
From: Tim Rodway | Rodway Planning [REDACTED]
Sent: 27 March 2019 15:02
To: NewLocalPlan
Subject: Consultation: Proposed Main Modifications to Wycombe District Local Plan
Attachments: WDLP Main Modifications Representations - Mr Wise 260319.pdf

Dear Sirs/Madams

On behalf of our client, Mr Wise, we herewith make representations in respect of the current public consultation for the proposed modifications to the Wycombe District Local Plan.

I would be grateful if you could acknowledge receipt of these submissions.

Yours faithfully,

TIM RODWAY
DIRECTOR / [REDACTED]



RODWAY PLANNING CONSULTANCY / [REDACTED] / RODWAYPLANNING.CO.UK

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PROPOSED MAIN MODIFICATION 30
ID REFERENCE NO. 37

Planning Policy Team
Wycombe District Council
Council offices
Queen Victoria Road
High Wycombe
BUCKINGHAMSHIRE
HP11 1BB
VIA EMAIL - newlocalplan@wycombe.gov.uk

26th March 2019

Dear Sir/Madam

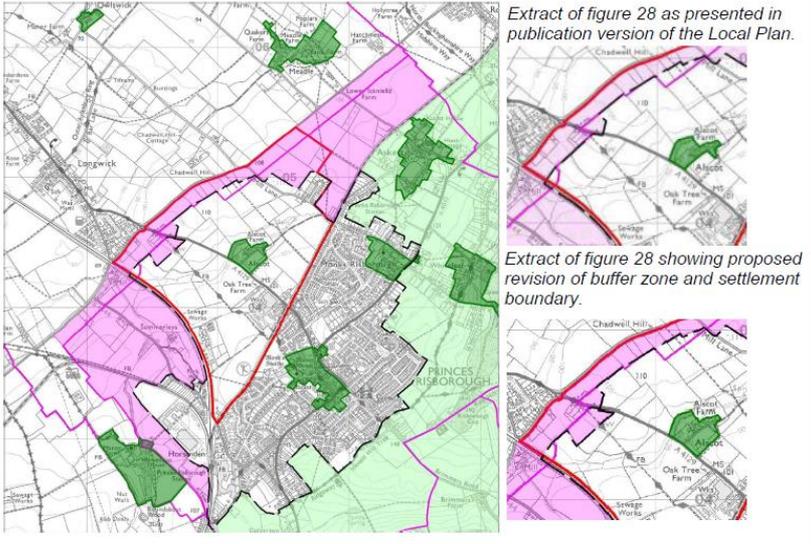
Consultation: Proposed Main Modifications to Wycombe District Local Plan
Representations made on behalf of Mr Jeremy Wise, Ivy Farm, Lower Icknield Way,
Longwick HP27 9RZ (ID Reference No. 37)
In respect of Land south of Lower Icknield Way, Longwick

We represent our client, Mr Wise, who owns the above detailed site. We write in respect of the emerging Wycombe District Local Plan, and the recently published Main Modifications, arising from your findings following the Examination in Public hearings.

On behalf of our client we have considered the Inspector’s ‘Main Modifications’, and we would like to make further written comments, specifically in respect of **PMM30**, which is set out below for your ease of reference:

PMM30		POLICY PR5 – SETTLEMENT BOUNDARY AND STRATEGIC BUFFER	
	Paragraph 5.3.55 Page 188	5.3.55	The outer edge of the town expansion area warrants its own policy, to reflect the fact that, once the town has been expanded, future gaps will become critical to the protection of the countryside and surrounding settlements. With this in mind a buffer zone has been drawn (see figure 28) which picks up the PR5 settlement boundary, and identifies the key gaps to Longwick, Meadle, Great and Little Kimble, Askett, and Horsenden. In general the buffer adheres to the Town Council (Parish) boundary, with the exception of the Longwick side where the PR5 area extends to the boundary. the land between here and the B4009 Lower Icknield Way is also retained as a buffer.
			Buffer adjusted to respond to development permitted at Ivy Farm, Longwick (AP8.3)



No.	Reference and page no. in the Plan	Proposed Main Modification	Reasons for change
	Figure 28 Page 190	<p>Amendment to existing figure in relation to the "buffer zone" and consequential amendment to settlement boundary to follow the amended buffer</p> 	Buffer adjusted to respond to development permitted at Ivy Farm, Longwick (AP8.3)

Although we note that some revisions to the 'strategic buffer' (Policy PR5) are now proposed, this does nothing to allay our concerns.

Indeed the extent of the buffer has been increased in a southerly direction, but area of the land that lies within the proposed buffer, and to which our objections relate, remains included in this proposed designation.

For all the reason set out in our previous representations, we conclude that the purpose of the strategic buffer would not be met via the inclusion of our client's land, and we suggest that it should therefore be removed from this designation, and the relevant maps and figures amended accordingly.

In addition, we also now note that part of the Sustainability Appraisal (specifically Appendix VII: Schedule of Sites included and excluded from the SA), includes Table VIII: Sites not appraised through the SA process. This includes our client's land (HELAA ID: SLK0016) as a "non-sustainable location".

Our previous submission, dated 27 June 2018, provided details of an extant Outline planning permission for 9 houses on part of my clients land, which lies within the Council's buffer zone. This permission was allowed on Appeal on 23rd August 2017 (PINS Appeal Reference: APP/K0425/W/17/3166948), and in concluding that the proposed development was acceptable the Planning Inspector determined that the proposed development:





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“includes a pedestrian link from the site through to Lower Icknield Way opposite the petrol station. This would therefore make pedestrian access more attractive... In addition, the submitted UU [unilateral undertaking] contains payments towards bus provision and a cycle route towards Princes Risborough, both of which would assist in developing sustainable travel objectives. I note the comments of the Highway Authority who now wishes to withdraw its objection on sustainable transport grounds due to the provision of these payments...”

I consider that the appeal site is not in an isolated location and future occupants of the proposed development would have reasonable access to the shops and services in Longwick by sustainable travel means...”

It is clear therefore that, contrary to the Council’s conclusions in the SA, that our client’s site **is** sustainably located. This therefore casts doubt on the SA process as a whole, and the Council’s strategy and focus of development on other locations.

Our client’s site has been found to be sustainably located by a previous Planning Inspector. It was accepted that the developer contributions arising from that development would improve sustainability, but naturally a larger scheme encompassing the entirety of our client’s land, would provide improved benefits in this respect, thereby improving accessibility and the sites sustainability credentials proportionately. The Council’s assessment in this respect is flawed, and we respectfully request that the Examiner revisits this work, and in particular the question of the extent of the buffer zone and apparent resistance to development in this area, despite the existence of existing built form, its relationship with the established built-up area to the north, and that there is an extant planning permission for 9 dwellings on part of this site already.

Within our previous representations we also drew the Examiner’s attention to the Planning Inspector’s conclusions on the lack of landscape sensitivity relating to this site, and specifically, it is clear from the Inspector’s comments that the land in question is not subject to any current specific landscape designation. Further the Inspector acknowledges that there is existing built form on this southern side of Lower Icknield Way and southwest of Longwick Road, and this will be intensified by the permission for 9 houses on this site. The Inspector also confirmed that this form of development would not increase the coalescence of Longwick and Princes Risborough, and the impact of development in this area could be mitigated by an appropriate landscape scheme.

Our representations went onto suggest an alternative buffer zone in this area, which encompasses solely undeveloped land to the south of our clients site. We consider this proposal to remain valid, and worthy of implementation via the modifications to the Local Plan.





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As set out in our previous representations, we consider that our proposals would clearly provide a naturally green gap, which is devoid of any built form (either existing or permitted). The land we are suggesting being used as the strategic buffer would be bordered by strong natural and man-made features, including the new bypass, the existing Longwick Road, drainage ditch system to the south, the railway line to the west, and the field boundaries to the north. These features provide protection of the proposed buffer area, and reinforces its integrity and importance as a local natural feature that would successfully divide the strategic level development to the southeast from the existing development at and around the settlement of Longwick.

In conclusion, we are of the strong view that policies relating to the strategic development at Princes Risborough – specifically Policy PR5 and its supporting text and policy map - is not soundly based, justified, and as currently drafted, will not provide an effective mechanism for delivering and managing the comprehensive development proposed for this area.

We wish for the Examiner to be made aware of the planning permission obtained on our client's land and the comments of the Planning Inspector who considered the importance of the Appeal Site in landscape terms and in relation to matters of coalescence and also sustainability. These are material changes in circumstance, which we feel have been ignored by the Local Authority.



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We consider that the presence of existing and approved development within the identified strategic buffer undermines its very purpose, and therefore its effectiveness will be dramatically reduced.

Therefore, we suggest an alternative area of land, located further to the south, and currently entirely devoid of development, as being a more suitable buffer between the strategic level of development that is proposed to the south, and the existing smaller settlement of Longwick to the north. The proposed buffer area, as currently drawn should therefore be amended.

We trust that the Inspector responsible for examining the Wycombe District Local Plan can closely consider our observations and suggestions, and in doing so we respectfully encourage the Inspector to recommend that the Plan be further modified in-line with our comments and recommendations.

Yours faithfully,

Tim Rodway
Director

c.c. Mr J Wise

