

# Wycombe District Local Plan Examination

## Matter 9: Rural Areas

Hearing Statement on behalf of Bellwood Homes

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### **ARROW PLANNING LIMITED**

w: [www.arrowplanning.co.uk](http://www.arrowplanning.co.uk)

e: [mark@arrowplanning.co.uk](mailto:mark@arrowplanning.co.uk)

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## 1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Arrow Planning Limited on behalf of Bellwood Homes. Bellwood Homes have previously submitted representations to the Local Plan under response ID 0559 and also submitted a written Statement in respect of Main Matter 3. This Statement should be read in conjunction with those earlier representations and Statement.
- 1.2 Bellwood Homes previous representations concern the settlement of Longwick, and in particular the apparent lack of allocations in the settlement.
- 1.3 This Statement has been prepared in response to the Inspector's list of main matters, and in particular Question 1 e) for Main Matter 9.
- 1.4 As the Planning Consultant acting on behalf of Bellwood Homes we confirm our intention to appear at the Main Matter 9 Hearing Session on 6<sup>th</sup> September.

## 2.0 Main Matter 9: Rural Areas

### Inspector Question 1 e)

- 2.1 We have already submitted a Hearing Statement in respect of Main Matter 3. That Statement identified that the Plan is unsound as it is not positively prepared and proposed the following change to Policy CP4:

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

*i. **at least** 300 homes in Longwick-cum-Ilmer Parish"*
- 2.2 Main Matter 9, Question 1 e) enquires as to whether the allocation under Policy RUR5 is soundly based and whether there is evidence that the sites are viable and deliverable.
- 2.3 For the reasons set out in our client's representations at the Regulation 19 Stage, and our Hearing Statement for Main Matter 3, we contend that Policy RUR5 is unsound as it is not Positively Prepared.
- 2.4 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 with both appeal decisions and decisions by the Council confirming this position.
- 2.5 The Local Plan proposes exporting a considerable level of unmet need to Aylesbury Vale. However, the Plan could meet a quantum of this need within the sustainable and relatively unconstrained settlement of Longwick.

### Commitments vs Allocations

- 2.6 Policy RUR5 delegates any allocations to the Neighbourhood Plan, which was recently made and also sets a 300 dwelling limit on development in the settlement. The Local Plan will now postdate the Neighbourhood Plan, so becomes the most up to date part of the Development Plan. It can therefore allocate additional growth and/or require that the Neighbourhood Plan is reviewed to find sites for this growth.
- 2.7 Policy CP4 distinguishes between committed sites and allocations under criteria 4 a) and b), with Neighbourhood Plans identified under 4 c). Criteria 4 states that the proposed homes will be delivered through a) Existing completions and commitments; b) Allocations in this Plan as set out in Appendix D; c) Allocations in Neighbourhood Plans.
- 2.8 Appendix D references Policy RUR5 and requires the Neighbourhood Plan for Longwick to deliver 300 dwellings in a Neighbourhood Plan that is to be produced. It does not reference the already Made Neighbourhood Plan.
- 2.9 Of the 300 dwelling limit, 268 dwellings identified in the Made Neighbourhood Plan already have planning permission. They should therefore count as commitments, as identified under 4 a) in Policy CP4. They also would not deliver dwellings “over the lifetime of the Local Plan”, as required by Policy RUR5 criteria b). Instead they will deliver dwellings either prior to, or closely following, adoption of the Plan. That leaves a c.15 year period where there would be no growth in Longwick, potentially affecting the vitality of the settlement.
- 2.10 The requirement for an allocation of 300 dwellings in Longwick should instead comprise the 32 dwellings identified in the Neighbourhood Plan, along with new allocations comprising at least 268 dwellings.
- 2.11 As currently drafted, the Policy is unsound as it is a) not positively prepared (for the reasons already set out); and b) not justified, as commitments are being treated as allocations in the Plan.

### Proposed Changes to Policy RUR5

- 2.12 In order to make the Plan sound, the following change to Policy RUR5 is proposed:

*The Council requires **at least** 300 homes to be developed in the Parish of Longwick-cum-Ilmer over the Plan period. A **review of the** Neighbourhood Plan will determine the distribution of development across the Parish, and allocate specific sites. In the absence of a **review of the** Neighbourhood Plan **being completed within 2 years of the date of adoption of this Plan**, development will be required to:*

*a) Be delivered over the lifetime of the Local Plan;*

*b) Provide ~~up to a maximum of~~ **at least** 300 homes, **of which a minimum of 268 will be over and above the allocations contained in the March 2018 Longwick Neighbourhood Plan. These will be provided** on a range of ~~small~~ sites within or adjacent*

*to the village of Longwick, including a small allowance for windfall sites;*

### Summary

- 2.13 This Statement is submitted on behalf of Bellwood Homes, in response to the Inspector's questions for Main Matter 9: Rural Areas. As previous respondents to the Local Plan consultation under representor ID 0559, we confirm our intention to appear at this Hearing Session.
- 2.14 This Statement should be read alongside the Statement submitted in respect of Main Matter 3, which proposed amendments to Policy CP4. This Statement proposes amendments to Policy RUR5 and the accompanying text in order to ensure that the Plan is positively prepared and justified.