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**From:** Colin Courtney [REDACTED]  
**Sent:** 26 March 2019 20:30  
**To:** NewLocalPlan  
**Cc:** Mrs Jacqui Farnell  
**Subject:** Wycombe District Local Plan - Responses to current consultation  
**Attachments:** 190326 WURG esponse to PMMs.docx; 190326 WURG Habitats Assessment.docx; 190326 WURG SA Report response.docx

Please find attached on behalf of the Wake Up Risborough Group, responses to the following documents regarding the Local Plan:

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

We trust these are in an acceptable format.

Colin Courtney,

On behalf of the Wake Up Risborough Group

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## Main Modifications to the Local Plan – Wake Up Risborough Group response – Mar 2019

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### 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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#### 3. Client Details

If you are an agent representing a specific site interest, please fill in the details below.

Site Interest	Princes Risborough
Client's Name	

**4. Please tick this box if you wish to be notified of future stages of the Wycombe District Local Plan**

**5. Please tick this box if you wish to receive our electronic Weekly Planning Bulletin which gives you updates on local and national Planning matters (you will need to supply an email address to receive this)**

**PART B – Comments on the Proposed Main Modifications– Please copy and use a separate sheet for each representation**

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Name or Organisation:

Wake Up Risborough Group

**1. Which of the inspector’s Proposed Main Modifications does this response relate to?**

Proposed Main Modification number

As detailed in the text

**Summary**

The proposed main modifications do not reflect the views expressed by the community and other stakeholders through the Representations and the Examination process. The modified Plan is not supported by the Wake Up Risborough Group (WURG).

It ignores 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.

**PMM 2 - CHAPTER 2.0 WYCOMBE DISTRICT – THE BIG CHALLENGE**

- Paragraph 2.1, Page 15 - We support the modifications, however these are in conflict with proposals elsewhere in the Plan which do not serve to enhance the historic environment e.g. Alscot, near Princes Risborough. They are also in conflict with Policy DM30 which should also aim to ‘enhance’ the Chilterns Area of Outstanding Natural Beauty (AONB), but it doesn’t.

**PMM 3 - CHAPTER 3.0 OUR VISION AND STRATEGIC OBJECTIVES**

- Chapter 3, Section 8, Page 24 – We support the modifications to the wording but these modifications are not reflected in the Plan with regard to development at Princes Risborough. The Plan proposals increase the need for travel by private car, ignore brownfield sites, and directs development to areas of high flood risk.
- Paragraph 3.18, Page 25 - We object to the modifications as they do not go far enough with regard to avoiding areas at risk of flooding, nor are they reflected in the Plan’s development proposals.

**PMM 5 - POLICY CP3 – SETTLEMENT STRATEGY**

- Policy CP3, Page 35 - The modifications are supported but are they are not reflected in the Plan. There has been little effort by WDC to consider brownfield sites as discussed at some length at Hearing 6. We cannot understand why brownfield sites in Princes Risborough have been ignored. These have been well documented and could provide 100 - 200 new homes.
- Paragraph 4.22, Page 35 - The revised wording and clarification is welcomed but not reflected in proposals for Princes Risborough. A large number of new homes and major infrastructure are still being proposed at Princes Risborough, in areas of valued landscape, in the AONB setting, the AONB, Green Belt, and areas acknowledged by the Environment Agency 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, and Paragraph 5.3.16, Page 174 - We object. A sustainable plan should address (as the NPPF points out) the environmental, social and economic agendas. Destruction of valued landscape, creating a divided community, and lack of employment opportunities, are reasons alone as to why the Plan is neither sound nor sustainable.

### **PMM 29 – POLICY PR4 – THE MAIN EXPANSION AREA DEVELOPMENT FRAMEWORK**

- Figure 26, Page 181 – We object to the narrow buffer zone as commented in our response to PMM 30. Within the buffer zone shown there is a brown hatched area and no key has been provided to explain what this is, please clarify.

### **PMM 30 - POLICY PR5 – SETTLEMENT BOUNDARY AND STRATEGIC BUFFER**

- Paragraph 5.3.55, Page 188 and Figure 28, Page 190 - We object. The proposed boundary between Longwick and Princes Risborough will be barely noticeable from vantage points within the AONB. We also consider that any strategic buffer should be kept free of all development. We believe the brown hatched area shown in Figure 26 is existing development which already rules this out as a buffer zone.

### **PMM 33 - POLICY PR8 – PROVISION AND SAFEGUARDING OF TRANSPORT INFRASTRUCTURE**

We object. The relief road proposal for Princes Risborough has not been justified and is not supported – as demonstrated by petitions and the responses to the consultation process. The relief road was one of the 4 key issues on the Planning Inspector’s Agenda for the Hearing Examination (Matter 8). It also had the largest number of objectors tabled for contributing to the discussion of all the Local Plan Hearings.

Despite all of this the only modification tabled (PMM 33) is to paragraph 5.3.140, 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. But what type of ‘safe crossing’ is being proposed and will it facilitate horse riders, cyclists etc.? A pedestrian crossing would not serve the required purpose. We also question what additional impact will the new crossing, and the possible new entrance and exit to Blanchfords (PMM41 – Fig 36), have with regard to traffic congestion?

We find it difficult to understand why key issues raised have not been addressed. WDC’s response is a good example of why the community feel let down, and consider the whole consultation process and the Examination a waste of everyone’s time.

Some of the many negative impacts of the relief road proposal expressed at the Hearing and through the Representations include:

- Developers concern with regard to its viability. To quote the Managing Director (Eric Gadsden) of W E Black: ‘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’. (25 September, 2017, email to WDC). Halsbury Homes have voiced their concern – as have others, with regard to the misleading statements in the submission by WDC for the Housing Infrastructure Fund (HIF). There is no funding in place for the road.
- 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 junctions in the vicinity of the railway station access”, positively discouraging rail commuters.

- Increased traffic congestion on the A4010 bottleneck either side of Princes Risborough. WDC recognise this problem but have made no attempt to find a solution. The new Bucks Unitary Council should be driving any new transport proposals in this regard. Until new elected members are in place this should be put on hold. The wider traffic issues, such as current congestion at Stoke Mandeville and West Wycombe, and the implications of the planned route of the Oxford to Cambridge Expressway link, need to be addressed by this new body. The new unitary council need to consult with Highways England (who have raised concerns about the proposed road and its adverse effect on the traffic flow in the rest of the district) and other relevant stakeholders to understand the bigger picture and come up with a sustainable transport solution that makes better use of existing infrastructure.
- Destroys valuable farmland, wildlife and natural habitats. (The Relief Road, Southern Options, Ecological Appraisal report (Aug 2017)). Damaging the environment – through noise, lighting, pollution and increased risk of flooding.
- Loss of gardens and drive way access to residents of Summerleys road.
- It will be visible from key vantage points in the AONB. It is in direct line of sight from Whiteleaf Cross and also clearly visible from Brush Hill and the Ridgeway National trail. 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 and the AONB. It constitutes major development in the AONB, to which the tests in para 116 of the NPPF (now 172) apply.

The NPPF requires that permission be refused for major developments in these areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. The Plan ignores this and no justification has been provided. WDC stated in their TP6 (October 2017) that ‘if it were considered to be major development, it has good grounds for passing the test of exceptional circumstances’. However WDC continually refused to publish or share these grounds. What are they?

According to the DRF report (Princes Risborough Feasibility Review Development of Southern Alternatives, September 2017) all options were similar in cost. However once other costs – not included in the DRF appraisal, such as new land purchase, flood risks, river crossings, and other mitigation measures are taken into consideration it is not the cheapest. The Jacobs 11b Option is the cheapest.

In TP6, WDC noted in Appendix B, 2f, that the Council had established contact with the owners of Culverton Farm and in the event of being unable to secure this land from the owners had a reasonable alternative route. WDC refused to elaborate on this alternative route at the Hearing. WURG would like to see more openness and transparency on this alternative route.

The proposed relief road has no funding, and is not a sustainable solution. It is not consistent with the Local Plan Principles for Rural Areas (page 275). It is a waste of tax payer’s money. Proceeding with this road proposal is eroding any public trust that still exists with regard to the whole planning process.

The WDC, Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan, December 2018, states that ‘Option 11b has been identified as the preferred option for the relief road’ (para 6.2.1 page 80). However as this appraisal appears to be largely a ‘cut and paste exercise’ we are not even sure that this is the message that WDC intended to convey.

### **PMM 36 - POLICY PR11 – LAND TO THE REAR OF POPPY ROAD**

- Policy PR11 Page 229 - We object. The revised wording and policy points highlight why development should not take place at this site. The 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 the Planning Inspector's accompanied site visit, the Hearing, and Representations, that WDC has little understanding of the site. Studies that should have been carried out have not been. The site has not been properly assessed and the proposal demonstrates the Council's inconsistent approach to site allocations within the AONB, the 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 and 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.

Point 4 refers to the preferred access being from the proposed relief road. Yet WDC (Mr White) at Hearing 6 on the 26<sup>th</sup> of July misinformed everyone by stating that 'It is a misconception that there is any link with the relief road and the Poppy Road development'. This new wording now clearly reinforces the strongly held view that the reason for the relief road being diverted through the Culverton farm field was to access this site.

- Figure 32, page 230 - We object. During the site visit by the Planning Inspector (PI), the WDC representative, when asked, 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 please with the actual preferred route shown? The WDC representative also stated during the site visit that what is now being proposed as a secondary access was not an intended access route. Also the clear span bridge required by the Environment Agency is not shown. Further clarification and elaboration is required.
- Paragraph 5.3.161 - We object. The site is in the Green Belt, part in 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 (paras. 79-86, 115 and 116).
- Paragraph 5.3.162 - We object. For the safe alternative access as described, will existing residential properties be impacted and if so to what extent? This needs to be clarified.
- Paragraph 5.3.163 - We object. Who is going to protect and manage the buffer areas identified? The Town Council or the new Bucks Unitary Council? This requires clarification and ownership.
- Paragraph 5.3.165 - We object. 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 - We object. 'Negative visual' impact from the Chiltern escarpment or relevant rights of way is inevitable and not a 'potential visual' impact with this allocation.

### General comment with regard to the Poppy Road modifications

- The site has not been thoroughly 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. The new text provided in the Sustainability Appraisal of the Plan (December 2018) makes no mention of this site and therefore nothing to justify its selection for development.

## **Main Modifications to the Local Plan – Wake Up Risborough Group response – Mar 2019**

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- Other Brownfield sites exist but have not been considered, or included in the Council's Brownfield Register. For example, New Road (potential for residential above retail), Blanchfords Builders merchants site, and Paddocks Hospital, all close to the Princes Risborough town centre. These could provide 100 -200 new homes.
- This allocation is not soundly based and there is no evidence that development of the site is either viable or deliverable.

### **PMM 41 - POLICY PR16 – LAND AT PRINCES RISBOROUGH STATION**

- Policy PR16 - We support the recognition that Princes Risborough is an important gateway to the Chilterns AONB and the important role the station plays in welcoming visitors and for tourist related development. The wording around tourism related development proposals should be encouraged more than by merely stating, 'acceptable in principle'.
- Figure 36 – We believe it would make for better planning to encourage Blanchfords to move to one of the proposed industrial sites and free this area up for residential development within walking distance of the station.
- Paragraph 5.3.212 - We object. The impact of, the required safe pedestrian and cycle crossing at Station Approach, the new Blanchfords access, and the new crossing between the two severed sections of Picts lane, require to be assessed with regard to traffic flow and resulting congestion implications. We expect this will further demonstrate that a new relief road through this residential and station heart of the town is not a sustainable or sound solution. It will result in a hostile environment discouraging commuters. An earlier Jacobs phasing report (May 2017 / TR17 page 24) highlighted an issue before these additional constraints were added. We would have expected the latest SA Report (December 2018) and the SA Report Addendum (February 2019) to have picked this up but both have failed in this regard. We also note that there is no detailed assessment or proposals with regard to parking in the PMM's. It should be stated that this will require careful consideration in view of the sensitive AONB setting.

### **PMM 63 –Policy DM30 – THE CHILTERNs AREA OF OUTSTANDING NATURAL BEAUTY**

- Policy DM30, Page 346 - We object. We welcome the amendment to point 2. Notably, 'in accordance with national policy, and will otherwise be refused'. However this then needs to be applied throughout the plan and it is not. 1(a) needs to be amended with the deletion of 'where possible' in relation to enhancing the natural beauty of the Chilterns AONB. Similarly in point 3, 'significant' must be removed as we should not be planning to have any adverse impact on the natural beauty of the Chilterns AONB. This is a major asset, and with support from all stakeholders could become a National Park following the current Government review. The modifications are not consistent with the intentions expressed in Paragraph 2.1, Page 15, of the Plan.
- Paragraphs 6.100 – 6.103, Pages 348 – 349 - The modified wording does 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 – MANAGING DEVELOPMENT IN THE GREEN BELT**

- Policy DM42, Page 381 – 382 - We object. We are surprised that there were no actions and no PMM's arising from the Representations and the Hearing specifically relating to CP8 and 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 Green Belt, and questioned the exceptional circumstances regarding the revision of boundaries. The strong body of evidence and the discussion at Hearing 6 clearly showed that the reviews carried out

## **Main Modifications to the Local Plan – Wake Up Risborough Group response – Mar 2019**

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were flawed, inconsistent, and with evidence of retrofitting of reports to suit housing needs. No assessments were carried out as required for example of Hill Top views. There was considerable criticism around the Council's assessment of 19 sites on one day in March 2016. The Green Belt assessments are one of the fundamental failings of the Plan yet this is not reflected in the PMM's.

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**Wycombe District Local Plan Revised Habitats Regulations Assessment Report – including  
Appropriate Assessment January 2019  
Wake Up Risborough Group (WURG) response to consultation – March 2019**

**PART A**

**1. Personal Details**

**2. Agent's Details (if applicable)**

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Wake Up Risborough Group

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Wake Up Risborough Group

**PART B – Comments on the Revised Habitats Regulations Assessment Report – including  
Appropriate Assessment January 2019.**

We have 3 points to make regarding this assessment:

1. Para. 5.62, page 79, states that ‘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’.

This reinforces our view that the wider strategic assessment has not yet been carried out. This needs to be carried out and given careful consideration before any new major transport proposals are put forward for Princes Risborough.

2. Para. 6.10, P84, states that ‘Thames Water has since identified that any growth at Princes Risborough and within the District would require an upgrade of the Princes Risborough and Little Marlow Sewage Treatment Works. “With the revised growth figures proposed an upgrade to both sewage works will certainly be required in the coming years. The revised figures are likely to mean that upgrades to the sewage works are likely to be required sooner than anticipated originally.” – Email from Carmelle Bell on behalf of Thames Water to Wycombe District Council on 16 February 2015.

As we pointed out at the Hearing session on Princes Risborough, current new housing development in Princes Risborough is already stressing the existing sewage network and resulting in blockages and over flows. The sewage network and sewage treatment plant in Princes Risborough needs to be upgraded before any further development takes place.

3. In para. 7.25, page 146, there is reference to, ‘.. the opportunity to create a country park between the Princes Risborough expansion and the nearby village of Longwick, which would act as a buffer between the two settlements and would provide further recreation opportunity.’

Sports playing fields as proposed in the buffer zone, and the infrastructure and traffic that would be generated as a result would not provide a suitable buffer. A country park however would provide a suitable buffer if it is of sufficient scale and carefully managed. The 50 metre strip currently proposed would not be sufficient for this purpose.

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**WDC - Sustainability Appraisal (SA) of the Local Plan (December 2018), including Addendum (February 2019)**

**Wake Up Risborough Group (WURG) response to consultation – March 2019**

**PART A**

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

**Summary**

Whilst this appraisal may have helped to condense the many reports produced for WDC it does not in our view satisfy the concerns of residents of Princes Risborough and other stakeholders with regard to the overall sustainability of the Local Plan or selection of development sites.

Our view is that the assessment is aimed at 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. It appears to be a 'cut and paste' exercise to try and justify WDC's actions. Many concerns raised in this report are ignored in the Local Plan, including the modified version now released.

The NPPF puts great weight on sustainability and in particular the environment, economic and social aspects. This report fails to adequately address each of these aspects.

We fail to understand how the Planning Inspector can state in her letter of the 5<sup>th</sup> of February 2019, 'I am content that the proposed main modifications, including changes to the policies map, the revised sustainability appraisal (SA) and revised habitats regulation assessment (HRA), address the issues identified by representors'. We would like to see the justification for this statement.

This Sustainability Appraisal only serves to demonstrate further that the Plan is neither legally compliant nor sound.

**Strategic Objectives of the Local Plan**

The eight strategic objectives of the Plan are referred to in the report (p3-4 and elsewhere). Number one according to WDC is to 'Cherish the Chilterns'. The report states that this is to be achieved 'by conserving and enhancing the natural beauty of the landscape of the Chilterns Hills'.

Objective number two is to 'Strengthen the Sense of Place' and stresses 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 to keep main settlements ..'

All fine words, yet the Local Plan reigns back on these, diluting the Plan to state, 'where possible enhance ..' with regard to our area of outstanding natural beauty.

Another example of ignoring the Plan objectives is in objective number eight. This relates to mitigating climate change and refers to 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.' None of this is reflected in the Plan proposals for Princes Risborough. All of which has been pointed out in Representations, at the Examination, and in our response to the proposed main modifications.

**WDC - Sustainability Appraisal (SA) of the Local Plan (December 2018), including Addendum (February 2019)**

**Wake Up Risborough Group (WURG) response to consultation – March 2019**

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**Landscape, Conservation and 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.' It is acknowledging that harm that will occur. We would argue that the harm to the landscape is significant. This is landscape that is more than just good agriculture land. We believe our concerns in this area have been well demonstrated in the representations made and in the discussions at the Hearing.

The analysis on Princes Risborough (on page\_69) refers to:

'Option 3 (2400 homes) extends the expansion area essentially surrounding the Alscot Conservation Area. Even with mitigation the character of surrounding area will permanently change from rural to urban and there is therefore the potential for a significant residual negative effect on the historic environment.' Also. 'All options would result in the loss of greenfield and agricultural land with a negative effect on natural resources. It should also be noted that all growth options contain best and most versatile agricultural land. Option 4 is likely to result in the greatest loss of green field and agricultural land, but there is little to differentiate between option 3 and 4 in terms of the loss of best and most versatile agricultural land. Compared to the other options 3 and 4 are more likely to have a residual negative effect of significance on natural resources through the loss of greenfield and agricultural land.'

The Plan is proposing even more homes than Option 3, so there is significant negative impact.

In chapter 8.5, page 110 regarding the Historic Environment, it states 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.' Fine words but not reflected in the Plan. Where, for example is the brownfield site analysis for Princes Risborough? At the Hearing and in the Representations, examples were pointed out of brownfield sites in Princes Risborough that are not on WDC's brownfield register and WDC didn't appear to know existed. Existing commercial development, e.g. on New Road and at the station (Blanchfords) should be relocated to more appropriate sites, improving the landscape and providing sites for more appropriate and affordable homes close to the town centre and railway station.

The report (page 110) states that 'The major residential led expansion of Princes Risborough proposed through Policy CP3 is likely to result in residual negative effects on the historic environment. The expansion area encompasses the Alscot Conservation Area as well as a number of listed buildings. Development is likely to affect the setting of these heritage assets as well as the setting of the historic environment in the surrounding area. Site specific policies require development to respect the setting of the Conservation Area and preserve important views in and out of the Conservation Area as part of a positive strategy for the conservation and enjoyment of the historic environment.'

Again fine words but not reflected in the Plan for Princes Risborough, so why go ahead?

Chapter 8.7, page 119, with regard to Landscape, refers to NPPF para. 115, "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of

**WDC - Sustainability Appraisal (SA) of the Local Plan (December 2018), including Addendum (February 2019)**  
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Outstanding National Beauty, which have the highest protection in relation to landscape and scenic beauty.” And NPPF para. 116, “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest”.

On page 119 the report states ‘The strategy (Policy CP2) attaches 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 despite all of this the Plan ignores the impact of the major road development in the AONB and the housing and road development on the landscape in the AONB setting.

Chapter 8.7, page 123 states, ‘It is difficult to conclude with any certainty what the residual effect for the landscape character of the District as a whole will be. Ultimately, the development on green field sites at the edge of existing settlements that are within or in close proximity to the AONB are likely to affect its setting to some degree and therefore have a residual negative effect. 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 wording appears to ignore the fact that Princes Risborough (and some of the development – including road development) is within the AONB. However it does recognise again the negative impact with regard to the landscape and the AONB,

### **Flood risk**

Pages 97 to 98 refer at length to the significant flood risk issues identified at development sites in Princes Risborough, including the Princes Risborough Station development of 45 homes, land north of Lower Icknield Way and the proposed relief road. All highlighting the error of planning for development in areas with high flood risk. Also highlighted by the Environment Agency in the Representation and at the hearing. This is planning to fail.

### **Social**

Under community and wellbeing in Chapter 8.3 / page 101, there is complete failure to address the ‘new town’ coalescence with Longwick, the remoteness to the town centre and physical barriers to integration (railway line and Crowbrook stream). A key issue with regard to social cohesion.

### **Economic**

With regard to economic development the SA report (on page 61) states 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.’ This again reinforces the message that development of the scale proposed is not sound and not sustainable from an economic perspective.

**WDC - Sustainability Appraisal (SA) of the Local Plan (December 2018), including Addendum (February 2019)  
Wake Up Risborough Group (WURG) response to consultation – March 2019**

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The economic viability of the number of new homes proposed for Princes Risborough has not been addressed by this report. Flooding the market with new homes in an area where there is no employment is simply not sustainable. The proposed development is not viable and it has been demonstrated that it is not viable.

The changes and more onerous burden on the developers by the revised requirements in the main modification (PMM 59), with regard to affordable and rentable homes, has not been addressed by this report or the SA addendum to the Main Modifications. The SA addendum merely states that the 'Modification does not significantly affect the findings of the previous SA work'. This is surprising and one example of why we question the thoroughness and quality of these SA appraisals.

### **Relief road**

With regard to the relief road proposals for Princes Risborough, on page 80 it states, 'Option 11b has been identified as the preferred option for the relief road, taking into account the appraisal and other more detailed and technical assessments including other factors such as the feasibility and deliverability of the road.' Yet the Plan does not propose the 11b option, put forward by Jacobs (2016) and which runs along Shootacre Lane and Picts Lane.

With regard to the text on pages 73 to 74 in connection with the southern road options assessment, this is not an accurate or balanced assessment and nowhere does WDC's flawed retrofitting strategy come through more clearly than here. This is trying to justify a road through Green Belt, AONB and prime agricultural land in order to provide a link to their equally flawed proposals for the Poppy Road development.

This road options assessment is not a balanced assessment on either carbon footprint, loss of AONB and Green Belt, or economic cost. For example no account has been taken of comparative new land take required (unlike with the Jacobs options study, 2016). The existing wide verges on Shootacre Lane and Picts Lane are already in local authority ownership and could accommodate the whole of the widening, but this has not been acknowledged. No detailed financial assessment has been carried out to take account of flood mitigation or land purchase.

The Transport and Traffic chapter 8.9, page 130, fails to recognise the current traffic issues and bottlenecks on the A4010 at West Wycombe and Aylesbury, and no account taken of the cumulative effects of the relief road and other proposals on these bottlenecks. WDC and this report continue to ignore a major infrastructure issue, and plan to make it worse. This is not a sound or sustainable proposal.

### **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.' In our view this reflects that:

- There are no significant modifications to the Plan, and most of the modifications are wrongly described as 'main modifications'.
- The latest SA report (December 2018) is merely a 'cut and paste' exercise that does nothing to justify site selection.
- The Inconsistencies and inaccuracies in the original sustainability work remain and have not been addressed.