

**The Chilterns  
Conservation Board**

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Chilterns AONB in Wycombe District – view from Coombe Hill

Photo: Richard Gillin

**Statement from the Chilterns Conservation Board  
Wycombe Local Plan Examination 2018**

**MATTER 8 – DEVELOPMENT FRAMEWORK: PRINCES RISBOROUGH**

**2<sup>nd</sup> August 2018**

## **Examination statement from the Chilterns Conservation Board**

### **Introduction**

1. The Chilterns Conservation Board is grateful for the opportunity to participate at the Wycombe Local Plan examination.
2. The Chilterns Conservation Board (CCB) is a statutory body established in 2004 under the provisions of the Countryside and Rights of Way Act 2000 to promote the conservation and enhancement of the Chilterns Area of Outstanding Natural Beauty (AONB) and increase the understanding and enjoyment by the public of the special qualities of the AONB. Further information about the Board and our role is set out in Appendix 1.
3. An Area of Outstanding Natural Beauty is an outstanding landscape whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them. The Chilterns AONB was designated in 1965. Its special qualities include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.
4. Our statement addresses Inspector's questions 1 – 4 of matter 8.
5. The Chilterns Conservation Board seeks amendments to modify or delete allocations that affect the Chilterns AONB.

### **Q1. Are the following allocations soundly based and is there evidence that the development of the sites is viable and deliverable?**

The allocations are not sound, because they are not consistent with national policy, for the reasons set out below:

## 1a) PR3 Princes Risborough Area of Comprehensive Development including Relief Road

The main expansion area is within the setting of the Chilterns Area of Outstanding Natural Beauty (AONB). The housing number being proposed at Princes Risborough is large, the relief road proposals involves a new road through the AONB, a significant area of greenfield land is under pressure for development in the setting of the Chilterns AONB.

Very careful consideration needs to be exercised with urban expansion below the scarp slope of the Chilterns. The views out of the AONB from key viewpoints e.g. from Whiteleaf Cross, Brush Hill Local Nature Reserve and along the Ridgeway National Trail, are some of the most important views in the Chilterns, central to the public's recreational enjoyment of the AONB. This is a nationally important place on a National Trail, which should be protected for current and future generations to enjoy.

The setting of the AONB is defined by the Chilterns Conservation Board as "the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB".

The legal duty on local authorities set out in section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONB does not just apply within the AONB; the only consideration is whether land in the AONB is affected, not where the effect originates. Similarly, the instruction in the NPPF paragraph 115 (now 172) to give 'great weight' to conserving landscape and scenic beauty applies regardless of whether a development is inside the AONB or on land outside but affecting it. The NPPG also draws attention to proposals 'which might have an impact on the setting of AONBs'.

The revised NPPF contains a small but significant change regarding major development and AONBs.

Old 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.

New NPPF para 172:

Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Critically, the new text does not explicitly state as before "major developments in these designated areas", instead it says "planning permission should be refused for major development" and goes on to provide some detail in footnote 55. That detail mentions nature, scale, setting (of the development), and whether it could have a significant adverse impact upon the purposes for which the area has been designated. Designation purposes lead us to the CroW Act, and the concept that it does not matter where an effect originates but only whether the AONB is affected. The point is that there is a case that major development could now be applied to AONB setting, which would have implications for the Princes Risborough allocation.

The photograph below conveys something of the sense you get on walking out from the woodland onto the summit of Whiteleaf; soaring height, unexpected proximity. A bright green jewel of grassland encasing an island of a compact town. Like Gulliver peering over Lilliput.



Photo: View from Whiteleaf by Colin Drake

The Chilterns Conservation Board understands the difficulty for Wycombe District Council in finding areas for strategic housing growth. This pressure has led the Council to make decisions which are harmful, as shown in the evidence base and SA:

- The Sustainability Appraisal of Reasonable Alternatives and Preferred Options for the Princes Risborough Town Plan (March 2016) by Lepus Consulting for Wycombe District Council, recognises at paras N9-10 that “In general options performed negatively with regards to biodiversity, landscape, cultural heritage, water, climate change mitigation, climate change adaptation and land resources. The larger scale of development for higher growth options may be more likely to lead to negative environmental effects, in particular on the setting of the nationally important Chilterns AONB.” Option 1 (development of sites within the town’s built-up area only with no greenfield expansion) had the highest number of positive performing sustainability objectives, leading Lepus Consulting to comment ‘This suggests that it is the best performing option; and in this sense, it is.’
- The quantum of housing proposed is likely to add to the volumes of traffic passing through the AONB which will erode its tranquillity, lead to noise and vibration and a reduction in air quality. The Habitats Assessment report identifies in relation to the Chiltern Beechwood Special Area of Conservation that “The main factors which could have harmful effect on all or some of these SACs are increased atmospheric pollution which may increase the susceptibility of the beech trees to disease, and poor management in the form of over grazing and human factors in the form of visitor pressure on the sites.” (para 3.39)
- The Council’s draft Princes Risborough Town Plan: Landscape Sensitivity and Capacity Study (February 2016) identifies that “The expansion area is visible from the AONB and many parts have strong intervisibility with the Chiltern escarpment” (para 4.8). It goes on to conclude that “Any proposed expansion of this scale will inevitably adversely affect views from the Chilterns AONB” (para 5.8).

The Chilterns Conservation Board agrees with these conclusions.



The Alscot conservation area is a tranquil and historic hamlet which will become engulfed within the new development area. Alscot is in the setting of the Chilterns Area of Outstanding Natural Beauty. The area is now under threat of change on an unprecedented scale, which risks altering the nature and character of the conservation area. Alscot is visible from Whiteleaf Cross and from Brush Hill at the top of the Chilterns escarpment. Housing development would block views from Alscot to Whiteleaf, damaging the important visual relationship between hamlet and hill. The chalk hill sits majestically over the clay vale. The view from Alscot to Whiteleaf will be all but obliterated by the development and the primary school.

“A View to a Hill”, looking from Alscot to Whiteleaf Cross



As an example of harm to views to the Chiltern hills, this new development on the north side of Chinnor has damaged the setting of the Chilterns AONB because it has harmed the view towards the escarpment. The edge of Chinnor is now very visible from the Thame Road and the Emmington Road and the public footpaths in between. The development is particularly visible because of the alignment of the houses tightly packed in a row parallel to the escarpment, and the lack of screening planting. The scale of the Princes Risborough expansion brings the risk of an even larger effect in views from Longwick, while it may be hard to see the escarpment at all from Alscot.

Example of development in the setting causing harm to the AONB at Chinnor



### **Recommended changes PR3:**

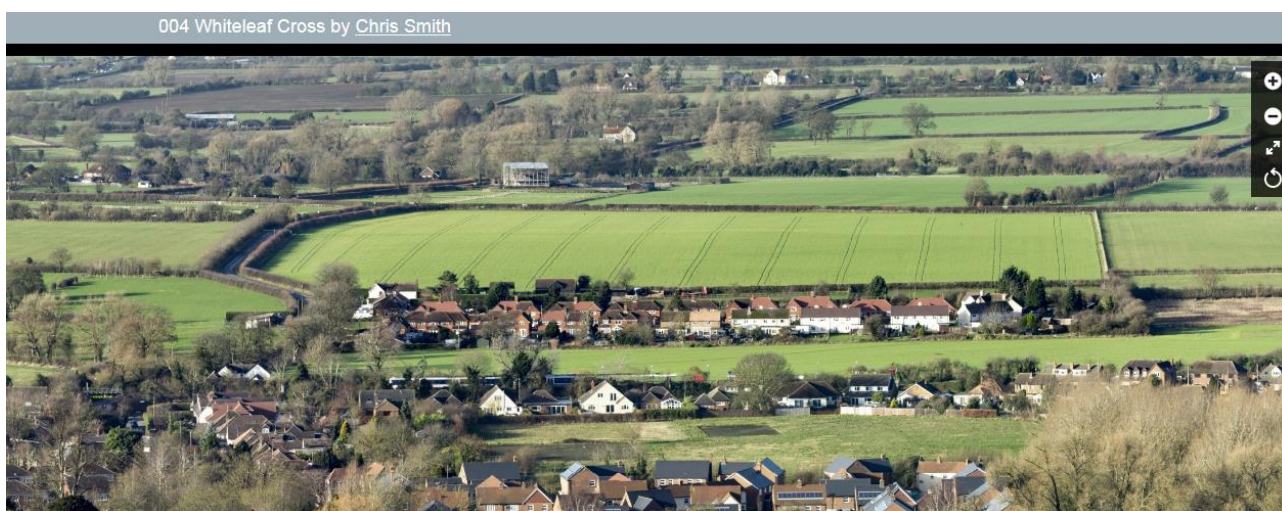
While accepting the Council's dilemma and the principle of the Princes Risborough expansion area, the Chilterns Conservation Board considers further changes are necessary to reduce the harm to the Chilterns AONB. These are:

1. Deletion of the new road through the Chilterns AONB (please see our response to PR8).
2. Lower numbers to allow lower densities and the removal of three storey development. This would be more prominent in views from Whiteleaf (the greater impact that 3 storeys makes is apparent from the recent Eaves Court development

in Princes Risborough). Building at higher density on the part of the development nearest the existing town means higher densities in the area most visible from the AONB, and allows less space for tree planting within the development. It also means higher development would block views from within and beyond the development area to the escarpment.

3. Wider strategic buffer (see our response to PR5)
4. There should be no development east of Mill Lane. This land is very visible from the AONB (see gigapan photograph below), the Board does not agree that long distance views of new development on Mill Lane from the AONB and Whiteleaf Cross could be mitigated with planting. Residential development here would be poor practice ribbon development. Sports pitches are unlikely to be a suitable use, the land should be enhanced as a green corridor connecting with Kingsmead Meadow LWS to the wider landscape. Sports pitches bring pressure for floodlighting, buildings, car parks, astroturf etc, which should all be avoided here. Sports facilities should be re-sited within the main development area.

Gigapan image (zoomed in) from Whiteleaf Cross showing land to east of Mill Lane:



Source: <http://www.gigapan.com/gigapans/182501>

5. Reference should be added in the plan to the Chilterns Conservation Board's policy statement on Development Affecting the Setting of the Chilterns AONB, available here <http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html>. This provides useful advice and guidance on avoiding and reducing harm which should be incorporated in the plan. The nature of the impacts and the harm they exert on the AONB will depend on key variables such as:
  - a) the extent of the built area – particularly the depth northwards towards Longwick and the amount of expansion eastwards towards Askett
  - b) the amount and location of the green infrastructure and accessible green space
  - c) the development layout and density



- d) the massing, materials and building heights
- e) the formality of the design and the roofscapes
- f) the street lighting design
- g) the application of AONB mitigation measures.

## **1c) PR5 Settlement boundary and strategic buffer**

Para 5.3.22 states that the extent of the expansion area is shaped by factors including avoiding coalescence with Longwick and the visual impact of the expansion from the AONB escarpment. But the Lower Icknield Way green buffer to Longwick as proposed (Figure 28 and the proposals map) is not wide enough to protect the visual impact from Whiteleaf.

Viewed from height at Whiteleaf Cross or Brush Hill the buffer will be foreshortened and almost imperceptible. I doubt there would be much green space evident between Princes Risborough and Longwick in views from Whiteleaf. The buffer would also be obscured by the height of medium density housing and a new local centre and school north of Alscot. The buffer will be hidden behind built development and there is unlikely to be a visual break between Princes Risborough (as expanded) and Longwick. The preparation of a photomontage from Whiteleaf would assist with assessing the adequacy of the strategic buffer from the AONB. As it stands the policy is not justified or effective.

### **Recommended changes PR5:**

Provide a photomontage of the view from Whiteleaf to assist in assessing the adequacy of the strategic buffer from the AONB. Increase the width of the buffer until it fulfils the desired aim of avoiding coalescence with Longwick and addressing the visual impact of the town's expansion from the AONB escarpment.

## **1e) PR7 Development Requirements**

This policy is not effective.

The development requirements should include contributions towards new and improved facilities for recreation in the Chilterns AONB and conservation land management of AONB visitor sites. The development will increase visitor numbers and add pressure like soil erosion, path maintenance, habitat management, dog disturbance, litter and anti-social behaviour. It will also potentially bring new volunteers and new custodians of the popular local sites like Whiteleaf and Brush Hill Nature Reserve, which are managed by the Chiltern Society, and the Ridgeway National Trail. This additional usage should be catered for and mitigated to maintain and improve public enjoyment of the AONB.

### **Recommended changes PR7:**

Add requirements to fund enhancements to visitor facilities, rights of way and habitat management at Whiteleaf and Brush Hill to accommodate without harm the increased town population using these already popular sites.

## **2) PR8 Provision and safeguarding of transport infrastructure**

The policy is not justified, not effective and not consistent with national policy. The new road in the AONB should be deleted from the plans, and a solution sought which avoids this (eg re-opening Poppy Road as a main through-route and providing Poppy Road with compensatory residents' parking on the land allocated for housing).

The road would constitute major development in the AONB, to which the tests in para 116 of the NPPF (now 172) apply.

The road proposal is inconsistent with the Local Plan's Principles for Rural Areas (page 275) which states "avoid damaging works with the Area of Outstanding Natural Beauty to address the need for significant improvements to county-wide north-south connectivity".

The new road would be visible from the important viewpoint at Brush Hill nature reserve and the Ridgeway National Trail. Particularly given the road alignment and the orientation of the view, the new road would appear as an elongated linear feature from Brush Hill, with a new roundabout which would potentially trigger the introduction of street lighting affecting the dark skies of the AONB. The introduction of motion (traffic passing) and lighting would be detrimental to the view, to tranquillity and to dark skies. The new road would also affect the Pyrtle Brook, a chalk-fed stream and a Priority Habitat (Chalk Headways), with a risk of polluted run-off from the new road. With no defensible boundary, in time the new road is likely to lead to pressure for further development in the field across which it passes.

The Chilterns Conservation Board has discussed with the Council the potential for highways works to incorporate:

- i) habitat creation works, including the possibility of verges which encourage and provide stepping stones to assist two rare colonies of Duke of Burgundy butterflies that live nearby;
- ii) closing part of the Ridgeway National Trail along the Upper Icknield Way to vehicular traffic, this would be a modest but positive enhancement to the enjoyment of the AONB.

Neither of these are identified to be delivered with the new road in the AONB. Measures have not been taken to avoid, reduce or mitigate harm to the nationally protected landscape.

### **Recommended changes PR8:**

Delete the new road in the AONB from the plan.  
Address any works in the AONB with a substantial AONB/ ecological mitigation package.

## **4c) PR11 Land to the Rear of Poppy Road**

The site is partly within the Chilterns AONB and is visible from important viewpoints in the Chilterns AONB and the Ridgeway National Trail.

A housing development here of 58 dwellings will not conserve and enhance the Chilterns AONB. This allocation fails to give great weight to conserving and enhancing the natural beauty of the AONB as required by para 115 of NPPF (now 172). The ecology of the site

and its surroundings, in particular the Pyrtle Brook, a Chalk Headwater Priority Habitat, which emerges from the foot of the chalk escarpment at the nearby Pyrtle Spring, requires further research. In these circumstances it is not justified to include an allocation and park the issue of its ecological value until the planning application stage, as suggested by para 5.3.167.

#### **Recommended changes PR11:**

Delete allocation.

#### **4f) PR16 Land at Princes Risborough Station**

The station area policy is currently a missed opportunity to provide a gateway to the Chilterns AONB. There is a new Chiltern Rail link direct to Oxford as well as a regular service to London Marylebone, and a future improving service to Aylesbury. The Ridgeway National Trail and the Chilterns AONB are a short stroll from the station, making this a key access point on sustainable means of transport for day visitors and tourists. This potential is currently largely untapped, because of lack of facilities for visitors or signposting to the rights of way network in the Chilterns AONB.

#### **Recommended changes PR16:**

Add to station policy measures that boost the tourism and day visitor experience e.g. cycle hire, café, information centre and signage and interpretation about the many cycling and walking opportunity into the Chilterns AONB to make this station a real 'gateway to the Chilterns'. This could bring sustainable tourism and economic benefits as well as health and wellbeing. Over 10 million people live within 1 hour of the Chilterns AONB and there are 55 million leisure visits to it each year, with a spend of over £400 million a year. Rather than trying to locate housing developments here, the plan could harness jobs and opportunities in the rural visitor economy, and increase recreation and enjoyment.

#### **Conclusion**

National policy in the NPPF is clear that "Plans should allocate land with the least environmental or amenity value" (para 110, now 171), that major development should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest, and that "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty" (para 115, now 172, which also adds "enhancing"). The revised NPPF adds a new instruction regarding the AONB "The scale and extent of development within these designated areas should be limited."

The Wycombe Local Plan's proposed allocations at Princes Risborough do not give sufficient weight to the AONB and its setting. It does not deliver on the objective to 'Cherish the Chilterns', and is inconsistent with policies DM30 on the Chilterns AONB and DM32(d) "Views and vistas, both from and towards the site, paying particular attention to hilltop and skyline views...".

The Chilterns Conservation Board is grateful for the opportunity to make these representations at the Examination.



### **The Chilterns Area of Outstanding Natural Beauty**

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

### **Chilterns Conservation Board**

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

### **List of Organisations providing Nominees to the Chilterns AONB Conservation Board**

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Buckinghamshire, Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Aylesbury Vale, Chiltern, North Hertfordshire, South Buckinghamshire, South Oxfordshire, Three Rivers and Wycombe District Councils
- Dacorum Borough Council
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- DEFRA (8 in total).