

AP3.2 – Turley Response

Regulation 18 Local Plan (June 2016)

At the Matter 3 sessions yesterday, in the context of a discussion regarding whether the Local Plan was 'constraints led' and whether the Council has sought to meet their needs in full within their own District boundary, I was asked by the Inspector to provide specific references points within the Regulation 18 Local Plan (June 2016). In that version of the Plan, the housing requirement it is clearly stated throughout as a 'target' of 10,000 houses.

For ease of reference, the Regulation 18 Version of the document is listed as document CONS1 within the Examination Library (see <https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Draft-new-local-plan-for-the-Wycombe-district.pdf>).

I would firstly like to draw the Inspector's attention to a leaflet published and issued to the public entitled 'The Big Challenge', which accompanied the consultation on the Regulation 18 Local Plan (<https://www.wycombe.gov.uk/pages/Planning-and-building-control/New-local-plan/Draft-Wycombe-district-local-plan-leaflet-introduction.aspx>).

This states: "10,000 - the target number of new homes we plan to deliver up to 2033 within Wycombe district (the target in our old plan was 8000). Some of these are already in the pipeline, some will be new proposals"

Within the Reg 18 Local Plan document itself, the following statements are noted:

- "About 15,000 of these are to meet the needs of Wycombe District. However, Wycombe has large areas in the Chilterns Area of Outstanding Natural Beauty and the Green Belt. We propose to accommodate 10,000 homes, with Aylesbury Vale accommodating the rest". (Exec Summary, xii)
- "This draft plan sets out where the 10,000 homes will be built, and where new business will be located". (Exec Summary, xiii)
- "In terms of housing, the plan does not release large areas of land from the Green Belt for housing that would also cause harm to the Area of Outstanding Natural Beauty." (Exec Summary, xiv)
- "POLICY CP4 – DELIVERING HOMES: "1. a housing target of broadly 10,000 homes for the District for the plan period 2013-2033; 2. the unmet element of the District's housing need (around 5,000 homes) to be met in Aylesbury Vale District.." (page 29)

As was discussed at the Hearing session, government guidance is clear that the Plan should seek to meet its development needs in full within the District boundary (this of course applies to both housing and employment needs). Our submissions (in summary) were that the Plan making process has not strived to meet this requirement, but had a predetermined target.

Under a chapter entitled "The Homes Challenge" the Reg 18 Local Plan however states: "2.6 The work we have done with other authorities shows that there is a need for 15,100 homes to be provided in Wycombe District in the period 2013-2033 – that is 750 homes per year". This is called the objectively assessed need for housing. This compares with the housing target in our current plans of just over 400 homes per year. Across Buckinghamshire as a whole, around 50,000 homes are required over the same period."

Without any explanation as to the rationale for the 10,000 homes 'target' figure, the following paragraph seeks to effectively prejudice the site assessment process:

2.18 The National Planning Policy Framework sets the expectation that each Council meets its objectively assessed needs for development. However, it also recognises

that this will not be possible everywhere without causing harmful adverse impacts, especially where large areas fall within Areas of Outstanding Natural Beauty and the Green Belt. For Wycombe, to meet all our development needs would cause unacceptable harm to the Green Belt and the Area of Outstanding Natural Beauty. We are therefore discussing with Aylesbury Vale District Council if it can accommodate our unmet need, to ensure that development remains sustainable.

I hope that this clarification assists the Inspector, and highlights the approach undertaken by the Council in seeking to limit the release of sites required to meet its development, by approaching this Plan with a specific target housing figure in mind.

Wycombe Housing Capacity – interrogation by Aylesbury Vale

At yesterday's Hearing I also referenced the fact that between the Reg 18 and Reg 19 Local Plan's the Council did not positively seek to identify further Green Belt sites capable for release to meet the full OAN. Whilst we acknowledge the existence of the MOU, it is a matter of record that Aylesbury Vale did not undertake further examination of the Council's housing capacity following their critical GL Hearn "[Review of housing capacity in New Wycombe Local Plan Consultation Draft \(August 2016\)](#)" (Document HELS6).

Mr Manktelow referred to Table 7 of the "[Response to Aylesbury Vale Review of Housing Capacity \(2nd November 2016\)](#)" document (p34 – document HELS5) at the Hearing, in response to matters we raised.

A discussion ensued and in response I highlighted that following AVDC's 'push back', Table 7 simply showed that the Council had sought to increase densities on reserve sites (by 250 dwellings), on already proposed green belt release sites (by 260 dwellings), at Princes Risborough (by 150 dwellings), and finally through a further allocation of 300 dwellings at Longwick (a tier 4 settlement) and 160 dwellings at Kimble (also a tier 4 settlement).

Mr Manktelow did not however respond to my specific question with respect of the reconsideration of green belt sites.

We will no doubt pick this up in later hearings, but as a point of clarification I would like to highlight to the Inspector that between the publication of these two versions of the plans the Council only identified a single further Green Belt site for release, totally just 20 units, at site RUR11 (Land at Heavens Above, 16 High Heavens, Marlow Bottom). We note that that green belt site also falls with the AONB. No other green belt sites at higher tier settlements were proposed for release. As detailed above, other non-green belt sites identified are clearly in the lower tier settlements, contrary to its spatial strategy.

Please pass on my thanks to the Inspector for allowing a response on these matters, and we look forward to partaking in the Hearing sessions next week.

Regards
Tim

Tim Burden
Director

Turley