
From: Colin Courtney [REDACTED]
Sent: 26 March 2019 16:41
To: NewLocalPlan
Subject: Wycombe District Local Plan - Responses to consultation
Attachments: 190326 CNC response to PMMs.docx; 190326 CNC SA Report, Addendum and Habitats assessment.docx

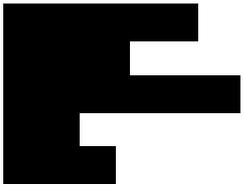
Please find attached my consultation responses to the following with regard to the Local Plan:

- Proposed Main Modifications
- Sustainability Appraisal
- Sustainability Appraisal Addendum
- Revised Habitats Regulations Assessment

The last three are included within the one document. Your acknowledgement of safe receipt would be appreciated.

Best regards,

Colin Courtney



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Main Modifications to the Local Plan – Colin Courtney response – March 2019

PART A

1. Personal Details

2. Agent's Details (if applicable)

** If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

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First Name	Colin	
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PART B – Comments on the Proposed Main Modifications

Summary

The proposed main modifications appear to virtually ignore the whole Examination process and in particular the Representations made and the discussions at the Hearing sessions.

The consultation process was flawed from start to finish as stated by local stakeholders on many occasions. The Princes Risborough Steering Group was acknowledged by WDC at the Examination as a box ticking exercise to carefully manage and control the planning process, with no regard for local views. I am extremely disappointed that the planning Inspector has not picked up on this.

The Plan and current modifications ignore the fundamentals of any sustainable plan in terms of addressing the, environment, social and economic needs of the District. The Plan is not sound, it is not sustainable and it is not legally compliant. It is a plan to fail.

PMM 2

- Paragraph 2.1, Page 15 – I support the modifications, however these are in conflict with Policy DM30 which should also aim to ‘enhance’ the Chilterns Area of Outstanding Natural Beauty (AONB), but doesn’t.

PMM 3

- Chapter 3, Section 8, Page 24 – I support the modifications but these modifications are not reflected in the Plan for Princes Risborough. The Plan increases the need for travel by private car, ignores brownfield sites, and directs development to areas of high flood risk.

PMM 5

- Policy CP3, Page 35 – I support these modifications but they are not reflected in the Plan. WDC has dismissed or failed to consider significant brownfield sites in Princes Risborough.
- Paragraph 4.22, Page 35 - The revised wording and clarification is supported but this is not reflected in the proposals. New homes and major infrastructure are being proposed at Princes Risborough, in areas of valued landscape, in the AONB setting, the AONB, Green Belt, and areas at high risk of flooding.

PMM 27

- Table 15, Page 170, Table 16, Page 171, and Paragraph 5.3.16, Page 174 – I object. No proper sustainability analysis has been carried out to justify the extent and form of development proposed at Princes Risborough. The destruction of valued landscape, creating a divided community, and lack of employment opportunities. These are just some of the reasons why the Plan is not sustainable.

PMM 29

- Figure 26, Page 181 - Within the buffer zone shown there is a brown hatched area. Please explain what this is.

PMM 30

- Paragraph 5.3.55, Page 188 and Figure 28, Page 190 - I object. The proposed boundary between Longwick and Princes Risborough is not sufficient, it is too narrow and should be at least twice this width to be fit for purpose. A strategic buffer should be free of development, including sports related. The area shown already has development within it.

PMM 33

- I object. The relief road proposal is not supported by the local community or by developers. This was one of the key issues on the Planning Inspector’s Agenda for the Hearing Examination and it had the largest number of objectors contributing to any of the Hearing sessions.

The many negative impacts of the road proposal have been well documented and include:

- A congested and dangerous situation at the railway station.
- Increased traffic congestion on the A4010 bottleneck either side of Princes Risborough.
- Damage to the environment – the destruction of valuable farmland, wildlife and natural habitats.
- Increased noise, lighting, pollution and increased risk of flooding.
- It will be visible from key vantage points in the AONB. It constitutes major development in the AONB, to which the tests in para 116 of the NPPF (now 172) should be applied.

Main Modifications to the Local Plan – Colin Courtney response – March 2019

If the proposed modification referred to in paragraph 5.3.140, relates to a pedestrian crossing this will not facilitate the many non-vehicle users, such as horse riders and cyclists. This requires further clarification.

Better and more sustainable transport solutions (less expensive and less damage to the environment) have been put forward. I am surprised and disappointed that the Planning Inspector has not listened.

There is no funding in place for the road – WDC’s request for HIF funding and various statements regarding this funding was exposed at the Examination Hearing as misleading.

PMM 36

- Policy PR11 Page 229 - I object. The policy merely serves to highlight why development should not take place at this site. The many constraints identified include ecological, hydrological, visual impacts, species rich habitats, the chalk headwaters of the Pyrtle Spring, flood risk, access restrictions and overall viability. It was clear from site visit that WDC had little understanding of the site. The WDC representatives could not indicate the proposed access route. The site has not been properly investigated and there is no consistency with other sites in terms of green belt assessment. Neither the Arup Green Belt Part 1 report (2016) or the WDC part 2 review (June 2016) support its removal from Green Belt.
- Figure 32, page 230 - I object. Can this figure be updated please with WDC’s preferred route shown, together with the bridge that is required by the Environment Agency.
- Paragraph 5.3.161 - I object. No exceptional circumstances have been demonstrated to change the status of this site and comply with the NPPF (paras. 79-86, 115 and 116).
- Paragraph 5.3.163 - I object. Clarification is required on how the proposed buffer zone is going to be managed and protected.
- Paragraph 5.3.166 - I object. There will be ‘Negative visual’ impact from the Chiltern escarpment and relevant rights of way with this allocation.

PMM 41

- I welcome the wording around tourism related development but these could go further and be stronger than just, ‘acceptable in principle’.
- Figure 36 – Blanchfords should be encouraged to move to one of the proposed industrial sites and free this area up for residential development.
- Paragraph 5.3.212 - I object. A new relief road through this area is not a sustainable solution. It will create a hostile environment discouraging commuters.

PMM 63

- Policy DM30, Page 346 - I object. Whilst I welcome the amendment to point 2, ‘in accordance with national policy, and will otherwise be refused’, this then needs to be applied throughout the Plan. It is not. Point 1(a) needs to be amended with the deletion of ‘where possible’ and similarly in point 3, ‘significant’ must be removed. We should not be planning to have any adverse impact on the natural beauty of the Chilterns AONB. The modifications are not consistent with the intentions expressed elsewhere in the Plan, e.g. paragraph 2.1, Page 15.

Main Modifications to the Local Plan – Colin Courtney response – March 2019

- Paragraphs 6.100 – 6.103, Pages 348 – 349 – I object. The modifications do not provide the clarification required to demonstrate that the Plan is compliant with the NPPF and the CRoW Act 2000 in respect of the impact of the Plan on the Chilterns AONB.

PMM 73

- Policy DM42, Page 381 – 382 - I object. The PI identified key issues from the Representations which formed a key part of the agenda for the relevant Examination Hearing 6. The evidence provided and the discussion at the Hearing clearly showed that the reviews carried out were flawed and inconsistent. The Green Belt assessments are one of the fundamental failings of the Plan but not reflected in the PMM's.
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**WDC - Sustainability Appraisal (SA) of the Local Plan (Dec. 2018), Addendum (Feb. 2019) and Revised Habitats Regulations Assessment Report (Jan. 2019).
Colin Courtney response to consultation (Mar. 2019)**

PART A

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PART B – Comments on the Sustainability Appraisal (SA) of the Local Plan (December 2018)

Summary

The SA appraisal does not in my view satisfy concerns with regard to the overall sustainability of the Local Plan or the selection of development sites. It appears to be trying to justify the retrofitting of housing development into a Local Plan with no concern for sustainable development or the importance that the National Planning Policy Framework (NPPF) puts on this. Many of the concerns raised in the SA report are ignored in the Plan. The NPPF puts great weight on sustainability and in particular the environment, economic and social aspects. This report fails to address these aspects.

Strategic Objectives of the Local Plan

The strategic objectives of the Plan are re stated in this report and include to ‘Cherish the Chilterns’, to ‘Strengthen the Sense of Place’. Also the importance of ‘protecting and enhancing the District’s natural and built environment, including landscape, biodiversity, green and blue infrastructure, historic and cultural assets; maintaining place identity by using Green Belt ..’ Yet the Plan, dilutes these to, ‘where possible enhance’ our area of outstanding natural beauty.

Another objective relates to mitigating climate change and reducing ‘CO2 emissions by reducing the need for travel by private car, and aid public transport viability, through intensifying existing urban areas by re-use of brownfield sites, locating development in settlements with the widest range of services and facilities, and by clustering development to achieve high quality walking, cycling and public transport provision.’ Yet none of this is reflected in the Plan proposals for Princes Risborough.

Environment - Chilterns Area of Outstanding Natural Beauty (AONB)

The report (on page 36) states that with regard to Princes Risborough, ‘The evidence demonstrates that there is scope for development without significant harm to the character of the landscape and setting of the AONB.’ The harm to the landscape however is significant as demonstrated in the body of evidence provided throughout the Examination.

The analysis on Princes Risborough (on page 69 and page 110) clearly demonstrates that there will be significant negative impact with the extent of development proposed. The report states in chapter 8.5, page 110 that ‘The strategy attaches great weight to conserving the landscape and scenic beauty of the AONB. The redevelopment of brownfield sites also provides an opportunity to remove existing development that is detracting from the significance of heritage assets and the wider historic environment. This coupled with improvements to accessibility and signage has the potential to enhance the historic environment with a long term positive effect.’ This is not reflected in the Plan and there has been no proper brownfield site analysis for Princes Risborough?

Chapter 8.7, page 119, refers to the requirements of NPPF para. 115, and para 116, yet the Plan ignores these requirements.

On page 119 the report refers to attaching ‘great weight to conserving the landscape and scenic beauty of the AONB. As a result, the spatial strategy does not allocate sites that constitute “major development” in the AONB, prioritising the conservation of the valued landscape feature and its setting. The AONB and wider landscape have been a key consideration in the development of the draft Publication plan, influencing the overall level of growth to be delivered and its location across the District.’ Yet the Plan ignores the impact of the major road development in the AONB in Princes Risborough and the housing and road development on the landscape in the AONB setting.

Chapter 8.7, page 123 states, ‘... While not within the AONB, the expansion of Princes Risborough will have an impact on the landscape character in the north of the District and potentially affect the setting of the AONB.’ This appears to ignore the fact that Princes Risborough (and some of the development – including road development) is within the AONB, and the remainder in the setting of the AONB.

Environment - Flood risk

**WDC - Sustainability Appraisal (SA) of the Local Plan (Dec. 2018), Addendum (Feb. 2019) and Revised Habitats Regulations Assessment Report (Jan. 2019).
Colin Courtney response to consultation (Mar. 2019)**

Pages 97 to 98 identifies the significant flood risk issues at development sites in Princes Risborough. Highlighting the error of planning for development in areas with high flood risk.

Social

With the creation of a new town at Princes Risborough, which is separated by distance and physical barriers (railway and stream) from the existing town, and the coalescence of this new town with Longwick, it is surprising that the social impact of this is not addressed in the report. For example in the section on community and wellbeing in Chapter 8.3 / page 101. This is a failure on the part of the appraisal and the Plan.

Economic

The SA report (on page 61) acknowledges that 'Princes Risborough is not considered to be likely to attract significant new employment growth in the Local Plan period. The Wycombe Commercial Assessment (February 2016) concludes that Princes Risborough does not score strongly on any key commercial drivers and is not ideally placed to benefit from national and regional growth trends.' Without employment, the scale of development proposed is not sound and not sustainable from an economic perspective.

Relief road

The appraisal appears confused with regard to the relief road proposals for Princes Risborough. It refers to different preferred options. It appears to have 'cut and paste' from various studies carried out, and there has never been an accurate assessment of costs or relative impact of the options now proposed. It fails to understand the wider transport issues in the chapter on transport and traffic (chapter 8.9, page 130).

Sustainability Appraisal (SA) for the Wycombe District Local Plan – SA Report Addendum (February 2019)

The SA screening text throughout constantly uses the expression, 'does not significantly affect the findings of the previous SA work.' This illustrates the fact that there are no significant modifications to the Plan and the SA appraisal work was just a box ticking exercise to appease the Planning Inspector.

Revised Habitats Regulations Assessment Report (January 2019)

The following extract from this report reinforces my view that a wider strategic assessment has to be carried out before any decisions can be made regarding investment in new transportation links for Princes Risborough. WDC don't appear to recognise this. I'm surprised that the Planning Inspector doesn't understand this.

Para. 5.62, page 79, states 'as part of assessing north-south routes options for countywide movements, it is understood that work is being commissioned to look at the A4010. However this is only at very early stages and alternative options for north-south routes may also be considered. This may need to be reviewed once available'.
