



Risborough Area Residents Association

Representation on the Publication Version of the Wycombe District Local Plan

From the Risborough Area Residents Association
(RARA)

Contact Details:

Mrs. Linda Cannon Clegg

Chairman: Risborough Area Residents Association (RARA)

Paddock House, 3, Whiteleaf Way, Whiteleaf, Princes Risborough, Buckinghamshire, HP27 0LN

Tel: 07702 162516 Email: linda@cannonclegg.co.uk

Representing:

Members of the RARA Committee

Will Streule	Ian Parknson	Anne Stonehewer
Colin Courtney	Charles Vint.	Peter Brookhouse
Richard Clayton	Ian Churchill	

Members of the RARA Wider Group - names available upon request



Table of Contents

1.	Request to participate at the oral part of the examination	4
2.	Introduction and Overview	5
2.1.	Background	5
2.2.	First Tier Objection	6
2.3.	Second Tier Objections	6
2.4.	Third Tier Objections	7
2.5.	Localism	8
2.6.	Summary of objection	8
3.	Involving the Community - Legal Compliance Not Met	10
3.1.	Refusal to recognise the Localism aspects of and objection to the expansion proposals	10
3.2.	Public Consultation	11
3.3.	Princes Risborough Town Council and the Steering Group	14
3.4.	RARA's Petition and Wycombe District Council	16
4.	Soundness of the Local Plan	19
4.1.	Consideration of Reasonable Alternatives	19
4.1.1.	Government Relief	19
4.1.2.	Recent Housing Growth	19
4.1.3.	Predetermination	19
4.1.4.	Poor Estimation of 'Windfalls'	19
4.1.5.	Incremental increase to settlements	20
4.1.6.	Housing Density (incl. Reserve Sites)	20
4.1.7.	Green Belt and AONB	20
4.1.8.	Reducing traffic movements	21
4.2.	Constraints	22
4.3.	Relief Road	24
4.3.20.	Suggestions for Change	28
4.4.	Right Homes Right Places	30
4.4.11.	Suggestions for change	32
4.5.	AONB and Sustainability	34
4.5.1.	Introduction	34
4.5.2.	AONB	34
4.5.3.	Suggestions for change	37
4.5.4.	Sustainability	37
4.5.5.	Economic	37



Risborough Area Residents Association

4.5.8.	Suggestions for change	42
4.6.	Deliverability	43
4.6.1.	Behind Schedule	43
4.6.2.	Relief road	43
4.6.3.	Sewage works	44
4.6.4.	Town Centre Improvements	44
4.6.5.	Timetable	44
4.6.6.	Integration (PR7)	44
5.	Duty to Cooperate	46
5.1.	Housing Numbers for Town and PR expansion zone	46
5.2.	Relief Road options – Steering Group	46
5.3.	Neighbouring Parishes (esp. Longwick and Kimble)	46
5.3.1.	Neighbouring Parish consultation	47
5.3.2.	Services and Utilities	47
5.4.	Strategic East West Road Solution/Wider review	48
5.5.	Cross County co-operation on housing.	49
5.6.	Cross County co-operation on services	49
5.7.	Economic Entity	49
	Appendices	51
A.	Petition, January 2017 to date	511
B.	WDC's Statement of Community Involvement, 2012	51
C.	PRTC 2015 Town Plan Statement	51
D.	Tibbalds Report 2014	51
E.	Parish Council Briefing Paper	51
F.	Steering Group Minutes, 26 th June 2017	51
G.	Statement to the PR Town Plan Steering Group, 22 nd November 2017	51
H.	RARA's Petition Presentation to WDC, 3 rd April 2017	51
I.	Confirmation of Petition Received By WDC	51
J.	RARA's Presentation to WDC Debate, 5 th June 2017	51
K.	Email from RARA to Katrina Wood, 27 th June 2017	51
L.	Letter from RARA to Katrina Wood, 1 st August 2017	51
M.	Email from Katrina Wood to RARA, 11 th August 2017	51
N.	RARA Rescue Risborough Leaflet - Oct/Nov 2017	51
O.	Letter to Penelope Tollitt on 'Process and Steering Group' from RARA, 6 th October 2016	51
P.	Letter to Penelope Tollitt on 'Road Infrastructure', 17 th October 2017	51
Q.	Letter to Penelope Tollitt on 'Economic Sustainability' from RARA 1 st November 2016	51



Risborough Area Residents Association

T.	Independent District Council Election Flyer, May 2015	51
U.	RARA's Power Point Presentation July 2016	51
V.	Consulation Response for 'Right Homes in the Right Places'	52
W.	RARA's Risborough First Principles for a Better Town Plan	51
X.	Councils reducing OAN through Rule of Constraint	51

Risborough Area Residents Association (RARA) is a democratic public-spirited organisation which helps its residents to protect and enhance both the natural and developed environment and the provision of public services and amenities. In so doing RARA seeks to represent independently the views of residents on any significant issues.

RARA requests to participate at the oral part of the examination. RARA is a democratic organisation which represents the views of its 800 members and 4,300 people who have signed a recent petition (Appendix A) objecting to the scale of development, lack of consultation and asking for better solutions for the Wycombe District that makes better use of available land. This represents over 50% of residents living in the Risborough area.

RARA, as an umbrella organisation, would like to be given the opportunity to present and expand upon key concerns regarding the overwhelming expansion of Risborough which are thematically outlined in this submission. As 'one voice' we hope this will make the process more manageable to do so.



Risborough Area Residents Association

Risborough Area Residents Association (RARA) wishes to object to the Wycombe District Local Plan, Regulation 19, Publication Version of October 2017, not least The Princes Risborough Expansion Plan incorporated within.

2.1. Background

RARA is a community-led, non-party political organisation with charitable status working on behalf of the residents of Princes Risborough, Monks Risborough, local villages and settlements. There are around 800 households in its membership, from the parishes of Risborough, Longwick, Lacey Green, Bledlow and the Kimbles. It seeks to ensure that members' interests are promoted and protected and that local and national government take the views of local residents and other stakeholders into consideration when making decisions about the area's future.

RARA is submitting this full response to WDC's Local Plan consultation on behalf of its 800 members, and the 4,300 signatories of its recent petition that called on the Planning Inspector to:

- Force WDC to reconsider its plan for Princes Risborough, and propose a lower scale of development;
- Investigate better solutions for the Wycombe District that makes better use of available land;
- Fully consult with local residents on future proposals and act on their views and feedback.

In the 1987 report: 'Our Common Future' the United Nations defined sustainable development as:

'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'

RARA believes the WDC plan is not in the public interest and will significantly compromise the needs of future generations by, not least, failing to address the needs of the present.



Sections 4 and 5

- 2.2.1. RARA believes that WDC have been overly ambitious in satisfying an Objectively Assessed Need (OAN) for the District without applying for sufficient concessions owing to the planning constraints, geography and topography of the District.
- 2.2.2. There has been no evidence of push-back against the DCLG in respect of such figures it may have been given. Furthermore, such agreement it has with AVDC regarding unmet need remains in question as a result of AVDC's acknowledged requirement to provide more housing than it anticipates as a result of upcoming Govt requirements (Failure of Duty to Cooperate).
- 2.2.3. When presented with the (apparent, since this has not been demonstrated) requirement by Government to respond to the demand for vastly increased Housing numbers in the District, given the severe constraints upon it caused by the extensive Green Belt and AONB (the sensitivity of which is fully evidenced in the Secretary of State's most recent pronouncement upon the local Molins Appeal in Saunderton), it is surely incumbent upon the Council to not only object to such numbers as may be imposed, but to actively negotiate such numbers to an acceptable level, and to demonstrate publicly that it has done so. The fact that it has simply chosen to comply with the given numbers could be seen as evidence of Plan-makers placing Party Politics over and above its responsibility to the community.

2.3. Second Tier Objections

Sections 4 and 5

- 2.3.1. The Plan presents as an overt and simple attempt to dump an extremely large residue of alleged unmet-need housing upon one single settlement immediately beyond the Green Belt and AONB, without consideration as to whether this is an appropriate course of action, or whether this is sound Planning, and with no evidential basis that this is a correct decision. The Plan fails to consider that the incremental expansion of many smaller Settlements comes before consideration of a massive and unsustainable expansion of a single settlement. It would appear that it is better to have an argument with one (unacceptably compliant) Town Council than with many Parish Councils or, to consider carefully selected Green Belt sites for housing that provide far more sustainable solutions. This presents as lack of comprehensive Planning rigour.



Risborough Area Residents Association

Brownfield sites and other density considerations of High Wycombe town itself. The emerging WDC Brownfield Register will not even be the result of Public consultation, and will have only a few sites included. This is further clear evidence of a lack of comprehensive and competent Plan-making and leads to a complete mismatch between employment sites (jobs) and residential areas (homes) within the District. This mismatch leads to areas within the Plan that are earmarked for employment being linked to unsustainably low housing proposals, failing the current and future needs of these communities. This imbalance should be addressed by a fairer and proportionate incremental increase to all settlements within the District.

- 2.3.3. Related to the correlation of homes and jobs is a fundamental Planning principle of fully planning for the infrastructure element of major proposals when a proposal is in the early stages of development. In this case, not only has such infrastructure not been planned at an appropriate level, but also such consideration as has been given fails to account for either the effects of new development elsewhere, but, more importantly, the resultant effects of the decant of vehicles to adjacent communities and the effect of infrastructure at those geographical points. It also doesn't account for the effects of the construction of the HS2 link, which will cause serious disruption to infrastructure over the entire Plan period.

2.4. Third Tier Objections

Sections 4 and 5

- 2.4.1. There is an established Planning principle which states that it is unacceptable to take a relatively small settlement (whether a small Town or Village) and overwhelm it by the sheer size and scale of proposed new development. It is obvious why such a basic principle exists. In the case of PR, the extent of the proposed new expansion is far greater than the current level of Housing in the Town. It also ignores the effects of current expansion taking place within PR.
- 2.4.2. A further and related principle of Plan-making is that the coalescence of definable Settlements must be avoided. The proposals would however merge the self-evidently definable and historic Settlements of PR, Alscot and Longwick, whilst failing to appropriately resolve the 'integration' barriers created by the Aylesbury railway line (and by the proposed 'relief road').
- 2.4.3. Proper planning for major expansion of Settlements requires incremental definitions to be made by the Plan-makers, in terms of the justification of



2.4.4. The proposals do not allow for the social infrastructure necessary for any significant form of expansion of PR. They also do not consider that the Retail and other offerings of this small Rural Market Town are based upon a limited and essentially non-expandable space, and do not demonstrate connectivity and integration effectively. They present, in Planning terms, as simultaneously ill-conceived and misconceived.

2.4.5. Any major expansion of a Settlement must be fully considered by the Plan-makers in Sustainability terms. Such consideration as has been given has been both scant and unreflective of the full impact of the proposals.

2.5. Localism

Sections 3, 4 and 5

2.5.1. The concept of 'Localism' (evidenced in the Localism Act 2011) is one which must be central to the Plan-makers considerations (also see NPPF 2012). The principles behind Localism have been neglected here in that a majority of residents in/around PR object in some form to the principle of the proposals, and that their objections have been rejected. Furthermore, there is strong evidence that significant numbers of current PR residents regard the proposals for PR in a negative light.

2.5.2. Although RARA has been involved in the process since the original 'community conversations' in 2013 and at every stage of 'consultation' and information since (including a strong presence on the PR Steering Group), there is scant, if any, evidence that their input has had any effect on the resulting proposals.

2.6. Summary of Objection

RARA believes the WDC Plan is a 'negatively prepared' unsustainable 'Plan' that is contrary to the principles of the NPPF by:

- not reflecting the views of local communities;
- failing to match housing with employment and forcing reliance on the car and train for economic movement;
- and without considering the infrastructure required, and the cooperation of neighbouring authorities, to address strategic connectivity and social infrastructure issues.



Risborough Area Residents Association

professional planning naivety, and the way in which it is being forced upon an unwilling PR community, together and separately present as evidence that those preparing the Plan do not possess the expertise, experience, knowledge and competence to be undertaking Plan-making in accordance with the NPPF and as regards the core duties imposed upon Plan-makers. This must be a fundamental failure of governance by Wycombe District Council.



Local Plan Paras 1.25, 1.27 and Foreword p. xv para 3, NPPF 2012

See RARA's Appendices A - X

Acronyms used:	PRTC - Princes Risborough Town Council
WDC	- Wycombe District Council
LP	- Local Plan
PRTP	- Princes Risborough Town Plan
PR	- Princes Risborough
TWG	- Transport Working Group
SWG	- Sports Working Group
PINs	- Planning Inspector

3.1. Refusal to recognise the Localism aspects of and objection to the expansion proposals

- 3.1.1. The concept of 'Localism' (evidenced in the Localism Act 2011) must be one which is central to the Plan-makers considerations (NPPF 2012 refers). The principles behind Localism are neglected here in that a majority of residents in/around PR object in some form to the principle of the proposals, and that their objections are being rejected. Further, there is no evidence that significant numbers of current PR residents regard such proposals in a positive light.
- 3.1.2. RARA does not think the proposed Town Plan (as part of the wider WDC Local Plan) has been developed in a fair and balanced manner and has taken on board the views of the local residents and businesses. Consultation at its best has been to 'inform' rather than 'involve' and 'consult'.
- 3.1.3. It therefore brings forward the objection that the Local Plan is not legally compliant. It has not met the requirements set out in Section 20(5)a of the Planning and Compulsory Purchase Act (2004) in that it has not adopted the process of involving the community in line with WDC's 'Statement of Community Involvement - 2012' - **see Appendix B and B.1 'Appendix B' from within document**
- 3.1.4. To decide the PR scale of expansion three levels of engagement should have been applied, 'involving', 'consulting' and 'informing' as set out in the Appendix A. RARA is of the belief that 'involving' and 'consulting' has not been properly carried out and that WDC have merely 'informed' the PR community about the scale of development.



Risborough Area Residents Association

matter was superficial to satisfy process alone. The WDC Statement on Community Involvement emphasises;

'The key difference between the three is that if a decision has already been taken and there is no scope for change, the engagement type that we would follow would be 'informing', rather than 'involving' or 'consulting.'

What follows seeks to outline our concerns about this neglect of duty and legal compliance.

3.2. Public Consultation

- 3.2.1. The draft plan went out to public consultation in 2015 and a summary of comments were published in November 2016 following an overwhelming response from 3,000 people raising over 10,000 individual comments. The majority of these comments were critical of the plan and particularly the 'swamping effect' of the scale of the planned expansion of Princes Risborough. No attempt was made by WDC to use this feedback constructively to revise the scale of the plan or rethink the relief road based on this feedback.
- 3.2.2. Residents of Princes Risborough have not been consulted on the scale of the planned development. It has always been presented as a 'fait accompli' and as this representation demonstrates was pre-determined by WDC prior to any consultation. As far back as September 2014 the public were being asked leading questions, to which they would obviously be in favour. They should have been asked if doubling the size of the town was acceptable. It is government policy to give localism a voice, this hasn't been done here. Every effort has been made to stifle debate and force the plan through.
- 3.2.3. Consultation by WDC and Princes Risborough Town Council (PRTC) has been restricted to low key exhibitions prior to the draft consultation and it was only recently, in July 2017, that RARA successfully lobbied PRTC and WDC to hold an 'Open Meeting' to give residents a chance to express their views and about the Local Plan and implications for PR. This was an 'entry by ticket only' event which prevented some people from attending.
- 3.2.4. RARA has tried to fill the void of 'localism' which has been created by PRTC's poor engagement with the community. We have encouraged positive debate and enabled the community to have their say via our comprehensive website <http://risboroughresidents.org>, and social media with our active Facebook page etc. It is noteworthy that PRTC's own website <http://www.princesrisborough.com> shows little evidence of dialogue with the local community. Minutes of meetings pay lip service to the Town Plan despite it being the biggest event in this Market Town's History. Their original statement posted in 2015 has never been updated - **see Appendix C** - citing PRTC's preferred scale of expansion then for the town. This statement is much more in line with RARA's vision for the town



3.2.5. The Town Council statement written in 2015 states that:

'Princes Risborough Town Council (PRTC) is opposed to large scale development on the northern side of the Risborough – Aylesbury railway line, as proposed in the draft Local Plan.'

It further adds:

'It is PRTC's considered opinion that all the land from the base of the Chiltern Hills, which extends from the northern border of the Town and lies within Wycombe District, should be re-designated as AONB and/or Greenbelt in order to protect this beautiful countryside for the present and future benefit of all.'

And that:

'in the worst-case scenario, development be considered on land north of the railway line it would be imperative that the necessary infrastructure improvements, (including, but not exclusively, a western relief road, new primary school, new doctors' surgery and current town centre redevelopment/expansion within the existing commercial centre of The High Street, Duke Street, New Road, Horns Lane and Bell Street), are implemented alongside any housing development. Furthermore, PRTC insist that it should play a key role in all matters relating to any development, including allocation of housing.'

3.2.6. In the recent Extraordinary meeting held on 14th November 2017, the Town Council debated their response to the plan. The statement above was included with their response, the fact that they were debating their 'worst case scenario' was not mentioned by the mayor Cllr Matt Walsh. A pre-prepared statement supporting the plan was given to the councillors, which many had not had time to review beforehand. This was approved with minor amendments.

3.2.7. Ironically, the PRTC's statement evolved from proper engagement with the community and is based upon findings in the Tibbalds Report 2014.

3.2.8. The Tibbalds Report, December 2014 - **Appendix D** - was commissioned by WDC 3 years ago to explore the potential expansion of Princes Risborough for the New Local Plan, against the three main options put forward by WDC:

- Low growth (600 homes)
- Medium growth (1,000 homes; and
- Very major expansion (2,000 - 2,500) homes



Risborough Area Residents Association

(p.3/8). Strong local opinion wanted PR to retain its market town character, close connections to the rural surroundings, role as an important centre for nearby villages and ensure existing features of the town are maintained for the future. It identifies 11 key issues for planning to address before expansion can be properly considered. The quantum leap from the community vision in the Tibbalds Report to where we are now bears little resemblance and worryingly many of the 11 key issues (expanded upon later in this representation) have been either ignored or unresolved leading to this unsustainable scale of expansion for Risborough within the LP.

- 3.2.10. Since 2015, RARA has worked hard to try to engage with the Town and District Council to work together to help shape the plan for the town. At a Steering Group meeting last year, RARA's Chairman requested an honest and frank meeting with Cllr. Johncock, Cabinet Portfolio Holder for Planning, to discuss the effect of 2,600 homes on the town and the opportunity to explore alternatives. He told her this was not possible and the scale of expansion of PR was non-negotiable as it had always been planned. This was reiterated at the public meeting in July 2017 by one of WDC's Senior Planners in answer to a direct question from RARA as to 'what evidence does WDC have that the numbers of homes had been properly consulted on?' who said publically:

'...no consultation on this scale of development had taken place'.

From this evidence, the decision to offload a quarter of WDC's housing allocation clearly was pre-determined and any consultations undertaken in respect of this were superficial.

- 3.2.11. RARA members also attended and presented a briefing paper for debate at local Parish Council Meetings during 2017 for Bledlow-cum-Saunderton and the Kimbles (we are still waiting to meet with Lacey Green and Longwick Parish Councils). This was to encourage engagement with the smaller surrounding settlements to build synergy of understanding of the sustainability issues which would impact on everyone.
See Appendix E

3.3. Princes Risborough Town Council and the Steering Group

- 3.3.1. The Town Council has failed to work independently and objectively throughout to listen to and apply the views of its electorate. Instead, it has aligned itself with WDC to fully support the scale of expansion and the relief road without question. The PRTC's aforementioned 'worst case scenario' option for the town has been fully realised by being an accomplice in supporting WDC's diktats.



Risborough Area Residents Association

Portfolio Holder for Planning whilst remaining a member of the Steering Group despite this conflict of interest. A consistent member of the Steering Group was the aforementioned WDC Cabinet Portfolio Holder for Planning Cllr. Johncock, who was a dominant member, accompanied by his Head of Planning Penelope Tollitt and other Senior Planners. These officials and professionals often outnumbered the community representatives and prevented the group from developing the plan in a fair and balanced manner - a core principle of planning within the NPPF (Para 17) which states should:

'..be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'.

3.3.3. We understand from widespread research a steering group should be made up of local representatives with the District Planning Officers acting as experts. It should not be led by the Deputy Cabinet Member for Planning and contain the Head of Planning as a member. This is a clear conflict of interest. It demonstrates the Steering Group was composed and led in the direction the Wycombe politicians wanted. A majority of the community members were ill-prepared to challenge any of these senior officers and councillors especially at the start of the process. None of the community members and a majority of the Town Council members had any skills in planning. With the lack of guidance from the WDC planners the Steering Group was effectively forcibly led by the WDC members to rubber stamp the decisions.

3.3.4. Over the last two years a number of councillors have resigned from the council over the stifling of any debate on the issue of the plan. The Town Council magazine has never been clear to the residents about the massive scale of the expansion. With any expansion on this scale it should be the Town Council's duty to consult with all of the resident population through a referendum, which has recently taken place in Chinnor and Oxfordshire. The Town Council is clearly concerned that the vote would go against the expansion and will not let this happen. They are not reflecting the views of the electorate, and are failing in their duties as councillors.

3.3.5. The Town Council is dominated by the 3 Wycombe District councillors, one of whom, Alan Turner is the aforementioned Deputy Cabinet Member for Planning. Both Alan Turner and Gary Hall were originally elected as Independents, as the pressure to push the plan through increased last year they have both now joined the Conservative group and sit on the cabinet at WDC see **Appendix T**.

3.3.6. At the point of the first Steering Group meeting in 2015, the plan was already pre-determined, the housing numbers and the route of the road already planned based on preliminary studies in 2013/4. No critical alterations or suggestions from the community members have ever been accepted. In fact, a number of members failed to attend or resigned from



Risborough Area Residents Association

constructive and open discourse. The minutes of the penultimate Steering Group meeting in June 2017 - **Appendix F** - show just 3 members of the community in attendance who were not elected officials or professional planners. This was a common pattern during the course of 2016/17. These members felt their views were not being listened to by WDC and the town plan was pre-determined and a fait accompli - so what difference could they make? The Steering Group was formed for one reason which was to give the planning process a veneer of local involvement.

- 3.3.7. The Steering Group was asked to make only one key decision, which was the route of the relief road. The group, including the Town Councillors agreed that this road should be an outer relief road, built around Risborough, joining the A4010 south of the town. This is also in line with the public consultation. However, the final decision of the SG and the wishes of the public were ignored by the WDC planners in favour of a cheaper alternative through Summerleys Road.
- 3.3.8. The Steering Group formed only two working groups to inform its decisions 1) The Transport Working Group (TWG) 2) The Sports Working Group (SWG).
- 3.3.9. The TWG dealt with the roads and rail scenario. This group worked on a detailed basis guided by the planners. However, no attention was paid to strong views about the relief road following the wrong route and merely acting as a service road.
- 3.3.10. The SWG only met twice in the latter stages of the Steering Group and once the draft plan was in place and lacked any detail. It had no impact i.e. buffer zones already identified as playing fields were supported despite car journeys being required for most of their users.
- 3.3.11. No working groups were created for important issues such as:
- Education
 - Health and Wellbeing
 - Employment
 - Environment
 - Improvement to the Town Centre - shops, parking etc.
- 3.3.12. The Steering Group was seriously flawed in respect of gender and age. The only female representation was the Chairperson of RARA for the latter stage of the steering Group meetings. Walking round Princes Risborough it is very difficult to believe the views of circa half the population had been adequately represented.
- 3.3.13. The lack of any consultees under the age of 40, no representatives of local employers were included. The panel principally comprised non-resident planners and a Town Mayor who lives in Hazlemere many miles from Princes Risborough.



Risborough Area Residents Association

community, a far cry from the Hibbalds Report which was grounded in community engagement. It was steered by the experts and local politicians to realise pre-determined decisions of scale to meet WDC's numbers ignoring the core principle of sustainability.

3.3.15. At the last meeting of the Steering Group a statement by current and former members was submitted expressing concern about the lack of community involvement in shaping the plan. Members stated:

*'...serious concern about the manner in which the Steering Group has worked and its failure to provide a relevant voice to shape the Princes Risborough Town Plan as part of WDC's Local Plan...On many key areas, the Steering Group has been **informed** of 'the answer' at the expense of working creatively to find ways to improve and enhance Princes Risborough. There was no real intention to empower local people to shape their environment but rather a pre-determined strategy to create the facade of consultation and localism to ensure a quarter of the district's OAN and accompanying road could be driven through.'* **Appendix G.**

3.4. RARA's Petition and Wycombe District Council

3.4.1. As mentioned, RARA has been the only effective opposition to the plan and has been doing the job of the Town Council in challenging decisions which are clearly against the well-being of the townspeople and the very existence of Risborough in its current form.

3.4.2. In being unable to bring about a proper dialogue with PRTC and generate the same within the Steering Group, a petition was started by RARA in 2017 to try to engage WDC in a responsible conversation. This was submitted to WDC on 3rd April 2017 - see **Appendix H** - for the presentation given by RARA to the WDC full council.

3.4.3. This petition - see **Appendix A** - asked WDC to:

- reconsider its plan for Princes Risborough, and propose a lower scale of development;
- investigate better solutions for the Wycombe District that makes better use of available land;
- fully consult with local residents on future proposals and act on their views and feedback.

3.4.4. To date, the petition had reached over 4,300 signatures and In line with WDC's Democratic Policy, its size triggered a debate at Cabinet level on 5th June 2017 and RARA was invited - **Appendix I** - to give a presentation - **Appendix J**. This was summarily dismissed by Cllr. Johncock as 'nimbyism' in the full council session. RARA was not given any opportunity to take part in the debate after giving their 5-minute presentation. Despite a member of the Council asking Cllr Johncock if he felt residents of PR had



Risborough Area Residents Association

3.4.4. The petition did not have an answer. It was decided that the petition be noted by the Cabinet and no further action would be taken.

3.4.5. The size of the petition provided RARA with the opportunity to meet with our MP John Bercow who indicated the scale of the expansion was unusually large and was able to directly forward our concerns to Sajid Javid. This was presented as a consultation response by RARA for the White Paper published in Feb/March 2017 'Planning for the right homes in the right places' **Appendix V**.

3.4.6. In trying to work with WDC, RARA believed they could collaborate to realise positive changes before the plan was submitted to the PIN. Believing we had been tolerated rather than listened to by WDC, RARA engaged in further correspondence with the Leader of the Council, Katrina Wood to request a meeting which she deemed 'would not be of benefit' - see **Appendices K, L and M** for correspondence. In this correspondence, RARA again reiterated the lack of consultation on the scale of the town expansion which she refuted.

3.4.7. RARA has been proactive in raising awareness regularly consulting with the local community. It has held meetings and drop-ins to provide up to date information see **Appendix U** to enable people to share their views. It meets regularly as a wider group where many attendees are chairs and leaders of local residents' groups and interested parties. To harness community feedback, RARA set to work in August and September of 2017 to look at how it could bring together a template for a better Town Plan. To this effect, wider group members were asked to contribute their views and suggested alternatives can be found in the document 'Principles for a Better Town Plan' - **Appendix W**.

3.4.8. During October and November 2017 we have engaged with the local community about the Final Consultation. We have encouraged people to write to the PINs to be heard and stressed the importance of the independent role of the Planning Inspector. **(see Appendix N)**. PRTC have been very quiet and have not promoted this consultation as a real opportunity for the local community to have their voice heard. RARA are keen that all stakeholders and those that care deeply about the future of their town and its sustainability are able to express their views in the hope that finally they will be heard and acted upon.

3.



4.1. Consideration of Reasonable Alternatives

Relating to LP Section 3, 4, CP1 and CP2, and section 5.3

4.1.1. Government Relief

It is recognised that the District has many restrictions and constraints on use of land, but in these circumstances a Council struggling to meet its target, should have asked the government for dispensation to reduce its Objectively Assessed Need. There is no evidence in the Plan that this has been done. When challenged on this, on many occasions, WDC's Head of Planning has denied such a procedure exists, so it is certain this procedure has not been explored. (See Legal Compliance, Sec 3)

4.1.2. Recent Housing Growth

We would like to correct a clear misrepresentation that the LP makes about Princes Risborough and the surrounding areas historic housing growth. In para 5.3.4 (page 163), it is stated that Risborough has not grown significantly in the last 40 years, and that growth in the period 2001-11 was half that of the rest of the District. Between a quarter and third of the homes in Risborough have been created in the last forty years and have been assimilated very successfully. This is a growth slightly above the national average and well above the median of the country. Wycombe have stated that they mean it has not grown beyond its natural boundary; on that argument, since the creation of the Green Belt, London, Manchester, Birmingham, Leeds and Liverpool have not grown for 60 years. In their review of options for Risborough carried out in 2013 WDC admit that housing growth in the period 2006-2012 was 20% greater than the rest of the District, proving that with minor adjustments to the period, the figures show a very different picture.

4.1.3. Predetermination

Initially we have been told that there is no other area to build in the district apart from the Risborough area, hence why so many homes have been targeted for here. This level of build has been described as disproportionate by our MP the Rt. Hon John Bercow and unsustainable by the CPRE. From GL Hearn's report in August 2016 (commissioned by AVDC) a top down review of Wycombe's emerging Local Plan was carried out. It must be noted that GL Hearn recognised a number of areas in the Wycombe District that could take more building, including Princes Risborough, however, the only sites that WDC pursued were here and the neighbouring parish of Kimble. (See Legal Compliance, section3, LP policy RUR6)

4.1.4. Poor Estimation of 'Windfalls'

The current government consultation is titled the 'right homes in the right places', not 'build a lot of houses'.

In the Local Plan's introduction WDC make it clear that the 'right place' is in the south of the District. But, about 45% of the full allocation is to be built in the north of the District or transferred as unmet need to Aylesbury Vale. GL Hearn's report



Risborough Area Residents Association

in 2000 and 2007). They argued that a longer period that evens out the effect of troughs and peaks would provide a more accurate estimate. This simple adjustment would increase the windfall figure by 200 houses and present a more accurate view of the district housing spread.

4.1.5. Incremental increase to settlements

The incremental and equal expansion of all settlements within the District and correlating identified residential sites with economic and employment sites must surely be the starting point for any fair and appropriate Plan. The Plan presented by WDC shows no evidence of this correlation and in fact highlights employment areas with very low residential options (Marlow, Stokenchurch etc.) and areas such as PR with very high residential allocations and poor employment opportunities. This disparity leads to increased and unnecessary travel (road and rail movements) entirely at odds with any definition of sustainability. Should WDC not be able to reduce their OAN with Central Government, then a better attempt to correlate Homes and Jobs must be the next alternative. (See 4.5 AONB and Sustainability)

4.1.6. Housing Density (incl. Reserve Sites)

GL Hearn also questioned the density figures for housing in the WDC Reserve Sites. These sites do have restrictions and less than half the area is suitable for building, but this should then mean that this land is used most efficiently. These reserve sites are in an enclave within the Green Belt and as well as controlling sprawl this in turn ensures efficient use as urban land. The Local Plan only provides indicative figures, but also three different numbers, table 4: 1,755; table 11: 1,635, and the individual sites, add up to 1,595. Nowhere is the density of these sites shown. You have to go back to WDC's initial assessment on the sites in 2013 to see that housing density was around 30 houses per hectare - close to or below the government's minimum expectation. This is significantly lower than the density expected in the PR expansion zone which also includes land set aside for schools and a road!

As a rural Market Town, Risborough currently has a much lower existing density of housing than those around the reserve sites and we are in the setting of the AONB, therefore consistency would demand that a higher density of houses should be built in the reserve sites. Nowhere in the Plan has such a low density in the reserve sites been justified (Localism act 2011 requirement). It must be noted that an additional site next to Abbey Barn North was found which will provide another 30 houses. This has been used to reduce the houses built in Abbey Barn North, in a District struggling to reach its housing target this would appear to be an unaffordable luxury.

4.1.7. Green Belt and AONB

It is notable that Wycombe has proportionally one of the lowest usages of the Green Belt (and one of the highest unmet needs) in the country. For example it is about a tenth that of Aylesbury DC where WDC's unmet need is being 'met'. Wycombe District Councillors have said that Stokenchurch is an area whose social and economic potential is being held back because of the land restrictions. The policy on both Green Belt and AONB is that local economic and social needs are circumstances for which these restrictions can be overridden.



Risborough Area Residents Association

4.1.2.47. For a town of 15,000 people to only build 4.5 homes per year for 20 years is unsustainable and will seriously damage the social and economic well-being of this town. (See also AONB and Sustainability, 4.5). It is noted that 4 substantial sites around Marlow were turned down in Wycombe's individual Green Belt review, all of which could give it the influx of new housing opportunities it needs.

In Hazlemere, a Green Belt site that straddled the Council boundary with Chiltern DC was identified by Chiltern DC as being acceptable for altering of the Green Belt. This was refused by WDC. This illustrates some areas where development should be carried out for many local benefits and within the intention and purpose of AONB and Green Belt legislation. These options warrant and require further investigation with an open mind to ensure a fairer distribution of housing.

These options and examples show that the Local Plan is not the most appropriate strategy, therefore not positively prepared and justified. Many of the problems with sustainability and viability around Risborough will be by reduction in the number of homes here and the scale of development proposed against the economic backdrop. The above show this is not impossible, and that there are a lot of wasted opportunities in the South of the District where, as WDC acknowledge, it is more appropriate to build.

4.1.8. Reducing traffic movements

The first review of options produced by Wycombe district in 2013 recognised that there was little potential for new business space, even with a significant, larger town. This scale of growth cannot be done without providing the economic development required and by providing infrastructure and transport links to make this happen and make PR attractive to employers. As the Tibbalds sustainability report (Appendix D) also mentioned, most new residents of this development would have to commute. This would provide a tidal wave of extra traffic onto a transport system that is currently overwhelmed. (see 4.3 Relief Road; 5, Duty to Co-operate, LP policy PR7). It seems staggering that WDC have ignored their own Planning advice and proceeded with the PR expansion plan regardless of this (and of the Town and Country Act). We also note that the proposed illustration of the larger proposed expansion zone, in the 2013 report, is the same as the final master plan now produced. That the proposed route of a relief road (apart from one part at the Southern end) is the one now being proposed, despite the unified opposition in the Steering Group to this route, must raise the question of pre-determination. And that correlating Homes, Jobs, Infrastructure and Interconnections have not been adequately developed by WDC in preparing their Plan.

4.2



- 4.2.1. The National Planning Policy Framework (NPPF) says that: 'Great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty.' Government policy also allows housing targets to be lower in designated areas and recommends that 'major developments', including housing schemes, should be refused except in 'exceptional circumstances'.
- 4.2.2. Chapter 3 of Wycombe District Council's Local Plan sets out a number of strategic objectives. The first of these, Cherish the Chilterns, states that "...conserving and enhancing the natural beauty of the landscape of the AONB is [...] central to the strategy of the Local Plan." They then go on to say "...this objective is not just about the part of the hills that are designated as AONB: it is about valuing the heritage and influence of the hills throughout the District"
- 4.2.3. Government planning rules state that councils should reduce their housing numbers if faced with significant constraints, and a number of councils around the country have done just this. In fact, 24 councils with significant AONB, Green Belt and unique landscape areas, have agreed their local plans with significantly reduced housing targets - see CPRE table of 24 councils with successfully reduced OAN. **Appendix S**
- 4.2.4. Despite Wycombe District being heavily constrained by AONB, Green Belt and areas of unique Chilterns landscape, WDC have committed themselves to a housing target which they are unable to deliver in a legally compliant and sustainable way, when there are alternative locations which, while designated, offer more sustainable opportunities for development and growth.
- 4.2.5. RARA has frequently challenged Wycombe District Council's Objectively Assessed Need on the basis that it has not been modified to take account of the considerable policy constraints and, as a consequence the local plan fails to meet its strategic objective of 'Cherishing the Chilterns'. At the Steering Group Meeting in June 2017, the Chair of RARA asked yet again as to whether an application to the government had been made to reduce OAN due to constraint - this is noted in the SG minutes under AOB - **Appendix F**. This question was repeated at the Public Meeting in July 2017 and again at the last Steering Group Meeting on 22nd November 2017. Here Penelope Tollitt finally answered and was emphatic that she was not aware such a planning rule existed for councils to seek a reduction in OAN due to constraint - see 4.1.3 above. She was disbelieving and asked for evidence of the 24 councils who had successfully done this which RARA has sent her prior to submitting this representation.
- 4.2.6. RARA is dismayed and incredulous that the Head of Planning for WDC, who has consistently avoided and 'fudged' this question, since as early as 2015, has not demonstrated essential planning knowledge and competence for all options and alternatives to be properly considered to realise the most



Risborough Area Residents Association



Applicable Plan Policy references include: PR3, PR6, PR7, PR8, PR11, PR12, PR16, and PR17

- 4.3.1. The Plan states that 'Major new road infrastructure in the form of a relief road would be required in the context of any expansion of the town.' A sweeping statement that we believe has not been properly substantiated in the Plan. The proposal being put forward is neither sound, legally compliant or shows little sign of co-operation with relevant stakeholders.
- 4.3.2. The route of the road is from Grove Lane, following the B4009 until midway between Meadle and Longwick. It then sweeps through the expansion area, coming out onto Summerleys Road, passing between Blanchfords commercial premises and the railway station. From Picts Lane it crosses Culverton Farm land to the A4010. It cuts through agricultural land, the AONB, Green Belt and various flood zone areas. According to WDC the road will relieve congestion and provide better access to the station – their own modelling report produced by Jacobs (May 2017) contradicts this.
- 4.3.3. The choice and design of the route has history. Jacobs was commissioned in 2015 to investigate options. Surprisingly the first option in any hierarchy of sustainable solutions, the 'do nothing option' - making better use of existing infrastructure, was not part of Jacobs brief. Jacobs analysed over 20 options and the three shortlisted were published in the 2016 draft plan. Jacobs was relieved of its brief in 2016, and DRF consulting engineers (DRF) appointed. DRF was asked to look at new options through the Culverton Farm land, and to compare these with Jacobs '11b' option - along Shootacre Lane and Picts Lane. This new 'Culverton' route has resulted. There is no rationale given - that we can find, on the decision making process behind this choice.
- 4.3.4. WDC has always maintained that cost was a driver, and for this reason the wider bypass option 17 - at an extra cost of c£20m and favoured by the Town Council and Steering Group, was ruled out. The Steering Group feedback to WDC on the Town Plan consultation in March 2016 stated:
- 4.3.5. *'Route option 17 is by far our preferred road option for relieving traffic from the town and A4010. It provides a more efficient route alignment and an appropriate and workable access to the expanded Princes Estate, which is not achieved at all by route option 11. Therefore the majority consensus view of the steering group is that option 17 is the only option that comprehensively contributes towards achieving the town vision (e.g. making PR an accessible town) and should therefore be taken forward in the final plan with the required level of funding and commitment from WDC, BCC and the LEP.'*
- 4.3.6. DRF in their Feasibility Review (Sept 2017) don't come to any conclusion on the best of the options they reviewed but state in relation to



Risborough Area Residents Association

£6,000m / plus other costs not included then the Jacobs 11b option is by far the cheapest. The Princes Risborough Expansion - Viability Report (Mar 2017) concludes that *'The costs of known infrastructure and planning obligations associated with the Princes Risborough expansion amount to £67.25m.'* and goes on to state that the scale of housing development proposed can easily accommodate these costs and still generate a *'cumulative project surplus / headroom of almost £70m'*. Clearly should the scale of housing proposed go ahead then all road options considered by Jacobs are affordable – including option 17, so cost cannot be the driver for the chosen option.



View from Brush Hill Nature Reserve and the Ridgeway National Trail - indicative route of relief road (and lighting) at the A4010 junction. Through agricultural land, Green Belt and AONB.

4.3.7. Petitions and consultation responses have been submitted objecting to the current proposals. The summary of the Local Plan responses to the August 2016 consultation indicated that 476 objections were received (when the two petitions regarding the relief road from the Wake up Risborough Group (WURG) and Summerleys Road Residents Group are included) against 6 in support. This also mirrors feedback from a town meeting facilitated by the Risborough Area Residents Association where 250 people said they were against the road with one person in support. And the RARA petition representing more than 50% of the town called for a better town plan. We believe that it is reasonable to say that the relief road proposal is not driven or supported by the community and certainly doesn't have the support that WDC would like to claim.

4.3.8. We also wonder what impact the Picts Mede development on Picts Lane has on the proposal. We note from the Princes Risborough Expansion - Viability Report (March 2017), with regard to the allowance for claims associated with the new relief road *'The figure does not include potential claims from the Picts Mede development which is currently in the process of being developed out. They may be added but can't be assessed until they are sold.'* This statement requires clarification. A freedom of information request on the subject has resulted in an evasive response. Does this mean that if the developer has to reduce house prices, because of the road development, we the tax payer incur this cost directly or indirectly? Will the same rules apply for homeowners similarly affected along the route?

4.3.9. WDC want to build 58 new homes in Green Belt land behind Poppy Road. Issues keep coming to light with regard to this proposal and the number of



Risborough Area Residents Association

Culverton route proposal for the Relief Road is needed to gain access to this site. We believe that this is the main driver for the proposed route of the relief road. We cannot accept that the need to construct 58 new homes (in Green Belt) can justify what is according to the Plan, 'Major new road infrastructure in the form of a relief road' development in farm land, Green Belt and AONB. The National Planning Policy Framework (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. This is not in the public interest.

- 4.3.10. The Relief Road, Southern Options, Ecological Appraisal (Aug 2017), points out that the Culverton arable field is '*within the Bird Conservation Targeting Project (BCTP) for declining and rare farmland birds*'. It also notes the presence in the area of various rare butterflies, including the endangered Duke of Burgundy butterfly. All would be at risk. The Green Belt Assessment Part 2 (July 2016) notes that the Culverton field has very long distance landscape views, and is well connected to the wider countryside. The site has a strong, unspoilt rural character and because of '*its visual exposure in short- and long-distance views, and its contribution to the amenity of the AONB and a National Trail, the site has a very low capacity for development*.' In addition visual intrusion caused by the introduction of new transport corridors and associated loss of tranquillity through the introduction of lighting, noise and traffic movement can only have a negative impact.
- 4.3.11. An outcome of the proposed road is the creation of a congested and dangerous situation at the railway station, with HGV traffic being diverted in to this hub. According to the report on Preliminary Phasing Strategy Modelling (May 2017), the traffic on Poppy Road will have increased at the end of the development '*the result of increased delay at junctions in the vicinity of the railway station access*.' Not exactly a sound outcome or one that is going to encourage more rail commuters.
- 4.3.12. The Steering Group feedback to WDC on the town plan consultation in March 2016 noted that the relief road proposal was '*effectively still a route through the heart of the town and a new housing estate*'. It also pointed out that it was tying up valuable brownfield land at the station that could be used for housing development. The Steering Group minutes of their January 2017 meeting highlights the dangerous situation for pedestrians and cyclists that has been created by the unusual 'T' type junction on Picts Lane.
- 4.3.13. The road will have to be realigned vertically along Summerleys Road, to allow heavy goods vehicle traffic to pass under the railway bridge, all adding to the flooding risk in this area.
- 4.3.14. Most of the road and hard asphalt surfacing will be visible from vantage points in the AONB. The main expansion area is in the setting of the AONB and the road is in direct line of sight from Whiteleaf Cross. The



Risborough Area Residents Association

with and clauses 115 and 116. Exceptional circumstances must be demonstrated, to justify harming the environment, the landscape and more.

4.3.15. No consideration has been given to the effects of new development elsewhere and the resultant effects of the decant of vehicles to adjacent communities and the effect of infrastructure at those geographical points. It also doesn't account for the effects of the construction of the HS2 link, which will cause serious disruption to infrastructure over the Plan period.

4.3.16. A major disappointment is the lack of any strategic alignment with the wider transport network and little sign of co-operation at an appropriate level with relevant stakeholders such as Bucks County Council (BCC). We need to take traffic off the A4010 between Aylesbury and High Wycombe (40% of traffic is through traffic) because of congestion at either end, not add to it. The Plan says discussions with BCC are only at an 'early stage'. BCC has always maintained that there is no solution to the traffic congestion on the A4010 at West Wycombe.

4.3.17. The negative impacts of the relief road proposal are considerable;

- It is not the most sustainable, cost efficient or transport efficient solution
- It is not in the public interest – with little support if any, in the local community
- Harms our Green Belt and our AONB – including the views to and from the AONB
- Will result in a congested and dangerous situation at the railway station
- Damage the environment – including risk of flooding on Summerleys road and surrounding area
- Loss of gardens and drive way access to residents of Summerleys road
- Ties up valuable brown field land at the station that could be used for housing
- Destroys existing recreational activity that takes place on the various lanes affected (the Steering Group minutes of the June 2016 highlight this) – for walkers, joggers, cyclists and horse riders
- Further exacerbates the already congested A4010 at West Wycombe.
- Results in inappropriate and unworkable access to the expanded Princes Estate
- Additional negative impacts from the expansion of neighbouring communities and associated infrastructure needs have not been considered.

4.3.18. The relief road proposal isn't sound, sustainable or legally compliant. There is no need to inflict this pain on Princes Risborough – as national planning policy makes clear. There is a need to look at more sustainable alternatives before one contemplates doing so – as the law makes quite clear.



Risborough Area Residents Association

to AONB settings, failure to preserve and enhance conservation areas and the AONB. (E.g. Kent International Gateway). We feel that the current proposal should meet the same fate.

4.3.20. Suggestions for Change

- For a sustainable solution we should be looking at making better use of our existing transport infrastructure. More imaginative 'smart' solutions that are being adopted by others including Highways England. Routemaster cameras in the town linked to Sat Nav systems. Providing commuters with more information on traffic information allowing them to make informed decisions and change their mode or time of travel.
- Traffic congestion in the town is on weekdays, during the morning and evening rush hour. At this time we could direct south west bound traffic from Aylesbury onto the B4009 - We understand the railway bridge at Grove Lane has to be replaced in any case for HS2 traffic. Non HGV traffic heading north from High Wycombe could be encouraged to use Shootacre Lane and Picts Lane – with sensitive lane upgrades. There is ample capacity for widening of these lanes by up to 2 metres without any land acquisition or disturbance to existing hedgerows.
- More use could be made of lower speed limits in the town. It is good to see some extra 20mph speed limits proposed. We should go further, for example along Picts Lane and around the Station area.
- We should be looking at a more sustainable and incremental approach. If population growth through time requires additional new capacity then the ring road promoted in the past by the Town Council and Steering Group should be considered, with proper community consultation.
- The answer is not a black belt of asphalt going through prime agricultural land, Green Belt and AONB, creating a safety issue at the railway station, and could, according to the Lepus report (2016), '*divert traffic that may otherwise stop and spend money in Princes Risborough town*'. We should be minimizing adverse impacts on the setting of the AONB through avoidance in the first place. Our lanes are an important source of recreation for walkers, joggers, cyclists and horse riders. These should be protected not destroyed.



Risborough Area Residents Association



Risborough Area Residents Association

Note: Applicable Plan Policy references include: PR3, PR6, PR7, PR11, and PR13.

4.4.1. The Plan is proposing 2,650 new homes for Princes Risborough almost doubling the size of the town. This includes 2,357 new homes to the west of the town beyond the railway line. We do not consider that this is sustainable or deliverable. The need for more new homes we accept – in particular affordable homes. However the proposals in this Plan are not sound planning, legally compliant or embrace the duty to co-operate.

4.4.2. The Government Housing White paper (Feb. 2017) raised a number of issues including the recognition that planning approvals are not being implemented by developers and that developers are reneging on affordable housing. The Conservative manifesto promised more '*high density housing*' whilst '*maintaining the existing strong protections on designated land like the Green Belt, National Parks and Areas of Outstanding Natural Beauty (AONB).*' It also promised to rebalance housing growth across the country.



4.4.3. The outcome of the consultations on the Housing White Paper and the follow up paper, 'Planning for the right homes in the right places' (Sept. 2017) is expected to be known in the spring of 2018. There is a desire in the White Paper to support higher-density housing in urban locations that are well served by public transport.

In locations that '*provide scope to replace or build over low-density uses (such as retail warehouses, lock-ups and car parks); or 'where buildings can be extended upwards by using the 'airspace' above them*'. This all makes us question if WDC's current 'Objectively Assessed Need' for housing in the District is joined up with the rebalancing of growth and need across the country?

4.4.4. A report by the Community Infrastructure Levy (CIL) Review Team (Oct. 2016) flagged up that CIL revenue from new homes has been much less than anticipated and infrastructure has not always been forthcoming. Therefore we are naturally wary that promised schools, public realm works etc. as suggested in the Plan will not be forthcoming. More assurances are required in this regard.

4.4.5. The Plan recognises the need to develop the land fronting New Road (Back Lane) in Princes Risborough. The area is unsightly, but we believe the Plan is missing an opportunity here. All the focus is on creating more commercial space in the town centre. Why not create both commercial



Risborough Area Residents Association

residential above. And why not be a bit more innovative and switch to underground car parking, not a difficult technical challenge – the Tesco car park is partly below ground level? More imagination is required by WDC if we want to create the vibrant town centre we need.

4.4.6. On a similar theme the Plan states that not all of the new homes will be within walking distance of the town. We think this is a mistake. Forcing people into cars and buses will only result in them going elsewhere to shop and socialise.

4.4.7. A major problem with regard to the siting of the new homes and infrastructure is the risk of flooding. The Princes Risborough Expansion Viability Report (March 2017) states, *'Parts of the expansion area are vulnerable to surface water flooding. There is also a risk of ground water flooding as the water table is close to the ground surface and due to the geology the expansion area is also prone to springs.'* The Plan notes the need for a *'comprehensive assessment of local sources of flooding including ordinary watercourses, surface water and groundwater flooding across the expansion area'*. It begs the question, why has this not been done sooner, it is after all a well-known issue. The feedback our members are getting from the Environment Agency is that they don't know what the implications will be of both the new housing and the relief road with regard to flooding. This is not sound or sustainable planning.

4.4.8. 58 homes are proposed in Green Belt land behind Poppy Road (PR11) – considerably less than WDC originally envisaged. If WDC hasn't done its homework with regard to flooding in the area west of the town, it certainly hasn't with regard to this site. There are flooding and drainage issues and a rare chalk stream - Pyrtle Brook. The Chilterns has 80% of the world's chalk streams - they provide a home for a variety of water plants, insects and animals, and there is an increasing awareness of the need to protect these beautiful and diverse ecosystems. There are active badger setts and this area is a haven of wild life. Access from the Wycombe Road is considered dangerous and access from the proposed Relief Road involves

going
across



Chalk stream, ecosystems, wildlife, badger setts and more, behind Poppy Road

agricultural land, Green Belt, the AONB and Pyrtle Brook. To remove land from Green Belt requires evidence of *'exceptional circumstances'*. We do not consider that there is any such evidence. This proposal is not in the public interest. We also question the capacity to even fit 58 new homes into this site with the constraints that exist and believe this number is



Risborough Area Residents Association

4.4.9. The Draft Princes Risborough Town Plan Consultation Feedback Report (Nov. 2016) noted that the *'Impacts on the setting of the Chilterns AONB were a concern'*. Recently a housing development at the Molins Site in Saunderton was turned down by The Secretary Of State. The reasons included the significant harm to the AONB and *'The very special circumstances that would be necessary to outweigh the harm to the green belt would not exist to justify the development.'* We consider the Green Belt and AONB to be important issues that have not been properly considered or addressed in the Plan.

4.4.10. The Rt Hon Sajid Javid MP Secretary of State for Communities and Local Government stated in, 'Planning for the right homes in the right places (Sept. 2017)', *'most of us are willing to welcome new homes if they're well-designed, built in the right places, and are planned with the co-operation of the local community.'* In a similar vein, Tom Fyans, Director at the Campaign to Protect Rural England (CPRE), said recently (Oct. 2017), *'we have to build more genuinely affordable homes, make the most of wasted brownfield sites and force developers to build the right mix of housing across the country.'*

We agree with both individuals.

4.4.11. Suggestions for change

- We need the right homes in the right places - we need to free up brownfield sites, and protect existing Green Belt and prime agricultural land.
- Work with existing commercial businesses on New Road to facilitate their location to the industrial areas – free these areas all within walking distance of the town centre for affordable homes
- Identify other potential brownfield sites and facilitate relocation / redevelopment e.g. Fire station site and Blanchfords
- Focus on building more 1-2 bedroom affordable homes that are needed for our young people
- Match homes to jobs, healthcare, education, infrastructure and leisure facilities
- Adopt an incremental approach involving and reviewing every 3 years with the local community – with key performance indicators on Plan delivery.
- Firm assurances with regard to the provision and timing of delivery of promised schools, public realm works etc. as suggested in the Plan.
- We need consistency across the district with regard to citing of new homes in areas of high flood risk – and this flood risk needs to be further



Risborough Area Residents Association

We need a sound, legally compliant and sustainable plan. If WDC is serious about protecting our AONB and creating a sustainable plan then start with the established wildlife area behind Poppy Road - and provide a 'breath of fresh air' for the local community. We propose this area remains within Green Belt, with no new homes, and is turned into one of the 'pocket parks' proposed in the 2015 Conservative manifesto. More imagination and effort is required in identifying the 'right places'.



Applicable Plan Policy references include: PR6, PR7, PR8, PR11 and PR16

4.5.1. Introduction

4.5.1.1. The distinctive character and natural beauty of Areas of Outstanding Natural Beauty (AONBs) make them some of the most special and loved places in England. We believe that Princes Risborough is the 'Gateway to the Chilterns' AONB, partly within it and partly within its setting. Inextricably linked with our AONB is sustainability. Paragraph 14 of the National Planning Policy Framework (NPPF) states that sustainability is the golden thread which runs throughout our planning system, and that all three pillars of sustainability must be met – social, economic and environmental.

4.5.1.2. We value our AONB and we want a sustainable plan that supports our growth ambitions for the town. As the largest and main area residents association for the area we also want to see genuine public engagement to ensure we have a plan that the local community is proud of and a plan that is in the best public interest. We feel the current Plan falls down with regard to soundness, legal compliance and co-operation in all of these areas.

4.5.2. AONB

4.5.2.1. The Chilterns AONB is beautiful. It is flower-rich, has arable and livestock farms managed with consideration for biodiversity and farmland birds. It has 85% of the world's chalk streams - a scarce habitat supporting a range of specialised wildlife. Not to forget the recreation, employment, tranquillity, health and wellbeing benefits it provides. It has an extensive public rights of way network so that local people and visitors can enjoy the beauty it provides.

4.5.2.2. We are pleased that the Government has made a clear commitment to protect AONBs. The Plan notes (P xviii) '*We can change Green Belt boundaries – but only in exceptional circumstances. The boundary of the AONB is set by Government.*' The NPPF policies at paragraphs 115 and 116 require great weight to be given to conserving landscape and scenic beauty. This applies to developments within the AONB and also in its setting, similarly the conservation of wildlife and cultural heritage. 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.

4.5.2.3. There are a lot of positive statements in the Plan, recognizing that (P 32) '*any allocation that would result in major development in the AONB would strongly conflict with the NPPF*', and for developments not considered major '*great weight should still be given to any*



Risborough Area Residents Association

within the town, particularly for young families, it is against the use of Green Belt/AONB for such developments'.

4.5.2.4. However WDC's Plan for 2650 new homes within the setting of the AONB (some in Green Belt), and according to the Plan *'Major new road infrastructure in the form of a relief road'* within the AONB and Green Belt, doesn't fit with the legislation and the good intentions expressed.

4.5.2.5. The Princes Risborough Expansion - Landscape Sensitivity and Capacity Study (Sept 2017) raises concerns. It *notes that 'Views across the town and wider countryside from the AONB are available from popular viewpoints on the Chiltern escarpment such as Whiteleaf Cross and from the Ridgeway National Trail'*. Going on to point out that with regard to, Park Mill Farm, the land north of Longwick Road, Mill Lane, Crowbrook stream, Alscot, and the Culverton area, views to and from the Chiltern escarpment are an important characteristic feature with risk of adverse impacts. With regard to Alscot it states *'Any development would either adversely impact on the conservation area or its setting or adversely affect the habitat value'*.



Views from Whiteleaf Cross towards Alscot and Longwick - never to be the same again? Photo courtesy of Tessa Davidson

4.5.2.6. The Relief Road, Southern Options, Ecological Appraisal (Aug 2017), points out that the Culverton arable field is *'within the Bird Conservation Targeting Project (BCTP) for declining and rare farmland birds'*. It also notes the presence in the area of various rare butterflies, including the endangered Duke of Burgundy butterfly. All would be at risk. The Green Belt Assessment Part 2 (July 2016) notes that the Culverton field has very long distance landscape views, and is well connected to the wider countryside. The site has a strong, unspoilt rural character and because of *'its visual exposure in short- and long-distance views, and its contribution to the amenity of the AONB and a National Trail, the site has a very low capacity for development.'* In addition visual intrusion caused by the introduction of new transport corridors and associated loss of tranquillity through the introduction of lighting, noise and traffic movement can only have a negative impact.



Culverton farm field from Icknield Way and the Ridgeway – AONB and Green Belt, soon to be tarmacked?

- 4.5.2.7. The proposed development behind Poppy Road, which is in Green Belt and adjacent to the AONB, impacts on the Pyrtle Spring a chalk headwater and as such a UK Biodiversity Action Plan (BAP) priority habitat. The relief road, further access road, and the planned housing development at this location would constitute major development in the AONB, which would be subject to further public interest tests under the NPPF. For up to 58 new homes (we suspect this area will not be able to accommodate this number) this area should not be taken out of Green Belt.
- 4.5.2.8. The Chilterns AONB setting is a major asset for the town, 10 million people live within an hour of the Chilterns. There is massive tourist potential.
- 4.5.2.9. There are a lot of cumulative negative impacts in the Plan and we don't believe it is sound, legally compliant or there has been sufficient co-operation with all interested stakeholders, in particular the local community.



4.5.3.1. We should be:

- Locating more of the homes close to existing buildings in the town, to avoid new expanses of development that are visible and out of context.
- Minimizing adverse impacts on the setting of the AONB through avoidance in the first place. Our lanes are an important source of recreation for walkers, joggers, cyclists and horse riders. These should be protected not destroyed.
- Promoting our AONB, including the opportunities to improve our health and wellbeing – walking in our AONB is free! According to Public Health England (Aug 2017). *'4 out of 10 (41%) adults aged 40 to 60 in England walk less than 10 minutes continuously each month at a brisk pace.'*
- Creating a Poppy Road/Pyrtle conservation and tranquility park. Enhancing the important chalk stream and associated areas of vegetation - instead of fragmenting this scarce habitat. The 2015 Conservative Party manifesto promised to 'launch an ambitious programme of pocket parks', small areas of inviting public space where people can enjoy relief from the hustle and bustle of everyday life. This would be an ideal location, complementing the surrounding area and bringing benefits to the community and adding an attraction for visitors.
- We have some fantastic views and trails on our doorstep – let's enjoy the landscape and start promoting and protecting the natural beauty and health benefits of our AONB. According to David Attenborough *'people will only protect what they care about, and they will only care about what they have experienced'*.

4.5.4. Sustainability

- Paragraph 14 of the National Planning Policy Framework (NPPF) states that sustainability is the golden thread which runs throughout our planning system, and that all three pillars of sustainability must be met – social, economic and environmental. We do not believe they have been met either individually or collectively in the Plan:

4.5.5. Economic

- ##### 4.5.5.1. The plan recognises but fails to address the economic challenges:
- The Wycombe Commercial Sites Assessment report (2016) identifies that Princes Risborough does not perform strongly on key commercial drivers for national and regional growth trends.



Risborough Area Residents Association

Risborough's work outside of the ward, there are less start up enterprises looking in the area', and the 'Potential for future growth in industrial units is likely to be limited'.

- Employment potential that does exist is not being nurtured. Farming is an important local industry, yet we are planning to destroy precious agricultural land - including land identified in the Arup report (2016)



Walkers enjoying Whiteleaf Cross, the landscape and the views – courtesy of Chiltern Explorers.

as scoring strongly to be included in the Green Belt. Where does this sit with the Conservative 2015 manifesto pledge to 'grow

more, buy more and sell more British food'? Our Area of Outstanding Natural Beauty (AONB) location has major tourist potential, yet this has not been seriously addressed. There is one small paragraph in the Plan.

- The number of new homes proposed is not proportional to the size of the town. Developers are profit driven not volume driven, flooding the market is not a sustainable option. As noted in the, UK Government Construction Leadership Council's 'Innovation in Buildings' report (Nov 2017) in relation to private developers, '*Housing completions are typically slowed to match the rates to maintain desired sales prices*'. For anything other than modest housing growth WDC would need to invest in a major public sector housing programme of their own.

4.5.6. Social

- The town needs better healthcare facilities - we are told that there is ample capacity for the local surgeries to expand and recruit more doctors - but they don't, and can't cope with present needs.
- We need an integrated plan for sports and recreation facilities in the town. There are a lot of good intentions in the Plan but there is no integration. According to the Infrastructure Delivery Plan (Sept 2017) – para 5.21, a S106 contribution has been secured from the Picts Mede developer for a footbridge extension at the railway station to link to the sports facilities west of the town. Good, but this comes across as just a vague promise. Why has it not happened already, properties are being sold?
- The recreation activity that takes place in our lanes has been completely ignored. The 'T' junction being created on Picts Lane for example will destroy this. How do cyclists – including groups of cyclists often travelling at speeds of up to 20mph negotiate this important National Cycle Route? How do parents with young children



Risborough Area Residents Association




Horse riders, cyclists and joggers enjoying our lanes – to be encouraged not destroyed.

- The Plan (P246) notes that the railway station '*will have a vital role to play in establishing sustainable patterns of commuting for the new population of the town. Direct, safe and attractive access to the station for all modes of travel will be needed, and train services of sufficient capacity to meet peak demands*'. Yet the journey times to London have increased over the last few years and the relief road proposal will create an unsafe and congested environment around the station.
- We believe that it is a fundamental principle of Plan-making that the coalescence of definable settlements must be avoided. The proposals would however merge the self-evidently definable and historic Settlements of Princes Risborough and Longwick.
- The reference in the Plan (P232) to the proposed Poppy Road development creating a possible crime issue for existing properties is disconcerting for those living in the area.



Risborough Area Residents Association

- The Sustainability Appraisal for Princes Risborough (March 2016) by Lepus Consulting, states (pN9/N10) that *"In general options performed negatively with regards to biodiversity, landscape, cultural heritage, water, climate change mitigation, climate change adaptation and land resources"*. It goes on to state that the larger scale of development proposed now *'may be more likely to lead to negative environmental effects, in particular on the setting of the nationally important AONB'*.


Wildlife enjoying Culverton Farm field – for now!
 - We need to protect and enhance our Chilterns AONB setting, our farm land, country lanes and historic villages – as noted above. There is little in WDC's plans about enhancement but a lot on destruction.
 - The WDC Level 2 Strategic Flood Risk Assessment (Sept 2017) notes (p152) that *'the planning process should lead to the avoidance of flood risk by where possible steering development towards the areas of lowest flood risk.'* Yet the Plan is steering development into areas of high flood risk!
 - Residents living along the proposed route of the relief road have been told by the Environment Agency (EA) that basically the EA has no idea what the flooding implication will be of building a road through a flood plain let alone 2650 new homes. The Town plan can't be approved until this issue has been resolved which should have been done as part of the preparation of the Plan.
 - At a WDC town meeting in 2016 it was recognised by WDC that more work needs to be done by the Department of the Environment with regard to current flooding and sewage spillage in the area - in which case how will the infrastructure cope with a significant increase in population?
 - The relief road proposed will send heavy goods vehicles through existing and new residential areas, and the new railway station hub. There appears to be no consideration to the pollution and safety issues this would create for residents, cyclists, joggers, pedestrians and horse riders.
- 4.5.7.1. The Plan is missing the NPPF golden thread of sustainable development. Yes we need more homes but we must build the right homes in the right places - where homes can be matched with jobs and reduce reliance on the car; and in locations where damage will not be done to the environment or our valued landscapes. More can be done to free up brownfield sites within the town and around the station in this regard.



Risborough Area Residents Association

close correlation between homes, jobs, infrastructure and their connections. The Plan simply presents a proposal to 'dump' housing numbers on the town, without any attempt to develop these critical aspects. Few of the new residents will work in or near Princes Risborough, and will be required to utilise travel means which are beyond, at, or near capacities, and could be overwhelmed by such an expansion.

- 4.5.7.3. It is clear that the WDC Plan does not meet the 'soundness' requirements of the NPPF as the imbalance of identified employment sites and proposed residential locations must be considered unsustainable. This imbalance will create unsustainable traffic movements between settlements within the district via geographical and topographical barriers that have not been addressed in the plan. Effectively the plan fails to align homes, jobs and infrastructure. (See Duty to Cooperate 5.5)
- 4.5.7.4. The small element of additional employment space in the proposals, and its lack of appropriate timing, will ensure that it makes a negligible difference to employment in Princes Risborough. The proposals do not allow for the social infrastructure necessary for any significant form of expansion. They also do not consider that the retail and other offerings of this small Market Town are based upon a limited and essentially non-expandable space, and do not demonstrate connectivity. It is unacceptable to take a relatively small settlement such as Princes Risborough and overwhelm it by the sheer size and scale of the proposed new development. We consider it is both ill-conceived and misconceived. There also appears to be double standards in play, with flooding and the AONB cited as reasons for not building new homes in Marlow and Stokenchurch. Yet the same constraints are applicable to Princes Risborough.
- 4.5.7.5. Proposals for many of the settlements within the district must be viewed as unsustainable by, either; failing to provide for the future housing needs of these communities, despite proposed improvements to transport connectivity and employment sites (e.g. Marlow and Stokenchurch) or; over supply of housing in communities that do not have and/or are unlikely to have employment growth owing to their remoteness to any strategic transport links/M40 (e.g. Princes Risborough, Longwick, Kimble). The Princes Risborough settlement in particular will be overwhelmed and effectively coalesced with Longwick and the small hamlet of Alscot for example.
- 4.5.7.6. There is reference in the Plan (P253) to the various promoters in the expansion area coming to an 'equalisation agreement' with regard to the development of a framework for a sustainable plan. This is vague and appears to be missing a key component – local input.



Risborough Area Residents Association

4.5.8.1. We need to:

- Agree through the local community a sustainable development plan with new homes, proportionate to the size of the town, its location and setting.
- Get our existing town in order before instigating any new large scale development – including better health care, rail service, leisure and recreation facilities.
- Undertake a sustainable drainage strategy to mitigate against climate change and risks of flooding.
- Develop our AONB tourist potential with a strategic plan to attract more visitors to the area.
- Make better use of our existing infrastructure rather than destroying our existing farm land, Green Belt and AONB – we have put forward suggestions in this regard on the section on the relief road.
- More consistency in Plan proposals across the District with regard to AONB and Flooding constraints.
- We are not opposed to development but opposed to unsustainable development.



4.6. Deliverability

Relating to LP policy PR17 also PR3, PR6, PR7, PR8, PR12, PR13, PR14

4.6.1. Behind Schedule

- 4.6.1.1. From the 2,649 new homes allocation for Princes Risborough, the LP plans to build 2,200 homes (PR17, table17) for the period of the Plan and from the LP's 2013 start date. (Incidentally this does not include current plans and developments such as the 90 at Leo Laboratories, or the Ker Maria site, or those built and completed since 2013). In the published LP, WDC admit they cannot build the full allocation during the period of the plan, but commit to building the remainder over the subsequent three years. This is a substantial slippage before any building has started and there is likely to be further slippages, as is normal with this scale of 'project'. It should also be noted that one small current PR site providing low price housing (Poppyseeds) still has a third of the houses available, after a year of completion. Likewise, other sites have experienced a low take up of houses (Pictsmede). Therefore, issues that have been uncovered during the construction of these homes is likely to slow building rate as the lack of incentive to dramatically increase building rate could consequently flood a sluggish market. Slippages are very likely to be substantial, so being able to deliver 2,200 houses within the plan period seems very optimistic.

4.6.2. Relief road

- 4.6.2.1. According to the Wessex report on deliverability of housing in the Buckinghamshire area, building of new homes cannot start until at least part of the relief road is in place. This requires the relocation (to where?) of a factory (Sumitomo Hard metal) and the closure of the Aylesbury railway line as part of HS2 construction. The chances of hitting a start target of 2023 would require these two separate projects meeting their schedule, which is unlikely, making WDC's reduced build target more impossible. It should be noted that the Council's chosen route is the only one that creates this issue. WDC claimed this was the cheapest route but there is a danger that in maintaining their schedule they will have to pay extra thus taking away its one alleged advantage, thus making other options much more attractive and appropriate. (see 4.1 Reasonable Alternatives)
- 4.6.2.2. The proposed relief road seeks to cut through AONB and Green Belt and as such should be subject to major development review significantly delaying the construction of any road and thus further hindering the opportunity to deliver any housing in any timely manner. (see 4.3, Relief Road for Princes Risborough)



minimum distance allowed by government advice, to the Princes Risborough Sewage Treatment works (off Summerleys Rd). As stated elsewhere in this representation this was against expert advice that recommended an increase in the buffer, when only looking at 500 new homes! For accommodating 2,600+ homes further filtration beds will be required, which would increase the odour buffer, thus making those new homes built closest to the sewage works, even with government guidelines, uninhabitable. This could be prevented but would incur significant extra costs for Thames Water which they could legitimately claim from the Council. In the worst case this could involve relocating the works which would create substantial delays to any building for at least months if not years.

4.6.4. Town Centre Improvements

- 4.6.4.1. The public realm enhancements to the existing town centre do not have any clear committed funding to ensure the enhancements are implemented to enable the town centre and associated amenities to support the massive extra demand that will be put on it. Furthermore, much of the town centre 'shared space' improvements can only be implemented if traffic loadings on the existing A4010 through the town centre are reduced. WDC's plan for incremental introduction of the new relief road will only enable the traffic volumes through the town to reduce once the final northern tranche of the relief road is built. Hence the majority of the town centre enhancements can only be introduced once the final batch of the extra 2,600+ homes are built, at some unknown point in the future, on indeed perhaps never... This is a clear sustainability risk as well as a key risk to the soundness of the integration and therefore deliverability of the plan.

4.6.5. Timetable

- 4.6.5.1. We note that there is still, after four years, a lack of detail on many of the infrastructure improvements required, and a lack of commitment from the Council to support them not least any approval from the local community. Without a more definite timetable it will be difficult to monitor progress and also risk that required and promised essential support services are in place to accommodate the level of builds envisaged.
- 4.6.5.2. The latest government policy is to speed up the building of houses. To have as a cornerstone of your plan an inability to start in the next five years is at complete odds with this policy.

4.6.6. Integration (PR7)

- 4.6.6.1. The Aylesbury Railway Line is the natural boundary for the existing settlement of Princes Risborough. This has always been the significant barrier for development of the town as it has limited crossing points and any development beyond will not allow easy



Risborough Area Residents Association

concern by PRIC and by all other stakeholders throughout this whole Plan process (and before). Previous applications across the railway line have consistently failed (often at Appeal) as WDC have successfully used integration (amongst other issues) as a barrier to development (see Park Mill Farm applications).

- 4.6.6.2. Policy PR7 clearly shows a net reduction in available crossing points to the railway along its entire length and specifically at the south end of the expansion zone by replacing the 2 existing foot crossings (well used by residents and visitors to access the open countryside) with a controversial and expensive 'underpass' at Wades Park (LP 5.3.86, 5.3.87). The siting of this underpass is in an area prone to flooding, its construction and form is at present vague and not well received by existing residents who have safety and security concerns. WDC state that the existing foot crossings are dangerous and that East West Rail are seeking to close them for safety reasons – this is no longer the case (as discovered at the latest East West Rail 'road show') as improvements (doubling of the track) are no longer planned (not least within the duration of the LP period). Closing of foot crossings is no longer proposed by East West Rail Consortium.
- 4.6.6.3. No appropriate solution to integration of what will be a satellite settlement to the existing town of PR is evident within the Plan, significantly questioning its soundness and deliverability.



Also relating to LP policy CP2 and PR4, PR5, and RUR5, RUR6

5.1. Housing Numbers for Town and PR expansion zone

Firstly, we would like to make the point that co-operation and the community views are not evident in the resulting LP, even between WDC and the Town Council (PRTC) on both housing numbers and road suggestions as noted in Steering Group reports.

For the first year of the process even members of the Steering Group were talking about numbers for the whole town, whilst non WDC members of the SG (inc PRTC) were only looking at the expansion area. This meant that sites like Ker Maria, Hypnos/Whiteleaf and Leo Laboratories were not included in the Council discussions. This is between another 4-500 new homes 'missed' by the Council, already an increase of 20% (and of consequent service users). WDC are now referring to only those homes built within the period, so despite committing to a further 500 after 2033 the extra demand on infrastructure requirements of all these homes is not recognised.

5.2. Relief Road options – Steering Group

A key aspect of the Town Plan is the relocation of Sumitomo to the proposed business park (in Longwick, PR10 – see 5.3, 5.5 below) so that the relief road can be built. The road needs to be in place to allow any building to start (difficult to reconcile with the governments aims to speed up building). Also access to any industrial park will need to be addressed. If the SG's preferred road option (including that of PRTC) had been chosen these issues would have been resolved and would have made that the most cost-effective option. Instead a further 10-15 million pounds will need to be spent on improvements to the Upper Icknield Way and Summerleys Rd to allow access to this new estate. In addition the SG's preferred option would have been safer, less congested and if shaped by community involvement a far more acceptable solution to existing residents.

If accompanied by wider strategic solutions to East West connectivity/access to the M40, Heathrow from Milton Keynes, Aylesbury, likely to garner local support (see Para 5.4).

5.3. Neighbouring Parishes (esp. Longwick and Kimble)

Princes Risborough is a rural market town serving the surrounding area, and is the main location of GP surgeries, dental practices, sewage works, police and fire station, library, banks, schools and the railway station for a large number of surrounding settlements. Therefore, the effect on the neighbouring Parishes of both Longwick and Kimble (and vice versa) by nature of their proposed considerable expansion too (RUR5 and RUR6), will be immense, and must be dealt with in a unified and cohesive way. This has not been encouraged during the development of the Local Plan. In the Local Plan there is an evident 'black hole' as both Longwick and Kimble's neighbourhood plans are still to be published. It should be noted that the Princes Risborough expansion Plan requires that a business park be located in Longwick, but forms no part of their Neighbourhood Plan. (PR10)



Risborough Area Residents Association

Kimble cum Marsh (see parish briefing paper in Appendix E). We were surprised at the lack of cooperation and discussion that either WDC or PRTC had had with these neighbouring parishes on the impact that the PR expansion Plan would have on this northern part of the district. Significant concerns over traffic levels on the A4010 and access to shared services resulted. Both these parishes are producing Neighbourhood Plans based upon housing allocations dictated by WDC. Neither Plan is as yet complete or included as part of the LP.

Despite the other neighbouring parishes of Longwick PC and Lacey Green PC having received a request for briefing accompanied with the RARA briefing paper, no meeting has been secured (Lacey Green PC) or forthcoming (Longwick PC). It should be noted that the Clerks for these small Parish Councils are both also Clerks for the (unacceptably compliant) PRTC.

5.3.2. Services and Utilities

It should be noted that in initial reviews building in Longwick and Kimble was to be about 200 and was not included in assessing the demands on various services in PR. Proposed development here has now been increased to 460 (RUR5, RUR6) which puts further and unplanned demand on various services and utilities. For example, the plan states only two new GPs are required for the area, this will create one of the country's highest patient to GP ratios: some current practices are threatening to close to new patients at lower levels. This indicates both viability and sustainability issues. These assessments were carried out in 2013 and the reasoning and information about how these decisions were made was never published. Publishing these would have made the process less opaque and offered some insight into some of the surprising results such as two additional doctors required. Likewise, the only review of the odour limit of the sewage works was carried out for the refused former Park Mill scheme which was for 500 houses (TWPS16_09_FINAL) not for circa 3,000. The expert concluded the buffer zone was too small. Follow up questions with the author identified that the zone will need to be extended as further filter beds would be required to accommodate further housing, so again highlighting viability issues (see 4.6, Deliverability). This would have provided more confidence in the process, but also these requirements should be updated to take account of the doubling in new homes from the figures originally presented by the Council. The Tibbalds sustainability report commissioned by WDC in 2014 (Appendix D) offers much more realistic projections of service and utility requirements.

5.4. Strategic East West Road Solution/Wider review

5.4.1. An example of uncoordinated thinking by WDC in this process is the relief road in that WDC have confined the problem to the expansion zone and PR Town Centre. From the beginning of this process the local population were raising concerns about the issue of traffic at either end not being addressed. The constant defence of WDC is that it is not part of the Town Plan. At the Council's initial proposal in 2013 they were aware of these issues and that a wider review of the traffic impacts on High Wycombe was



Risborough Area Residents Association

- 5.4.2. Geographically, the unconstrained rural area to the north of the Wycombe District is of high quality agricultural land with the market town of Princes Risborough and smaller rural settlements set on the lower slopes of the Chiltern Hills. The only current access to significant employment areas (High Wycombe, Marlow, Reading, Thames Valley, London, M40, M4, M25, and Heathrow) is funnelled into High Wycombe by train and road (A4010) through the already congested valley bottom bottle neck through Stokenchurch, Bradenham and West Wycombe. It is imperative that this topographical constraint and/or the significant infrastructure required to resolve and facilitate easy access to the M40/A404(M) (or to make the northern area accessible and therefore attractive for employers to locate to) is in place before significant residential development can be considered for the northern part of the district.
- 5.4.3. Options and solutions to this Topographical barrier will by nature open up new opportunities for employment and housing thus rendering the unsustainable elements of the WDC Plan unnecessary.
- 5.4.4. Solutions could include a complicated, expensive, substantial, controversial direct continuation of the A4010 through West Wycombe Park to the M40 Marlow (potentially creating great residential opportunities for High Wycombe) or, an equally complicated improvement to the B4009, bypassing Chinnor and Kingston Blount and accessing the M40 at Jct 5, just north of Stokenchurch.
- 5.4.5. A solution to congestion in 2013 was that the B4009 improvement could help relieve the traffic pressure at the Wycombe end of the A4010. Most of the B4009 and the key point of restriction is in Oxfordshire. The development of the Princes Risborough expansion zone was seen as opportunity to improve this issue and make the town more attractive for business, this chance has been missed.
- 5.4.6. For any much needed long term solution to the East West road route to even be considered involves WDC evidencing a 'duty to cooperate' on strategic transport solutions with many partners including South Oxon DC and with the Highways Authority of Buckinghamshire, Oxfordshire and wider (Berkshire for solutions to the A404M issues to the M4 for example). Although it must be noted that improvements to the A404M at Bisham are addressed by WDC with significant Central Government investment (garnered through evidenced improvements) to ease access to the employment areas of Marlow, Maidenhead etc – none such funding is evident for essential congestion easing required for the A4010.
- 5.4.7. This County wide infrastructure cooperation is something that is noticeably absent and/or vague within the WDC Local Plan. (LP policy CP2)

5.5. Cross County co-operation on housing.

There has been some cooperation between the local District Councils within the Buckinghamshire County Council area, the Arup review on the Green Belt being an example of this but, this contact has lacked any strategic input. The duty of cooperation has been limited to distribution of the southern Districts unmet needs to Aylesbury Vale DC. Across Buckinghamshire half the Councils have a



Risborough Area Residents Association

nam. co-operation has been carried out theoretically by an agreed 'memorandum of understanding' but for all practical purposes this has not existed. This has meant that potential sites that straddle district boundaries have not been fully explored, for example Penn Lane in Wycombe is not being developed, despite the site on the Chiltern District site able to be taken forward. Services like education and surgeries which cross district boundaries are difficult to influence and administer so creating inefficiencies.

5.6. Cross County co-operation on services

Princes Risborough is closer to Oxfordshire than Wycombe, and so developments in Thame and Chinnor have an effect on this area. The Wellington house surgery has a practice in Chinnor, as well as PR, served by the same doctors. The railway station at Risborough also serves Chinnor, having an effect on railway capacity and also on traffic to and from the station. The South Oxon DC LP and the accompanying Chinnor Neighbourhood Plan propose to build 800 houses in Chinnor that will have a significant effect on PR. The Cottage Hospital in Thame, Oxon has also been used by convalescing patients for the Risborough area; this, together with some cross county education cooperation, has been ignored in WDC's plan but is key to the well-being of the area.

5.7. Economic Entity

Duty of cooperation should be between areas of a similar housing market. In Buckinghamshire this has been based on the County boundary. In producing the housing demand number, the requirement to uplift the numbers because of affordability, showed that Aylesbury Vale District was classified as being more affordable than the other three Districts. A County commissioned report on deliverability, identifies that only the southern part of Aylesbury Vale is in the same housing market, as Wycombe, in fact it states it should include parts of South Oxfordshire in particular with regard the Risborough area.

WDC's Local Plan goes against every aspect of sustainability as defined by the NPPF as well as by international standards. The overwhelming opposition to so many aspects of The Plan by, not least the 'Keep Bourne End Green' group in the South of the District but by 'Risborough Area Residents Association', 'Wake Up Risborough Group' etc, and the many individuals who, despite the technical and bureaucratic challenges of doing so, have made their views heard, is evidence of poor community engagement.

Localism and sustainability have been disregarded in favour of the seemingly easiest options for housing sites regardless of economic development, infrastructure and geography. As such the WDC Local Plan as presented must be subject to significant modification by the Planning Inspectorate and the reasons for this openly and publicly shared.



Risborough Area Residents Association

- B. WDC's Statement of Community Involvement, 2012
- C. PRTC 2015 Town Plan Statement
- D. Tibbalds Report 2014
- E. Parish Council Briefing Paper
- F. Steering Group Minutes, 26th June 2017
- G. Statement to the PR Town Plan Steering Group, 22nd November 2017
- H. RARA's Petition Presentation to WDC, 3rd April 2017
- I. Confirmation of Petition Received By WDC
- J. RARA's Presentation to WDC Debate, 5th June 2017
- K. Email from RARA to Katrina Wood, 27th June 2017
- L. Letter from RARA to Katrina Wood, 1st August 2017
- M. Email from Katrina Wood to RARA, 11th August 2017
- N. RARA Rescue Risborough Leaflet - Oct/Nov 2017
- O. Letter to Penelope Tollitt on 'Process and Steering Group' from RARA, 6th October 2016
- P. Letter to Penelope Tollitt on 'Road Infrastructure', 17th October 2017
- Q. Letter to Penelope Tollitt on 'Economic Sustainability' from RARA 1st November 2016
- R. Letter to Penelope Tollitt on 'Rail Transportation Issues', 1st November 2016
- S. Letter to Penelope Tollitt on 'AONB' from RARA, 14th November 2016
- T. Independent District Council Election Flyer, May 2015
- U. RARA's Power Point Presentation July 2016
- V. Consultation Response 'Right Homes in the Right Places'
- W. RARA's Risborough First Principles for a Better Town Plan
- X. Councils reducing OAN through Rule of Constraint