
From: James Mackreath [REDACTED]
Sent: 27 March 2019 10:06
To: NewLocalPlan
Subject: Comments on Main Modification PMM29
Attachments: WDLP-Main-Mods-Response-Form-2019-01-22.doc

Dear Sirs,

Please see the Attachment.

Sincerely

Jamie

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For official use only



Wycombe District Local Plan Proposed Main Modifications (February - March 2019) Representation Form

The Wycombe District Local Plan was submitted for examination in public in March 2018. Hearings were held over the summer of 2018.

The independent Local Plan inspector has identified various changes that she considers may need to be made to the Plan (known as “Proposed Main Modifications”) to make the Wycombe District Local Plan a “sound” plan.

We invite your comments, also known as representations, on these Proposed Main Modifications.

- Please quote the Proposed Main Modification you are commenting on (question 1 in part B).
- Please give your comments on the Proposed Main Modification and indicate any further changes to the Proposed Main Modifications that you feel are necessary (question 2 in part B).
- **Comments will only be accepted for the Proposed Main Modifications. General comments about the content of the Local Plan not related to a Proposed Main Modification will not be accepted.**

The deadline for responses to be received by the Council is **11:59 pm on Wednesday 27 March 2019**.

Responses can be submitted:

- online at www.wycombe.gov.uk/local-plan-modifications
- by email to newlocalplan@wycombe.gov.uk (an automatic email response will confirm receipt)
- or sent by post to:
Planning Policy Team,
Wycombe District Council,
Queen Victoria Road,
High Wycombe,
Bucks,
HP11 1BB

You can submit as many comments as you would like. Please complete a separate part B for each part of the plan on which you want to comment.

This form has two parts:

- Part A – Your Details
- Part B – Your comment(s). Please expand the comments table as appropriate

All comments received will be passed to the independent Local Plan Inspector for consideration.

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.

Title	Mr	
First Name	James	
Last Name	Mackreath	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Telephone		
Email Address		

3. Client Details

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

Site Interest	
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

Name or Organisation:

James Mackreath

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

Proposed Main Modification number

PMM29

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

1. My observations concern Main Modification PMM29 and more specifically proposed changes to: paragraph 5.3.46 (Page 185); and sub-paragraph 2 to Policy PR4 (Page 179). These changes are aimed at narrowing down the location of two new Primary Schools within the envisaged Princes Risborough Expansion Area. I wish to point out that given increasing national awareness of the implications of poor air quality, particularly near schools, in my opinion the WDLP Sustainability Appraisal (SA)/Strategic Environmental Appraisal (SEA) documents are currently not fit for purpose in considering Air Quality Management (AQM). As a minor point, the SA Objective numbering system is inconsistent across the documents so air quality might be Objective 5 in one and perhaps Objective 9 in another. **So, I object to PMM29 and also to the supporting SA/SEA documents.** Actually, I seek changes to these.

2. I draw attention to two recent reports: Public Health England's "Review of interventions to improve outdoor air quality and public health" published in March 19; and "Reducing air pollution in the UK: Progress report 2018" published by The Royal College of Physicians. I won't here point to specific chapters/paragraphs within these reports although I willingly can do so if the Inspector would find this helpful. The general message is I think clear – AQM is an increasingly important discipline. Surprisingly to me, the current wisdom seems to be that the introduction of electric vehicles is not seen as a panacea for future years.

3. The Oct 13 WDLP SA/SEA Scoping Report mentions air quality only (as far as I can see) on Page 16 and refers to a single WDC Air Quality Management Area (AQMA) 30m either side of the M40 Motorway. Objective 9e at Appendix A to the Mar 16 Princes Risborough Town Plan SA poses the simple question: "Will air quality be affected by proposals in the plan?". In Supporting Evidence, paragraph 5.69 to the Oct 17 Topic Paper 6 (Princes Risborough) includes this reference to Relief Road planning: " All options may have some negative effect on air quality and noise, particularly during construction, and this will need further assessment and mitigation as part of the environmental impact assessment of the preferred option." Frankly, I don't see the construction phase as the real issue here.

4. Given that at PMM29 the Inspector has helpfully, in my opinion, proposed injecting more clarity to the location of two new Primary Schools in the Princes Risborough Expansion Area, this highlights deficiency in the SA/SEA documents regarding AQM. Arguably, an adequate, up-to-date Air Quality Management Plan (AQMP)¹ is absent for the WDC area as a

¹ I found a 2003 WDC AQMP online that mentions AQMAs in various High Wycombe and Marlow streets. Princes Risborough is not mentioned.

whole, and Princes Risborough especially given the scope of expansion proposed in the latter location.

5. I note that the Feb 19 SA for WDLP Screening Report suggests that the two PMM29 proposed changes I highlight are: “Modification to provide further clarity, does not significantly affect the findings of the previous SA work”. I also note in the Consolidated Dec 18 SA at Tables IIB and IIC comment is made that average air quality in the WDC area is essentially good other than perhaps in parts of High Wycombe and adjacent to the M40. I don’t know how average air quality is quantified, but given that most of the district is within the Metropolitan Green Belt and a lot within the Chilterns AONB I would expect the ‘average’ across the district to be excellent. This seems to miss the point though. What will air quality be like in the Princes Risborough Expansion Area adjacent to the two new Primary Schools? If they are built willy-nilly, how would we subsequently mitigate the advent of poor air quality? Or, referring again to paragraph 5.69 to the Oct 17 Topic Paper 6 (Princes Risborough) how and when will further assessment of air quality as part of the environmental impact assessment take place before development begins?

6. I suggest that what I consider to be only a superficial examination in the WDLP SA/SEA documents of air quality in the proximity of the two new Primary Schools for Princes Risborough, a factor brought to light by the Inspector’s PMM29 main modification, should be corrected. This, to me, needs action first before mere words. I also invite the Inspector to consider strengthening her proposed PMM29 main modification to require a more rigorous approach to the identification of acceptable locations of the two new Primary Schools perhaps mentioning AQM specifically.

(Please continue on a separate sheet/expand box if necessary)

Privacy notice

Wycombe District Council Planning Policy Service collects, uses and is responsible for certain personal information about you.

This response form collects the following personal information from you:

- your name
- your phone numbers
- your email address
- your home address

This information is being collected to allow us to fulfil our statutory function of producing a Local Plan covering the Wycombe District.

Your submissions, including personal data, may be shared with the Local Plan Programme Officer and the Local Plan Inspector. We may also share your submissions with other government partners and agencies such as Buckinghamshire County Council, the Environment Agency, Historic England and Natural England, or other service departments within Wycombe District Council.

Your submissions will be published on our website. These will be redacted (“blacked out”) to remove personal information including:

- personal contact details - Telephone numbers, email addresses, postal addresses
- signatures
- information about health conditions or ethnic origin
- information agreed to be confidential

If you are submitting information which you would like to be treated confidentially or wish to be specifically withheld from the public register, please let us know as soon as you can.

Your submissions and personal information will be kept until the Local Plan is superseded.

If you have questions about data or privacy, please see our full privacy policy on our website: <https://www.wycombe.gov.uk/pages/About-the-council/Privacy/Our-privacy-policy.aspx>

Alternatively you may contact our Data Protection Officer at **Wycombe District Council, Queen Victoria Road, High Wycombe, HP11 1BB** or at access2information@wycombe.gov.uk.