

Winslow Town Council (WTC) considers that Policy DM34, as defined and applied in the Wycombe District Local Plan, is unsound because it results in a profligate use of valuable land allocated for housing for ‘other uses.’ For the reasons detailed below, which demonstrate clearly that this Policy is not fit for purpose as it minimises housing delivery, Policy DM34 requires significant modification.

WDLP Policy DM34 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, together with other luxuries and ‘nice to haves’ (such as not building high and low housing densities on the outskirts of large settlements), 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 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 unsound in this respect.

Paragraph 4.38 states: *‘The Council has thoroughly reviewed the scope for meeting its housing needs within the District’.* This statement is unsound as the WDLP does not consider any option of increasing housing densities. It lists the various areas considered, but then includes large allocated sites for housing delivering less than 10 dwellings per hectare:

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

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

APPENDIX A below provides a more detailed assessment of all the larger sites identified for housing growth in the greater High Wycombe area

By way of comparison, the Winslow Neighbourhood Plan (WNP) delivers its housing growth on identified sites at more than 30 dph and delivers satisfactory provision of green space for each housing development site. Even taking into

account the difficulties of the terrain in parts of the High Wycombe area, WTC believes that the identified sites could and should be developed at significantly higher densities than are currently proposed, and thereby absorb more of the District's FOAN.

Policy DM 34 encourages the use of much higher than necessary proportions of land, allocated for essential housing development, for other purposes, by maximising green infrastructure and demanding future tree canopy cover of at least 25% on sites outside of town centres. This begs the question of whether the realisation of such a target is legitimately achieved if it does not also recognise the adverse environmental and social impacts which will result elsewhere i.e. in Aylesbury Vale, in order to achieve it. Global conventions, such as those for climate change and biodiversity, require full consideration of leakage, to avoid gains being made in one area at the expense of losses in other localities. The WDLP appears to take no account of the leakage to which its policies give rise and the Plan accordingly would therefore appear to be unsound.

WTC therefore considers that Policy DM 34 is not fit for purpose, in the current climate nationally of maximising the delivery of new homes. This Policy therefore requires significant modification in order to maximise developable land for housing on allocated sites and thereby reflect a strategy to positively prepare the Local Plan to meet Wycombe District's FOAN within its own boundary.

APPENDIX A

HW4 – Abbey Barn North

5.1.15 Abbey Barn North is an 11ha site that is located off Abbey Barn Lane, it is a sloping and elevated site that is visible from the opposite side of the Wye Valley and is covered by a mix of scrub and woodland.

This is a site of 11.32 hectares, all for housing development and is planned to deliver only 100 new homes at 8.8 dwellings per hectare (dph). The WDLP advises that development will retain a substantial area of chalk grassland habitat. But the above description of the site makes no mention of chalk grassland and it appears that, rather than developing scrubland for housing, the WDLP proposes development of quite a large area of chalk grassland. This must surely be rationally viewed as a luxury too far when the Government's guidance is unequivocally to build more homes.

The site lies on the outskirts of the High Wycombe conurbation, with nearby good infrastructure and high density housing. The restrictions on housing density proposed by WDC for this site are based on concerns about the impact on views

that are not even from an AONB site. However, there is already a prominent electricity pylon behind the site and there are plans to build apartments within half a mile and in direct sight from any view on the Abbey Barn North site. The need for a substantial green path connection, which is further suppressing housing density numbers, is not justified.

HW5 – Abbey Barn South and Wycombe Summit, High Wycombe

5.1.27 Abbey Barn South is a 34 ha site that is located on the southern side of High Wycombe, off Abbey Barn Lane close to the M40, it is a flat area which is mainly farmland with a significant Ride running through the site.

This 34.3 hectare mixed use site has 1.6 hectares allocated for employment. This means that the 505 new homes planned for the remaining 32.7 hectares at a rate of 15.4 dph. It appears that too little of the developable area of this ‘flat’ site is allocated for housing and too much as green space.

HW6 – Gomm Valley and Ashwells, High Wycombe

5.1.36 The Gomm Valley and Ashwells site is a 74 ha site, located between High Wycombe and Tylers Green to the north of the High Wycombe to Marylebone railway line. It is a hillside location that is a mix of arable land, chalk grassland and woodland.

This mixed use site has 1.2 hectares allocated for employment. Only 530 new homes are planned for the remaining 72.8 hectares at a rate of 7.3 dph. Again, the developable area for housing has not been maximised, in fact quite the reverse as there appears to be an allocation of much more green infrastructure than can possibly be justified in the development of this site.

HW8 – Land off Amersham Road including Tralee Farm, Hazlemere

5.1.59 The site of 15 ha is located on the edge of High Wycombe urban area in Hazlemere, adjacent to the District border. It is currently a mix of farmland and woodland and adjacent to the A404.

This site of 15.93 hectares is planned to deliver 350 homes at the rate of 22 dph. The area allocated to green space and an orchard would appear to be higher than is necessary.