

Wycombe District Local Plan Examination

Matter 6 – Green Belt Session

Examination Statement by Nexus Planning on behalf of Inland Homes

1. This Examination Statement has been prepared by Nexus Planning on behalf of Inland Homes in support of draft site allocation HW9.

Issue: Do the exceptional circumstances exist to justify the proposed revision of Green Belt boundaries and can the need for housing and employment development be accommodated without releasing land from the Green Belt?

Question 1) Are the Green Belt Assessments (GB1 and GB2) soundly based, justified and consistent with national policy?

a) Can the need for housing and employment development be accommodated on deliverable sites within settlements without releasing land from the Green Belt?

1. The Sustainability Appraisal ("SA") (September 2017) (document reference WDLP2) demonstrates that there is only sufficient deliverable land outside the Green Belt to provide 9,800 dwellings. This is significantly below the full objectively assessed needs ("OAN") with respect to housing identified in the Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 - Addendum Report ("HEDNA") (document reference HEDN2), and would not be accommodated by the terms of the Buckinghamshire Memorandum of Understanding ("MOU") (July 2017) (document reference MOU5).
2. Therefore, Inland Homes agrees with the Council that it is necessary to remove land from the Green Belt to meet development needs.

b) Has the capacity of areas within settlements to accommodate growth been robustly assessed and what were the conclusions?

1. The Council has carried out a robust assessment of all available sites within the district as part of the Housing and Economic Land Availability Assessment ("HELAA") (September 2017) (document reference HELS1).
2. As mentioned in our response to question 1a of this Matter, the SA (September 2017) (document reference WDLP2) concludes that deliverable sites within existing settlements and outside the Green Belt can only accommodate 9,800 new dwellings, which constitutes a significant shortfall in comparison to the full OAN in relation to housing.

Question 2) Is the approach to amending Green Belt boundaries to release sites for development soundly based and is it consistent with the conclusions of the review in respect of their contribution to Green Belt purposes?

1. The Council's Green Belt Part 2 Assessment evaluates the contribution that the sites which are identified as deliverable within the HELAA make towards the purposes of including land within the Green Belt (as listed at Paragraph 80 of the NPPF). From this, only those sites that perform weakly against Green Belt purposes are to be released as housing allocations. This approach is consistent with national planning policy.
2. We support the Council's assessment with regards to draft allocation reference HW9 for the reasons highlighted at paragraph 23 of our Regulation 19 representations with respect to draft Policy HW9.

Question 3) Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries?

1. The SA details that only 9,800 dwellings are capable of being provided on deliverable sites located outside the Green Belt. As a result of the significant development constraints within the district (71% Area of Outstanding Natural Beauty ("AONB") and 48% Green Belt), a MOU (document reference MOU5) has been agreed with Aylesbury Vale District Council to accommodate some of Wycombe District's unmet needs. However, the MOU details that Aylesbury Vale will also accommodate some of Chiltern District and South Bucks District's unmet needs.
2. Paragraph 3.14 of the Council's Green Belt Part 2 Assessment (September 2017) (document reference GB1) explains that there is a market limit to the degree of housing growth that can be realistically delivered in Aylesbury Vale, therefore land must be released from the Green Belt within Wycombe District in order to ensure that the Housing Market Area OAN is met in full.
3. Failure to meet the OAN in full across the Housing Market Area would be damaging to the local needs of residents and businesses, and would be inconsistent with the aims of NPPF Paragraph 47 and the delivery of sustainable development.
4. In light of the above, we agree with the Council that exceptional circumstances exist to justify the release of land from the Green Belt.

Question 4) What are the exceptional circumstances, as required by the NPPF paragraphs 79-86, that justify the Plan's proposed revision of the boundaries of the Green Belt?

1. Please refer to our response to Question 3 of this Matter.