

CHEPPING WYCOMBE PARISH COUNCIL

SERVING THE COMMUNITIES OF TYLERS GREEN, LOUDWATER AND FLACKWELL HEATH

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3 September 2026

Cllr S Broadbent,
Leader, Buckinghamshire Council

Dear Cllr Broadbent

Reg 19 Draft Local Plan.

1. **Introduction.** The Parish Council is submitting this letter in response to the latest consultation on the Reg 19 version of your draft new local plan. Overall, we are very supportive of the plan and especially the decision not to rely on Green or Grey Belt land for future development. We believe that our residents would fully back that strategy. Moreover, we very much welcome your decision not to allocate BW003 which would have the adverse impact of merging 2 major settlements together - Bourne End and Flackwell Heath – contrary to national policy. All that said, we do continue to have several serious concerns which hopefully will be addressed during the formal examination next year.
2. **Housing Target.** The housing target of more than 95,000 homes in 15 years seems to us to be an unreasonable one. We appreciate that this figure has been set by national government, but it fails to recognise that a large part of Buckinghamshire is made up either of Green Belt or national landscape or both. Moreover, the sheer practicality of building that number of houses seems to us to be unachievable given the availability of tradesmen and building materials both of which are in short supply. We urge Buckinghamshire Council to continue to question the target.
3. **Target Buffer.** Whilst excluding a buffer means that, notionally, Buckinghamshire Council can meet its target without using Green or Grey Belt, we are concerned that this might be a risky strategy given that build-out rates do not always meet expectations. We know from local experience with the Gomm Valley development that major sites like that one can often take many years to come to fruition, in that case, over 10 years from the time the land was released until the time that construction teams were on-site. We strongly recommend that a 5% buffer be included in the final plan to give it any real credibility.
4. **Land Allocation.** Whilst we remain supportive of your policy not to rely on Green or Grey Belt land for development, the draft plan allocates 11% of the target to “windfall” and we remain concerned that these could well end up being on Green or Grey Belt land unless the DM policy makes it perfectly clear that this would not be acceptable. In any case, we are aware that land already potentially ear-marked for development such as the Amersham Wycombe College site in Flackwell Heath are not included in the Reg 19 version of the plan and we suggest that this too be rectified.
5. **Infrastructure.** Again, from experience over the last 10 years or so, we know that essential infrastructure arising from major developments either does not get delivered or gets delivered at the end of the building programme. Residents moving into new homes need to have that infrastructure in place from the outset and there is a strong argument that developers should be made to deliver the necessary infrastructure before any house building takes place. This is particularly important with medical and educational facilities as well as utilities such as gas, electricity and water. Thames Water has been particularly bad at delivering essential improvements to the sewage treatment works in Little Marlow despite numerous promises from senior managers within the company. We urge that the DM policies in the adopted plan include more stringent demands on all infrastructure providers.

6. Infrastructure Funding. In terms of guaranteeing that essential new infrastructure will be delivered on time, there is also the question about how that will be funded. The Reg 19 plan assumes that £B5.9 of infrastructure funding will come from developers via s106 leaving a further £B0.9 unfunded. However, it is essential that the source of this deficit be identified now otherwise our previous unsatisfactory experiences will continue into the future

7. Employment. We are fully supportive of a strategy that provides employment areas close to housing thereby reducing the amount of commuting. Our concern rests on the ability of County organisations to actually generate sufficient new employment opportunities to match the planned increase in housing numbers. Some land allocated for employment sites within the adopted 2019 Wycombe Local Plan have still not been developed into occupied industrial sites, eg the Daws Hill development in High Wycombe. We believe that we need the positive and active support of national government to create the employment opportunities.

8. Affordable Housing. We fully support the policy that 40% of all new housing in the south of the County should be “affordable” and we believe that there is no reason why that policy should not also apply in the north. We urge you to reconsider this decision.

9. Energy Efficiency Targets. Local Plan Objective 2 includes the following statement “Increase the supply of renewable/low-carbon energy and provide supporting infrastructure such as electric vehicle charging points and hydrogen fuelling.” This is further supported by SP11 but there appears to be no specific detailed requirement that would include the requirement for solar panels to be fitted to all new homes, and this seems like a no-brainer to us. We therefore urge that the adopted local plan include such a requirement.

10. Designated Green Spaces. We are seriously disappointed that our previous request to include policy DM12 of the adopted 2019 Wycombe Local Plan in the Reg 19 version of the Buckinghamshire draft Local Plan has been ignored. Your own draft policies make clear how important natural green space is for the well-being of residents, and we believe that the protection of those green spaces is essential for those very good reasons. So, once again, we urge that a new policy is inserted in the finally adopted Buckinghamshire Local Plan to provide that essential protection.

11. Car Parking. We highlighted our concerns on this matter in our earlier comments of the Reg 18 version of the Buckinghamshire draft Local Plan and you have tightened up the policy since but, in our opinion, not sufficiently well enough. As we have argued from the beginning, the parking standard needs to be a standard and not a guide as hitherto. It is therefore not acceptable to include such phrases in the parking policy as “Parking provision will be determined by the outlined standards as a minimum supported by evidence-based justification for variations”, ie there is still some latitude that can and will be easily exploited by some developers. We therefore urge that further amendments be made to the Reg 19 draft to remove these kind of “get out of jail” clauses.

12. Walking, Wheeling and Cycling Strategy. Whilst we support the general philosophy of encouraging active travel, the policies on this need to seriously recognise how hilly the area around High Wycombe is and how much of a disincentive it is to these forms of transport particularly for the older and less fit. There therefore needs to continue to be a high standard of public transport in this area and, in that regards, we urge that the DRT service continue to be provided given how successful and how economical it has proved in recent years,

13. Finally, this is to confirm that CWPC will wish to address the planning inspector on these points during the public examination next year.

Yours sincerely



Cllr Katrina Wood
Chairman of Council