

23th March, 2019

Wycombe District Council
Queen Victoria Road
High Wycombe
Bucks

Dear Sirs,

Ref: Proposed Main Modifications to the WDC Local Plan.

I attach my responses to your modification documents and would like to say that I am extremely concerned at the lack of understanding of the concerns raised by the residents of Princes Risborough with regard to the extent of the planned expansion to the town.

I am also concerned that the Council are NOT concerned that the beauty of the countryside around Princes Risborough (Green Belt & AONB) is not being protected or enhanced but destroyed.

Princes Risborough is an ancient market town that has seen a lot of development in recent years the latest being Picts Mead, Kite Meadows (built on land that was used for businesses in the past) and the two lots of retirement apartments.

There is very little opportunity for jobs in the town as much of this land has been taken for housing so it means travelling to High Wycombe, Aylesbury or even further afield, so even more congestion on the roads beyond Princes Risborough and railways which cannot cope now.

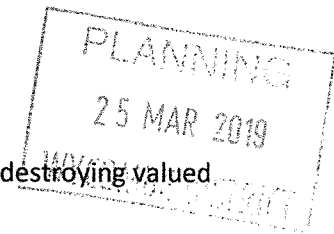
I look forward to yours & the Planning Inspectors responses to all the concerns voiced.

Regards



Audrey Hussey.

PMM33 Policy PR8 Provision & Safeguarding of Transport Infrastructure



Still a cut price alternative to a proper by-pass, going through housing estates & destroying valued landscape. A waste of tax payers money with no guaranteed funding.

The proposed relief road for Princes Risborough is not supported by the local community or other stakeholders- as demonstrated by petitions and the responses to the consultation process. The relief road was one of the 4 key issues on the planning inspectors agenda for the hearing examination (matter 8). The issue also had the largest number of objectors tabled for contributing to the discussion and the largest attendance in the public gallery of all the Local Plan Hearings.

I understand that at the examination developers also voiced major concern with regard to the viability of the housing developments at Princes Risborough if they had to bear the cost of the proposed relief road.

The managing Director (Eric Gadsden) of W E Black, developer of the current Goodearl site (Picts Mead) in the town, stated in correspondence with the WDC 'the last thing that we all want to happen is to start building this cut price alternative through our site only to find that on completion it is wholly inadequate and money which could have gone towards a proper bypass has already been expended and effectively wasted' (25th September 2017, email to WDC)

Halsbury Homes has voiced major concern (as have RARA) to the secretary of state, for communities and local government, with regard to the misleading statements in the submission by WDC for a housing infrastructure fund (HIF) to enable the delivery of the southern part of the relief road.

Despite all the concern voiced and solutions offered sadly the only modification tabled (PMM33) is to para 5.3.140, page 222-223 with the addition of a bullet point to recognise the needs of walkers, cyclists and horse riders for a safe crossing of the severed Picts Lane.

'A safe crossing of the relief road for non-motorised users between the east & west parts of Picts Lane.'

Whilst I welcomed this change there is no information as to how this safe crossing will be achieved to facilitate horse riders, cyclists etc. Are you planning an underpass? a pedestrian crossing would not serve the required purpose, and what are the cost and traffic flow implications.

I find it difficult to understand why there are no substantive changes to the plan to address the key issues raised and clearly expressed at the Hearing, I am concerned as to the point of the hearings and the whole consultation process as it appears to have been largely a waste of peoples time & tax payers money.

Some of the many negative impacts of the relief road expressed at the hearing and through the representation included:

1. Creating a congested and dangerous situation at the railway station. According to the Jacobs Report for WDC on "Preliminary Phasing Strategy Modelling" (May 2017) (TR17,Page 24), the traffic will have increased at the end of the development and result in "increased delay at the junctions in the vicinity of the railway access", positively discouraging rail commuters. I now question the additional impact the crossing proposed on Picts Lane and the new entrance/exit to Blanchfords (PMM41-Fig 36), will have with regard to congestion?

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2. Increased traffic congestion on the A4010 bottlenecks either side of Princes Risborough at Stoke Mandeville & West Wycombe. WDC recognise this problem but have made no attempt to find a solution. Neither has any serious consideration been given to the implications of the planned & currently favoured route of the Oxford to Cambridge Expressway Link.
3. Destroys valuable farmland and the ability for the farmer to access his land, wildlife & natural habitats. (The relief Rd, Southern Options Ecological Appraisal report (Aug 2017). Damaging environment-through noise ,lighting, pollution & increased risk of flooding.
I question that WDC might have a hidden agenda regarding this farmland in the future.
4. Loss of gardens & drive way access to residents in Summerleys Road.

A major concern relates to the Chilterns AONB.

5. The relief road. will be visible from key vantage points in the AONB
During the hearing on Matter 5, the Council accepted that the relevant policy (DM30) was not in line with NPPF & the CRoW Act and an action was raised to address this (Action AP5.5). The Council has failed to address this in the main modifications

There is no mention in PR8 of this major road infrastructure (rightly described as 'major' by the Council) going through valued landscape--- more than just countryside, Green Belt & the AONB. It constitutes major development in the AONB, to which the tests in para 116 of the NPPF (now 172) apply. (Ref the Chiltern Conservation Board statement on Matter 8, Aug 2018) The NPPF requires that permission be refused for major developments in these areas except in exceptional circumstances & where it can be demonstrated they are in the public interest. The Plan ignores this & no justification has been provided.

WDC's TP6 --dated Oct 2017, stated in para 5.89,' Even if it were considered to be a major development it has good grounds for passing the test of exceptional circumstances', WDC refused to publish this & share these grounds, I would like to know what they are.

The WDC Sustainability Appraisal (SA) of the Publication (Reg 19) Draft of the District Local Plan, Dec 2018 states that 'Option 11b has been identified as the preferred option for the relief road.' (para 6.2.1 page 80) It is inconclusive with regard to the chosen option.

The Council should be consulting with Highways England (who have raised concerns about the proposed road and its adverse effects on the traffic flow in the rest of the district) & other relevant stakeholders to understand the bigger picture & come up with a solution that makes better use of existing infrastructure and embraces existing technology

The Council has refused to elaborate on various things and more openness & transparency would be appreciated to restore some public trust in the whole planning process.

And then there is the planned development behind Poppy Road. PMM36- Policy PR11

Policy PR11 Page 229

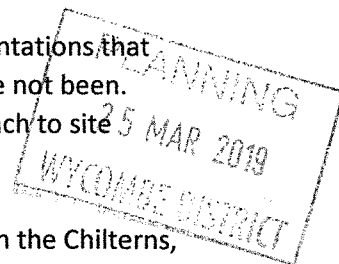
The plan & policy is clear on the many reasons NOT to build on this site----But WDC don't seem to be interested.

The revised wording & Policy points out 1-5 again serve to highlight why development should NOT take

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place at this site. The many constraints identified include hydrological, ecological, visual impacts, species-rich habitats, the chalk headwaters of the Pyrtle Spring, flood risk, access restrictions and overall viability

It was clear from the Planning Inspectors accompanied site visit, the Hearing & Representations that WDC has little understanding of the site. Studies that should have been carried out have not been. It has not been properly assessed and it demonstrates the Councils inconsistent approach to site allocations within the AONB, its AONB setting and the Green Belt.



Point 2 refers to limiting the Impact on the AONB. If the plan seriously intends to cherish the Chilterns, let alone comply with the NPPF, it should be setting out to conserve & enhance the AONB. Point 2a implies that we are happy to build homes in areas at high risk of flooding. We are therefore planning to fail, this is not a sound policy. This field was the site of the Mill Pond and a flood plain, according to at least 1 insurance company.

Point 4 refers to the preferred access being from the proposed new road, Yet WDC (Mr White) at Hearing 6 on the 26th July lied by stating that "it is a misconception that there is any link with the relief road and the Poppy Rd development". This new wording now clearly re enforces the strong held view that the reason for the relief road being diverted through the Culverton Farm field (in the AONB & Green Belt) was to access the (difficult to access) site. As stated at the Hearing 2 wrongs do not make a right.

WDC have previously pointed out that this a difficult site to access.

Figure 32, page 230

WDC are still confused & uncertain how to access this site.

During the visit by the Planning Inspector (PI), the WDC representative was unable to point out the preferred vehicular access route, stating that the route shown on figure 32 was only indicative and not the actual route. Can this figure be updated with the actual preferred route shown? The WDC representative also stated during the visit that what is proposed as a secondary access was not a planned access- in response to a query from the PI. Also the clear span bridge required by the Environment Agency is not shown. Further clarification & elaboration is required.

Paragraph 5.3.161

NO justification forthcoming from WDC

The site is Green Belt, is part of the AONB and part in the AONB setting. This is not properly recognised and no exceptional circumstances have been demonstrated to change this status and comply with the NPPF (e.g. paras 79-86, 115 & 116).

Paragraph 5.3.162

Some local consultation would be welcome

NB development of this site has been refused twice before due to problems with access. All of the above begs the question.... Who put this site forward to be considered for development?

For the safe alternative access as described, will existing residential properties be impacted & if so to what extent?. Clarification required please.

Paragraph 5.3.163

Properly managed buffer zone or extended private gardens?

Who is going to protect & manage buffer areas identified? The Town Council or the new Unitary Council?
This also needs clarification & ownership.

Paragraph 5.3.165

Where is the bridge & has it been allowed for in the viability study of this site?

The Environment Agency (EA) has pointed out that this is one of the sites in the Plan that may be undeliverable. The EA has also pointed out that a clear span bridge would be required to cross the chalk stream, this is not reflected in the modifications or in Fig 32.

Paragraph 5.3.166

What happened to the No. 1 objective in the plan to 'Cherish the Chilterns-?

Negative visual' impact from the Chiltern escarpment or relevant rights of way is inevitable and not a 'potential visual' impact with this allocation.

General Points.

NO viability assessment presented, nor proper site sustainability analysis and no consistency with the other site selections, This allocation is NOT soundly based or deliverable.

The Green Belt assessment of the site has not been thoroughly investigated & there is no consistency with, for example, other sites such as Molins Sports Ground in Monks Risborough, Neither the Arup Green Belt pt1 report (2016) or the WDC part 2 review (June 2016) supports its removal from Green Belt. The new text provided in the Sustainability Appraisal of the Plan (December 2018) makes no mention of this site & therefore nothing to justify its selection for development.

Other Brownfield sites exist but have not been considered, or included in the Councils Brownfield Register. For example Paddocks hospital site.

The allocation is not soundly based & there is no evidence that the development of the site is either viable or deliverable.

This all adds to my suspicions as to why this site has been chosen.

PMM41 - Policy PR16- Land at Princes Risborough Station

I welcome recognition that Princes Risborough is an important gateway to the Chilterns AONB and the important role that the station plays in welcoming visitors & for the tourist rated development. I commend the Planning Inspector for picking up on this, I would also like to see the importance of the scenic routes recognised, these being the Horsenden conservation area & the Phoenix Trail, which could be more easily accessed from the back of the station across Princes Estate. Stronger insistence on tourism related development proposals in the wording used would be better than merely saying

'acceptable in principle'.

The Chilterns AONB is an extremely valuable asset & a major attraction for visitors. Valued landscape is going to be destroyed. I would request that WDC reflect this in the rest of the plan by ensuring that the relevant policies set out to protect and enhance this asset is in accordance with the NPPF & the Countryside & Rights of Way (CROW) Act 2000. For example in policy DM30.

PMM73-Policy DM42 Managing development in the Green Belt

Policy DM42, Page 381-382.

Green Belt Assessment flawed, not consistent & mismanaged.

I am surprised & very disappointed that there were no actions & there are no PPM, arising from the Representations and the Hearing relating specifically to CP8 & the Green Belt.

The PI identified key issues regarding the Green Belt assessments & the soundness with regard to the decision making process on the release of sites from the Green Belt, and questioned the exceptional circumstances regarding the revision of boundaries. The strong body of evidence & the discussion at Hearing 6 clearly showed that the reviews carried out were severely flawed, inconsistent & the evidence of retrofitting of reports to suit housing needs. No assessments were carried out as required, for example, views from Hill Top. There was a lot of criticism around the Councils assessment of 19 sites on the day in March 2016 & no explanation was forthcoming on whether this was 3 people visiting all 19 of the sites or the sites divided up amongst the 3 people involved.

PMM39-Policy PR14- Town centre site: Land south of Horns Lane (page 242)

Removal of the plan to double-deck Horns Lane car park.

The removal of this plan is welcomed, as this was opposed by the steering group, the Town Council & probably 98% of residents. To even put this in the plans shows the utter contempt that WDC has for local concerns. It is, however, disappointing to see that it has not been completely removed.

WDC needs to explore different ideas such as underground parking. The idea of double-decking Horns Lane car park is an appalling idea and would create an eyesore in the centre of the town. It would be very visible from the AONB viewpoints of Whiteleaf & Brush Hill & would certainly NOT enhance the setting.

PMM5 - Policy CP3- Settlement strategy.

Paragraph 4.22, Page 35

Saying one thing but doing something else.

The revised wording & clarification is welcomed but begs the question as to why development (homes & major infrastructure) is still being proposed at Princes Risborough in areas of valued landscape that includes the AONB setting, the AONB, Green Belt & areas acknowledged by the Environment Agency, & others (Insurance Companies) , as being at high risk of flooding.

PMM 27/28 - Policy PR3- Princes Risborough Area of Comprehensive development.

Table 15, Page 170, Table 16, Page 171, & Para 5.3.16, Page 174

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The housing numbers & location proposed for Princes Risborough are not desirable & the planned growth is not sustainable. A sustainable plan (as the NPPF points out) should address the environmental, social & economic agendas. This Plan does not, as has been well stated in the Representations. Destruction of valued landscape, creating a divided community, and the lack of employment opportunities are just some of the reasons why the Plan is not sustainable, sound , not deliverable & certain to fail.