
From: Ian Gillespie [REDACTED]
Sent: 27 March 2019 08:18
To: NewLocalPlan
Subject: Wycombe Local Plan - Main Modifications
Attachments: Wycombe LP Main Modifications Response - 270319 - Final.pdf; WDLP Response Form - Igloo Planning 270319.pdf

Dear Sir/ Madam

Please find attached a covering letter and completed response form, which respond to the above consultation on behalf of JSN Property Developments Limited.

We would be grateful for confirmation of receipt.

Kind regards, Ian Gillespie

Ian Gillespie BSc (Hons) MRTPI
Director
[REDACTED]
iglooplanning.com

For and on behalf of Igloo Planning

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Registered Office: [REDACTED].

Company Number: 10578385 (England and Wales).

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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
First Name		Ian
Last Name		Gillespie
Job Title (where relevant)		Director
Organisation (where relevant)		Igloo Planning
Address		
Postcode		
Telephone		
Email Address		

3. Client Details

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

Site Interest	Land off Kingsley Drive, Marlow Bottom
Client's Name	JSN Property Developments Limited

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:

Igloo Planning

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

Proposed Main Modification number

PMM5

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.

We do not support PMM5, as it relates to paragraph 4.22.

The amendment to paragraph 4.22 seeks to provide further clarification on the role of the settlement hierarchy, by referring to other constraints on development.

The additional wording helps to demonstrate the discord between the stated strategy for accommodating development needs in the District, and the allocations proposed in the Local Plan.

We fully recognise that Wycombe is a constrained District, and that therefore some compromises are required if development needs are to be accommodated, but the PMM5 wording for paragraph 4.22 is uncompromising, and simply does not describe the settlement strategy that will be implemented by the Local Plan allocations.

Take the approach to Marlow Bottom as an example. It cannot be said that the settlement strategy ensures (our emphasis) that development is not proposed in areas where development should be restricted such as in the AONB, in the Green Belt, in areas at risk of flooding, or in places without the facilities and services to support it, when the allocation of land at Heavens Above, Marlow Bottom is in the AONB, in the Green Belt, has service water flooding issues and has no facilities or services within reasonable walking distance.

The wording of paragraph 4.22 needs further amendment, to reflect the compromises that the Local Plan makes in seeking to accommodate development needs, and to accurately describe the settlement strategy.

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

Name or Organisation:

Igloo Planning

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

Proposed Main Modification number

PMM6 (and 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.

The proposed changes to Table 5 are 'factual', in so much as they provide an up to date view on the likely timing of housing delivery across the District in the period to 2033. The figures show that from a peak delivery rate over the current five-year period (of over 900 dwellings per annum), housing delivery is then likely to slow significantly over the next five-year period (to around 650 dwellings per annum) and then in the last five-year period of the Plan, delivery is projected to fall to around 300 dwellings per annum.

We recognise that the shape of the Wycombe District housing trajectory was discussed at the Local Plan Examination hearing sessions, but the issue is brought into sharper focus by the PMM1 changes to the planning context, which highlight further factors that are likely to place upward pressure on housing delivery in the area over time – namely the third runway at Heathrow and the Government's growth objectives for the Oxford–Cambridge expressway corridor.

As a result of the aforementioned PMM, we believe that the Local Plan should include additional text which sets out how Wycombe District Council intends to address the divergence between the need for more housing in the area later in the Plan period/ beyond the plan period, and the downward housing delivery trajectory.

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

Name or Organisation:

Igloo Planning

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

Proposed Main Modification number

PMM54

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.

Amendments are proposed to Policy RUR11 – Heavens Above, Marlow Bottom, which seek to ensure a consistent approach to development within the AONB, and a consistent approach to the management of surface water flood risk.

These changes are supported as a matter of principle, but do not change our fundamental concerns with the proposed allocation of this land, when there are better, more sustainably located omission sites available for allocation.

(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

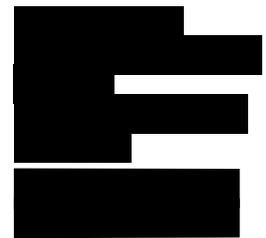
If you are submitting information which you would like to be treated confidentially or wish to be specifically withheld from the public register, please let us know as soon as you can.

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.

Planning Policy Team
Wycombe District Council
Council Offices
Queen Victoria Road
High Wycombe
Buckinghamshire
HP11 1BB



Your ref:
Our ref: 196

BY E-MAIL ONLY

27th March 2019

Dear Sir/ Madam

**WYCOMBE DISTRICT LOCAL PLAN MAIN MODIFICATIONS –
RESPONSE ON BEHALF OF JSN PROPERTY DEVELOPMENTS LIMITED**

INTRODUCTION

We write on behalf of our client, JSN Property Developments Limited, in response to the above consultation.

JSN Property Developments Limited own land off Kingsley Drive, Marlow Bottom, which has been promoted as an omission site through the Wycombe District Local Plan examination process.

Our response ID Number is 0948.

We maintain our fundamental concerns over the significant inconsistencies in the evidence base (in particular in relation to the site assessment work, including the assessment of Green Belt matters), and indeed, do not understand why the land off Kingsley Drive has been omitted from the Plan, when a previous Inspector considered the land suitable for release from the Green Belt for development. However, we do understand that at this point in the Local Plan process, our comments must only address the proposed main modifications, and these comments are set out below:

PMM5

The amendment to paragraph 4.22 seeks to provide further clarification on the role of the settlement hierarchy, by referring to other constraints on development.

The additional wording helps to demonstrate the discord between the stated strategy for accommodating development needs in the District, and the allocations proposed in the Local Plan.

We fully recognise that Wycombe is a constrained District, and that therefore some compromises are required if development needs are to be accommodated, but the PMM5 wording for paragraph 4.22 is uncompromising, and simply does not describe the settlement strategy that will be implemented by the Local Plan allocations.

Take the approach to Marlow Bottom as an example. It cannot be said that the settlement strategy ensures (our emphasis) that development is not proposed in areas where development should be restricted such as in the AONB, in the Green Belt, in areas at risk of flooding, or in places without the facilities and services to support it, when the allocation of land at Heavens Above, Marlow Bottom is in the AONB, in the Green Belt, has service water flooding issues and has no facilities or services within reasonable walking distance.

The wording of paragraph 4.22 needs further amendment, to reflect the compromises that the Local Plan makes in seeking to accommodate development needs, and to accurately describe the settlement strategy.

PMM6 (and PMM1)

The proposed changes to Table 5 are 'factual', in so much as they provide an up to date view on the likely timing of housing delivery across the District in the period to 2033. The figures show that from a peak delivery rate over the current five-year period (of over 900 dwellings per annum), housing delivery is then likely to slow significantly over the next five-year period (to around 650 dwellings per annum) and then in the last five-year period of the Plan, delivery is projected to fall to around 300 dwellings per annum.

We recognise that the shape of the Wycombe District housing trajectory was discussed at the Local Plan Examination hearing sessions, but the issue is brought into sharper focus by the PMM1 changes to the planning context, which highlight further factors that are likely to place upward pressure on housing delivery in the area over time – namely the third runway at Heathrow and the Government's growth objectives for the Oxford–Cambridge expressway corridor.

As a result of the aforementioned PMM, we believe that the Local Plan should include additional text which sets out how Wycombe District Council intends to address the divergence between the need for more housing in the area later in the Plan period/ beyond the plan period, and the downward housing delivery trajectory.

PMM54

Amendments are proposed to Policy RUR11 – Heavens Above, Marlow Bottom, which seek to ensure a consistent approach to development within the AONB, and a consistent approach to the management of surface water flood risk.

These changes are supported as a matter of principle, but do not change our fundamental concerns with the proposed allocation of this land, when there are better, more sustainably located omission sites available for allocation.

Enclosed with this letter is a duly completed response form, which duplicates the contents of this letter.

Please do let us know if you have any queries.

Yours faithfully,

[Redacted signature]

Ian Gillespie BSc (Hons) MRTPI
Director

t
m

[Redacted contact information]

Enc Completed Response Form

CC Jonathan Perkins, JSN Property Developments Limited