

Winslow Town Council (WTC) believes that Wycombe District Council (WDC) has not recognised its duty and responsibility in these days of ‘exceptional circumstances’ because it has not demonstrated a robust approach to maximise the delivery of new housing within the District’s boundary in order to meet its own Full Objectively Assessed Need (FOAN). As a consequence the Wycombe District Local Plan (WDLP) has not followed a strategy which seeks to meet the District’s FOAN for new homes during the Plan period, leaving WTC to believe that the plan has not been positively prepared and is therefore unsound in respect of its provision for housing development.

The Wycombe District Local Plan (WDLP) only allocates 57 hectares of previously designated Green Belt land for housing, to deliver 1,100 new homes at 19.3 dph. This represents a mere 0.4% of the District’s Green Belt in a District with 48% Green Belt. Many LPAs in a similar position to WDC have recognised that, in order to meet the housing need identified by the FOAN, it is necessary to recognise the ‘exceptional circumstances’ and to reallocate poorly performing areas of Green Belt for housing development in order to fully meet their own FOAN. A local example of such an approach is South Oxfordshire’s Local Plan, where re-designated Green Belt land will deliver 5,500 new homes on 3 sites.

Other LPAs such as Cherwell, Central Bedfordshire and Dacorum Councils are taking a similar positive and responsible approach to the challenge, following guidance from the Government such as that of the then Housing Minister, Gavin Barwell, when speaking in relation to the Housing White paper, who said - “*The green belt is 13% of the land. We can solve this crisis without having to take huge tracts out of the green belt. We are not going to weaken the protections; we have a clear manifesto promise and there is no need to take huge tracts of land out of the green belt to solve our housing crisis. **They can take land out of the green belt in exceptional circumstances but they should have looked at every other alternative first.***” The WDLP claims to have exhaustively examined ways in which it can deliver its FOAN but claims it is unable to do so. This is incorrect, as nowhere in the Plan is there an attempt to maximise housing delivery on allocated sites, in fact quite the reverse.

In WDPL Policy 34, WDC sets out an objective to that is demonstrably not appropriate to a positively prepared Local Plan because it demands that new housing developments should provide –

*a) Opportunities to enhance existing and provide new green infrastructure have been **maximised**, including delivering long lasting measurable net gains.*

b) In all cases, development is required as **a minimum** to: Secure adequate buffers to valuable habitats and

c) Achieve a future canopy cover of **at least 25%** of the site area on sites outside of the town centres and 0.5HA or more (WTC's emphasis in bold).

These requirements to overly generously maximise non-housing uses of valuable land allocated for housing, significantly limit the area of developable land for housing on allocated sites, and therefore limit the scale of housing development that can be accommodated. WTC believes that this Policy cannot, under the prevailing exceptional circumstances, be justified as it does not represent the most appropriate strategy, when considered against the reasonable alternatives and is not based on proportionate evidence. The Plan offers no justification for these policies and therefore leads WTC to the view that WDLP is therefore unsound in this respect.

Policy CP4 of the WDLP confirms that the planned delivery of new homes in the urban area of High Wycombe is 6,350 dwellings. This amounts to housing growth of less than 12% over the 20 year Plan period which represents less than the basic demographic growth figure. WTC believes that WDC should be aiming to achieve a far greater quantum of new housing from its major conurbation in the District in order for their Local Plan to be considered as positively prepared and hence sound.

This under-provision is exacerbated by the irrational and unacceptably low housing densities proposed for the large sites allocated for housing in High Wycombe. The 5 largest sites allocated for housing development in the High Wycombe urban area amount to 157 hectares with housing delivery of 1,985 at 12.6 dph, figures which lead to the WDLP's inability to meet the District's FOAN.

Paragraph 4.38 states: *'The Council has thoroughly reviewed the scope for meeting its housing needs within the District'*. However it did not consider any option of increasing housing densities. It lists the various areas considered, but includes large allocated sites for housing delivering less than 10 dwellings per hectare:

HW4 Abbey Barn 4 - 11.32 hectares - 100 homes at 8.8 dwellings per hectare (dph)

HW6 Gomm Valley and Ashwells - 72.8 hectares - 530 homes at 7.3 dph.

With WDLP's reliance upon Aylesbury Vale to deliver the unmet housing need, its lack of any flexibility, in the form of a buffer etc, means that if sites for housing in the Local Plan fail to deliver for any reason, the Plan has no contingency to compensate for such undersupply, other than the unspoken assumption that such additional unmet need can spill over into a neighbouring Authority, presumably Aylesbury Vale.