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Princes Risborough Expansion Supplementary Planning Document Consultation (June - July 2019) Representation Form

Following on the new Local Plan proposals, the Council is consulting on further detailed design and delivery guidance for the expansion of the town, in the form of a Princes Risborough Expansion Supplementary Planning Document, now published as a consultation draft.

We invite your comments on the draft document.

- Please make any comments using the forms below – this will help us to be clear about what part of the Document you are commenting on
- Please quote the section you are commenting on (question 1 in part B).
- Please give your comments on the Supplementary Planning Document and indicate any further changes to the draft that you feel are necessary (question 2 in part B).
- **Comments will only be accepted about the consultation draft. The Council is not able to accept general comments about the content of the Local Plan.**
- Please send your response by the deadline on **Sunday 21 July 2019** (11:59 pm).

Responses can be submitted:

- online at www.wycombe.gov.uk/consultations
- by email to risborough.expansion@wycombe.gov.uk (an automatic email response will confirm receipt)
- or sent by post to:
Spatial Planning,
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 document 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

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.*

Name	C Clark	
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 about future stages of the Princes Risborough Expansion Supplementary Planning Document.

5. Please tick this box if you wish to be notified of the Princes Risborough Expansion Supplementary Planning Document adoption

6. 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 in Part A to receive this).

PART B – Comments on the Princes Risborough Expansion Area Supplementary Planning Document (consultation draft) – Please use a separate sheet for each representation. Please copy further sheets if you wish to make more comments.

Name or Organisation:

C Clark

1. Which part of the SPD does this response relate to?

Section / subsection / page(s) of the Princes Risborough Expansion Supplementary Planning Document consultation draft

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2. Please use this box to set out your comments on the Supplementary Planning Document consultation draft, setting out clearly if you support or object to the proposals and the reasons for your position.

If appropriate, please set out what further change(s) to the consultation draft you consider necessary. It will be helpful if you are able to put forward some suggested revised wording.

- 2.1.1 Existing
 - 2.1.1 PR is in an area of AOB and conservation in part of the UK which is privileged to have particular flora and fauna, the plans show no linked up plans to impact/provide for natural corridors to preserve this flora and fauna e.g. meadow areas, there is need for a corridor not just a buffer to the Alscot conservation area as isolating this will not allow it to be sustainable.
- 2.1.2 Topography
 - 2.1.2 Plans directly opposite to the UK trends of wanting more countryside and less “townships”
 - 2.1.2 Tree planting is not enough on its own to ensure this area blends into the countryside, it must be supported to allow natural corridors of flora and fauna across the area e.g. effectively undisturbed natural meadows (not just “pretty planting areas”)
 - 2.1.2 Current areas which are partially screened by the landscape must be protected to ensure that changes to that landscape do not expose the sites in the future
- 2.1.3 Flood
 - Drainage must not affect the natural habitats of the rivers along their courses e.g. the higher water levels by the crowbrook stream will support a niche which managed drainage may eradicate,
 - corridors of similar high water fauna/flora need to be retained so that neither the areas directly under threat nor any directly or indirectly adjacent areas disappear over time.
 - Assessment flora biodiversity’s along the river and the fauna they support including butterflies etc, their dependencies in particular of movement to ensure that seeds/insects/badgers/hedgehogs etc can continue to travel across this area in sustainable manners.
 - Particular focus on fish, frogs (young migrating) etc
- 2.1.4 Landscape
 - Impacts on views mean parked cars and building areas must be minimised while minimising requests for further building once the houses are established e.g. underground garages and parking.
 - Planning rules for this area must be specific e.g. there should be hedges rather than fencing. Green and/or solar roofs. Proposals are not enough to ensure that these are either

planted nor retained especially with the current high Wycombe planning rules which encourage fencing – how is this going to be implemented?

- There is not enough detail on trees and continuous meadow areas and management to ensure that this area stays anywhere near in balance and blends into the surrounding environment – need flora and fauna experts with management plan e.g. when meadows will be grazed/cut, to what height etc and corridors to allow movement and on-going sustainability of species, not just of hedges.
- There are no overlying objectives and detail plans of the ecology and niches of the area in which to fit individual ecology / surveys and therefore the surveys will not inform sufficiently for an assessment on the overall impact to be made e.g. if a bird roosts in one area its not an issue – but if its nest in near-by but outside the survey area it might be, mud is necessary for some birds to nest, but if their nests are not in the survey area this dependency is not picked up.
- Treating the rivers as central features while crammed between the rail and roadways is not in line with retaining these as natural biodiverse areas.
- There is nothing on the plans to show how footpaths, cycleways and bridleways will connect especially outside the immediate estate/town/railway area, nor sufficient plans to ensure these are practice e.g. they do not all share the same paths
- The strong vegetation belt along the railway only purpose should be visual, it is most unpleasant and urban to cycle or walk along railways and is certainly not a good habitat for nature.
- Landscaping must be in line with the nature of the chalklands and not “designer”.

2.1.5 Biodiversity

- Natural corridors of the different niches must be retained.
 - o There needs to be an assessment of the different flora and fauna niches and their diversity with a report on corridor requirements
 - o Assessment of how these will be retained for the different species, particularly e.g. the higher water flora & fauna.
- There is not enough detail on trees and continuous meadow areas and management to ensure that this area stays anywhere near in balance and blends into the surrounding environment – need flora and fauna experts with management plan e.g. when meadows will be grazed/cut, to what height etc
- Detail provided as to the height/density of vegetation to ensure birds such as owls which might be in the area have tall enough trees to nest in, bats suitable habitats, nesting and roosting etc.
- Cutting up a triangle of area between the railway and major road is a disaster for wildlife, particularly when it surrounds the main biodiverse area – the rivers!!!!, this is an effective death trap for any of the local species which go further than a few meters from the river.

2.2.1 Curtilage

- Include green roofs wherever possible, on all flat rooves
 - Parking and garages should be built under-ground
- need way to ensure that curtilage etc is not overridden / compromised in the future

2.2.2 Wider context

- The block layout is not in character with the area
- Use native species for hedges e.g. beech for hedges and in particular natural hedgerow mixes - Evergreen hedgerows are not natural to the Chilterns – beech ones are and the dead leaves provide screening in the winter, black thorn provide security protection with their thorns and crab apples fruit for birds etc hence the mixes
- Are the current high Wycombe plans being amended to include hedge preference over fences?
- How are the retention of hedges going to be retained
- Bucks and Risborough has a history of flint, why are the awful red multi bricks and rendered houses being proliferated, this is not in keeping other than another particular area of princes Risborough which was also “stuck on” and does not add to the village.

2.3.1 Vehicle movement

- Much on travel to work, but little employment/commutes to High Wycombe or Aylesbury in past and unlikely to change in future, and London travel is congested rail or road and long enough for many to only go in some days a week and show few are able to sustain regular travel for demanding roles –
 - o The traffic flow diagrams just show bottlenecks moving, other than in the evening when it is easier for people to move their commuting times anyway to avoid congestion
 - o The commuting times from PR are well over the average quoted – even for going into High Wycombe and are 300 – 400% higher in my experience from PR
 - o The road networks to High Wycombe and London which goes in close to High Wycombe are congested with road which cannot be widened e.g. the one down to Handy-cross from the Wycombe road and make regular car commuting that way impractical
 - Increased traffic will increase pollution (including sound and lights) further degrading the AOB status and “amenity” aspect of the area, none of this has been addressed in the plans
 - There is already an extensive network of roads in the area, if yet more are being built then existing ones should be closed e.g. shortacre – or made into cycle/walking lanes only (with access only for residence if there are any on that road). If the new road cannot support the flow of existing traffic flows as well then the solution is not sufficient.
 - Forcing heavy traffic and HGV's through the middle of such a new estate and established bio-diverse area puts human lives at risk and will destroy and pollute the land, flora and fauna, particularly the water life of three rivers.
 - Funding must all come from developers – while not extending the number of plots designated to developers, nobody outside this area is going to gain anything so this should not be put directly or indirectly onto other residence or tax payers.
 - o Self-builds must be carefully managed otherwise individual builders in the guise of self builds will take up these plots.
 - There should be no compulsory purchases where planning is so far out and the council's have had ample opportunity to plan and have passed by recent land parcel options which could have been used such as the Hypnos site – the precedent cannot be set otherwise none of us will have any certainty over our house choice.
- 2.3.2 Public Transport Stated in March 2015 report Poor commuting links with Slough, Windsor & Maidenhead
- Not a place with infrastructure which can be changed without affecting the special AOB and therefore character.
- The commuting times from PR are well over the average quoted – even for going into High Wycombe and are 300 – 400% higher in my experience from PR
 - Trains Expensive, insufficient parking and drop off/pick up facilities - PR is does not have the infrastructure, there is no linked plan / commitment to ensure the plan is realised
 - There are no linked up plans outside the immediate build area and station
 - The Bus system suffers also from the road network and the plans to do not provide easy bus set off points etc other than specifically for this new estate area, there is no plan further than the station (which should be in cycling distance)
 - The Trains are not particularly regular and in commuting times particularly over-crowded
 - o There are not the parking facilities to support increased population
 - o There are not the cycle ways or facilities to support existing populations never mind extra ones – and without facilities for parking existing residents will be pushed out
 - The infrastructure does not support buses to any extent (without changing the character of the area). Relatively few people in PR commute regularly to work to either London or Birmingham – train times are longer than areas such as Aylesbury, and parking etc currently or in plans do not support this increase – with no potential to expand as the land near the station is being developed for residential estate
 - Bus 300 between Aylesbury and high Wycombe does not go to the station – getting in and out of the station is likely to be an issue at commuting time as cars will be queuing up on the short entrance road to drop people off.
 - Not specific on what a good bus service is, the 300 currently reduces quite early, not long after someone leaving a London office at 18:00 will get in and therefore is not practical to use for regular commuting without significantly extending the commute time.

2.3.3 Cycle/Pedestrian • No linked up plans with the railways to support cycling e.g. cycle parks

- No linked up station access avoiding main roads e.g. re-designation and upgrade of the path between shootacre and princes Risborough station along the railway / through the new development on the old Hypnos site
- No linked up plans how cyclists can be separated from cars and truck so as not to endanger their lives particularly in the High Wycombe direction
- The major road through the new development endangers cyclists and pedestrians trying to cross it – of forces diversions on concentrate parts of the road that make both the cycle/walk impractical and unpleasant and introducing new blockages as vehicles stop to let them cross.
- Walking and cycling take-up will be low as there is no sustainable plans for pedestrians/cycling across the surrounding areas e.g. further south than PR station, links to Tring etc.
- Issues around cycling and getting into work particularly on the Chiltern cycle way etc where roads are not maintained to standard and cycles are sharing road areas with cars with no demarcation.
- Substantial increase appears to directly conflict with promotion for walking, cycling – other than in the isolated new development area which is of little use if the containment is so limited, there is no link up to any other plan – the current proposal does not increase the cycling lanes – cycling on joint roads has been proved as neither safe nor scalable and I as one can state that this is the reason I am unable to cycle to work – to make cycling effective the issue of cycle security also needs to be addressed or being able to take Bikes to work which is not possible via trains in commuting hours currently.

Section 9 This states there will be pedestrian and cycle crossings of the railway – but in the recent past all pedestrian railway crossings were removed. How is this going to be established?

Have the railways / required authorities agreed – fundamental to the whole design.

2.4.1 Housing • younger people in the area) but particularly if it is extended.

- There are insufficient green energy plans for the new development, but also such a big area should be used to provide existing residence with local green energy
- Different populations/character – Aylesbury lower priced housing, High Wycombe retail, PR is distinct to these, such large designation of housing does not tie up to retaining this character.
- Higher designation of self builds, so low currently that there is no established network of builders or information to assist
- Need to increase the green credentials including green rooves, underground parking, brown water
- Need to think of waste pick ups so litter is not left out e.g. semi-submersed rubbish collection areas per road rather than needing individual pickups
- Do not consider PR an appropriate location for such an increase;
 - o PR has had considerable development recently. The Character of PR will change with a 25% increase within a short period, such a number of houses would have less impact in the larger towns as less of a %
 - o Not identified as an area as a seed for housing market in the HMA-FEMA mar 2015 report, and specifically (in more than one Census) that Aylesbury commuters go south and High Wycombe to Slough – PR is not located as well for either sets of these commutes.
 - o PR does not satisfy the “Housing market area” definition as it does not provide key functional linkages between places where people live and work for the number of people currently (represented by the preference of older, rather than

2.4.2 Local Centre

2.4.3 Employment • No evidence that there is a clear understanding of:

- o the business needs of the area which PR satisfies
- o PR does not have supply chains set up. Business's in the area are small boutique businesses further evidencing that it is not set up for commercial enterprises
- o does not meet the criteria for a high proportion of all journeys to work occur in the

area.

o Shows red to amber linkage between urban centres and the study area Is shown in the HMA-FEMA-Final Report Mar 15 as red to amber

2.4.4 Community • How is this going to be realised when there are not enough GP's at the moment.

- The proposed increase is in one distinct area which will effectively create a separate "PR" area and will not integrate into the current PR especially with a railway crossing.

- The area its-self is split up by the main road and along the railway making these distinct sub-sets with children on each side going to the school on their side of the road – or having to cross a dangerous road.

- Specific road / railway crossings will encourage targeted bullying and victimisation hot spots.

- will result in a band of similar housing and populations from High Wycombe through to Milton Keynes blighting the whole area which is currently one of the jewels of natural landscape – which is the current drive.

- "Meeting spaces" are little used by youth, these need to be internet café's, youth clubs, brownies/scouts etc

2.4.5 Open space • There must be no double or triple counting of open space i.e. it is either recreational, or it is conservation area, or it is for walking in – you can neither walk through a football game, nor play football on a meadow, walking through meadow will damage, trimmed verges along roadsides do not cover any of the above.

- Any designation needs to be backed up with leverage to ensure that designation cannot be ignored or overruled in the future.

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

Privacy notice

Wycombe District Council Spatial Planning 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

Such processing is necessary for compliance with a legal obligation to which we are subject and/or the performance of a task carried out in the public interest, i.e. to fulfil our planning function of producing a Supplementary Planning Document covering the Princes Risborough Expansion.

Your submissions, including personal data, may be shared with the Planning and Sustainability Department. 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.

For further information see our Privacy Policy on our website at <https://www.wycombe.gov.uk/pages/About-the-council/Privacy/Our-privacy-policy.aspx> or at our offices. Our Data Protection Officer can be contacted at Wycombe District Council, Queen Victoria Road, High Wycombe, HP11 1BB or at access2information@wycombe.gov.uk.