



Matter 5 Natural, Built and Historic Environment

[Representor ID Reference: 600]

Issue: Does the Plan provide a framework for the management of the Natural, Built and Historic Environment that is soundly based, justified and consistent with the requirements of national policy?

Q1.) Have the following policies been positively prepared and are they justified, effective and consistent with national policy?

...

c) Policy CP11 (Historic environment);

...

e) Policy DM30 (The Chilterns Area of Outstanding Natural Beauty);

f) Policy DM31 (Development affecting the historic environment);

...

i) Policy DM34 (Delivering green infrastructure and biodiversity in development)

..."

- 1.1 Whilst RARA appreciates that some of the above policies seek laudable objectives with which RARA agrees, RARA considers that those objectives are wholly incompatible with the PROPOSALS in the Plan for Princes Risborough. Hence, and by reason of this inherent incompatibility, RARA considers that, taken as a whole, the Plan's policies for Natural, Built and Historic Environment is unsound, negative in its impact, unjustified, ineffective and inconsistent with the requirements of national policy.
- 1.2 Areas of Outstanding Natural Beauty (AONB's) have strong legal protection through the Countryside and Rights of Way Act 2000, and the National Planning Policy Framework (NPPF).
- 1.3 The Plan notes (Page xviii) "We can change Green Belt boundaries – but only in exceptional circumstances. The boundary of the AONB is set by Government."
- 1.4 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 within 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.
- 1.5 The Government has a clear commitment to protect AONBs. Following publication of the 25 Year Environment Plan it has launched a review of National Parks and AONBs, including scope

for expansion. The review will report in 2019. There is the possibility that the Chilterns AONB could increase in area and/or become a National Park, the only one in central southern England.

- 1.6 There are positive statements about the protection of the AONB in the Plan, recognising (P 32) that “any allocation that would result in major development in the AONB would strongly conflict with the NPPF”, and that for developments not considered major, “great weight should still be given to any adverse impacts on the AONB.”
- 1.7 However, and despite these warm words and good intentions, WDC’s Plan is for 2,650 new homes for Princes Risborough, all within the setting of the AONB and some in Green Belt; as well as “major new road infrastructure in the form of a relief road”, again within the AONB. This is completely contrary to the good intentions expressed.
- 1.8 The statutory body set up by Government, the Chiltern Conservation Board has provided a very comprehensive assessment of the Plan, District-wide (reference their representation WDLP 190618 and our “Representation on the Publication Version of the Wycombe District Local Plan”, section 4.5.2). The further comments below relate more specifically to the Princes Risborough area our “Gateway to the Chilterns”.
- 1.9 The “Princes Risborough Expansion - Landscape Sensitivity and Capacity Study” (Sept 2017) highlights many cognate concerns:
 - (1) It notes (Page 3, para 1.5) 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”.
 - (2) It goes on to point out (Page 8-25) 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.
 - (3) With regard to the historic settlement of Alscot it states: “Any development would either adversely impact on the conservation area or its setting or adversely affect the habitat value’.
- 1.10 The “Relief Road, Southern Options, Ecological Appraisal” (Aug 2017), points out (Page 8, para 6.2 - 6.3) 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.
- 1.11 The “Green Belt Assessment Part 2” (July 2016) notes (Page 296) 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.
- 1.12 The proposed development behind Poppy Road, 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.

- 1.13 And all of this is proposed when 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 here; and instead of benefiting from that the proposed Plan will bring a lot of cumulative negative impacts on our natural, built and historic environment.
- 1.14 Rather, than inflicting such harm, the Local Plan should positively plan to:
- (1) Minimise adverse impacts on the setting of the Chilterns AONB through avoidance in the first place. The lanes, for example are an important source of recreation for walkers, joggers, cyclists (including the National Cycle Route, NCR 57) and horse riders. These should be protected not destroyed.
 - (2) Promote the AONB, including the opportunities to improve our health and well-being – 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.”
- 1.15 In order to address these concerns, significant modifications are required to make the Plan sound. In particular:
- (1) Reducing the number of homes to be allocated to Princes Risborough to 1,000 and removing the proposed relief road (as set out in Matters 2 and 3), thus minimising harm to the AONB and to the natural and historic environment;
 - (2) Where there are available brownfield sites in Princes Risborough, close to existing buildings in the town, they should be providing new homes of higher density in order to minimise new expanses of development that are highly visible from designated and valued landscapes and out of context - there are potential sites for example on New Road and the existing Blanchfords Depot; and
 - (3) Given that the Chilterns AONB is already more developed than most, and has huge potential to bring benefits to millions, any further planned development within the Chilterns AONB and its close setting should be put on hold pending the outcome of the Government’s review of National Parks and the reviews required in result of a reduced allocation to Princes Risborough (see Matters 2 and 3).