

# Great and Little Kimble-cum- Marsh Neighbourhood Plan Publication Stage Consultation Comment Form

December 2019 – February 2020



This consultation seeks your views on the Great and Little Kimble-cum-Marsh neighbourhood plan and [whether it meets the basic conditions](#). All comments will be sent to an independent examiner who will examine the plan. If the examiner determines that the plan meets the basic conditions then a referendum will be held on whether to 'make' the neighbourhood plan.

All comments should be submitted to us by **11.59pm on Tuesday 18 February 2020**.

## How to submit your comments

Return this form to us by:

- email: [neighbourhood.planning@wycombe.gov.uk](mailto:neighbourhood.planning@wycombe.gov.uk)
- post: Planning Policy Team, Wycombe District Council, Council Offices, Queen Victoria Road, High Wycombe, Bucks, HP11 1BB

## Completing the comments form

There are two parts to this comment form.

- Part A: Personal/agent contact details (personal details will not be published except your name and organisation if applicable).
- Part B: Your comments (this will be made publically available).

Please do not send multiple copies of the same comment (either electronically or in writing). Where groups share a common view you may submit one comment representing the group.

## Personal data - fair processing notice

As part of this public consultation exercise any information received by us, including personal data, may be put into the public domain, including on this website.

## Privacy notice

Before completing and send this form please ensure you read and agree with [our privacy policy](#).



## Comments form: Great and Little Kimble-cum-Marsh Neighbourhood Plan publication stage

### Part A: Contact details

In this section, we would like some information about you. We will need your contact details in order to take your comments into account. Personal details will not be published by us, other than your name and organisation.

#### 1. Your details

<b>Name</b>	John Gill
<b>Job title (where relevant)</b>	
<b>Organisation (where relevant)</b>	

#### 2. Agent details (if you are responding on someone's behalf)

<b>Name</b>	
<b>Job title (where relevant)</b>	
<b>Organisation (where relevant)</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Email</b>	
<b>Phone number</b>	



3. Which of the following do you consider yourself (please tick only one):

	Adjoining Local Authority
	Other Local Authority
yes	Local resident
	Parish or town councillor
	Developer / housebuilder
	Community group
	Environmental organisation
	Other (please specify)

4. Keeping in touch – please tick if you wish to be kept updated on any of the following:

yes	<b>Please inform me of Wycombe District Council’s decision to ‘make’ the Neighbourhood Plan (Regulation 19).</b>
yes	<b>Please notify me of future Local Plan consultations.</b>
yes	<b>Please add me to the mailing list for the Weekly Planning Bulletin, for planning news and information of wider interest.</b>

**End of part A**



## Part B: Comments on the neighbourhood plan

Please note all comments will be made publically available. Please continue on a separate sheet if necessary.

**Which part of the Great and Little Kimble-cum-Marsh Neighbourhood Plan does your comment relate to?**

**What part of the Basic Conditions does your comment relate to? (please tick all that apply)**

yes	having regard to national policies
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yes	the achievement of sustainable development
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yes	general conformity with the strategic policies contained in the development plan area
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	compatibility with EU obligations
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**Please make your comments here. Please be as clear as possible and ensure any relevant supporting information is included, and continue on additional sheets if necessary. There will not normally be a subsequent opportunity to make further comments.**

Dear Independent Examiner, please see below comments. I would also ask that if possible you visit the area and walk round the villages as I fear that just looking at maps and documents will not give you the full understanding of the issues being raised below and by other people from the parish.

When the requirement to have 160 houses built in the parish was announced I along with many others in the parish considered the number to be excessive and ill thought out, but apart from our local knowledge we had little we could put forward as evidence, at that time. to support our view especially as we had very little knowledge of planning matters.

The work done on trying to develop the Kimble plan and the information contained in it, along with recent planning refusals for sites in Marsh and Marsh Road, and in independent review reports and documents that are now in the public domain, clearly demonstrate that building 160 homes in the parish at this time is not feasible without breaching several regulations, especially those re sustainability, pollution and environment, and indeed the specific regulation governing the parish RUR6.

As the Plan indicates much of the parish is in green belt/conservation areas or is in parts of the parish that has only very narrow lanes and often no mains sewerage. Anything other than the odd dwelling will not be possible to be built here without breaching regulations , and indeed is evidenced by recent planning refusals for just one house in Marsh ( Land Opposite Ashbrook Farm Marsh Lane) trying to build just one house in this area is going to prove difficult to get permission for.

As such practically all 160 house will have to be based around Great and Little Kimble. However there are just not sufficient sites in these areas that will satisfy the all the required regulations, clearly demonstrating that the allocation of 160 houses was done without due diligence at the

time and is not feasible to be attained.

At the present time there is no sustainable access from Grove Lane (B4009) and adjoining lanes including Marsh Road to the A4010, there being no footpath /cycle track under the railway bridge at the junction of the B4009 and A4010, or through Great Kimble itself and thus there is no sustainable, safe pedestrian/cycle access to where bus routes and the railway station are located (on the A4010) thus making the use of private vehicles and not public transport more essential for properties on/adjacent to the B4009.

This lack of sustainable access specifically highlighted in the independent reviews of the area carried out for the Parish Council and included in the Neighbourhood plan supporting documentation. It is also highlighted and referred to by the Wycombe District Planning Authorities and Highways Authority, along with the need to be able to comply with DM33, when they have been considering various planning applications in the parish and especially applications in Marsh and in Marsh Road.

These have been REFUSED due to the development not be accessible to public transport and thus the residents “would be reliant upon the use of the private car and consequently not adhere to the guidance contained within paragraph 103 of the National Planning Policy Framework insomuch as it would not actively manage patterns of growth to support the use of public transport, walking and cycling.” They would also not be in accordance with DM33”

And the Highways department when considering a planning application for a development at the Laurels in Marsh Road (site 10) reach similar conclusions that this site was inappropriate. In their rejection letter they again state that the site has “ dangerous and unsuitable access along the highway network due to danger posed by the lack of pedestrian footway beneath the railway bridge over Grove Lane, and the lack of other suitable routes to the A4010 or Little Kimble railway station ...and consequently would not adhere to ..par.103 National Planning Policy Framework..... The development is contrary to Policy CS20 (transport and Infrastructure) of the Wycombe Development Framework Core Strategy and the Buckinghamshire CC Highways Development Management Guidance.

Consequently all sites showing in the neighbourhood plan on or near to the B4009 including Marsh Road (ie sites 10,1,15,14 ) will fail all sustainability, environmental and transport regulations and requirements and therefore cannot be considered as suitable to be included in any plan at this time. (Requiring a financial contribution to be made by the developers under say S106 does not suddenly make the site sustainable and compliant with the regulations. Only the ACTUAL PHYSICAL construction of a new bridge with suitable safe footpath and cycle track can do that and provide a safe sustainable access to the public transport system, via the A4010, to the B4009. If such a new bridge and suitable footpath and cycle track is ever built then that is the time when consideration of potential sites on/adjacent to the B4009 and Marsh Road could take place, but until such time as such a new bridge is built any inclusion of sites in this area is premature as they cannot be developed now,(or in the foreseeable future as not only has no final decisions as to whether there will be a dual track along this section of the railway, or whether a new bridge will be built have been taken,) as there is as yet no timescales indicated as to when such decision maybe taken- let alone any construction work take place!!

Having ruled out the conservation area, the very rural areas such as Marsh, all sites on/near the B4009 all that is left is that part of Little Kimble that falls along the A4010 that is outside of the “green belt/conservation area (it should be noted that a long stretch of that area that appears to be in Little Kimble according to the Road signage actually falls outside the Parish and is in Ellesborough – so that actual available land is smaller than might at first seem apparent! And

why we have the **totally bizarre** situation that planning permission has been given to a property referred to in the Wycombe planning permission documentation as “Land at Meadow Brook Farm Risborough Road **LITTLE KIMBLE** HP17 0UE”

But which cant be included in the 160 houses forced on the Little Kimble Parish because , regardless of its **physical location and address as in the village** is deemed to be in the Parish of Ellesborough!!!)

Given the nature of this narrow strip of land along the A4010 and taking the current houses already located there into account, there is no way that some 130 houses can be built here without breaching the requirements of RUR6 (wycombe district planning documentation)

For example RUR6(b)(i) states that housing must be built on “a range of small sites” with 5.5.44 stating

“Whether sites are ‘small’ or not will be assessed against how much they expand the village to which they are adjacent, and the extent to which they are compatible with the existing structure of the landscape.” And 5.5.45 acknowledges that some sites -especially any along the A4010 will be visible from key view points in the Chilterns AONB and thus “the scale and form of development will also need to avoid or minimise the impact on views from the AONB and its landscape setting.” Also the National Planning Policy Framework and National Planning Practice Guidance, require sites “to ensure that they conserve and enhance the natural beauty and landscape character of the AONB’

Given the number of houses that will have to be built along the A4010 to meet the required number currently allocated to the Parish and the actual lack of land potentially suitable for development it will be impossible to

- a) have small sites and
- b) make those sites such that they do not adversely impact on the views from the AONB as required by the regulations.

(note according to the information contained in the draft neighbourhood plan documentation(2.13) there were only 128 houses in Little Kimble in 2011 census. The numbers will have increased slightly since then but are unlikely to be over 150. To be compatible with the requirements of RUR6 and 5.5.44 requirements any developments over say 15 houses must breach these requirements; also any developments bigger than that number will find it very difficult to comply with the requirement to fit into the “existing structure of the landscape” because, as stressed in 2.15 of the draft kimble plan , the majority of the dwellings in the parish are in ribbon developments with only a very small minority having any dwellings immediately to the front or rear. Any “block” type of development -which almost certainly is the type that would be needed if numbers of houses involved were more than say 10 -15 - must surely fail 5.5.44 .

It is also doubtful that there is currently a safe access to bus stops and the railway station from any potential sites of the size that would be required along the A4010 as evidenced by the numerous accidents that have taken place on this stretch of road over the recent years, many of which have involved vehicles encroaching on the footpaths.

Evidence in the neighbourhood plan shows that there are on average some 2 cars for every household in the parish. (2.7) There is no reason to consider that any new developments will be any different to this – indeed the plan expects this to be the case and is specifically requiring large number of carparking spaces to be allocated to each dwelling- so the allocation of 160 houses to the village will result in some 320 more cars crowded into the small area of Great and Little Kimble, adding to congestion and therefore atmospheric pollution and greenhouse gasses

at a time when the Government is actively seeking to reduce such pollution, and would again be in breach of environmental regulations, and according to the report in the plan (2.18) "road access is a serious issue and it is difficult to see how any upgrading of the B4009 can be achieved in a manner that would not escalate the local traffic congestion problems" and cause added environmental pollution in the area.

The OVERWHELMING CONCLUSION and the only one that can logically be arrived at from all the evidence contained within the Neighbourhood plan and its supporting documents, along with comments from planning authorities and related bodies in rejecting planning applications in the area is that the requirement to have 160 houses built in the Parish at this time has not been properly considered, is illogical and above all totally not feasible to be undertaken at this time or any time in the foreseeable future.

The requirement should thus be urgently reviewed and reduced to a more feasible and sustainable number say around 50- 60 houses.

To require the parishioners to vote on the current plan at this time in its current format when it has been based on an ill thought out and unsustainable number of houses allocated to the parish is unreasonable.

The Independent Reviewer is therefore urged to reject the plan as it does not meet the basic conditions namely it is impossible to implement at this time, and anytime in the foreseeable future possibly even beyond 2033.

Also the Independent Reviewer is also requested to ask /tell Wycombe Council and indeed the soon to be combined Buckinghamshire Council, that the allocation of houses to the parish should be urgently reviewed and reduced, based on the above comments and other independent information that is now available and was not available to /sought by Wycombe Council when the original allocation was made some years ago.

The plan based on the revised numbers could then be re developed and submitted to the parish. With this in mind and to assist when any revised plan is being put forward I also have some specific comments on the details included in the plan which I set out below.

2.6 It should be noted that the only way that Marsh Road could be widened to so that it would be capable of taking two way traffic and the appropriate space for a footpath cum cycle track would be to demolish part of the house called the Laurels. This would be totally uncalled for as would making Marsh Road wider as such event would undoubtedly result in more traffic speeding along the road as they would then have no reason to slow up as "pinch points " would have been removed. This comment by the PC is therefore not well thought out.

2.7 It should be stressed in this paragraph to give a more complete picture that there will be significant number of extra vehicles that are certain to use the B4009 and pass through the village once the large expansion of houses in Princes Risborough and Longwick is completed. If that number is combined with another 300 + cars that will be added to the area if the unrealistic number of 160 houses continues to be required will mean significant congestion, added environment pollution and additional danger to local people will occur, so that a better picture of what will occur is outlined .

4.2 To give a more accurate picture it should have been stressed here that although residents did rank sites there were strong objections raised during those consultations

about the number of houses being forced onto the Parish and the size of some of the proposed sites.

5.1 The vision statement is somewhat wishful thinking and will not match the reality of what the area will be like in 2033 the proposed number of houses are built. The comment “ the location size and design of the new entrants have allowed them to blend into the villages without significant damage to the rural character of the Parish” 160 additional houses in a village of only some 150 houses currently cant under any stretch of the imagination not have any significant impact on the existing village!!! As the plan notes in 2.18 “road access is a serious issue and it is difficult to see how the upgrading of the B4009 can be achieved in a manner that would not escalate local traffic congestion problems . So that makes the conclusion of the vision statement dubious and as such it should be ignored when considering what is being suggested in the plan.

Kim1 Taking the lack of available sustainable sites in the villages -as referred to above there is very little scope to set the boundaries. Keeping a gap between Little Kimble /Clanking and Great Kimble at the bottom of Grove lane is good

Kim2 seems fine

Kim3 It must be stressed in the opening paragraph of KIM3 that at the present time few if ANY sites included in the plan are capable of meeting current regulations, especially sites 10,1.15. and 14. And that these sites are pended for the foreseeable future until a public footpath/cycle path is put into connect the B4009 to the A4010. This can not feasibly be achieved until a new bridge is built at the junction of the B4009 and the A4010.

Ref 1 para 5.10 contains a **false statement** - “is conveniently located for walking trips to.the school, public transport services..” there is **NO Convenient** (safe)access from the site to the school -there is no footpath through Great Kimble to the school especially over the narrow railway bridge; there is **NO Convenient** access to the A4010 which is where the public transport is available due to the very dangerous junction at the railway bridge which has no footpath – see the various comments above on this subject.

Ref 10 para 5.12 . contains a **false statement** - “is conveniently located for walking trips to.the school, public transport services..” there is **NO Convenient** (safe)access from the site to the school -there is no footpath through Great Kimble to the school especially over the narrow railway bridge; there is **NO Convenient** access to the A4010 which is where the public transport is available due to the very dangerous junction at the railway bridge which has no footpath – see the various comments above on this subject

Ref 14 It is estimated that this site will contain 45 homes . This number is too large to be compliant with the requirements of RUR6 (ie small sites compatible with existing landscape)

Para 5.16 contains a **false statement** - “is conveniently located for walking trips to.the school, public transport services..” there is **NO Convenient** (safe)access from the site to the school - there is no footpath through Great Kimble to the school especially over the narrow railway bridge; there is **NO Convenient** access to the A4010 which is where the public transport is available due to the very dangerous junction at the railway bridge which has no footpath – see the various comments above on this subject

Para 5.17 This should stress that NO site on the B4009 and adjacent roads is currently available to be built on, as any such developments would not be complaint with current regulations and so should be ignored for the present time as not feasible.

Para 5.19 The evidence currently available (eg planning permission rejections etc -referred to above) makes the statement in this para “ It is therefore assumed that these development principles will not undermine the deliverability of the plan” . This is a dubious assumption as many of the sites are not compliant with the regulations and will not ever be unless an new bridge is built at the junction of the B4009 and the A4010.

KIM4 -no comments

Kim5 the buffer is a good feature

Kim 6 – no comments

Kim 7 no comment

Kim 8 -no comment

Kim9 This should stress that paying a financial contribution does not in itself make a development that is not in accordance with regs become in accordance with regs. Thus a S106 contribution to help fund a say footpath to provide a safe and sustainable access under the railway at the junction of the B4009 and the A4010 will not in itself make any site on the B4009 a compliant site. They can only become eg sustainable sites if the new bridge and footpaths are **actually built** !

**End of part B**

Thank you for completing the comment form.

**Contact Details**

If you have any questions, comments or queries please contact us on the details below:

Neighbourhood Planning - Telephone: 01494 421570

Email: [neighbourhood.planning@wycombe.gov.uk](mailto:neighbourhood.planning@wycombe.gov.uk)

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High Wycombe, Bucks HP11 1BB

Website: [www.wycombe.gov.uk/council-services/planning-and-buildings/planning-policy](http://www.wycombe.gov.uk/council-services/planning-and-buildings/planning-policy)