

# Great and Little Kimble-cum- Marsh Neighbourhood Plan Publication Stage Consultation Comment Form

December 2019 – February 2020



This consultation seeks your views on the Great and Little Kimble-cum-Marsh neighbourhood plan and [whether it meets the basic conditions](#). All comments will be sent to an independent examiner who will examine the plan. If the examiner determines that the plan meets the basic conditions then a referendum will be held on whether to 'make' the neighbourhood plan.

All comments should be submitted to us by **11.59pm on Tuesday 18 February 2020**.

## How to submit your comments

Return this form to us by:

- email: [neighbourhood.planning@wycombe.gov.uk](mailto:neighbourhood.planning@wycombe.gov.uk)
- post: Planning Policy Team, Wycombe District Council, Council Offices, Queen Victoria Road, High Wycombe, Bucks, HP11 1BB

## Completing the comments form

There are two parts to this comment form.

- Part A: Personal/agent contact details (personal details will not be published except your name and organisation if applicable).
- Part B: Your comments (this will be made publically available).

Please do not send multiple copies of the same comment (either electronically or in writing). Where groups share a common view you may submit one comment representing the group.

## Personal data - fair processing notice

As part of this public consultation exercise any information received by us, including personal data, may be put into the public domain, including on this website.

## Privacy notice

Before completing and send this form please ensure you read and agree with [our privacy policy](#).



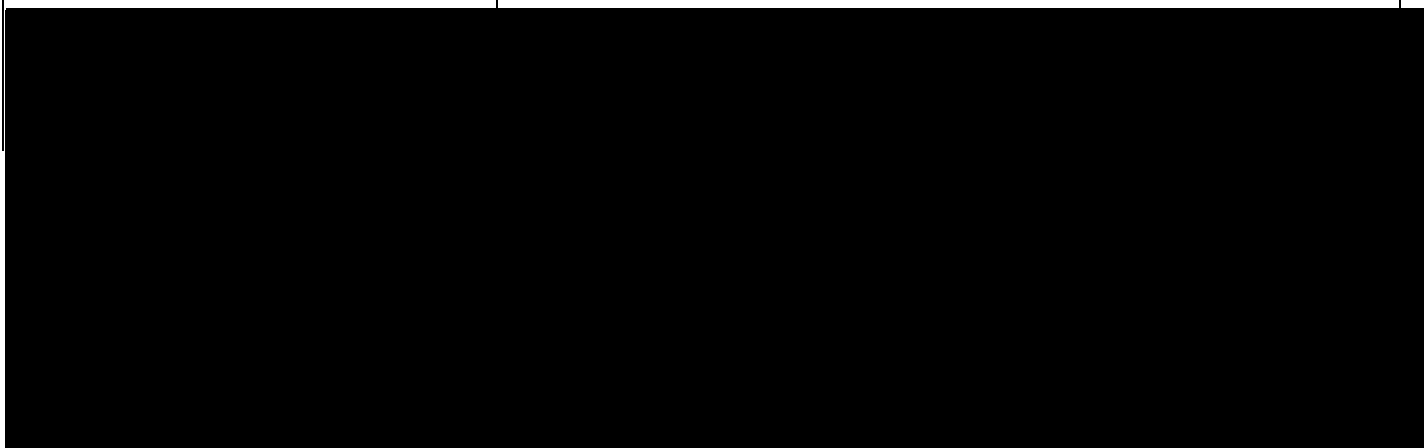
## Comments form: Great and Little Kimble-cum-Marsh Neighbourhood Plan publication stage

### Part A: Contact details

In this section, we would like some information about you. We will need your contact details in order to take your comments into account. Personal details will not be published by us, other than your name and organisation.

#### 1. Your details

<b>Name</b>	Nick Wyke
<b>Job title (where relevant)</b>	Project Planner
<b>Organisation (where relevant)</b>	Village Foundations



#### 2. Agent details (if you are responding on someone's behalf)

<b>Name</b>	
<b>Job title (where relevant)</b>	
<b>Organisation (where relevant)</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Email</b>	



<b>Phone number</b>	
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3. Which of the following do you consider yourself (please tick only one):

	Adjoining Local Authority
	Other Local Authority
	Local resident
	Parish or town councillor
X	Developer / housebuilder
	Community group
	Environmental organisation
	Other (please specify)

4. Keeping in touch – please tick if you wish to be kept updated on any of the following:

X	<b>Please inform me of Wycombe District Council’s decision to ‘make’ the Neighbourhood Plan (Regulation 19).</b>
X	<b>Please notify me of future Local Plan consultations.</b>
X	<b>Please add me to the mailing list for the Weekly Planning Bulletin, for planning news and information of wider interest.</b>

**End of part A**



## Part B: Comments on the neighbourhood plan

Please note all comments will be made publically available. Please continue on a separate sheet if necessary.

**Which part of the Great and Little Kimble-cum-Marsh Neighbourhood Plan does your comment relate to?**

Policy KIM3 Housing Site Allocations

**What part of the Basic Conditions does your comment relate to? (please tick all that apply)**

having regard to national policies;

the achievement of sustainable development;

general conformity with the strategic policies contained in the development plan area;

compatibility with EU obligations;

**Please make your comments here. Please be as clear as possible and ensure any relevant supporting information is included, and continue on additional sheets if necessary. There will not normally be a subsequent opportunity to make further comments.**

We support the work to date by the neighbourhood plan steering group and the allocation of site 15 (Land South of Grove Lane) in the neighbourhood plan.

Our comment relates to paragraph 5.15 which states the site will not be released for development until the details of the Grove Lane infrastructure improvements and the requirements for the double tracking of the railway have been clarified and finalised.

Other sites (No. 1 and 10) are also affected by the same infrastructure improvements but have a different policy wording applied – stating that a development may not commence until the infrastructure land requirements are clear. There is no apparent justification to the stronger wording for Site 15 stating the site will not be released for development until the land requirements are “clarified and finalised”.

Both policy PR8 (Provision and Safeguarding of Transport Infrastructure) and RUR6 (Great and Little Kimble Cum Marsh Parish) of the adopted Wycombe District Local Plan give protection and control in preventing development from prejudicing the provision of the infrastructure works. RUR6 does not specify a distance from the railway but PR8 states a distance of 15 metres parallel to the track from the boundary fence to be safeguarded within the Princes Risborough expansion area. There is no reason to depart from this figure in Little Kimble.

Paragraph 5.15 prevents development on Site 15 until the road and rail infrastructure has been “clarified and finalised”. Village Foundations is concerned that this blanket restriction is not sufficiently justified when the safeguarded land requirement has been thoroughly tested through the Wycombe Local Plan. It is not necessary to apply such a restrictive criterion when

the safeguarding policies within the Local Plan prevent any prejudice of the planned infrastructure schemes

The potential rail infrastructure, which may include electrification and a passing loop or double tracking, has a safeguarded land requirement of 15 metres. This is a known factor as the requirements have been considered for the expansion of Princes Risborough and are set out in Wycombe Local Plan Policy PR8. In Chiltern Railways' response to the Princes Risborough Expansion SPD, published on Wycombe DC's website, a 15m strip of safeguarded land is welcomed.

Village Foundations supports the principle of phasing in the Neighbourhood Plan, however the designs for the Site 15 in Little Kimble mean that a phased approach can be applied not as a blanket restriction on the whole site but instead on land which is safeguarded in the Local Plan. 10 homes can safely be delivered, using an extant access point serving existing homes, without any impact upon the future road infrastructure or the improvements to the railway. Further development can be delivered in later phase(s).

The Wycombe Local Plan Policies Map shows safeguarded land areas for both the road and rail infrastructure, and even though these are cautious, with the rail safeguarding seemingly considerably wider than the 15m described in the policy itself, it still leaves a significant area of unconstrained land sufficient to deliver 10 homes. The remainder of the site can then follow, delivering at least 14 homes overall with the final number dependent upon the eventual land requirements of the planned infrastructure.

The Local Plan policies PR8 and RUR6 would apply to sites 1, 10 and 15. The additional restriction set out in paragraph 5.15 of the Neighbourhood Plan is not considered to serve a clear purpose as required by paragraph 16 of the NPPF or speed up the delivery of homes as required by paragraph 68 of the NPPF.

Paragraph 29 of the NPPF states Neighbourhood Plans should not promote less development than set out in the strategic policies for the area whilst paragraph 23 requires sufficient sites to be allocated to deliver the strategic priorities of the area. The sites allocated in the draft neighbourhood plan are expected to deliver 110 new homes (excluding the reserved site 15). With 36 homes already been built or committed in the plan period there is a shortfall of 14 homes which are considered to be accommodated by windfall applications.

Since concerns were raised by the Neighbourhood Plan steering group over the deliverability of the site due to the infrastructure improvements, Village Foundations produced layout plans that showed the site can accommodate at least 10-14 units leaving sufficient space for the road and rail infrastructure improvements to be finalised. Plan 3285.SK05 safeguards the 15m buffer to the railway and the land required for the road improvements, allowing for 14 homes. Plan 3285.SK04 sets aside a more substantial area of land beyond the expected requirements and this could deliver 10 homes without delay. The site is therefore able to accommodate the outstanding housing needs for the Kimble Neighbourhood plan ensuring it meets the requirements of paragraph 23 and 29 of the NPPF.

On this basis site 15 should not be held in reserve as it is capable of accommodating at least 10-14 units even allowing for the infrastructure works. We would encourage the wording of paragraph 5.15 policy KIM3 to be revised as follows.

“The site is estimated to have a developable area of about 0.7HA and could deliver 10 homes without prejudicing road or rail infrastructure based on the Local Plan's safeguarded areas, and at least a further 4 homes subject to the final land requirements of the proposed infrastructure.”

**End of part B**

Thank you for completing the comment form.

**Contact Details**

If you have any questions, comments or queries please contact us on the details below:

Neighbourhood Planning - Telephone: 01494 421570

Email: [neighbourhood.planning@wycombe.gov.uk](mailto:neighbourhood.planning@wycombe.gov.uk)

Address: Planning Policy Team, Wycombe District Council, Council Offices, Queen Victoria Road,  
High Wycombe, Bucks HP11 1BB

Website: [www.wycombe.gov.uk/council-services/planning-and-buildings/planning-policy](http://www.wycombe.gov.uk/council-services/planning-and-buildings/planning-policy)