
From: Deirdre Goodwin [REDACTED]
Sent: 26 March 2019 07:20
To: NewLocalPlan
Subject: Proposed Main Modifications to New Local Plan for the Princes Risborough Area
Attachments: RESPONSES TO LP CONSULTATION 250319.pdf
Importance: High

Dear Sirs

I attach my response to the Proposed Main Modifications to the Wycombe District Local Plan.

I would be grateful if you would acknowledge receipt.

Kind regards

Deirdre John
[REDACTED]

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25th March 2019

Dear Sirs

**Main Modifications and the Sustainability Appraisal (SA) of the Publication
(Regulation 19) Draft of the Local Plan – December 2018**

Princes Risborough Area

I write in relation to the proposed Modifications and Sustainability Appraisal.

PMM 1 – CHAPTER 10 INTRODUCTION AND CONTEXT, Paragraph 1.15, Page 7

The decision of the Independent Local Plan Inspector was entirely predictable but not surprising. What is both troubling and surprising however is the range, scope and purpose behind many of the proposed provisions which appear to run contrary to the expressed purpose and scope of the original Area Plan for Princes Risborough upon which the March 2018 consultation was sought.

I accept that no further comments will be considered upon the plan itself. It is however important to bear in mind that approval of the full proposal for 2,500 homes will result in at the very least a doubling of the population of Princes Risborough and surrounding areas, with commensurate pressure on key resources including healthcare, schools, transport (including already overcrowded Chiltern Line trains) and adequate gas, electricity and water supply.

The latter impact also has to be seen in the context of the significant house building that has already taken place in Princes Risborough, Monks Risborough and Longwick since the initial consultation began in March 2018, with planning permission currently being sought for significant developments in Monks Risborough and in the fields on south-west corner of the Sportsman's roundabout in Longwick, immediately to the south of the Sportsman's Shell service station.

The WDC focus in the proposed modifications seem to have been unacceptably: focusing on the large housing developments alone with little or no considered planning for the short and long term implications of how WDC will address vital strategic issues affecting the Princes Risborough area. This lacuna is of particular concern as WDC will have been subsumed into a Unitary Authority, remote in all sense of the word from the actual and perceived needs of those living in the District and who will be occupying the new homes. The plan should recognise the actual and potential challenges and constraints this proposed reorganisation creates and allow a timely two -year review to enable the Unitary Council to advise on how to manage key strategic issues which will impact on the Local Plan.

There also appear to have been inadequate consideration of proposals to take account of further strategic initiatives to create new transport links to Heathrow and a super (road and railway)

highway between Oxford and Cambridge with the bridging link being within the Princes Risborough district. Similarly, the impact and timing of HS2 does not appear to have been taken into account, including the significant disruption to road and rail access that will occur during construction of HS2: this will particularly affect the arterial M40 and A404 routes with a knock-on effect to outlying road links to the Princes Risborough area .

There is a self-evident and worrying disconnect with the proposed Local Plan for South Bucks and Chiltern where other major concurrent housing developments have been approved. It is no exaggeration to state that this lack of joined-up thinking is likely to result in gridlock at the expense of the local economy, employment and wellbeing of the population at large. An example of this is that while WDC have agreed a compensation package with HS2 in respect of the construction works, there is no concomitant proposal on how properly to manage the proposed major road and bridge construction in the Risborough area to accommodate the significant increase in traffic as a result of these construction works. The funds from this HS2 compensation package will accrue to the WDC coffers but none of the expenditure from these funds is hypothecated to benefit the Risborough area and there is no apparent plan to make additional funding available to ease the congestion and associated grid-locking of the area in general. The unintended consequence of this lack of foresight is likely to be that existing properties in the area will increase in value and that people will not be attracted to the new builds with the unresolved issues of adequate roads and infrastructure in general. This will result in affordable housing with appropriate infrastructure resources will not be made available.

PMM 3 – CHAPTER 3.0 VISION AND STRATEGIC OBJECTIVES

The words ‘Vision’ and ‘Strategic Objectives’ seem to have been deployed without actually providing clear and reasoned analysis of what this actually involves. This ‘business speak’ barely conceals the lack of any focused in-depth consideration of what this real means when translated into the difficulties and challenges posed in the construction of these homes and creation of a vibrant well-resourced environment to meet the needs of those who will occupy them.

Given the reasoned objections made in respect of the original area plan, there has been a breath-taking and unreasoned disregard to the concerns issued, through the proposed modification to build a further 1,000 homes bring the total to more than 4,000 after account has been taken of the developments which have already been carried out, or for which planning permission has already been granted, since the original consultation. On a conservative estimate, this increases the size of the existing population and demand on resources by some 150%

There is also a failure to appreciate that objective analysis shows that the demand for housing is falling significantly: the raw data which informed the ONS Housing figures in 2014 is no longer reliable and the more accurate data is that upon which the 2016 ONS figures are based. Yet the modifications are predicated on an allegedly objective basis of preferring the more generous ambit of the outdated 2014 objections to the consistent trend to a need for fewer not more home in the Risborough area¹. There is an evidentially untested casuistry in seeking to justify this modification in order “to provide clarity on the 2016-based Household Projections for England and their effect on the Plan”. This translates as ‘do not allow objectively obtained evidence to prevent the WDC from pressing forward with an evidentially flawed plan’.

¹ Paragraph 4.36 page 44

The WDC is not responsible for the Projections for England as a whole but the Projections for their area of Buckinghamshire, including Risborough. The 2016 figures cannot be disregarded by expressing an objectively unsupported preference for earlier figures which support the WDC's agenda. The 2016 ONS figures, and the trend which they reflect, indicate that the provision of an additional 1,000 homes, combined with the proposal to accelerate the pace of building in the Risborough area (thereby adding another 540 houses to this number) will result in 13,000 new homes being built, is unsustainable in fact and finds its basis in unevidenced rhetoric². The result is that the proposed modification exceeds the level which has previously been excluded as being too harmful³.

This alone is a valid reason for question this modification and to require evidence-based justification; in addition, however, there is no longer any cogent argument for requiring such a large development at Princes Risborough when the number of windfall sites in the entire area covered by the Plan, is significantly higher than originally anticipated and will more than provide for sufficient houses to be found elsewhere in the WDC area. The original target can and should be met without destroying the character and environment of the Risborough area and without impinging on AONBs and green belt and an essentially rural way of life.

I note also the proposal that one of the two new primary schools is now to be sited **in the south of the explanation area**⁴ This is a major departure from the expansion envisaged at the time of the original March 2018 consultation.

The unavoidable and objective conclusion is that WDC is choosing to adopt a solution which will not require them to address underlying issues of irreversible harm and which avoids them having to carry out a robust and resilient analysis of their proposals, properly based on current objective data, as opposed to outdated and inaccurate data. They appear to have closed their eyes and minds to considered opinion and reasoned analysis, viewing this additional consultation into proposed wide-ranging and non-empirically evidenced modifications, as a simple tick-boxing exercise to be produced in response to any subsequent cogent objection to the need for and the pace of change to, and destruction of, the Risborough area.

Drilling down into the data relied upon by WDC demonstrates that the foundations of the original plan are insecure thereby undermining much of the rationale for the plan. WDC has used a calculation forecast for windfall which empirical objective analysis of the ONS forecasts has demonstrated to be seriously inaccurate. There is a breath-taking and inexcusable disregard (and lack of concern) for the fact that their windfall forecast is below 50% of the level of that which is actually available for building without destroying the heritage of the Risborough area. This may be the result of lack of awareness or poor training in statistical analysis or that, for the most part, those

² Policy CP4 footnote 32 page 42 – in response to exiting development at Ivy Farm, Longwick (AP8.3); PMM 26, Figure 24 Page 169 – extension of buffer adjusted to respond to development permitted at Ivy Farm, Longwick (AP8.3) P56; see too:

- Concept plan at Figure 26, Page 181 (page 63 of Modifications)
- POLICY PR 5 SETTLEMENT BOUNDARY AND STRATEGIC BUFFER – PMM30, Page 188 (pages 6 4 and 65 of the Modifications) and Figure 28 Page 190 (page 66 of the Modifications).
- Map 14 Princes Risborough x 2 (pages 158 and 167 of the Modifications)

This removes protection from the *“boundary: the land between here and the B4009* such that the PR5 area will now extend to the B4009 Lower Icknield Way, paving the way (in all sense of the phrase) for ribbon development to the east.

³ Paragraph 4.40 page 45, and Table 4 page 45

⁴ Paragraph 5.3.46, Page 185 (page 46 of the modifications)

taking these decisions on behalf of the Risborough plan, do not live in the area and simply do not care about the social, economic, environmental and infrastructure impact: they do not want the extra work or to use the financial resources involved in reviewing the plan properly to reflect the current and predicted objective housing needs in this area for the next 12 years and beyond.

The reality is perhaps to be found at PMM28, Policy PR3, Page 183 - page 59 of the Modifications, in the deletion of the words “*the Council will require*”, substituting a generic mission statement that “***The development of the Princes Risborough Expansion Area as defined on the policies map is required to be an area of comprehensive development, to be taken forward on a comprehensive basis***”. In other words, the original consultation to which reasonable and reasoned argument was presented to the Inspector, has been overtaken by a disinclination to carry out a rigorous and informed review, reflecting recent changes whereby such extensive housing development is no longer required, instead being content to destroy the heritage of Princes Risborough and create a new and vast conurbation paying no more than lip service to its historic setting, beauty and environment.

This is further evidenced by Paragraph 5.3.16 Pages 174 where the proposed modification is: **It is not necessary that a single application is required for the whole expansion area. Realistically, the Council expects that applications for individual parcels will come forward and these need to demonstrate how they work together to contribute to the whole, and not prejudice the realisation of the total expansion area.** With the extended buffer zone, triggered ironically by a separate development of Ivy Farm in Longwick, this is an ‘open sesame’ to unstructured planning to realise a level of housing not actually required with little or no disregard on how this will impact on the area as a whole, the environment, the eco-structure, the people or the historic character and place with the outstanding beauty of the Chilterns.

Examples of the poor and inappropriate planning, preparation and foresight, include failure in terms of housing and infrastructure provision, properly to address:

- the implications of Climate Change and Urban Creep on natural resources such as water supply where the water table is in places only inches below the surface
- absence of an evidence-based study of the flooding issues facing Risborough and the proposed sites, many of which already have poor drainage
- empirical geographical and historical evidence of the ‘major’ risk of flooding: the clues are there in the local names – Meadle, Leys, Mill Lane, Leas
- no provision for additional medical centres
- no discussion with Chiltern Rail and/or Network Rail as to whether the railway infrastructure will be suitable for the significant increase in traffic, particularly during busy commuting periods. If the proposed link to Milton Keynes / Cambridge eventuates, the pressure on the extant routes will be significant, the passenger footfall between London and Risborough and Birmingham / Oxford and Risborough being such that those living in the Risborough area will be the losers. (As it is, many trains are now rammed with standing-room only when they arrive at Princes Risborough station).

Finally, it is noted that new paragraphs 6.271 Page 386 and 6.222 Page 387 provide for development of residential and business property outbuildings within the curtilage of the house with little focused planning regulation. This again will adversely impact on the existing densely populated housing areas.

In summary, it would seem that the modifications anticipate vastly increased expansion beyond that anticipated and projected in the plans submitted for the March 2018 consultation, with little coherent or cohesive thought being given to the impact on the Princes Risborough area. As a result, the character and history of the Risborough area will be destroyed with insult added to this injury through incompetently planned and inadequate infrastructure provision.

The over-provision of housing catered for in the original plan should be recognised and appropriately reduced to conserve the Risborough area for future generations while still encouraging organic evolution of the area, through well-managed and vibrant expansion in housing and local amenities, thereby attracting a local population across all age, income and cultural groups, with inspired and appropriately funded investment in social, recreational and business opportunities.

Yours faithfully

Deirdre John