
From: neil [REDACTED]
Sent: 22 March 2019 17:28
To: NewLocalPlan
Subject: Proposed Main Modifications to the Wycombe District Local Plan (February 2019)
Attachments: CPRE Letter re Local Plan Proposed Amendments.pdf
Importance: High

Dear Sir/Madam,

Please find attached the comments from CPRE Buckinghamshire branch concerning the above referenced consultation.

Kind regards

Neil Salisbury
Trustee and Head of Planning, CPRE Bucks

Click [here](#) to report this email as spam.



Planning Department
Wycombe District Council
Queen Victoria Road
High Wycombe
HP11 1BB
Email: newlocalplan@wycombe.gov.uk

21 March 2019

Dear Sir/Madam,

Proposed Main Modifications to the Wycombe District Local Plan (February 2019)

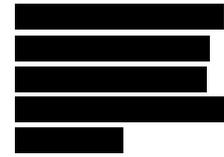
The Campaign to Protect Rural England Buckinghamshire branch (CPRE Bucks), as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines.

We would like to register CPRE Bucks' views on the above referenced document as set out below:

- PMM1 through PMM4: We welcome the changes to improve future-proofing of the Plan
- PMM5 Para 4.22: We welcome the proposed strategy that *“ensures that development is not proposed in areas where development should be restricted such as AONB, Green Belt and areas at risk of flooding, or in places without the facilities and services to support it.”*. Unfortunately we believe this Plan already fails to meet that strategy because there are still proposed developments in the AONB/Green Belt (including PMM36: Policy PR11 Land to the rear of Poppy Road), in areas of flooding (eg: many developments in Princes Risborough) and in Lane End (PMM45: Policy RUR1) being a few examples. We also think that a number of sites, including RUR1 in Lane End, do not achieve the aim of reducing private car use as they are rural locations with very poor public transport options available.
- PMM5: Policy CP3 We believe this Policy is not implemented within this very document, as we understand the Council has admitted that it is not fully utilising brownfield sites.
- PMM36: Policy PR11 We believe that many parties, including the Environment Agency, consider this site undeliverable. We do not believe that *“its limited size and location within the urban setting of Princes Risborough”* is a criterion in the NPPF for considering whether or not to develop a site in the AONB.

Chair
Stan Jones OBE

Registered charity
number 1163356
Company number 9186100



PMM39: Policy PR14 In general, CPRE prefers multi-storey car parking because large surface car parks consume so much land, but it must be appropriate within the local environment and not obscure or dominate attractive views. In this case, we would not object to a two-level car park (ie: ground plus one level) because the general surroundings have many two (and a few three) storey buildings. However we believe the option of going down (ie: underground) should also be looked at in this case.

PMM73: *“Development that accords with a made Neighbourhood Plan”* is NOT a valid exception to the general rule about prohibiting development in the Green Belt. This is not an exception identified in the NPPF and, in any case, any NPs “made” before the new Local Plan is “made” would need to be re-validated. This is because the NP would have been developed against an earlier Local Plan, and the Local Plan may override the NP in the event of conflict.

In conclusion we consider the Local Plan with these proposed amendments is still inconsistent within itself and also incompatible with the NPPF regarding sites that are in the Green Belt, AONB or at risk of flooding. It is also incompatible with the NPPF concerning the hierarchy of Local Plans and Neighbourhood Plans.

Yours faithfully,

Neil Salisbury
CPRE Buckinghamshire - Head of Planning
Tel: 

Chair
Stan Jones OBE

Registered charity
number 1163356
Company number 9186100