

**MATTER NO: 8 – Development Framework – Princes Risborough
ID REFERENCE NO. 37**

Ms Nicola Gulley MA MRTPI
Planning Inspector
c/o Mr Ian Kemp (Programme Officer)
16 Cross Furlong
Wychbold
Droitwich Spa
Worcestershire
WR9 7TA

27th June 2018

Dear Ms Gulley

**Wycombe District Local Plan: Examination
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 Mr Wise, who we understand has previously made representations himself, as part of the previous consultation stages, in respect of the emerging Wycombe District Local Plan.

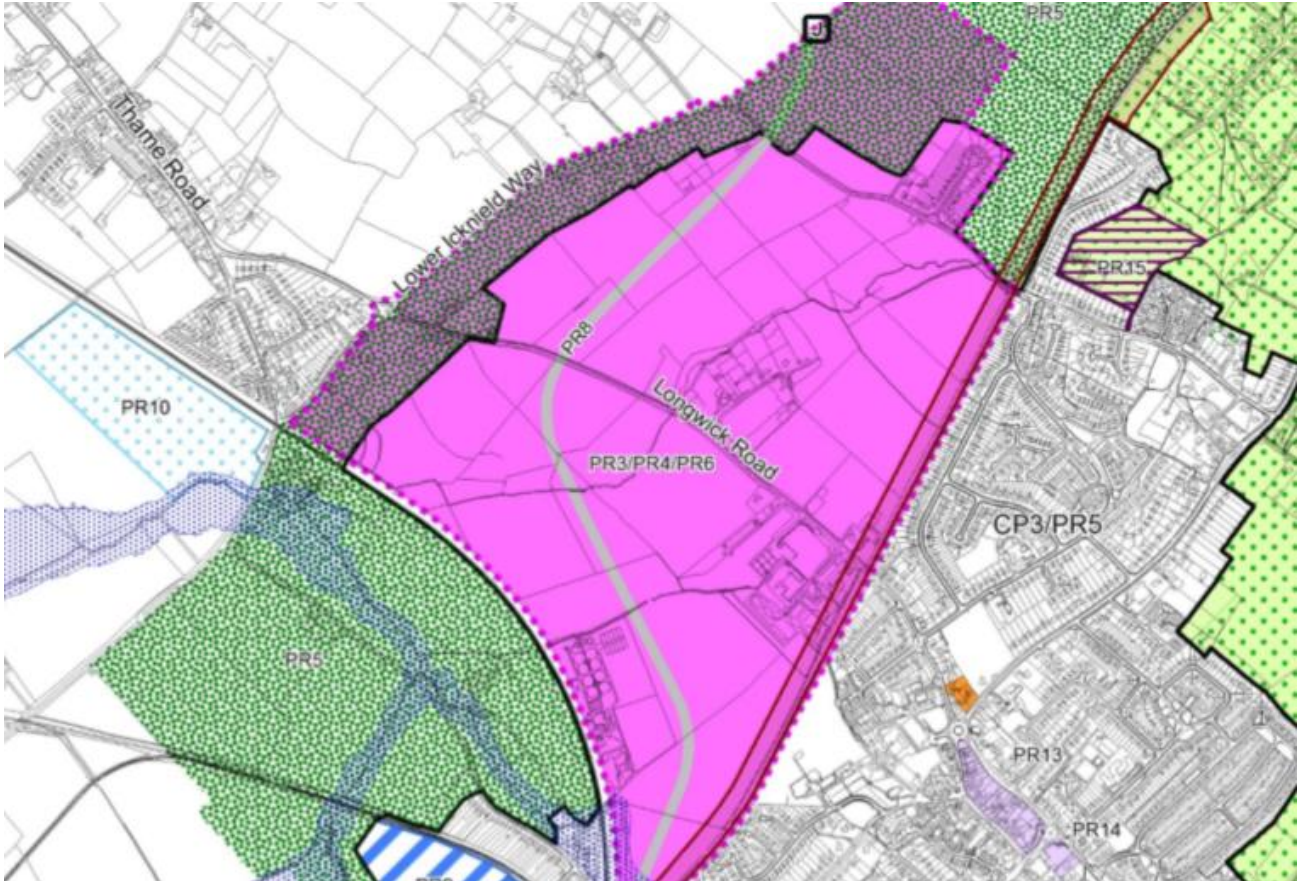
On behalf of our client we have considered the Inspector's Matters, Issues and Questions, and we would like to make further written comments. However, I can confirm that we do not wish to participate in the hearing sessions.

Mr Wise now wishes for us to confirm his position in respect to the Local Plan, and in particular to the proposed inclusion of a 'strategic buffer' designation between the settlements of Longwick and Princes Risborough. The reason for wishing to make further representations is because there has been a recent material change in circumstances, specifically via the approval of a planning permission on part of Mr Wise's land, for residential development within the proposed buffer.

This proposed buffer designation forms part of a wider allocation as an '*Area of comprehensive development including relief road*', as shown on draft Local Plan Map 14: 'Princes Risborough'. An extract of this map is included below for clarity. The relevant draft policy (PR3) sets out a vision for this area, which includes residential development, social infrastructure, retail and business development, together with a new relief road. The policy map includes an indication on the route for the relief road.



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Policy PR4 focusses on the ‘main expansion area’, which is the land between Princes Risborough and Longwick. The policy includes reference to the provision of two primary schools, as well as a local centre, and the formation of residential neighbourhoods. The supporting text to the policy sets out that:

“Capacity work based on the Concept illustrated here indicates the expansion area can deliver up to 2460 homes, with 600 of these homes being provided beyond the plan period.”

The policy also confirms that the “Location of the green gap between development and Longwick” is “fixed”. Therefore although the Concept Plan (Fig 26 of the submission version of the Local Plan) is illustrative in nature, the extent and position of the ‘strategic buffer’ will be confirmed via this Local Plan policy.

Para 5.3.33 of the submitted Plan sets out the Council’s justification for this ‘strategic buffer’ as follows:

“A green buffer is retained south of the Lower Icknield Way as open countryside or strategic open space with limited land uses, continuing around Longwick Bog. This is to function as a separation between the main expansion area and the village of

Longwick, so preventing the coalescence of the two settlements. It is also to establish a clear green edge to the main expansion area. Alongside Longwick Bog, it helps protect the hydrology of this designated wildlife site.”

Our client owns land located to the south of Longwick, as identified on the plan below.



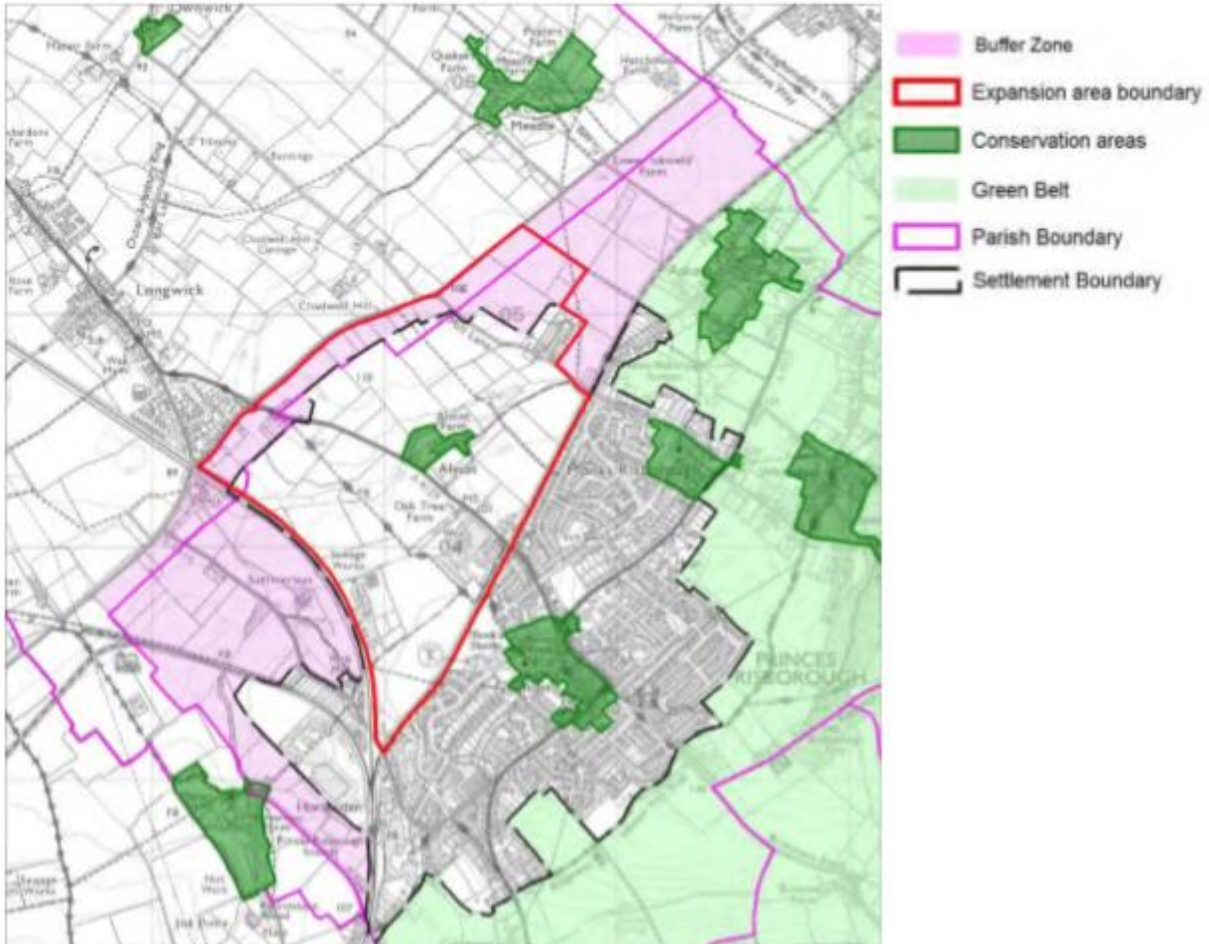
Our client’s land falls within the area that is proposed to be designated as a strategic buffer within the submitted Local Plan, but also within the ‘comprehensive development’ area. Draft Policy PR5 refers, and sets out that:

“development within the strategic buffer is required to be of a small scale, in order to protect the rural character of the land between the settlements.”

Figure 28 of the plan (copied below for clarity) confirms the proposed extent of the buffer zone, and the position of the new settlement boundary.



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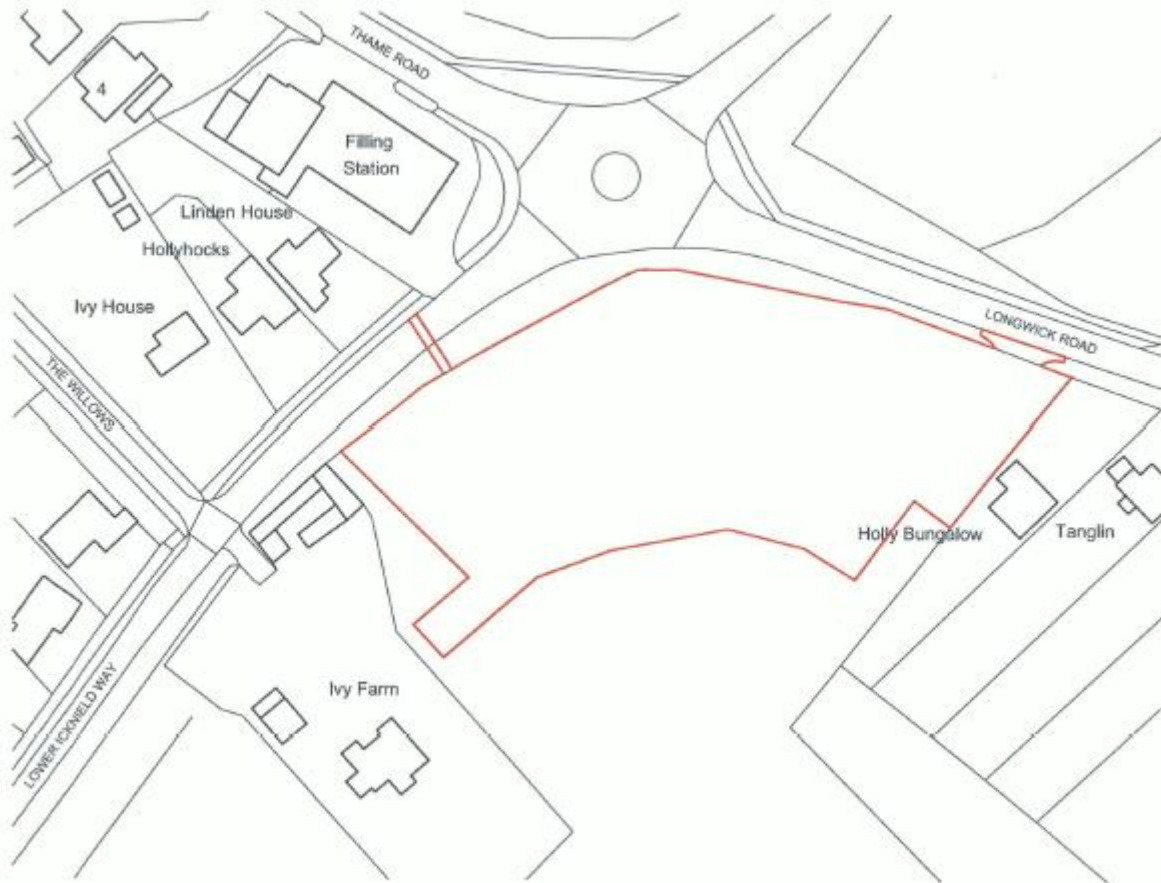


It is considered particularly significant that part of our client's land, which also forms part of the 'strategic buffer' within the 'comprehensive development' designation, now benefits from an Outline planning permission "for the erection of 9 dwellings including access, parking and garaging with ancillary works with all other matters reserved" (Wycombe District Planning Application Reference: 15/07209/OUT).

An extract of the Location Plan submitted with the application is detailed below:



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This application for 9 new houses was allowed on Appeal on 23rd August 2017 (PINS Appeal Reference: APP/K0425/W/17/3166948). The Inspector in making their decision made a number of pertinent comments in respect of the character of the land south of Lower Icknield Way, as detailed below:

“9. It is not in dispute between the parties that the appeal site is located in open countryside outside of the designated settlement boundary for Longwick, which lies to the north-west. The B4009, Lower Icknield Way, forms a physical and visual boundary between the appeal site and the main built development of Longwick. However, this is tempered by the presence of some built development on the southern side of the road, particularly the small cluster of dwellings close to the village signpost. Also, the petrol station and the surrounding road network give rise to significant urbanising features within the immediate landscape.

10. Beyond the southern side of Lower Icknield Way the pattern of development is one of small clusters of properties with open countryside in between comprising fields bounded by hedgerows. The proposal would have the effect of closing the gap between Ivy Farm and the existing cluster of properties on Longwick Road...

11. ... The Council acknowledges that unlike many of the settlements within the district the appeal site does not lie within the Chilterns Area of Outstanding Natural Beauty and neither is it designated as Green Belt.

12. The Council has referred to the Princes Risborough Town Plan Area Action Plan Development Plan Document (PRTP) and states that as the bulk of development is to be concentrated in Princes Risborough then the gap between there and the settlement of Longwick, in which the appeal site would be located, becomes ever more important. The PRPT is now to be incorporated within the emerging New Wycombe District Local Plan 2033 (NLP). However, due to the emerging status of both the PRTP and the NLP, I accord them little weight. Also, as there is already a cluster of houses further along Longwick Road toward Princes Risborough I do not consider that the proposal would increase the coalescence of Longwick and Princes Risborough.

13. Although the paddock is open countryside, nevertheless it is visually constrained by the development that lies on either side of it and thus is of a different character and appearance than the wider open countryside that lies beyond it. The proposed development would not extend out beyond the paddock into this area to the south and any landscape impact could be further mitigated through the provision of an appropriate landscaping scheme. Therefore whilst there would be some impact on the landscape character and appearance, and thus conflict with LP Policies C10 and G3 and CS Policy CS19 that among other matters seek to protect the character of the countryside, it is my view that this would be to a limited rather than a significant degree."

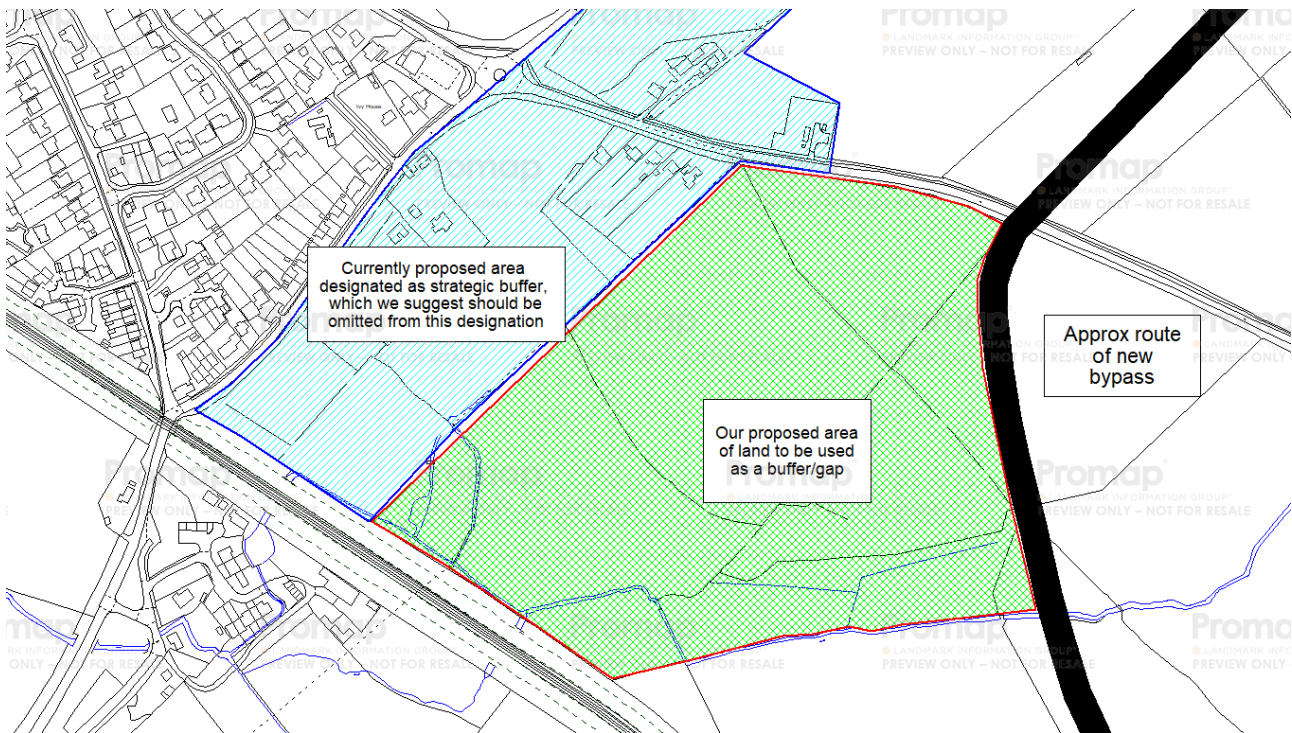
Therefore, it is clear from the Inspector's comments that the land in question is not subject to any current specific landscape designation. Further the Inspector acknowledges that there is existing built form on this southern side of Lower Icknield Way and southwest of Longwick Road, and this will be 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.

Having taken these comments into account, and the significant material change resulting from the approval of 9 new houses within the 'strategic buffer' allocation, we now strongly question whether the extent of land identified by the Council remains relevant for its identified purpose (i.e. as a 'gap' to restrict coalescence)?

It is our position, and a view shared by our client, that the land in their ownership that is identified as being part of the 'strategic buffer' between Longwick and Princes Risborough is illogical on the basis that it is already bordered by houses that will join up with the Risborough development if the next field is built on (Which seems likely given that it will form part of the built-up area).

Instead, it is our case that the buffer designation should be re-drawn, so that its boundary would be the next field to the south. This would form a genuine 'green' buffer

between the new 'by-pass' and the land south of Lower Icknield Way, which would act as a robust visual countryside gap that would separate the new development from existing development in and around Longwick. Our proposals are indicated below:



Our proposals would 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 Policies PR3 and PR5 and their supporting text and policy maps – are not soundly based, justified, and as currently drafted they will not provide an effective mechanism for delivering and managing the comprehensive development proposed for this area.

We wish for the Inspector 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. These are

material changes in circumstance, which we feel have been ignored by the Local Authority.

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 is modified in-line with our comments.

Yours faithfully,

Tim Rodway
Director

c.c. Mr J Wise