



27th March 2019

Risborough Area Residents Association's (RARA) Response to WDC's Local Plan, Proposed Main Modifications

RARA has followed the guidance on how to respond to this latest consultation and our comments are chronologically organised and referenced against the individual 'Proposed Main Modifications' (PMM's) identified by the Planning Inspector (PI). RARA has also commented on the revised Sustainability Assessment document.

As an introduction, RARA's overarching comment is that the Planning Inspector's PMMs appear minor, superficial and certainly do not go far enough. There are significant omissions to the PMMs, suggesting the Final Plan, when published, will not have been amended enough to render it 'sound' or 'legally compliant'. The scope of the PMMs are narrow in the extreme and do not reflect the detailed discussions heard by the PI during the Examination in July and September last year on the 'Matters and Questions' identified. In fact, and strangely, there seems to be a complete disconnect between the hearings and the modifications arising from them. The process is flawed and RARA remains resolute that decisions regarding WDC's Local Plan are not reflective of the views of the District's taxpayers; and that the process of determination and consultation is beyond the average resident's skillset or abilities, being unnecessarily complicated and opaque. In contrast to neighbouring authorities' Local Plan reports, insufficient modifications have been requested or suggested in light of emerging government guidance to render WDC's LP sound and, as such, RARA reserves its right to challenge any 'adopted Plan'.

Of particular concern to RARA is the complete failure to find non-compliance with the Statement of Community Involvement and the Duty to Cooperate, discussed during the hearing on 16th July (Matter 1: Compliance & Duty to Cooperate).

RARA clearly succeeded in bringing to the PI's attention that Community Engagement by WDC had not followed due process at Princes Risborough. RARA raised an umbrella objection to the lack of authentic consultation regarding the scale of development of circa 2,600 homes (a quarter of WDC's OAN), drawing attention to the fact that Steering Group (SG) established by WDC as part of the consultation, was not a vehicle for proper Community Engagement but a 'one way strategy' imposed by WDC on the community to meet the council's objectives.

The question addressed at the hearing was 'Has consultation on the Plan been carried out in accordance with the Council's Statement of Community Involvement (WDLP 11) and the requirements of the 2004 Act (as amended) and the 2012 Regulations?'

In summary RARA's concerns in this regard are:

1. In developing the Plan, WDC has ignored the feedback from the local community so far as its proposals for Risborough are concerned, and has driven through a pre-determined decision in the face of very strong local opposition (There were objections from 3,000 residents following the 2015 public consultation and over half the town's

residents (circa 4,000) have signed a petition objecting to the scale of the Plan for Risborough).

2. Whilst the Steering Group should have played a key role as part of overall engagement with the local community, it was very much led by WDC and the Planning officers. RARA has access to a Minority Report compiled by 7 members of the Steering Group, outlining the key failings of the group and underlining the lack of legal compliance through the failure properly to engage with the community in accordance with the Council's Statement of Community Involvement (WDLP 11), the requirements of the 2004 Act (as amended), and the 2012 Regulations.
3. The direct consequence of this failure has been the proposed allocation at Risborough which is unsound for all the reasons set out in RARA's representation being too large and an unsustainable solution to the requirement to meet housing need.
4. The Council's Statement of Community Involvement repeatedly states that WDC will "inform", "consult" and "involve" the local community. The WDC Statement of Community Involvement emphasises the importance and use of these three methods and reflects the legal requirement of consultation that the Council give genuine and conscientious consideration to local views – see: *R v Brent LBC ex p Gunning* (1986) 84 LGR 168 at 189).
5. However, for Risborough at least, the local community has only ever been "informed, and has not been either "involved" or "consulted" in any meaningful way.

This was recognised during the hearings and admitted by Penelope Tollitt (Head of Planning at WDC), who spoke in response to RARA at the hearing admitting that, with the shift in political landscape, this had placed WDC in a position where the 2,600 homes in PR was non-negotiable, despite the work of the Steering Group and in direct contradiction with the Council's Statement of Community Involvement.

6. Because there was not compliance with the above Statement of Community Involvement, the Plan remains does not meet the requirements for Legal Compliance.

RARA wants to make it clear that it intends to make a challenge re: the validity of WDC's Local Plan as, and when it is adopted, under Section 113 of the Planning and Compulsory Purchase Act 2004 due to its non-compliance with its own Statement of Community Involvement (and, furthermore, its lack of regard for 'sustainability' and 'deliverability'). RARA believes the interests of the community are aggrieved and that the Local Plan has been substantially prejudiced by a failure to comply with a procedural requirement.

The following represents RARA's specific comments on the PMM's:

PMM1 - CHAPTER 1.0 INTRODUCTION AND CONTEXT

Paragraph 1.15, Page 7

No plan as to how WDC will manage the other strategic initiatives affecting the District should initiatives arise. They are merely mentioned. By the time they are coming into place Bucks will have a Unitary Authority and WDC will be gone. The plan should allow for a timely two-year review to enable the Unitary Council to advise on how to manage the key strategic issues which will impact on the Local Plan.

The additional recognition of sub-regional strategic initiatives in their early stage including Heathrow and Ox-Cambridge Growth Arc are welcomed but the modifications here do not go far enough and the impact and timing of HS2 has been over looked . HS2 will be under construction during the time of this Local Plan, and although the economic effect is limited, the disruptive effect construction will have on the district has largely been ignored although it is significant particularly in relation to the upgrades on the M40 and A404.

The plan lacks consistency with the concurrently developing Local Plan of South Bucks and Chiltern where consideration is given to the timing for many housing developments to avoid clashing with major construction projects to minimise the effect of disruption. Of further concern is WDC's awareness of the increase in HS2 construction for which they have agreed a compensation package with HS2, but still they intend to carry out major road and bridge construction in the Risborough area at this time of heightened traffic. There will also be a knock-on effect of increasing the costs of these infrastructure projects by requiring limited resources at a time of high demand leading to a scarcity premium.

The effect of Cross Rail 2 (CR2) is known, because it can be seen on its path across London, leading to an increase in house prices in these areas benefiting from it, in contrast to the falls in the rest of the capital. Marlow and the south west of the district will benefit from this premium, an area which currently have the most unaffordable houses in the district and among the highest in the country outside the capital. Therefore, failure to mitigate these by providing new homes in this area seriously questions the ability of this Plan to meet the key part of this initiative to reduce unaffordability.

The Council with Highways England are improving the A404 Marlow by-pass increasing the appeal of Marlow. The general improvement to the M40 including reducing the effect of traffic noise, has in effect increased land available for housing near the motorway. The forming of the forthcoming formation of a Bucks unitary authority will allow potentially more appropriate sites to be available, all ignored in these modifications.

PMM 2 - CHAPTER 2.0 WYCOMBE DISTRICT – THE BIG CHALLENGE

Paragraph 2.1, Page 15

No enhancement to Alscot or Princes Risborough – only destruction

The modifications are welcomed however this wording is in conflict with proposals elsewhere in the Plan which do not serve to enhance the historic environment e.g. Alscot, near Princes Risborough. This is also in conflict with Policy DM30 which should also aim to enhance the Chilterns Area of Outstanding Natural Beauty but doesn't.

PMM 3 - CHAPTER 3.0 OUR VISION AND STRATEGIC OBJECTIVES

Chapter 3, Section 8, Page 24

Sustainable development – not for Princes Risborough

Modifications to the wording is welcomed but is not reflected in the Plan with regard to development at Princes Risborough which only serve to, increase the need for travel by private car (no employment), ignore potential brownfield sites and directs development to areas of high flood risk.
Paragraph 3.18, Page 25

Outside areas at risk of flooding – so why Princes Risborough?

As noted in comments with regard to Section 8, Page 24, most development in Princes Risborough is directed at areas of high flood risk. The modifications do not go far enough with regard to avoiding areas at risk of flooding, nor are they reflected in the Plan's development proposals.

Paragraph 3.8, Page 25

Additional comments on flooding and increased need of water supply to supplement the above.

The modifications refer to issues of flooding and also scarcity of water, however flooding is the only one addressed. It is known that the water supply will not be increased until 2029 at the earliest until then the area is recognised as suffering as under water distress. The current need to try and reduce demand is contrary to the Local Plan's aim to increase the number of water users before 2029.

WDC's defence against flooding is to react to the issues during these developments as they occur. As was clearly seen in the last-minute memorandum of understanding with the Environment Agency, no study of the flooding issues facing Risborough and the proposed sites has not been carried out. Likewise, no study of the effect of 'Climate Change' and 'Urban Creep' have been made in the area or its environs. However, in theory, the effect of both these are expected to be greater in the Risborough area than average for the country.

The flood risk is not known without a proper study, but there is a lot of geographical and historical evidence this is a major risk. The names of many of the areas reflect this such as Leys, Meadle etc. Sites next to the proposed sites have been turned down because of flooding risks. Parts of most of the site have a history of flooding on a regular basis. The water table on some of the sites is barely inches below the surface, so the expected increase in rainfall of climate change will make this land waterlogged. This includes the area around the rail bridge of Summerleys Road, where the road is planned to be lowered by a couple of feet. These are foreseeable events within just one locality of the district. A detailed plan would be expected to avoid these issues not make them an inevitable consequence requiring remedial action. Avoidance of these issues make the Local Plan ineffective.

PMM 5 - POLICY CP3 – SETTLEMENT STRATEGY

Policy CP3, Page 35

No consistency of approach or proper sustainability assessment on site selection

The modifications are not reflected in the Plan. The Council has made little effort to consider brownfield sites and acknowledged this at Hearing 6. In Princes Risborough for example some of the sites that could be developed include, New Road (potential for residential above retail), Blanchfords Builders merchants site, and Paddocks Hospital (now closed), all close to the Princes Risborough town centre. These could provide more than 100 new homes. WDC continue to ignore these in favour of building on green field sites.

There is no consistency of approach across the district with regard to site selection. Reasons given for not building in Marlow for example apply more so to Princes Risborough.

Paragraph 4.22, Page 35

Saying one thing but doing something completely different

The revised wording and clarification is welcomed but begs the question as to why development (homes and major infrastructure) is still being proposed at Princes Risborough in areas of valued landscape that includes, the AONB setting, the AONB, Green Belt, and areas acknowledged by the Environment Agency - and others, as being at high risk of flooding?

PMM 6 - POLICY CP4 – DELIVERING HOMES

Policy CP4, Para 4.36, 4.40 Pages 44, 45

Use of higher ONS Housing numbers from 2014 is out of date with newly released 2016 ONS figures which represent a circa 25% reduction.

Whilst the ONS 2016 figures show that demand for housing is dramatically falling, the government policy is to stay with the higher 2014 rate, which the Local Plan's allocations continue to use. However, the most recent raw data shows this trend is continuing and accelerating, so there is a real danger of an oversupply of new homes. The modifications suggested here provide up to an extra 1,000 homes on what is too high a figure already, leading to unnecessary, harmful and irreversibly damaging sites being built. In addition to this increase, the council is stating that they could accelerate the pace of building in the Risborough area, so adding another 600 houses to this additional number, plus the underestimate of windfall sites means that during the period of the plan, actually 13,000 new homes will be built, a level that has been ruled out in the supporting documents as too harmful. Ironically, the plan now contradicts its own supporting documents.

Since a major part of the argument for a large-scale development in the Risborough and Bourne End areas was reasoned because no other sites were apparently available to meet a target of the original 11,000 homes required, 13,000 homes seriously puts into question why such a large development is required at Princes Risborough when enough houses can be found to meet the original target. The plan's foundations are therefore not secure, therefore undermining the whole plan.

The council is still using a calculation forecast for windfall which is currently well below half the level of what is actually available. Looking at the last six years of actual and permitted builds the figure for windfall is already significantly higher than that predicted for the future 12 years, so the figure is a significant underrepresentation and again this undermines the soundness of the plan.

PMM 23 - Policy HW21 -- LAND AT QUEENSWAY, HAZLEMERE

Policy HW21, Page 150

Ignoring the National Planning Policy Framework and the Chilterns AONB

The terminology proposed in point 5, to 'where possible enhance', the natural beauty of the AONB, is not acceptable or compliant with national policy. The Plan should be 'conserving and enhancing' the Chilterns AONB.

PMM 27 / 28 –POLICY PR3 – PRINCES RISBOROUGH AREA OF COMPREHENSIVE DEVELOPMENT

Table 15, Page 170, Table 16, Page 171, and Paragraph 5.3.16, Page 174

Not sound, not sustainable, not deliverable and certain to fail.

The housing numbers and locations proposed for Princes Risborough are not desirable and the planned growth is not sustainable. A sustainable plan should address (as the NPPF points out) the environmental, social and economic agendas. This Plan does not, as has been well stated in the Representations. Destruction of valued landscape, creating a divided community, and lack of employment opportunities, are just some of the reasons why the Plan is not sound, not sustainable, not deliverable and certain to fail.

PMM30 - POLICY PR5 – SETTLEMENT BOUNDARY AND STRATEGIC BUFFER

Paragraph 5.3.55, Page 188 and Figure 28, Page 190

A boundary – but not as we know it

This does not reflect the strong concern expressed from the Representations and the participants at the Hearing. The boundary between Longwick and Princes Risborough is not sufficient and barely noticeable from within the AONB e.g. from Whiteleaf Cross. Also, any boundary/strategic buffer should be kept free of all development including sports related development. This buffer zone has already required re-routing as a result of 'windfall' development in Longwick but more importantly a longstanding 'developed' and authorised showman's site off the B4009 already sits directly within this buffer negating its intended 'green' credentials.

PMM33 - POLICY PR8 – PROVISION AND SAFEGUARDING OF TRANSPORT INFRASTRUCTURE

Still a cut-price alternative to a proper by-pass, going through housing estates and destroying valued landscape. A waste of tax payer's money with no guaranteed funding.

The relief road proposal for Princes Risborough is not supported by the local community or other key stakeholders – as demonstrated by petitions and the responses to the consultation process. The relief road was one of the 4 key issues on the Planning Inspector's Agenda for the Hearing Examination (Matter 8). This issue also had the largest number of objectors tabled for contributing to the discussion and the largest attendance in the public gallery of all the Local Plan Hearings.

At the examination developers also voiced major concern with regard to the viability of the housing developments at Princes Risborough if they had to bear the cost of the proposed relief road.

The Managing Director (Eric Gadsden) of W E Black, developer of the current Goodearl site in the town stated in correspondence with WDC: 'The last thing that we all want to happen is to start building this

cut price alternative through our site only to find that on completion it is wholly inadequate and money which could have gone towards a proper bypass has already been expended and effectively wasted'. (25th September 2017, email to WDC).

Halsbury Homes has voiced major concern (as have RARA) to the Secretary of State, for Communities and Local Government, with regard to the misleading statements in the submission by WDC for a Housing Infrastructure Fund (HIF) to enable the delivery of the southern part of the relief road.

Despite all the concern expressed and solutions offered the only modification tabled (PMM33) is to paragraph 5.3.140, page 222 - 223, with the addition of a bullet point to recognise the needs of walkers, cyclists and horse riders for a safe crossing of the severed Picts Lane:

'A safe crossing of the relief road for non-motorised users between the east and west parts of Picts Lane'.

Whilst this change is welcomed there is no information on how this safe crossing will be achieved to facilitate horse riders, cyclists etc. Will it be an underpass? A pedestrian crossing would not serve the required purpose. And what are the cost and traffic flow implications?

We find it difficult to understand why there are no substantive changes to the plan to address the key issues raised and clearly expressed at the Hearing. We are concerned as to the point of the Hearings and the whole consultation process as it appears to have been largely a waste of people's time and tax payer's money.

Some of the many negative impacts of the relief road proposal expressed at the Hearing and through the representations included:

- Creating a congested and dangerous situation at the railway station. According to the Jacobs Report for WDC on "Preliminary Phasing Strategy Modelling" (May 2017) (TR17, Page 24), the traffic will have increased at the end of the development and result in "increased delay at junctions in the vicinity of the railway station access", positively discouraging rail commuters. We now question the additional impact the new crossing proposed on Picts Lane and the new entrance / exit to Blanchfords (PMM41 – Fig 36), will have with regard to congestion?
- Increased traffic congestion on the A4010 bottleneck either side of Princes Risborough at Stoke Mandeville and West Wycombe. WDC recognise this problem but have made no attempt to find a solution. Neither has any serious consideration been given to the implications of the planned and currently favoured route of the Oxford to Cambridge Expressway link.
- Destroys valuable farmland, wildlife and natural habitats. (The Relief Road, Southern Options, Ecological Appraisal report (Aug 2017)). Damaging the environment – through noise, lighting, pollution and increased risk of flooding.
- Loss of gardens and drive way access to residents of Summerleys road.

A major concern relates to the Chilterns Area of Outstanding Natural Beauty (AONB):

- The relief road will be visible from key vantage points in the AONB. It is in direct line of sight from Whiteleaf Cross and also clearly visible from Brush Hill and the Ridgeway National trail.

During the Hearing on Matter 5, the Council accepted that the relevant policy (DM30) was not in line with the NPPF and the CRoW Act and an action was raised to address this (Action AP5.5). The Council has failed to address this in the main modifications.

There is no mention in PR8 of this major road infrastructure (rightly described as 'major' by the Council), going through, valued landscape – more than just countryside, Green Belt and the AONB. It constitutes major development in the AONB, to which the tests in para 116 of the NPPF (now 172) apply. (Ref. The Chiltern Conservation Board statement on Matter 8, August 2018) The NPPF requires that permission be refused for major developments in these areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. The Plan ignores this, and no justification has been provided.

WDC's TP6 – dated October 2017, stated in para 5.89, '... even if it were considered to be major development, it has good grounds for passing the test of exceptional circumstances'. WDC refused to publish or share these grounds. We would like to know what they are.

The WDC, Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan, December 2018, states that 'Option 11b has been identified as the preferred option for the relief road' (para 6.2.1 page 80). It is inconclusive with regard to the chosen option.

According to the DRF report (Princes Risborough Feasibility Review Development of Southern Alternatives, September 2017) all options were similar in cost. However once other costs – not included in the DRF appraisal, such as new land purchase, flood risks, river crossings, and other mitigation measures are taken into consideration it is not the cheapest. The Jacobs 11b Option is the cheapest.

The Council should be consulting with Highways England (who have raised concerns about the proposed road and its adverse effect on the traffic flow in the rest of the district) and other relevant stakeholders to understand the bigger picture and come up with a solution that makes better use of existing infrastructure, and embraces current technology.

In TP6, WDC noted in Appendix B, 2f, that the Council had established contact with the owners of Culverton Farm and in the event of being unable to secure this land from the owners had a reasonable alternative route. WDC refused to elaborate on this alternative at the Hearing. We would like to see more openness and transparency on this alternative route.

The proposed relief road is not sound for the reasons stated, has no guaranteed funding, and is not a sustainable solution. It is not consistent with the Local Plan Principles for Rural Areas (page 275). It is a waste of tax payer's money. Proceeding with this road proposal is eroding any public trust that still exists with regard to the whole planning process.

PMM36 - POLICY PR11 – LAND TO THE REAR OF POPPY ROAD

Policy PR11 Page 229

The plan and policy's clear on the many reasons not to build on this site – but WDC don't seem to get it!

The revised wording and policy points 1-5 again serve to highlight why development should not take place at this site. The many constraints identified include ecological, hydrological, visual impacts, species – rich habitats, the chalk headwaters of the Pyrtle Spring, flood risk, access restrictions and overall viability.

It was clear from the Planning Inspector's accompanied site visit, the Hearing and Representations, that WDC has little understanding of the site. Studies that should have been carried out have not been. It has not been properly assessed and it demonstrates the Council's inconsistent approach to site allocations within the AONB, its AONB setting, and the Green Belt.

Point 2 refers to limiting the impact on the AONB. If the Plan seriously intends to cherish the Chilterns let alone comply with the NPPF it should be setting out to conserve and enhance the AONB. Point 2a implies that we are happy to build homes in areas at high risk of flooding. We are therefore planning to fail; this is not a sound policy.

Point 4 refers to the preferred access being from the proposed relief road. Yet WDC (Mr White) at Hearing 6 on the 26th of July lied by stating that 'It is a misconception that there is any link with the relief road and the Poppy Road development'. This new wording now clearly reinforces the strongly held view that the reason for the relief road being diverted through the Culverton farm field (in the

AONB and Green Belt) was to access this site. As stated at the Hearing, two wrongs do not make a right.

Figure 32, page 230

WDC still confused and uncertain on how to access this site

During the site visit by the Planning Inspector (PI), the WDC representative was unable to point out the preferred vehicular access route, stating that the route shown on Figure 32 was only indicative and not the actual route. Can this figure be updated please with the actual preferred route shown? The WDC representative also stated during the site visit that what is proposed as a secondary access was not a planned access – in response to a query from the PI. Also, the clear span bridge required by the Environment Agency is not shown. Further clarification and elaboration are required.

Paragraph 5.3.161

No justification forthcoming from WDC

The site is in the Green Belt, is part in the AONB and part in the AONB setting. This is not properly recognised, and no exceptional circumstances have been demonstrated to change this status and comply with the NPPF (e.g. paras 79-86, 115 and 116).

Paragraph 5.3.162

Some local consultation would be welcome

For the safe alternative access as described, will existing residential properties be impacted and if so to what extent? This needs to be clarified.

Paragraph 5.3.163

Properly managed buffer zone or extended private gardens?

Who is going to protect and manage the buffer areas identified? The Town Council or the new Unitary Council? This requires clarification and ownership.

Paragraph 5.3.165

Where is the bridge and has it been allowed for in the viability study of this site?

The Environment Agency (EA) has pointed out that this is one of the sites in the Plan that may be undeliverable. The EA has also pointed out that a clear span bridge would be required to cross the chalk stream, this is not reflected in the modifications or in Fig. 32.

Paragraph 5.3.166

What happened the number one objective in the Plan to ‘Cherish the Chilterns’?

‘Negative visual’ impact from the Chiltern escarpment or relevant rights of way is inevitable and not a ‘potential visual’ impact with this allocation.

General

No viability assessment presented, no proper site sustainability analysis. and no consistency with other site selections. This allocation is not soundly based or deliverable.

The Green Belt assessment of the site has not been thoroughly investigated and there is no consistency with for example other sites such as Molins Sports Ground in Princes Risborough. Neither the Arup Green Belt Part 1 report (2016) or the WDC part 2 review (June 2016) support its removal from Green Belt. The new text provided in the Sustainability Appraisal of the Plan (December 2018) makes no mention of this site and therefore nothing to justify its selection for development.

Other Brownfield sites exist but have not been considered or included in the Council's Brownfield Register. For example, New Road (potential for residential above retail), Blanchfords Builders merchants site, and Paddocks Hospital, all close to the Princes Risborough town centre. These could provide more than 100 new homes.

This allocation is not soundly based and there is no evidence that development of the site is either viable or deliverable.

PMM37 – POLICY PR12 – TOWN CENTRE TRAFFIC AND PUBLIC REALM ENHANCEMENTS (page 235)

No details on how the additional parking will be delivered – if it can be.

The minor amendment to this policy, which seemingly has been made to admonish the Council of the responsibility of delivering these improvements, fails to address the key point that it is essential that the town centre is developed in line with the increase in housing in Risborough, without this we are in danger of building a new town without a new town centre. The plan itself admits that improving the public realm enhancements and traffic calming are interdependent with the completion of the relief road and can only be achieved once the planned road is fully operational, as this will not be fully delivered until at least 2033 any town centre improvements will be delayed until this date. This is a clear sustainability risk as well as a key risk to the soundness of the integration and therefore deliverability of the plan.

The plan acknowledges that there needs to be additional parking in the town centre. Currently there is insufficient parking in the town now, the Jacobs parking review shows that the Railway Station car park, Tesco's and all High St parking is at 100% of capacity, Horns Lane at 70% and The Mount around 50%. The solution proposed in the plan is to double-deck the Mount car park. This is unacceptable in the centre of a conservation area, opposite the church, and shows complete lack of empathy with the historic nature of this part of the town. This proposal was rejected by the steering group and WDC was asked to remove it.

PMM38 - POLICY PR13 – TOWN CENTRE SITE: LAND FRONTING NEW ROAD (BACK LANE) (page 240)

No details, no ability to deliver.

Again, the only change here seems to be to take out any responsibility of the Council to deliver these changes.

It is essential that the town centre is developed for retail and leisure activities with the increase in population, the area outlined in PR13 is the main area of the town where this can be achieved. There is an opportunity here to greatly improve a much-under-utilised area of the town centre, the plan has no details of how this should look or how it will be achieved. This amendment has failed to address these issues. There is no funding allocated for this work, as the land is in multiple ownership, it will need more than aspiration of the Town Council to get the parties to work together, it will take leadership by WDC and probably funding for compulsory purchase of the land now used for parking.

The lack of a comprehensive brownfield site register has hampered the identification of suitable town centre sites for development. For example, more residential space could be created on brownfield land by building flats above street level retail and providing underground parking in the PR13 area. This would be popular with younger age groups and could bring some much-needed life into the town.

The improvement of this area needs to be actively funded and pursued. These suggestions are in line with NPPF para 23. Ensuring the vitality of town centres.

Additional food retailing needs to be provided to feed the expansion zone. Ideally Tesco's should be moved to an out of town location in the expansion zone and the land it now occupies used to enhance the town centre.

PMM39 - POLICY PR14 – TOWN CENTRE SITE: LAND SOUTH OF HORNS LANE (page 242)

Removal of the plan to double-deck Horns Lane car park – for now.

The removal of the plan to double deck the Horns Lane car parks is welcomed, this was opposed by the Steering Group, the Town Council and probably 98% of residents. To even put this is the plan shows WDC has utter contempt for local concerns. It is disappointing to see that it has not been completely removed. WDC need to explore different ideas such as underground parking. Double decking Horns Lane car park, it will create an eyesore in the centre of the town that we all want to improve. Above all it would be very visible from the AONB viewpoints of Whiteleaf and Brush Hill and would certainly not enhance the setting,

As with PR13, there are no details of how the site will be laid out, what it will look like and how it will be achieved. Also, PR14 should allocate funding to support the moving of the fire station to the new development area.

PMM41 - POLICY PR16 – LAND AT PRINCES RISBOROUGH STATION

Policy PR16

Welcome recognition of the importance of Princes Risborough now let's not destroy our valued asset.

We welcome the recognition that Princes Risborough is an important gateway to the Chilterns AONB and the important role the station plays in welcoming visitors and for tourist related development. We commend the Planning Inspector for picking up on this. We would also like to see recognised the importance of the scenic routes through the Horsenden conservation area and Phoenix trail, which could be more easily accessed from the back of the station across the Princes Estate. Stronger insistence on tourism related development proposals in the wording used would be better than merely saying 'acceptable in principle'.

The Chilterns AONB is an extremely valuable asset to the town and a major attraction for visitors. Valued landscape is going to be destroyed. We would ask that WDC reflect this in the rest of the plan by ensuring relevant policies set out to protect and enhance this asset in accordance with the NPPF and the Countryside and Rights of Way Act 2000. For example, in policy DM30.

Figure 36

Where is the sustainable planning here – just moving the problem

We note the new potential access to Blanchfords. Whilst this will remove the congestion that occurs outside Blanchfords current access on Picts Lane each morning, it will merely shift the problem onto the proposed relief road and cause further congestion there. It would make for better planning to encourage Blanchfords to move to one of the proposed industrial sites and free this area up for residential development within walking distance of the station.

Paragraph 5.3.212

A hostile solution that will discourage commuters and exacerbate traffic congestion

The impact of, the required safe pedestrian and cycle crossing at Station Approach, the new Blanchfords access, and the new crossing between the two severed sections of Picts lane, require to be assessed with regard to traffic flow and resulting congestion implications. We expect this will further demonstrate that a new relief road through this residential and station heart of the town is not a sustainable or sound solution, only leading to a hostile environment discouraging commuters. An earlier Jacobs phasing report (May 2017 / TR17 page 24) already highlighted an issue before these additional constraints were added. We would have expected the latest SA Report (December 2018) and the SA Report Addendum (February 2019) to have picked this up but both have failed in this regard. We also note that there is no detailed assessment or proposals with regard to parking in the PMM's. With approximately 90% of the planned new builds more than walking distance to the station, a conservative estimate is that there will be a three to fourfold increase in car space demand. This will require careful consideration in view of the sensitive AONB setting.

PMM63 –Policy DM30 – THE CHILTERNES AREA OF OUTSTANDING NATURAL BEAUTY

Policy DM30, Page 346

WDC ignoring National Policy, the Planning Inspector and the Chilterns AONB

We welcome the amendment to point 2. Notably, ‘in accordance with national policy, and will otherwise be refused’. However, this then needs to be applied throughout the plan and it is not. 1(a) needs to be amended with the deletion of ‘where possible’ in relation to enhancing the natural beauty of the Chilterns AONB. Similarly, in point 3, ‘significant’ must be removed as we should not be planning to have any adverse impact on the natural beauty of the Chilterns AONB. This is a major asset and with support from all stakeholders could become a National Park following the current Government review. Nor is this consistent with the intentions expressed in Paragraph 2.1, Page 15, of the Plan.

Paragraphs 6.100 – 6.103, Pages 348 – 349

WDC again ignoring National Planning Policy, the Planning Inspector, and the Chilterns AONB

The modified wording does not provide the clarification required to demonstrate that the Plan is compliant with the NPPF and the CRoW Act 2000 in respect of the impact of the Plan on the Chilterns AONB. The minimum requirements were made clear at the Hearing and through the Representation from the Chilterns Conservation Board. WDC appear to have paid ‘lip service’ to AP5.5.

PMM73 – POLICY DM42 – MANAGING DEVELOPMENT IN THE GREEN BELT

Policy DM42, Page 381 – 382

Green belt assessments flawed, inconsistent and mismanaged

We are surprised and disappointed that there were no actions and there are no PMM’s arising from the Representations and the Hearing specifically relating to CP8 and the Green Belt. The PI identified key issues regarding the Green Belt Assessments, the soundness with regard to the decision-making process on the release of sites from Green Belt, and questioned the exceptional circumstances regarding the revision of boundaries. The strong body of evidence and the discussion at Hearing 6 clearly showed that the reviews carried out were severely flawed, inconsistent, and with evidence of retrofitting of reports to suit housing needs. No assessments were carried out as required of Hill Top views for example. There was a lot of criticism around the Council’s assessment of 19 sites on one day in March 2016 and no explanation was forthcoming on whether this was 3 people visiting all 19 sites or the sites divided up amongst the 3 people involved.

The Green Belt assessments are one of the fundamental failings of the Plan, yet it is not picked up in the PMM’s.

Risborough Area Residents (RARA) Response to WDC's Local Plan Proposed Main Modifications' supporting document WDC's Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Local Plan - December 2018

RARA considers this document to be a blatantly biased document to justify and retrofit the Plan around the housing proposals. The report was written by Wycombe District Council, with support from AECOM who have acted as a 'critical friend' and have also produced parts of the report on behalf of the Council.

Primarily, RARA is concerned the eight overarching and strategic objectives of the Plan referred to (p3-4 and elsewhere) are being dramatically reduced in importance by WDC and this is also significant in the PI's light touch Proposed Main Modifications (PMMs) which further devalues their importance. One example demonstrates this minor yet retrofit change the PI makes to Strategic Objective 1 below.

Objective 1 states: 'Cherish the Chilterns by conserving and enhancing the natural beauty of the landscape of the Chilterns Hills'. Yet in the plan the PI recommends '**where possible enhance** .' This syntax modification seriously mitigates this fundamental objective of the plan. Here, commitment to 'Cherishing the Chilterns' is eroded in order to make way for the life changing development of 3,000 houses within its setting.

Another crucial example is the omission by the PI to apply Objective 8 'Mitigate Climate Change' to Princes Risborough. Objective 8 addresses 'CO2 emissions by reducing the need for travel by private car, and aid public transport viability, through intensifying existing urban areas by re-use of brownfield sites, locating development in settlements with the widest range of services and facilities, and by clustering development to achieve high quality walking, cycling and public transport provision.' This is not at all reflected in the proposals for Princes Risborough and there is no PMM to provide any amendment to meet this objective.

RARA also takes issue with the following findings within the report:

Princes Risborough (p36)

'The evidence demonstrates that there is scope for development without significant harm to the character of the landscape and setting of the AONB.' RARA considers this untrue and again a retrofit statement to enable this unsustainable scale of development to take place.

Princes Risborough (p61)

'Princes Risborough is not considered to be likely to attract significant new employment growth in the Local Plan period. The Wycombe Commercial Assessment (February 2016) concludes that Princes Risborough does not score strongly on any key commercial drivers and is not ideally placed to benefit from national and regional growth trends.' Reinforces our message that we shouldn't be building all these houses in PR.

Princes Risborough Options analysis (p69)

'Option 3 (2400 homes) extends the expansion area essentially surrounding the Alscot Conservation Area. Even with mitigation the character of surrounding area will permanently change from rural to urban and there is therefore the potential for a significant residual negative effect on the historic environment. In addition to the effects identified for option 3,

option 4 (4000 homes) is likely to have impacts on the setting of a wider number of other designated heritage assets, including Askett Conservation Area. The additional expansion area to the south west also contains an Archaeological Notification Site (ANS). Option 4 will have a residual negative effect of greater significance on the historic environment compared to the other options.'

'All options would result in the loss of greenfield and agricultural land with a negative effect on natural resources. It should also be noted that all growth options contain best and most versatile agricultural land. Option 4 is likely to result in the greatest loss of green field and agricultural land, but there is little to differentiate between option 3 and 4 in terms of the loss of best and most versatile agricultural land. Compared to the other options 3 and 4 are more likely to have a residual negative effect of significance on natural resources through the loss of greenfield and agricultural land.'

The Plan goes with slightly more homes than Option 3.

Southern Road options assessment (p73 – p74)

Not a balanced assessment re carbon footprint or loss of AONB and Green Belt. No account taken of comparative new land take required (unlike with the Jacobs study). Existing verges on Shootacre and Picts Lane could virtually accommodate the whole of the widening but not acknowledged.

(p80) - 'Option 11b has been identified as the preferred option for the relief road, taking into account the appraisal and other more detailed and technical assessments including other factors such as the feasibility and deliverability of the road.' I think they are referring more to the northern options but got themselves confused here with regard to various road options.

Flood risk (p97-98)

'The following sites are associated with notable policy to ensure that fluvial flood risk is reduced as far as possible.'

'Policy PR10 (Land north of Lower Icknield Way; employment location) states that "in relation to flood risk, [development will] use a sequential approach to the location of development within the site to avoid areas of flood risk, providing a buffer to the stream and ensuring that the development will not increase the risk of flooding on site or elsewhere."

Policy PR16 (Land at Princes Risborough Station; 45 homes) states that "the Council will require development of the site to provide flood risk management measures, including the de-cultivating of the stream in accordance with policy DM15, subject to feasibility/ amenity, in the context of the Culverton Mill corridor."

'Policy PR8 (Provision and Safeguarding of Transport Infrastructure) addresses the proposed relief road for the Princes Risborough Expansion Area, specifically requiring the scheme to, where the alignment of the relief road meets Flood Zones 2 and 3: • Be designed and constructed to remain operational and safe for users in time of flood; • Result in no net loss of floodplain storage; • Not impede water flows and not increase flood risk elsewhere; and • The policy includes further area specific flooding requirements, positively responding to the specific needs of infrastructure development locations.'

All demonstrating that the Plan is preparing to fail.

Community and wellbeing (Chapter 8.3 - p101)

Fails to address the 'new town' proposal coalescence with Longwick and, remoteness to the town centre and barriers to integration (railway line and Crowbrook stream).

Historic Environment – Ch 8.5 (p110)

'The strategy attaches great weight to conserving the landscape and scenic beauty of the AONB. The redevelopment of brownfield sites also provides an opportunity to remove existing development that is detracting from the significance of heritage assets and the wider historic environment. This coupled with improvements to accessibility and signage has the potential to enhance the historic environment with a long-term positive effect.' Where is the brownfield site analysis for PR?

'The major residential led expansion of Princes Risborough proposed through Policy CP3 is likely to result in residual negative effects on the historic environment. The expansion area encompasses the Alscot Conservation Area as well as a number of listed buildings. Development is likely to affect the setting of these heritage assets as well as the setting of the historic environment in the surrounding area. Site specific policies require development to respect the setting of the Conservation Area and preserve important views in and out of the Conservation Area as part of a positive strategy for the conservation and enjoyment of the historic environment.' So why go ahead?

Landscape Ch 8.7 (p119)

"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding National Beauty, which have the highest protection in relation to landscape and scenic beauty."

'It also states in Para 116 that, "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest".

'The strategy (Policy CP2) attaches great weight to conserving the landscape and scenic beauty of the AONB. As a result, the spatial strategy does not allocate sites that constitute "major development" in the AONB, prioritising the conservation of the valued landscape feature and its setting. The AONB and wider landscape have been a key consideration in the development of the draft Publication plan, influencing the overall level of growth to be delivered and its location across the District.' Ignoring the impact of the major road development in the AONB and the housing and road development in the adjacent landscape in the AONB setting.

Ch 8.7 (p123)

'It is difficult to conclude with any certainty what the residual effect for the landscape character of the District as a whole will be. Ultimately, the development on greenfield sites at the edge of existing settlements that are within or in close proximity to the AONB are likely to affect its setting to some degree and therefore have a residual negative effect. While not within the AONB, the expansion of Princes Risborough will have an impact on the landscape character in the north of the District and potentially affect the setting of the AONB.'

Transport and Traffic Ch 8.9 p130

No mention of bottlenecks on A4010 at West Wycombe and Aylesbury and no account taken of the cumulative effects of the relief road proposals.