

Longwick-cum-Ilmer Neighbourhood Plan Publication Stage Consultation Comment Form

25 August – 9 October 2017



Longwick-cum-Ilmer Neighbourhood Plan

We have published the final version of the Longwick-cum-Ilmer Neighbourhood Plan. The Longwick-cum-Ilmer Neighbourhood Plan and supporting documents are available to view at www.wycombe.gov.uk/consultations

Paper copies are available for view at the following addresses:

- Wycombe District Council offices in Queen Victoria Road, High Wycombe,
- Princes Risborough Town Council offices, the Princes Centre, Clifford Road, Princes Risborough, Bucks HP27 0DP
- High Wycombe library, and
- Princes Risborough library.

This consultation seeks your views on the Longwick-cum-Ilmer Neighbourhood Plan and whether it meets the Basic Conditions¹. 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 shall be held on whether to 'make' the Neighbourhood Plan.

All comments should be received **by midnight on Monday 9 October 2017**.

How to submit your comments?

You can send your representations to us by:

- Email: 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- Part A personal/agent contact details (personal details will not be published except your name and organisation if applicable).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.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/>

Comments form: Longwick-cum-Ilmer 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 Personal details will not be published by us, other than your name and organisation.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

Name	
Job title (where relevant)	
Organisation (where relevant)	Bellway Homes (North London)
Address	C/O Agent
Postcode	
Email	
Phone number	

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

Name	Mrs Claire Steele (or Miss Carmelle Bell)
Job title (where relevant)	Associate Planner
Organisation (where relevant)	Savills
Address	██████████ ██████████ ██ ██████████
Postcode	██████████
Email	██████████████████ ██



Phone number	[REDACTED]
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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
✓	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:

✓	Please inform me of Wycombe District Council’s decision to ‘make’ the Neighbourhood Plan.
✓	Please notify me of future Local Plan consultations.
✓	Please add me to the mailing list for the Weekly Planning Bulletin, for planning news and information of wider interest.

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 Longwick-cum-Ilmer Neighbourhood Plan does your comment relate to?

Land off Boxer Road / Barn Road; Policy A2; Policy L2 and Section 7.3.

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

<input checked="" type="checkbox"/>	having regard to national policies
<input checked="" type="checkbox"/>	the achievement of sustainable development
<input checked="" type="checkbox"/>	general conformity with the strategic policies contained in the development plan area
<input type="checkbox"/>	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.

These representations have been prepared by Savills on behalf of Bellway Homes Limited (North London) ('Bellway Homes') in respect of Land off Barn Road, Longwick (referred to as Land off Boxer Road / Barn Road in the neighbourhood plan) and here on in referred to as 'the site'.

These representations seek to ensure that the Longwick Neighbourhood Plan, in meeting national and local guidance, meets the basic conditions as set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and meets the National Planning Policy Framework (NPPF) requirements in being positively prepared and in the achievement of sustainable development and "general conformity with the strategic policies of the Local Plan" (para 184 of the NPPF).

The site has outline planning permission (planning reference 14/06965/OUT, appeal reference APP/K0425/W/15/3018514) granted on 19 May 2016 for residential development for up to 160 dwellings with access, parking, public open space with play facilities and landscaping. The outline permission is subject to a S106 Agreement which makes provision for a number of planning obligations.

Following extensive pre-application discussions with Officers at Wycombe District Council a reserved matters application has been submitted by Bellway Homes to seek detailed consent for the appearance, landscaping, layout and scale for 160 dwellings (planning reference 17/06691/REM). Agreement has been reached with Officers on the application and it is to be determined by Wycombe District Council Planning Committee.

Bellway Homes generally support the objectives of the Submission Longwick Neighbourhood Plan but wish to make the following constructive comments/ objections to ensure that the plan accords with the Basic Conditions that require the Plan to have regard to the NPPF, achieve sustainable development, and to conform with the strategic policies in the Development Plan.

Policy A2: New Housing Allocations.

The site is identified for development within the Neighbourhood Plan under “Policy A2: New Housing Allocations, Land at Boxer Road. Barn Road (Policy L2)”. The policy states that this site (amongst others) should make financial contributions to provide long term and viable sustainable transport choices to the village in the form of a) pedestrian and cycle routes to Princes Risborough and b) a bus service to Princes Risborough.

In relation to the site, the outline consent already secures a financial contribution towards a Monday to Friday peak hour bus service between Longwick and Princes Risborough. A financial contribution towards cycleway improvements failed the terms of CIL Regulation 122 as it was found not to be necessary to the acceptability of the scheme and therefore was not secured.

The necessary planning obligations for the site have already been secured through the S106 agreement associated with the outline consent. The development makes a proportionate financial contribution to mitigate the impact of the development and the financial contributions proposed to be sought through the Neighbourhood Plan (including those set out in Policy A2) are therefore not justified in relation the site. Policy A2 should therefore be amended to make clear that the financial contributions sought are not applicable to the site.

Policy L2: Site Allocation of land at Boxer Road / Barn Road.

Policy L2 sets out 16 criteria that the Neighbourhood Plan states the development of the site is ‘required to meet’. This policy is supported by an illustrative layout plan at Figure 3.

As already stated, the site has already been granted outline consent for residential development which agreed the principle of development and a reserved matters application has been submitted to the Council. Agreement has been reached with Officers on the application and it is to be determined by Wycombe District Council Planning Committee.

The layout submitted with the reserved matters application has been subject to extensive discussions with the Council’s Planning Officers and consultees through pre-application discussions and the planning application. The applicant has also met with the Parish Council to discuss the proposals prior to submission and these discussions along with the Parish Councils comments in response to the current reserved matters application have not raised any concerns with the principles of the proposed development of the site or referred to any inconsistencies with the Neighbourhood Plan.

The reserved matters layout has been informed by the results of technical surveys, including additional drainage and flood risk investigations. The Neighbourhood Plan policy has not been informed by discussions with relevant parties or had the benefit of this technical evidence. As such, it is considered not to be appropriate for the Neighbourhood Plan to include a prescriptive set of criteria which are “required to be met”.

Furthermore, the reserved matters application has now been under consideration for some time and it is anticipated that the reserved matters application will be approved before the Neighbourhood Plan is submitted for examination. We therefore question the merit of including Policy L2 for the site within the Neighbourhood Plan.

Notwithstanding this, the reserved matters application largely accords with the aspirations of the Neighbourhood Plan. Concise comments on each criteria are provided below (the criteria are stated in italics).

- 1. Provide a mix of housing units which can be demonstrated to reflect the needs of the village.*

A mix of dwellings has been provided which meets the requirements of the Council's Affordable Housing Team and housing need as set out within the Council's Housing and Economic Development Needs Assessment.

ACCESS

2. Provide vehicle, cycle and pedestrian access to the site from Boxer Road.

This is provided for in the reserved matters proposal in accordance with the outline consent.

3. Provide pedestrian and cycle access to Walnut Tree Lane.

This is provided for in the reserved matters proposal in accordance with the outline consent.

4. Provide well-overlooked pedestrian links to the existing playing field and the new open space through the development area.

This is achieved within the reserved matters layout.

5. Provide an all-weather, permeable loose surfaced footpath to the existing east-west public right of way, which runs westwards to the railway bridge, and in the east for part of the footpath near Thame Road.

Appropriate provision has already been secured for improvements to public rights of way within the outline consent. Upgrades to existing Public Rights of Way running through the site were secured under the outline consent. A financial contribution towards resurfacing a stretch of bridleways 5 and 6 between Walnut Tree Lane and Bledlow Paper Mill failed the terms of CIL Regulation 122 as it was found not to be necessary to the acceptability of the scheme.

The necessary contributions to mitigate the impact of the development have already been secured through the S106 agreement associated with the outline consent and no further financial contributions towards the site can be secured through the neighbourhood plan. This criteria should therefore be omitted.

OPEN SPACE

6. Deliver the land identified on Map L2 as L2 Open Space as part of the development of Site L2, and to be used as open space.

The reserved matters application has been subject to extensive discussions with Officers to agree the most appropriate layout and this has been informed by detailed technical evidence in relation to drainage and flood risk. Based on these discussions the layout includes the proposed provision of open space around the existing playing field (south-west and south-east) with the SuDS attenuation basin provided within the open space to the south-west of the playing field (as supported by technical evidence). This layout has been agreed with Officers and the Council's consultees.

The development provides appropriate open space to serve the development and the neighbourhood plan should therefore not seek to stipulate exactly where the open space or drainage and water attenuation should be provided.

7. Add to the overall variety of public spaces within the village through the provision of the open space, integrate it with the existing playing field and provide access to the village hall changing facilities.



This is achieved by the reserved matters layout. The proposed open space adjoins the existing playing field allowing it to integrate with this existing space with the potential for connections through.

DRAINAGE

8. Accommodate SUDs to address issues of surface and groundwater flooding.

This is provided for in the reserved matters application.

9. Limit surface water discharge to the equivalent of green field run off rates for the drained area, and show how this can be achieved.

This is provided for in the reserved matters application.

LANDSCAPE AND BOUNDARIES

10. Maintain mature landscape features and hedgerows within and around the site.

This is provided for in the reserved matters application.

11. Provide suitable acoustic barriers and landscaping along the railway line embankment to minimise visual and noise disturbance to new residents.

A noise report has determined that due to the noise levels and proposed layout of the development an acoustic barrier along the railway is not required. Landscaping along the railway is provided for in the reserved matters application.

DESIGN LAYOUT

12. Create a development frontage overlooking the strip of land behind Thame Road/ Chestnut Way, which is not within the new settlement boundary.

The reserved matters has been designed to provide appropriate natural surveillance whilst also protecting the amenity of this land.

13. Form a separate all-weather, permeable footpath through an attractive rural landscaped public space along this edge of the site (overlooking the external strip of land), with a water attenuation pond and drainage channels.

As stated above the location and design of the attenuation has been determined through discussions with the Council and technical evidence. The attenuation area proposed under the reserved matters provides accessible public open space which will provide an attractive landscaped area for recreation.

14. Position development frontages to overlook the existing playing field and the new open space L2, between areas of intermittent landscape planting.

The reserved matters application provides sufficient overlooking and natural surveillance and is supported by a detailed landscaping scheme.

15. Ensure that the layout of new housing is designed to sit well with the existing play area nearby, to minimise any potential nuisance for future residents.

This is provided for in the reserved matters application.

16. Protect the amenity and privacy of existing residential properties on Boxer Road, Barn Road and Williams Way in the layout of public open spaces and access to garages.



This is provided for in the reserved matters application.

In summary the proposed reserved matters application therefore meets a number of the criteria set out within the proposed neighbourhood plan. However, there are certain criteria that differ to discussions with Council Officers and technical evidence. If this policy is to be included the list of criteria should be reviewed to be more generic and less prescriptive in line with the current reserved matters proposals.

Section 7.3 Infrastructure Projects

The list of Infrastructure Projects set out at Section 7.3 includes 'Essential Improvement 1E' which is "New Open Space in Site L2 off Boxer Road, a multi-use games area (MUGA), and open space in L2 around the proposed drainage and water attenuation area". The funding source / on-going responsibility is stated as "s106 contributions for land and maintenance, to pass to LclPC for maintenance".

Infrastructure requirements for the site have already been secured under the outline consent. These include the provision of a Local Equipped Area of Play, provision for which has been provided for in the reserved matters application. There is no justification for the provision of a MUGA on the site and therefore this requirement is not appropriate and should be omitted from Section 7.3 of the Neighbourhood Plan.

Summary

In summary Bellway Homes are in principle supportive of the objectives of the Neighbourhood Plan but make the following constructive objections which are provided to ensure that the Neighbourhood Plan satisfies the Basic Conditions. In summary the following should be taken into consideration:

- Policy A2 should be amended to omit any reference to the site making financial contributions towards transport improvements.
- Preparation of the reserved matters application was subject to extensive pre-application discussions with the Council and consultation with the Parish Council. The reserved matters application has now been under consideration for some time and it is anticipated that the reserved matters application will be approved before the Neighbourhood Plan is submitted for examination. We therefore question the merit of including detailed Policy L2 for the site within the Neighbourhood Plan.
- If Policy L2 is nonetheless retained in the plan it should not provide a list of criteria which are 'required' to be met. The policy should be less prescriptive to account for design development and technical work.
- The Parish Council have met with the applicant during pre-application discussions and commented on the reserved matters application and have not in either instance raised concerns with the principles of the proposed layout of the development or referred to any inconsistencies with the Neighbourhood Plan. As stated under the bullet point above, we therefore question the prescriptive nature of Policy L2.
- Section 7.3 Essential improvement 1E should omit reference to the provision of a MUGA.

If you would like any clarification or further information on the above representations we would be happy to assist.

Bellway Homes would like to be notified of future progress with the Neighbourhood Plan.

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:

Forward Plans - Telephone: 01494 421158

Email: 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

