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Spatial Planning
Wycombe District Council
Council offices
Queen Victoria Road
High Wycombe
Buckinghamshire, HP11 1BB

20th July 2019

Dear Sirs

**Princes Risborough Expansion Supplementary Planning Document (Consultation Draft) – June 2018
(referred to in the Local Plan as “Capacity and Delivery Plan”)**

We are Hugh and Deirdre John (husband and wife) and Alexander John (adult son) who reside at Monks Thacky, Burton Lane, Monks Risborough. We write in response to the Supplementary Planning Document [SPD]. In respect of the proposals within that document and as summarised in the Executive summary, we share and endorse the concerns of RARA which were summarised during the meeting in Princes Risborough at Wades Park on 16th July 2019. These are listed in a separate document appended to this letter.

We refer to our earlier Responses to LP Consultation on 25 March 2019, a copy of which is embedded at the end of this letter in both Word and pdf format .

We note that for the first time it is acknowledged in the SPD that an overall development in the region of 2,500 dwellings equates to an increase of 6,250 in the population (paragraph 2.4.5 Open Space)¹

We would also add that this document is predicated upon a number of assumptions for which there is little evidence. These include the adequacy of potential:

- Government funding under their HIF
- Funding by the WDC ‘Community Infrastructure Levy’ (CIL) once WDC ceases to exist and there is a Unified Council in place
- Funding of the proposed relief road to the south of the first phase of development of around 400 homes off Mill Lane (to the west)
- Funding of the third phase east of Longwick Road and beyond the Crowbrook stream
- Funding of the relief road being in place early on in this phase
- Financing of proposed highway works
- Co-operation of developers in contributing towards the cost of:
 - o the relief road
 - o infrastructure in general
 - o green infrastructure

¹ SPD section 2 Analysis - page 45

- Funding of the proposed upgrade to the water supply network in the vicinity of the expansion area (para. 2.1.6²), both as to costings and who will fund this (Thames Water and/or the developers); also where the water booster station will be located
- Timing, building, financing and location of the proposed upgrades to the Sewage Treatment works between 2020-2025

There is also no attempt to define the precise extent of the vaguely expressed ‘*scope to use compulsory powers to acquire land for key infrastructure such as the relief road, if necessary*’³

In respect of funding in general, the phrase ‘*Contributions will be sought to meet the costs*’ appears with alarming regularity throughout the SPD: in relation to the cost of additional school places; the initial phase of works to address highway constraints in Mill Lane; stepped railway bridges; the relief road; the proposed upgrades to the A4010 and associated junctions. The proposed funders and commitment are rarely identified or confirmed.

The Viability Appraisal work undertaken by Avison Young (May 2019) apparently confirmed that ‘*the project overall is viable but the forward funding of major investments in key enabling infrastructure presents a financial challenge*’ (paragraph 5.7 Delivery Mechanisms⁴).

The proposal is for a collaborative approach between Wycombe District Council [WDC], Buckinghamshire County Council [BCC], Network Rail, Princes Risborough Town Council, Homes England, and ‘*critically the landowners and promoters of development*’. In Appendix 5 it is stated that such an approach is ‘*fundamental to the successful delivery of PREA*’ (Principles 10 and 11, page 7). There is however no convincing evidence that such a collaborative approach will occur; in part this is because in March 2020, WDC and BCC will be absorbed into the new Unitary Council and their influence within this body remains a significant unknown; in part, there is no evidence that Network Rail has any appetite to be collaborative, considering the lines in question are already at capacity. Their budget for line and access upgrades is set nationally and not at local authority level, and is already fixed for the next 5 years such that matters have moved on since the 2017 Framework Agreement and Memorandum of Understanding⁵. Developers are most reluctant to contribute towards these costs and have not indicated any intention to do so; this is acknowledged at paragraph 5.7.1: ‘*There has so far been limited willingness to cooperate on phasing and infrastructure delivery issues ...*’⁶

Yet, this SPD proposes that the timing of the original plan be brought forward such that the development to the west of Mill Lane by Bloor Homes, south of the Crowbrook Corridor is due to be completed by the end of 2022/23 with commencement of phase 2 north west of the Longwick Road commencing in 2023 (paragraph 5.5.1 Delivery Plan⁷). The proposal remains that the first stage of the relief road will be met in part by developer contributions but the sense is that there will continue to be little appetite for this from the developers. The expressed hope to obtain for an agreement on cost apportionment (SLIC)⁸, or ad hoc planning applications for compliance with policy with

² SPD section 2 Analysis - page 31

³ SPD section 1 Executive Summary - page viii

⁴ SPD section 5 Delivery Plan - page 188

⁵ SPD Appendix 5, page 4

⁶ SPD section 5 Delivery Plan - penultimate paragraph, page 188

⁷ SPD section 5 Delivery Plan - page 174

⁸ SPD section 5 Delivery Plan sub-paragraph 1 - page 189

equitable developer contributions through planning obligations⁹, is no more than that – a hope - and is not a sound basis for proceeding as proposed

This is particularly so with the looming uncertainties of Brexit and the likely impact on such collaborative proposals even if these were anywhere close to being crystallised.

The end result therefore is:

- ad hoc planning with an insufficiently crystallised structure
- paying lip-service to the proposed buffer zones thereby providing the ‘foot in the door’ for urban sprawl: the development by Rectory homes on the north west side of the B4009 Lower Icknield Way is a testament to the willingness of WDC to resile from undertakings and disregard reasoned comments made throughout the consultation process.

Taking specific points for further comment:

Proposed Relief Road

The intention is for this road to be ‘*a complete alternative route to the A4010*’ (section 3 Development Requirements (PR8)¹⁰). This is the crux to the justification for the proposed planning expansion and yet the plans are characterised by vagueness and uncertainty as to when this will be implemented and who will fund it. The proposal is to improve the A4010 as outlined in the 4 bullet points at the bottom of page 90 of section 3¹¹ with additional highway measures on the existing road through the town ‘*to deter through-traffic*’ but the lightness on detail is concerning: there is simply a reference to the *Princes Risborough Western Relief Road Feasibility Study* (April 2015) and the later study in September 2017. As RARA saliently point out, these studies remain theoretical with little or no resilient evidence-based approach or consideration of how and when this will be funded (see paragraph 5.2.2.1 Transport¹² where it is stated that ‘*Detailed design work to enable the construction of the relief road remains to be done;*’). This does not augur well for a coherent and effective transport network where the Tesco roundabout off Longwick Road ‘*is expected to be at capacity by 2011 in a do minimum*’⁵ scenario¹³

Proposed changes to the junction of Mill Lane and the A4010

Having stated that the ‘*distinct identity*’ of Monks Risborough should be preserved¹⁴, the proposal (one suspects because of uncertainty of funding) is to use the existing highway network to accommodate some new development (paragraph 5 Delivery Plan¹⁵) by relying in part upon the already busy Mill Lane junction with the A4010. The intention is to ‘*find a workable solution for the traffic demand flows of 595 houses*’; however:

- 1) reliance upon this junction is scarcely compatible with the ‘*distinct identity*’ of the adjacent Monks Risborough Conservation Area

⁹ SPD section 5 Delivery Plan sub-paragraph 1 - page 189

¹⁰ SPD Section 3 Development Requirements - page 89

¹¹ SPD Section 3 Development Requirements – page 90

¹² SPD section 5 Delivery Plan - page 151

¹³ SPD section 5 Delivery Plan - page 152

¹⁴ SPD section 2 Analysis - page 48, paragraph 2.5.1 Constraints

¹⁵ SPD section 5 Delivery Plan - page 153

- 2) the proposed “*reallocated carriageway space*” to allow for footpaths and cycle paths to be created north and south of the railway bridge in Mill Lane (see paragraphs 2.3.3 and 3.8.1) is likely to result in significant queues
- 3) the resultant increased use of this junction can only result in traffic chaos
- 4) the junction is in very close proximity to Monks Risborough Primary School and there is therefore likely to be a significant increase in the risk of injury to schoolchildren and their parents who use this junction for the ‘school run’.

The alternative of a mini-roundabout is to be investigated further but, if adopted, would almost certainly need to widen the carriageway and/or acquire third-party land through compulsory purchase, as the larger of the two roundabout options is proposed. This again would be incompatible with separating Monks Risborough from the proposed development and would further impact on character of Monks Risborough, contrary to WDC’s stated purpose through the consultation procedure¹⁶.

In addition, with a mini-roundabout at this junction:

- 1) traffic travelling south on Mill Lane would have to give way to traffic approaching from the west from Princes Risborough which during the rush-hour is constant;
- 2) traffic travelling west on the A4010 toward Princes Risborough would have to give way to traffic emerging from Mill Lane when this is turning right (west) towards Princes Risborough
- 3) traffic travelling east on the A4010 towards Aylesbury would have to give way to traffic emerging from Peter’s Lane with the intention of turning right in the direction of Aylesbury

thereby grid-locking the flow of traffic on a major ‘A’ road which is already close to traffic saturation.

On the first page of Appendix D . Mill Lane junction assessment¹⁷, it is stated that *‘there are sufficient gaps in the traffic on the A4010 for there not to be too much queue building up’*. This is seriously inaccurate and we say this having been resident within 200 yards of this junction since 1976 (Hugh and Deirdre John) and 1980 (Alexander John). Part of the traffic density is the ‘Risborough soundtrack’ - a constant stream of blue light run Ambulance sirens throughout the day, as there is no fully operational Accident and Emergency department in High Wycombe.

There is also nothing to suggest that construction traffic will not seek to use Mill Lane as a ‘rat run with the likely chaos and potential danger this would cause to pedestrians and cyclists.

Again, therefore, this is ill-thought through with funding being the principle driver rather than logic and coherent planning.

Traffic calming measures in the Mill Lane / Askett area

These are addressed above and, presumably, relate to narrowing the carriageway rather than ‘speed bumps’ although this remains unclear from the available documentation.

New Transport

¹⁶ see Jacobs’ Traffic Modelling (21/07/2017) traffic management proposals for Mill Lane which include stopping up of Mill Lane, alternatively traffic calming to reduce rat running : paragraph 3.4.2 Do Something 2, pages 13. Further proposals are set out in Appendix D Mill Lane Junction Assessment - page 1 (second table and Table 1), page 2 (Table 2)

¹⁷ Jacobs Princes Risborough Phasing Test

Having recognised the inevitable adverse impact of increased traffic on the A4010 from Princes Risborough towards Aylesbury, this SPD then disregards the reasonable observations that have previously been made about the need for residents of Monks Risborough to have to drive into Princes Risborough in order to access Longwick and Thame (or indeed the proposed multi-sport 'hub' to the north-east of the railway), through the proposal for '*reallocating carriageway space*' in Mill Lane to '*help deter its use as a through-route for vehicles*' (paragraphs 2.3.3 and 3.8.1)¹⁸. For residents of Monks Risborough, this is not a 'through-route' but the most sensible, easy and safest way to access the Lower Icknield Way. This, as yet, possible proposal is ill thought-through and illogical: far from improving town centre congestion (as suggested at paragraph 2.5.2¹⁹) this would unnecessarily increase this, by forcing residents of Monks Risborough to drive into Princes Risborough as described above. Not everyone can walk or cycle and it is inappropriate to assume that the majority of access to Mill Lane during the day will be on foot or by bicycle.

Green Infrastructure – landscape character and sensitivity

We accept that careful consideration has been given at paragraph 2.1.4 to the location of high density housing and lower density where this will adversely impact on the views from Whiteleaf across the AONB (Figures 6, 7 and 8)²⁰. This includes the intention, expressed within the Key response, to retain the network of dense hedgerows and trees where possible and to retain the rural character of Mill Lane bordered by grass verges, ditches and tall hedgerows plus the network of public footpaths and bridleways through the development connecting to the surrounding countryside, as well as avoiding the introduction of large scale, bulky buildings²¹.

We are also pleased that the need to retain Monks Risborough, Longwick and Askett as distinct and identifiable places has been recognised (paragraph 2.2.2)²² with the intention to retain the rural character of Mill Lane with traffic deterrents "*as a through-route for vehicles*" (paragraph 2.3.4)²³. This intention however is belied by the proposals to '*upgrade Mill Lane .. to enable walking and cycling*' (para 2.3.3)²⁴ and to expand the junction with the A4010 (see above). This will 'urbanise' this road and thereby reduce or eclipse the 'rural' character which the SPD maintains it wishes to conserve.

We are also concerned by the view expressed at paragraph 2.1.4²⁵ that land south of the Crowbrook Stream and south west corner of the site of New development on the '*urban fringe*' of Princes Risborough, is less sensitive to change. At present, within Monks Risborough, there is a recreation ground (St. Dunstan's Park and then fields to the north of the Princes Risborough / Aylesbury railway line. The latter will be completely lost as the proposed development is right up to the railway line (see Figures 14 and 16 under section 3 Development Requirements²⁶) such that any buffer zone becomes extremely slender; it is noticeable that there is higher density development proposed to the south of the buffer zone (which includes Alscot) in comparison to the north. As such, this area is clearly highly sensitive to change and it is inaccurate to describe this as '*urban fringe*' as this is

¹⁸ SPD Analysis section 2 - page 39 and section 3 Development Requirements page 88

¹⁹ SPD Analysis section 2 - page 50

²⁰ also paragraph 2.5.1 Constraints, SPD Analysis section 2 - page 47

²¹ SPD Analysis section 2 - page 25

²² page 34 SPD Analysis section 2; also paragraph 2.5.1, page 48 SPD Analysis section 2, where there is acknowledgement of the '*distinct identity*' of Monks Risborough

²³ SPD Analysis section 2 - page 35

²⁴ SPD Analysis section 2 - page 36

²⁵ SPD Analysis section 2 - page 26

²⁶ SPD Development Requirements section 3 - pages 56 and 60 SPD

clearly not the case.

Health Provision

The plan is to relocate Wellington House surgery to a new medical centre in the south-west sector of the proposed development. There is no apparent proposal for a new surgery. The two existing surgeries however are already worryingly over-subscribed with a 4+ week for non-urgent appointments. This woefully inadequate provision has been highlighted by commentators throughout the consultation process but appears to have been disregarded and dismissed as not being an actual or potential problem despite the anticipated 6,250 increase in the population²⁷.

Summary

It would seem that the proposed planning still anticipates increased expansion beyond that anticipated and projected in the original plans submitted for the March 2018 consultation, with little coherent or cohesive thought being given to the overall impact on the Princes Risborough area, the character of which will not be retained by simply safeguarding a few trees, ancient hedges and streams. The position remains that the significant numbers of uncertainties, outlined in the RARA response, and the apparent failure to address – or know how address these – will result in destruction of the character and history of the Risborough area: this is inevitable when such a disproportionate percentage of the WDC housing requirement has thoughtlessly been imposed upon Princes Risborough and the villages of Monks Risborough, Longwick and Askett.

There is evidence that the population is not increasing as exponentially as originally envisaged in the original plan. As such there is still time at this stage of planning to recognise over-provision of housing and to reduce this appropriately to conserve the Risborough area for future generations while still encouraging organic evolution of the area, through well-managed and vibrant expansion in housing and local amenities, thereby attracting a local population across all age, income and cultural groups, with inspired and appropriately funded investment in social, recreational and business opportunities.

Yours faithfully

Deirdre John
Hugh John
Alexander John

****Other documents considered:**

- PREA Delivery Plan Viability Report (June 2019)
- New Local Plan examination supporting evidence
- Our response to the LP Consultation on 25 March 2019



RESPONSES TO LP
CONSULTATION 250.



RESPONSES TO LP
CONSULTATION 250.

²⁷ SPD section 2 Analysis - page 45

Appendix –

KEY AREA OF CONCERN WITH THE SPD IDENTIFIED BY RARA

Section - Executive Summary

1. Why are we being asked to comment on this planning document when the Local Plan has still to be agreed by the Planning Inspector?
2. Throughout the document and at the public hearings we have noted concerns from the developers, with regard to the viability of your proposals. The inference from this document is that we are heading towards ad hoc planning. Something we were told the Local Plan would avoid.
3. The £12m Housing Infrastructure Fund (Homes England) to 'kick start' paying for the relief road, presented as a 'given' by WDC at the public hearing last September, still appears to be in doubt. We are aware developers currently do not have an 'appetite' for a relief road and are not in favour of making contributions to fund it. This could lead to a 'road to nowhere', something 'Homes England' will want to avoid as a waste of taxpayers' money. At the Public Meeting on 16th July, WDC pledged to provide the £12M if the HIF bid failed. However, with Unitary imminent, such a pledge may not be supported by the Unitary Council after WDC has been dissolved.
4. In view of the pending formation of a Unitary Council there is no merit in rushing ahead at this stage with a Local Plan that is not sound, is unsustainable and does not command the support of the community.
5. As has been noted throughout this process, this part of the Local Plan has a detrimental effect to the district as a whole, most of which far outweigh the minor gains made at a town level. Noted not only by many government organisations like Highways England, but also other non-government organisations such as the CPRE.

Section 1.0 Introduction

- The document defines the Area of Comprehensive Development as including the Relief Road, the Main Expansion Area, land to the rear of Poppy Road and land at Princes Risborough station. Yet there is no detail on the Relief Road, the land to the rear of Poppy Road and land at Princes Risborough station. We need to be consulted on this.
- You state that written representations on the Proposed Main Modifications have been received and passed to the Inspector for her to consider when finalising her report. These representations were submitted in March, why is this consultation going ahead before they have been acted upon?
- The delivery plan is already out of date and likely to slip even further, and the Council is unlikely to be in existence to adopt the Local Plan if and when it is approved as a new Unitary Authority takes over in May 2020. Is this not a futile exercise and a waste of taxpayers' money?

Section 2.0 Analysis

- Many of the major issues raised through the consultation process and recognised by the Planning Inspector have not been acknowledged in Section 2.1. For example,
 - relief road going through AONB and the wider transportation congestion issues
 - The lack of any proper integration with the existing town, and a non-existent buffer Zone with Longwick referred to at the Public Meetings as ‘The Longwick Gap’ will have sports fields with floodlights, existing traveller sites and new houses currently being built by Rectory Homes, hardly the green buffer to prevent urban sprawl.
 - Lack of employment to justify housing numbers – it is not a sustainable plan
 - Major environmental concerns raised regarding the Poppy Road development.
- Most of the proposed housing development and leisure facilities are more than 1km from the town centre. We should be focusing more on town centre residential development
- We also note that all of the PREA is well over ¾ of a mile from the secondary school. This will generate a massive increase in the size of the school run, with severe detrimental effects on air pollution and traffic flow, during the busiest hours.

Section 3.0 Development Requirements

- There is reference to ‘a green buffer’ between Longwick and Princes Risborough, yet part of the buffer zone is already earmarked as a sports field with infrastructure facilities.
- We note the proposals for ‘improving the capacity of some lengths of existing roads’ – including Summerleys Road, Picts Lane and Shootacre Lane. Whilst we may welcome this and have always said that there is no need for major new road infrastructure that would destroy valuable farmland, green belt and our AONB we are concerned that any ‘temporary’ solution will become permanent and that proposals and plans for work at Phase 1 are not yet available for comment.
- Alscot hamlet, an historical setting and a designated conservation area, will be totally isolated by development and worryingly the choice of high density homes close to its boundary. How does this meet WDC’s vision for the town to ‘strongly reflect its historic roots and setting within the Chiltern Hills’?

Section 4.0 Design details

- There is no detail on housing or road design, with regard to the, Poppy Road development, Station development, Picts Lane, Shootacre Lane and Summerleys Road. Will there be a separate consultation exercise regarding these?

Section 5.0 Delivery Plan

- There is conflicting statement as to whether the Culverton link is proposed after 1100 homes or 1396 homes.

- The NPPF test of exceptional circumstances has never been provided by WDC for this major development in both AONB and Green Belt. Nor has WDC ever addressed the issue of bottlenecks on the A4010 - merely stating at the public Hearing that there are no solutions to these bottlenecks. As BCC are leading on this going forward we believe they should be required to carry out a detailed review and consultation on the whole transport infrastructure proposals before proceeding with the Culverton link.
- We cannot understand why when Bucks CC are carrying out road calming measures for HS2 traffic through Princes Risborough that WDC don't combine their road calming proposals at the same time.
- Page 170 states that 'The housing delivery profile is an indicative profile. It is based on the latest evidence available and assumes that Housing Infrastructure Fund funding is available for the first phase of the relief road.' With regard to the housing delivery profile, our view is that this is significantly over-estimating the likely demand, even in a buoyant market. Nor does it take account of the significant unsold stock that exists in the current developments, with 2/3 of homes unsold and building work stopping on sites in nearby Longwick, Chinnor and Haddenham where sales are at a standstill. Government requires homes to be built to meet need but also clearly states 'right homes in the right places'. Currently, with such poor take-up, are these homes in the right places?
- We cannot see how you can justify the numbers proposed unless it is to convince Homes England regarding the award of the Housing Infrastructure Fund.
- Our understanding from Developers is that they do not agree with your proposals in the Local Plan, in particular around viability issues and the need for the new relief road.
- Without the local community and other key stakeholders bought in to the Plan sadly it will fail.
- The new primary school will not be delivered until Phase 2 – despite the document highlighting only a 5% surplus capacity at present. Where will children during the build out in Phase 1 go to school locally? The proposal for new schools delivery will be lagging the need as identified in you document. The first primary school needs to be brought forward.
- Improvements and infrastructure requirements of the existing town are not expected until the completion of phase 3 at the earliest. This includes the new Sports Hub, remotely located in the green corridor by Askett; improvements to the B4009 and Grove Lane junction and improvements to the existing town. With concerns over local housing demand and developer appetite, and the timescales involved there is significant worry that phase 3 will not come forward as WDC expect. This puts completion of the A4010 re-routing and town parking, sports and recreation facilities in jeopardy. All the infrastructure intended for delivery at or after phase 3 needs to be brought forward and implemented upon completion of phase 2. It is essential that all this is in place before phase 3 housing delivery is started. Reassurance and commitment to this earlier delivery needs to be formalised within this SPD.

Sadly, this all demonstrates just how unsound the whole plan is and it is not a robust plan. The response you received at the town meeting on the 2nd and 16th of July reflected this.

Section - Statement of Consultation

- Disappointingly, no matter how you dress up the consultation process this was a major failure of the Planning process. It was never genuine, it was not listened to, considered or acted upon. None more so than the Princes Risborough Steering Group.
- We note that you state this plan was shaped by input from the Steering group. However, at the Planning Inquiry WDC admitted that this had failed to function effectively. A majority of the representatives of the local groups produced and signed a minority report, disagreeing with the working processes and conclusions of the group. This is therefore a contradictory statement.
- If the Steering Group was an important instrument in community engagement, the fact that this group was disbanded before this implementation plan was created, illustrates a lack of the council's commitment to involve local people in the planning of their home town (a core principle of the NPPF and indeed WDC's policy for consultation). The plan has not benefited from any real community involvement. Discussing this implementation plan twice recently with the Town Council does not represent community engagement, particularly as the Town Council is closely allied to WDC and has always been supportive of the wider expansion of Princes Risborough despite the feedback from over 50% (over 4,000 signatures) of local residents who signed a petition in 2018 seeking a significant reduction in housing numbers to ensure sustainability.
- The only time residents' opinions was really sought was over five years ago and based on much lower growth scenarios, the response on most of the questions is contrary to this plan. For example, public opinion was overwhelming re keeping the settlements of Longwick and Princes Risborough separate to maintain their identities. A narrow buffer 'Longwick Gap', significantly populated by playing fields flood lights, car parking, houses and traveller sites certainly does not deliver this.
- The consultation process failed. With the advent of a new unitary authority we would respectfully suggest that adoption of the first two phases identified in the SPD are held back until such time as BCC has the opportunity to review these. Phase 3 should be completely aborted until a detailed review and consultation is carried out as part of the five year review referred to.