



Response ID: 0559 (Bellwood Homes)

Mr Ian Kemp
Programme Officer
Wycombe District Council Local Plan Examination
By email to: ikemp@icloud.com

26 June 2018
Our Ref: APL-080

Dear Ian

Bellwood Homes: Wycombe District Local Plan Examination – Matter 3

We act on behalf of Bellwood Homes, who have previously submitted representations to the Local Plan under response ID 0559. We have recently been instructed to act as the Planning Consultant for Bellwood Homes at the Examination and would be grateful if you could update your records accordingly and address any relevant future correspondence to the details at the head of this letter.

Bellwood Homes previous representations related to the settlement of Longwick, and in particular the quantum of housing allocated to Longwick in the Local Plan under Policy CP4.

Main Matter 3

Inspector's Questions 3, 5 and 7 all query matters relating to housing supply, and how the OAN will be met in the Local Plan.

Our client's previous representations identified that the Local Plan is not sound as it is not positively prepared. In particular, they queried the quantum of housing proposed in the (at that time, draft) Longwick Neighbourhood Plan.

Since those representations were submitted, the Longwick Neighbourhood Plan was made (March 2018). The Neighbourhood Plan only allocates 32 new homes. The remaining balance is made up of 268 dwellings which should instead count as commitments, as they are all sites that already have planning permission.

As per our client's previous representations, in order for the Plan to be positively prepared it should allocate additional growth to Longwick. Longwick is one of the least constrained settlements in the District, being outside the AONB and Green Belt, and is already established as a sustainable location for development. It has a range of services and facilities and could comfortably accommodate additional growth.

Vale of Aylesbury Local Plan

We trust that the Inspector is aware of the Vale of Aylesbury Local Plan (VALP) Examination, which is taking place at the same time as Wycombe's. The VALP Inspector has queried (VALP Inspector's Question 29) both the OAN for the VALP, and whether it is appropriate for that plan to meet Wycombe's unmet need when that itself has not yet been subject of Examination. It should not therefore be taken as a certainty that the unmet need figure is correct, nor that AVDC can meet that figure, simply because of the presence of an agreement between the authorities.

We also note that other parties have put forward strong criticisms of the overall housing need being met in both the VALP and Wycombe Local Plans based on a criticism of the HEDNA. There are clear arguments which state that the housing need in the Plan should be higher. We support these arguments and note that a greater housing need for the VALP could mean that Aylesbury Vale does not have sufficient capacity to meet the unmet need of the adjoining authorities.

Having regard to these matters, the Wycombe Local Plan is unsound as it fails to positively meet OAN and duty to cooperate.

Proposed Changes to the Plan

We propose the Inspector recommend to WDC a change to the Plan as per our client's previous representations, namely:

Policy CP4 should be amended as follows:

"c) Tiers 3-6- 1,400 homes broadly distributed as follows:

*i. **at least** 300 homes in Longwick-cum-Ilmer Parish"*

Appearance at the Examination

Having reviewed the Inspector's list of questions, we do not consider it necessary to appear at the Hearing Session for Matter 3 and instead request that the Inspector have due regard to our client's previous representations and this letter.

However, we consider that the issues relating to Longwick, the quantum of development proposed for the settlement, and the lack of allocations in the Plan are matters for considered in the Rural Areas session under Matter 9.

Accordingly, we will submit a further letter by the deadline of 17th August, which relates to points raised in our client's previous representations and reconfirming this request to appear at the Matter 9 Hearing session.



We look forward to receiving confirmation that we can attend the Matter 9 Hearing Session. In the meantime, if you require anything further then please contact me on the details at the head of this letter.

Best regards

A handwritten signature in black ink, appearing to read 'M.Schmull'.

Mark Schmull

Cc Mr K Hawtree - Bellwood Homes