

From: Jamie Roberts [REDACTED]
Sent: 27 March 2019 09:42
To: NewLocalPlan
Cc: Robert Barber
Subject: Wycombe Local Plan - Main Modifications
Attachments: P16-1044 Risborough Main Mods Reps 260319 Rev A.pdf; P16-1044 Risborough Main Mods Reps 260319 Form.doc

Dear Sir, Madam,

Thank you for the opportunity to comment on the proposed Main Modifications to the Wycombe Local Plan. I write to submit representations on behalf of Endurance Estates which has development interests at land at Culverton Hill, Princes Risborough. I attach the representations and duly completed forms. I would be most grateful if you could confirm safe receipt of these representations. If you have any queries please let me know on the details below.

With kind regards

Jamie Roberts
Principal Planner

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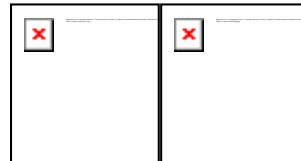
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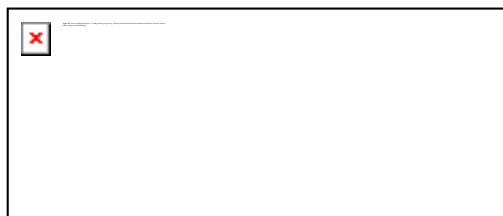
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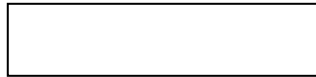
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Wycombe District Local Plan Proposed Main Modifications (February - March 2019) Representation Form

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	-	Jamie
Last Name	-	Roberts
Job Title (where relevant)	-	Principal Planner
Organisation (where relevant)	Endurance Estates	Pegasus Group
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 at Culverton Hill, Princes Risborough
Client's Name	Endurance 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: Endurance Estates

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

Proposed Main Modification number PMM5 (Paragraph 4.22)

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.

This modification indicates that the settlement strategy directs development away from “*areas where development should be restricted such as AONB, Green Belt and areas at risk of flooding...*”

As set out within our Regulation 19 representations, Endurance Estates does not agree that this is an appropriate strategy.

AONB designation is not an absolute constraint to development. Paragraph 116 of the Framework explains that major development should be refused within the AONB except where it can be demonstrated to be in the public interest. There is a longstanding approach to whether development comprises ‘major’ or ‘minor’ development in the AONB which leaves it for the decision taker. This is encapsulated within paragraph 172 of the revised 2019 Framework which explains that such a judgement should be reached “*taking into account [the proposal’s] nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined*”.

Similarly, Green Belt can be modified in ‘exceptional circumstances’ under paragraph 83 of the Framework. Endurance Estates consider that the extent of housing need in Wycombe district, coupled with the need to direct development to the most sustainable locations, comprise the exceptional circumstances to justify release of land at Culverton Hill from the Green Belt. Paragraph 84 of the Framework is relevant here since it explains that green belt boundaries should take account of the need to promote sustainable patterns of development.

As such, the modification to paragraph 4.22 is not considered effective or consistent with national policy, since it unnecessarily directs development away from sites that, although designated Green Belt and / or AONB, could be sensitively designed, deliver public benefits, and can come forward in the context of national policy. Such sites could, on balance, provide more sustainable development than at sites located outside of these designated areas and further from existing settlements. The modification should therefore be deleted.

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

Name or Organisation:

Endurance Estates

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

Proposed Main Modification number

PMM6 (Paragraph 4.47)

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.

This modification is intended to highlight the range of sites that are included within the Plan. However, it remains the case that of the 1,765 dwellings due to come forward at Princes Risborough in the Plan period, around 1,662 are at the Expansion Area, with just 103 dwellings at other smaller sites (PR11 Poppy Road and PR16 Princes Risborough Station). It is Endurance Estates' position that, given Princes Risborough's strong sustainability credentials, a wider range of sites must be allocated in and around the town (not just at the district-wide level) in order to secure sustainable development. Should delivery of the Expansion Area be delayed, there will be few opportunities to secure any other development in Princes Risborough. This could place pressure for development in less sustainable locations, thereby failing to take the opportunity to achieve sustainable development in Princes Risborough itself. The modification is therefore not effective.

The modification should therefore be deleted and the Council should consider allocation of a wider range of development sites.

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

Name or Organisation:

Endurance Estates

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

Proposed Main Modification number

PMM36 Policy PR11

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.

It is noted that a series of amendments are proposed to the policy, in order to achieve a consistent approach to all site allocations within the AONB. These relate to the need to deliver on-site ecology measures, additional landscaping to mitigate effects on important views, and to provide a landscape-led approach to the design and layout of the scheme in order to limit impacts upon the AONB.

Endurance Estates does not have any comments on how these relate to the Poppy Road allocation itself. Nonetheless, it is noted that the modifications seek to deliver a landscape-led approach to development. This is the same approach as that being advocated for land at Culverton Hill, where Endurance Estates is proposing a modest scale of development within a landscape-led masterplan and significant potential to deliver improvements to public access, ecology and landscape of the site. This has been subject to discussion with the Chilterns AONB Board and Endurance Estates is committed to ongoing engagement with stakeholders in respect of the site. The Authority is therefore encouraged to review land at Culverton Hill in the same regard.

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

Name or Organisation:

Endurance Estates

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

Proposed Main Modification number

PMM41 Policy PR16

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.

These modifications are intended to strengthen the role of the area around the railway station; the modification to part 1 of the policy explains that "*land at Princes Risborough Station will provide an important gateway to the town and to the Chilterns AONB*". Endurance Estates agrees that the Station and its immediate surroundings play an important role in welcoming visitors to the AONB. The importance of the station has further increased in recent years, following the introduction of the Chiltern Railways service to and from Oxford, and the extension of the Chinnor and Princes Risborough heritage railway. Furthermore, East West Rail is proposing a service from Milton Keynes and Aylesbury. The station therefore plays an essential role in facilitating sustainable tourism.

Endurance Estates consider that the role of Princes Risborough as a 'gateway' to the AONB should be thought of more holistically. At present, connections between the railway station and the AONB are not as strong as they could be; there is no obvious entry point into the AONB close to the station. Endurance Estates notes that their site at Culverton Hill could provide an attractive gateway to the AONB with suitable landscaping and a potential visitor facility.

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

Name or Organisation:

Endurance Estates

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

Proposed Main Modification number

PMM59 Policy DM24

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.

This modification seeks to change the basis for calculating affordable housing provision from floorspace to number of units, resulting in a 48% affordable housing requirement on many sites in the district. Endurance Estates has significant reservations about this policy approach. It appears that the modification has been published without any accompanying assessment of the effects it could have upon development viability. It has not been demonstrated that a requirement of 48% affordable housing can be achieved in a viable way. This in turn risks the delivery of housing across the district. The result of this modification will either be the delay or failure of sites to come forward where they are not viable. Alternatively, it could result in many development proposals where viability evidence must be submitted and assessed in order to justify a departure from the policy, delaying determination.

As such, the modification is not justified, and not effective, and therefore should be deleted.

(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.

REPRESENTATIONS TO THE MAIN MODIFICATIONS TO THE WYCOMBE LOCAL PLAN

LAND AT CULVERTON HILL, PRINCES RISBOROUGH

ON BEHALF OF ENDURANCE ESTATES

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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1. Introduction

- 1.1 These representations have been prepared by Pegasus Group on behalf of Endurance Estates, which has development interests at land at Culverton Hill, Princes Risborough. Endurance Estates has participated in previous stages of plan preparation. Endurance Estates seeks the allocation of land at Culverton Hill, Princes Risborough, for the development of residential dwellings as well as a significant amount of landscaped public open space and potential community facility.
- 1.2 For the avoidance of doubt, references within these representations to the National Planning Policy Framework (the Framework) are made in respect of the 2012 version unless otherwise stated, against which the Wycombe Local Plan's examination is being considered.

2. PMM5: Paragraph 4.22

- 2.1 This modification indicates that the settlement strategy directs development away from *"areas where development should be restricted such as AONB, Green Belt and areas at risk of flooding..."*
- 2.2 As set out within our Regulation 19 representations, Endurance Estates does not agree that this is an appropriate strategy.
- 2.3 AONB designation is not an absolute constraint to development. Paragraph 116 of the Framework explains that major development should be refused within the AONB except where it can be demonstrated to be in the public interest. There is a longstanding approach to whether development comprises 'major' or 'minor' development in the AONB which leaves it for the decision taker. This is encapsulated within paragraph 172 of the revised 2019 Framework which explains that such a judgement should be reached *"taking into account [the proposal's] nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined"*.
- 2.4 Similarly, Green Belt can be modified in 'exceptional circumstances' under paragraph 83 of the Framework. Endurance Estates consider that the extent of housing need in Wycombe district, coupled with the need to direct development

to the most sustainable locations, comprise the exceptional circumstances to justify release of land at Culverton Hill from the Green Belt. Paragraph 84 of the Framework is relevant here since it explains that green belt boundaries should take account of the need to promote sustainable patterns of development.

- 2.5 As such, the modification to paragraph 4.22 is not considered effective or consistent with national policy, since it unnecessarily directs development away from sites that, although designated Green Belt and / or AONB, could be sensitively designed, deliver public benefits, and can come forward in the context of national policy. Such sites could, on balance, provide more sustainable development than at sites located outside of these designated areas and further from existing settlements. The modification should therefore be deleted.

3. **PMM6: Paragraph 4.47**

- 3.1 This modification is intended to highlight the range of sites that are included within the Plan. However, it remains the case that of the 1,765 dwellings due to come forward at Princes Risborough in the Plan period, around 1,662 are at the Expansion Area, with just 103 dwellings at other smaller sites (PR11 Poppy Road and PR16 Princes Risborough Station). It is Endurance Estates' position that, given Princes Risborough's strong sustainability credentials, a wider range of sites must be allocated in and around the town (not just at the district-wide level) in order to secure sustainable development. Should delivery of the Expansion Area be delayed, there will be few opportunities to secure any other development in Princes Risborough. This could place pressure for development in less sustainable locations, thereby failing to take the opportunity to achieve sustainable development in Princes Risborough itself. The modification is therefore not effective.
- 3.2 The modification should therefore be deleted and the Council should consider allocation of a wider range of development sites.

4. **PMM36: Policy PR11** *Land to the Rear of Poppy Road*

- 4.1 It is noted that a series of amendments are proposed to the policy, in order to achieve a consistent approach to all site allocations within the AONB. These relate to the need to deliver on-site ecology measures, additional landscaping to

mitigate effects on important views, and to provide a landscape-led approach to the design and layout of the scheme in order to limit impacts upon the AONB.

- 4.2 Endurance Estates does not have any comments on how these relate to the Poppy Road allocation itself. Nonetheless, it is noted that the modifications seek to deliver a landscape-led approach to development. This is the same approach as that being advocated for land at Culverton Hill, where Endurance Estates is proposing a modest scale of development within a landscape-led masterplan and significant potential to deliver improvements to public access, ecology and landscape of the site. This has been subject to discussion with the Chilterns AONB Board and Endurance Estates is committed to ongoing engagement with stakeholders in respect of the site. The Authority is therefore encouraged to review land at Culverton Hill in the same regard.

5. PMM41: Policy PR16 *Land at Princes Risborough Station*

- 5.1 These modifications are intended to strengthen the role of the area around the railway station; the modification to part 1 of the policy explains that “*land at Princes Risborough Station will provide an important gateway to the town and to the Chilterns AONB*”. Endurance Estates agrees that the Station and its immediate surroundings play an important role in welcoming visitors to the AONB. The importance of the station has further increased in recent years, following the introduction of the Chiltern Railways service to and from Oxford, and the extension of the Chinnor and Princes Risborough heritage railway. Furthermore, East West Rail is proposing a service from Milton Keynes and Aylesbury. The station therefore plays an essential role in facilitating sustainable tourism.
- 5.2 Endurance Estates consider that the role of Princes Risborough as a ‘gateway’ to the AONB should be thought of more holistically. At present, connections between the railway station and the AONB are not as strong as they could be; there is no obvious entry point into the AONB close to the station. Endurance Estates notes that their site at Culverton Hill could provide an attractive gateway to the AONB with suitable landscaping and a potential visitor facility.

6. PMM59: Policy DM24 *Affordable housing*

- 6.1 This modification seeks to change the basis for calculating affordable housing provision from floorspace to number of units, resulting in a 48% affordable housing requirement on many sites in the district. Endurance Estates has significant reservations about this policy approach. It appears that the modification has been published without any accompanying assessment of the effects it could have upon development viability. It has not been demonstrated that a requirement of 48% affordable housing can be achieved in a viable way. This in turn risks the delivery of housing across the district. The result of this modification will either be the delay or failure of sites to come forward where they are not viable. Alternatively, it could result in many development proposals where viability evidence must be submitted and assessed in order to justify a departure from the policy, delaying determination.
- 6.2 As such, the modification is not justified, and not effective, and therefore should be deleted.

<ends>