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**From:** John Hughes [REDACTED]  
**Sent:** 26 March 2019 11:44  
**To:** NewLocalPlan  
**Subject:** Comments on PMM to Draft Local Plan  
**Attachments:** Comments on Proposed Main Modifications to the Draft WDC Local Plan.docx

Please find attached my comments regarding the proposed main modifications to the Draft Local Plan for consideration by the PI.

John Hughes

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## **Comments from J G Hughes on**

### **Proposed Main Modifications to the Draft WDC Local Plan**

#### **SUMMARY**

**Most of the proposed main modifications (MM) serve to reinforce rather than eliminate or even modify unsustainability issues with Wycombe District Council's draft Local Plan (LP) particularly insofar as they relate to Princes Risborough (PMM). They continue to ignore both the economic, social and environmental realities involved and fly in the face of "*development that reflects the vision and aspiration of local communities*". Both aspects were covered in detail in evidence before and at the Planning Inquiry considering the LP. Little attention appears to have been paid to them, however, and I would specifically draw the Inspector's attention to the following aspects.**

#### **PMM 1**

The wording proposed suggests simply a reactive rather than proactive approach to the major initiatives mentioned. The Local Plan is supposed to cover until 2033. Risborough Area Community Action, which included WDC, was able to undertake such forward thinking in 2005 and published their conclusions in Risborough 2035 which carried wide community buy in. As an interested layman, it would appear I am better informed than the planning professionals at WDC about the major initiatives underway. Based on existing knowledge, professionals should be able to venture approaches to them which provide a sustainable option for future development of the district that covers the social, environmental and economic effects. The proposed wording remains unsound.

#### **PMM 2**

Whilst the proposed wording rightly puts emphasis on the historic environment, it is not reflected elsewhere in the plan and particularly in so far as the Chilterns AONB and the Risborough area as a gateway to it is concerned. The plan's lack of economic development in the Risborough area whilst being by far the largest housing provision, will result in much greater commuting by car not reducing it. Public transport is already at capacity. The modifications proposed acknowledge significant effects of the major initiatives covered in PMM1 but fail to suggest how they should be tackled except in the most generalised ways. This does nothing to clarify the intended approach, reinforcing the unsoundness of the plan.

#### **PMM 3**

The additional wording regarding flooding is negated by the fact that there is little or no substantive research into flooding or water resource availability in areas such as Princes Risborough and

environs where the bulk of the development under the plan is intended. What evidence there is suggests that this area is indeed prone to flooding and is already subject to water stress. The approach proposed is again reactive not proactive and unsound.

#### **PMM 4**

What “governance structures” is being proposed? Bucks is to become a unitary authority. How can WDC suggest governance structures which may or may not be considered appropriate by the new authority? This is again unsound.

#### **PMM 5**

The new wording does nothing to correct the inconsistencies CP3 demonstrates across the district. Why are the approaches not adopted district wide? Most are common to all the tiers as demonstrated at the public hearings, particularly in respect of brownfield sites and areas adjacent to the AONB such as in Princes Risborough.

#### **PMM 6**

There is a significant reduction in house sales particularly in the new developments already underway in the Risborough area. The modifications proposed ignore the 25 per cent reduction in housing numbers contained in the 2016 ONS figures. Yet the LP modifications propose a major increase in the number to be developed in the Risborough area exacerbating the already significant over supply. This is unsustainable and unsound.

#### **PMM 7**

The new wording proposes nothing to resolve the lack of jobs that already exists in the Risborough area. Try as they might, WDC have signally failed to attract employment to the area in the past, as they have readily admitted. There is nothing in the modification likely to reverse this and the problems associated with far higher commuting by road are likely to grow significantly. The intended “relief” road will simply add to the problems at the West Wycombe round about and the Stoke Mandeville junction. The rail service is already at or very near to capacity. This yet again demonstrates the lack of sustainability in the LP and its unsoundness.

#### **PMM 9, PMM 10, PMM 23 (HW21) and PMM 63**

WDC is under an obligation to conserve and enhance the AONB. The phrase “where possible” flies in the face of this obligation and is totally unacceptable in all places. The LP must conform to national policy in this respect.

#### **PMM 26**

The changes to the map clearly demonstrate just how easy it is to sideline the LP when required by the planning authority.

## **PMM 27 and 28**

This piecemeal approach shows the lack of sustainability involved in the approach to the major development area. There is no need locally for the number of houses proposed, new build ales are already well down and the ONS 2016 figure is 25% below that used to develop the LP. The LP fails to properly take into account the social (particularly divided community), environmental (especially flood risk, water stress and damage to the landscape adjacent to the AONB at a major gateway) and economic (no plan to attract jobs and reliance on a “relief road” to help local traffic flow whilst doing nothing to resolve existing issues at West Wickham and Stoke Mandeville). The result is back to a “Yellow one today and a blue one tomorrow” which plagued development of the Risborough area for too many years. It is both unsound and unsustainable and must be rejected.

## **PMM 32, 33, 34, 35, 36, 37, 38, 39, 40, 41 and 42**

Who will police this “required” development in the expansion area and elsewhere in the Risborough area? No onus to do so is placed on the planning authority as it should be. For example, who determines where the “safe crossing” of the relief road should be placed and how? Who determines the appropriateness of any proposal to double deck the Horns Lane car park? Indeed, the aspirations voiced in the LP would be subject to developers accepting and implementing provisions which they – and the community – have to an overwhelming extent rejected roundly at all stages in the development of the LP including before the Inspector. None of the key issues raised at the inquiry have been addressed by the modifications which do not provide a coherent and complimentary approach to planning for the area and simply serve to remove the burden of determination and policing from the planning authority. The plan remains totally unsound in all respects for the reasons given prior to and at the inquiry.

John Hughes

