and in addition need an estimated £55,000 to ensure support at the hearings.

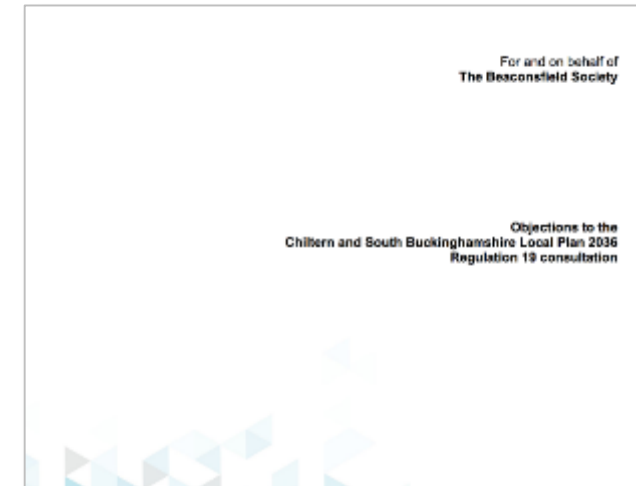
# Where your money is going: BecSoc expert reports



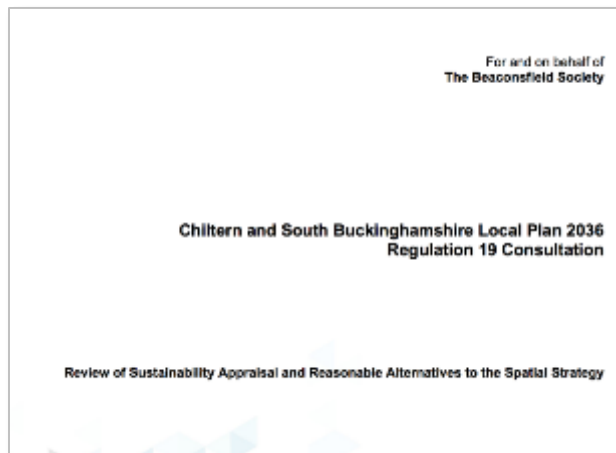
**Housing Need**



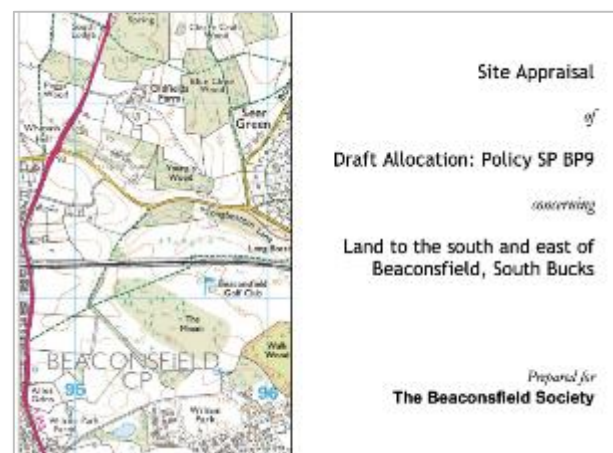
**Green Belt Assessment**



**Reg 19 Consultation**



**Sustainability**



**Site Appraisal**



**Transport**

# In summary: The plan is 'Unsound'

- Consultation flawed
- 'Housing need' phony
- 'Exceptional need' for the release of Green Belt not met:
  - a 5 year supply of housing land exists.
  - reasonable alternatives not considered
- Process failures
- Unsustainable, unviable

## Draft Chiltern and South Bucks Local Plan 2036 - Publication Version





# What happens next:

- ‘Matters, issues, and questions’ come from Planning Inspector
  - rapid, meticulous response required (££)
- Planning Inspector hearings
  - We must be formidably prepared (££)
  - QC and consultants present case (££)



**WE HAVE A POWERFUL CASE.  
IT COSTS MONEY TO PRESENT IT.**

# Donate now: Here's how

- <http://www.beaconsfieldnow.org.uk/donate/>
- All details on our web site
- We accept BACS, credit cards, JustGiving, and PayPal



**Over £6,000 received since Thursday 28/11**  
**Together we can win!**