
From: Planning Secretaries [REDACTED]
Sent: 18 March 2019 11:37
To: NewLocalPlan
Cc: [REDACTED]
Subject: WYCOMBE DISTRICT LOCAL PLAN PROPOSED MAIN MODIFICATIONS - 28134
Attachments: 28134 A3 EF 19 03 18 Main mods reps FINAL.pdf
Importance: High

SENT ON BEHALF OF MICHAEL KNOTT

On behalf of our client, L&Q Estates, please find attached representations to the Wycombe District Local Plan Proposed Main Modifications.

Please confirm that these representations have been received and that they have been registered as having been 'duly made'.

A copy will follow by first class post.

Donna Williams

Secretary to Kim Cohen and the Planning Team



**BARTON
WILLMORE**

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I. Manktelow, Esq.,
Planning Policy Team,
Wycombe District Council,
Council Offices,
Queen Victoria Road,
HIGH WYCOMBE.
HP11 1BB

28134/A3/EF/MK/dw

BY EMAIL: newlocalplan@wycombe.gov.uk

18th March, 2019

Dear Mr. Manktelow,

**WYCOMBE DISTRICT LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION:
REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES**

We write on behalf of L&Q Estates (previously Gallagher Estates) in response to Wycombe District Council's consultation on the Proposed Main Modifications to the Wycombe District Local Plan (hereafter referred to as 'the Local Plan'). These representations should be read in conjunction with all previous representations submitted to the Local Plan Examination on behalf of L&Q Estates in relation to land off Shootacre Lane, Princes Risborough.

For the sake of brevity, the issues and matters put to the examination both orally and in writing relating to the soundness of the Local Plan are not repeated and are to be taken as duly made.

These representations are made in response to proposed main modifications PMM1, PMM2 and PMM4 relating to the strategic context in which the Local Plan operates and PMM28, PMM32-33 and PMM42 in relation to proposed growth at Princes Risborough.

Strategic Context

PMM1, PMM2 and PMM4

We welcome the proposed additional text referring to emerging strategic initiatives, such as the Oxford-Cambridge Expressway, as well as reference to the Council's involvement in strategic planning across Buckinghamshire and the Oxford-Cambridge Growth Arc in PMM1, PMM2 and PMM4. As noted by the Inspector in Question 2 of the Follow Up Questions (October 2018), significant progress has been made on projects including the Expressway. We therefore consider that reference to the emerging strategic context in which the Local Plan operates is necessary for soundness and that the proposed additions are appropriate.



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However, it is unclear how the Local Plan will be reviewed to take account of the emerging strategic context. We note that the Local Plan's Introduction sets out that there are a number of matters at a strategic level that 'could lead to the need for an early review of the Plan' (paragraph 1.18). The trigger for an early review is not specified within the Local Plan and, as such, it is not clear how the need for an early review will be determined.

Furthermore, whilst PMM1 sets out that 'the Council expects to engage in the formation of appropriate governance structures to steer the preparation of formal strategic plans as part of the process of Plan review', it is unclear how a review of the Local Plan will be undertaken in the context of the emerging Buckinghamshire Combined Authority. As a minimum, we consider that a review will need to be coordinated with Aylesbury Vale District Council given the likely continuation of unmet need from Wycombe District. To this end, we recommend that a commitment to working with Aylesbury Vale is specified within paragraph 1.15 of the Local Plan as follows:

It will remain important for Wycombe to coordinate the review of this Local Plan with the review of the Vale of Aylesbury Local Plan (the VALP) in order to agree how to accommodate the future housing and economic development needs of the area.

Princes Risborough

PMM28, PMM32-33 and PMM42

We support the Council in requiring the delivery of necessary strategic infrastructure, including a new Relief Road as a complete alternative to the A4010, through development in the Princes Risborough Expansion Area. We therefore support the Council's proposed modifications to Policies PR3, PR7, PR8 and PR17 to clarify that development 'is required to' deliver identified infrastructure.

However, we have concerns that there is a lack of clarity regarding how infrastructure will be delivered in the Princes Risborough Expansion Area. In the context of the Relief Road, the delivery of which the Council has acknowledged will 'take place over a number of years as a series of elements triggered by developments and capacity of key existing junctions' (Infrastructure Delivery Plan, September 2017), there is a need for clarity and a mechanism which ensures that the road can be delivered in its entirety.

Policy PR17 sets out that development in the Expansion Area will be assessed against the Council's capacity and delivery plans for the area. The Council advised during the Matter 8 hearing session held in September 2018 that this work would be completed 'within a couple of months'. As yet, nothing has been published. Therefore, the intentions of the Council and developers regarding phasing and the delivery of infrastructure are uncertain.

As stated in previous submissions, L&Q Estates control land off Shootacre Lane which is identified as part of the 'Area of Comprehensive Development' in Figure 25 of the Local Plan. This part of the Area of the Comprehensive Development within the site is included in order to provide the southern section of the proposed Relief Road (as identified within paragraph 5.3.140, 7th bullet).

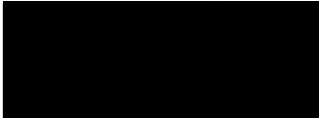
We note that Policy PR17 states that the Council will assist in the delivery of infrastructure, including the Relief Road, and that criterion 3. c) states that this includes the acquisition of land. We therefore invite the Council to meet with L&Q Estates to discuss the alignment and design of the southern section of the Relief Road including the junction with the A4010 Wycombe Road and the associated acquisition of land.

Completed copies of the Part A and Part B representation forms are provided at **Appendix 1**.

We trust that the enclosed representations are duly made and we look forward to receiving confirmation of receipt.

Please contact the writer on 0118 943 0000 should you require any further information or have any queries.

Yours sincerely,



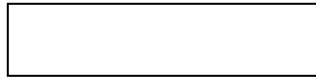
PP

MICHAEL KNOTT
Director

Encs.

cc. R. Edwards, Esq. - L&Q Estates

APPENDIX 1



For official use only



Wycombe District Local Plan Proposed Main Modifications (February - March 2019) Representation Form

The Wycombe District Local Plan was submitted for examination in public in March 2018. Hearings were held over the summer of 2018.

The independent Local Plan inspector has identified various changes that she considers may need to be made to the Plan (known as “Proposed Main Modifications”) to make the Wycombe District Local Plan a “sound” plan.

We invite your comments, also known as representations, on these Proposed Main Modifications.

- Please quote the Proposed Main Modification you are commenting on (question 1 in part B).
- Please give your comments on the Proposed Main Modification and indicate any further changes to the Proposed Main Modifications that you feel are necessary (question 2 in part B).
- **Comments will only be accepted for the Proposed Main Modifications. General comments about the content of the Local Plan not related to a Proposed Main Modification will not be accepted.**

The deadline for responses to be received by the Council is **11:59 pm on Wednesday 27 March 2019**.

Responses can be submitted:

- online at www.wycombe.gov.uk/local-plan-modifications
- by email to newlocalplan@wycombe.gov.uk (an automatic email response will confirm receipt)
- or sent by post to:
Planning Policy Team,
Wycombe District Council,
Queen Victoria Road,
High Wycombe,
Bucks,
HP11 1BB

You can submit as many comments as you would like. Please complete a separate part B for each part of the plan on which you want to comment.

This form has two parts:

- Part A – Your Details
- Part B – Your comment(s). Please expand the comments table as appropriate

All comments received will be passed to the independent Local Plan Inspector for consideration.

PART A

1. Personal Details

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	Mr	Mr
First Name	Richard	Michael
Last Name	Edwards	Knott
Job Title (where relevant)		Director
Organisation (where relevant)	L&Q Estates	Barton Willmore
Address		The Blade Abbey Square Reading
Postcode		RG1 3BE
Telephone		0118 943 0000
Email Address		michael.knott@bartonwillmore.co.uk

3. Client Details

If you are an agent representing a specific site interest, please fill in the details below.

Site Interest	Land off Shootacre Lane, Princes Risborough
Client's Name	L&Q Estates

4. Please tick this box if you wish to be notified of future stages of the Wycombe District Local Plan

5. Please tick this box if you wish to receive our electronic Weekly Planning Bulletin which gives you updates on local and national Planning matters (you will need to supply an email address to receive this)

PART B – Comments on the Proposed Main Modifications– Please copy and use a separate sheet for each representation

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM1

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM2

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM4

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM28

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM32

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM33

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

L&Q Estates

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM42

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see covering letter.

(Please continue on a separate sheet/expand box if necessary)

Privacy notice

Wycombe District Council Planning Policy Service collects, uses and is responsible for certain personal information about you.

This response form collects the following personal information from you:

- your name
- your phone numbers
- your email address
- your home address

This information is being collected to allow us to fulfil our statutory function of producing a Local Plan covering the Wycombe District.

Your submissions, including personal data, may be shared with the Local Plan Programme Officer and the Local Plan Inspector. We may also share your submissions with other government partners and agencies such as Buckinghamshire County Council, the Environment Agency, Historic England and Natural England, or other service departments within Wycombe District Council.

Your submissions will be published on our website. These will be redacted (“blacked out”) to remove personal information including:

- personal contact details - Telephone numbers, email addresses, postal addresses
- signatures
- information about health conditions or ethnic origin
- information agreed to be confidential

If you are submitting information which you would like to be treated confidentially or wish to be specifically withheld from the public register, please let us know as soon as you can.

Your submissions and personal information will be kept until the Local Plan is superseded.

If you have questions about data or privacy, please see our full privacy policy on our website: <https://www.wycombe.gov.uk/pages/About-the-council/Privacy/Our-privacy-policy.aspx>

Alternatively you may contact our Data Protection Officer at **Wycombe District Council, Queen Victoria Road, High Wycombe, HP11 1BB** or at access2information@wycombe.gov.uk.