

For official use only



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	Stephen Jeanes	
Job Title (where relevant)		
Organisation (where relevant)	Risborough Environmental Group	
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:

Stephen Jeanes
Risborough Environmental Group

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

See in-line with comments

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.

Name, or Organisation:

Section, sub-section/page(s): Introduction, section 1

Comments:

Support or object, OBJECT; This section and the document as a whole only deals with the PR expansion area, (i.e. north of the railway line) and not the other parts of PR.

? Reasons: All sections of the draft Local Plan are integral because ALL are affected by the "Relief Road" proposals that depends on the PREA. Also the intent in section 1 is to INTEGRATE the PREA with the rest of the town. This cannot be seen in its proper context without including the rest of the town.

? Changes needed, suggested wording, if appropriate: Document must be expanded to include the rest of the town in many sections.

Name, or Organisation:

Section, sub-section/page(s): Introduction, section 1.4

Comments:

Support or object, SUPPORT; This section includes many policy statements using the word "sustainable" as a necessary objective.

? Reasons: No development can be justified unless its many attributes are sustainable in the long term. All following sections of the draft must consider the long-term environmental sustainability of the proposed development.

? Changes needed, suggested wording, if appropriate: Changes are required to each section, such as those described below.

Name, or Organisation:

Section, sub-section/page(s): Introduction, section 1.5

Comments:

Support or object, OBJECT; This section describes "Community Engagement" and attempts to claim that proper community engagement took place. .

? Reasons: in the opinion of many PR residents, what took place was simply a box-ticking exercise with no true attempt at community engagement as most residents oppose the scale of the proposals. For example, the substantial petition coordinated by RARA was

not seriously considered.

? The "Steering Group" contained only parties with vested interests (including the Town Council) in forcing the plan on the local community and no independent representation from any part of the community.

? Changes needed, suggested wording, if appropriate: Document must make it clear that the majority of the local community OPPOSE the proposals described.

Name, or Organisation:

Section, sub-section/page(s): Development Requirements, section 3.6 Green Infrastructure section

Comments:

Support or object, OBJECT; This section makes reference to "section 3 of the Residential Design Guidance" for guidance on green infrastructure

? Reasons: The reference section did not appear to be in the consultation documents, or was poorly referenced

? Changes needed, suggested wording, if appropriate: Clarify or correct the reference to ensure that the subject material can be readily located by lay readers of the document.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.1 Crowbrook Corridor

Comments:

Support or object, OBJECT; This section includes several important ecological sites (e.g. Longwick Bog, Kingsmead Meadow). No details are presented on how such areas will be managed in the long term.

? Reasons: Ecological sites must be protected and managed, not just during any construction period, but also cared for in the long term.

? Changes needed, suggested wording, if appropriate: These sites should be transferred to the ownership of a "public" body, with sufficient funding to take care of their ecological value in the long term. Such an environmentally friendly "public" body such as BBOWT.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.1 Crowbrook Corridor

Comments:

Support or object, OBJECT; This section includes several important ecological sites (e.g. Longwick Bog, Kingsmead Meadow). No details are presented on how their valued ecological status will be protected during the period of any development.

? Reasons: Ecological sites are very sensitive to disturbance and their value would be diminished if not lost if construction activity was allowed within the site(s).

? Changes needed, suggested wording, if appropriate: These sites should be defined, finalised and transferred to the ownership of an environmentally friendly "public" body such as BBOWT BEFORE the construction period is allowed to begin on any adjacent land. Just look at the mess that has been made on the Lea Valley Homes site off Longwick Road. Not a blade of grass left standing.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.1 Crowbrook Corridor

Comments:

Support or object, OBJECT; In the summary for this section, some of the 'key new elements to integrate' are in conflict with the 'primary uses' and 'key elements to preserve'.

? Reasons: Ecological sites and their biodiversity and wildlife are very sensitive to disturbance and their value would be lost if inappropriate recreational activity is promoted within the site(s).

? Changes needed, suggested wording, if appropriate: The corridor's 'secondary use' should be limited to "pedestrian movement on existing footpaths", and "new public spaces" with "...benches.. "(etc.) removed from the 'Key new elements to integrate'. The areas where "species rich priority habitat" (etc.) is to be 'integrated' must be defined so that it can be protected in the long term as any nature lover knows that it takes years to develop, but

minutes for developers and planners to destroy.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.2 Longwick Gap

Comments:

Support or object, OBJECT; Several of the parts of this area are already developed or in use as travellers' sites and therefore cannot be classed as a 'green edge' or 'green buffer'.

? Reasons: Areas that are already developed or in use as travellers' sites, car parks etc. have little ecological value and should be classified as "brownfield" sites. They cannot be classed as part of a 'green edge' or 'green buffer', as they are likely to be re-developed in the future as soon as an economic benefit is available to the present owners, as their commitment to the local area is purely transient. The language surrounding the term "green buffer" implies an ecological value to wildlife. This proposal includes recreation facilities, brownfield sites and already developed land and that does not have any significant ecological value to wildlife.

? Changes needed, suggested wording, if appropriate: These sites should be re-defined as "brownfield" sites, and NOT as part of a 'green buffer'. An effective 'green buffer' between the two settlements is required as is stated elsewhere.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.3 Green Lanes

Comments:

Support or object, OBJECT; The scope of this section includes "retaining existing hedgerows" but makes no mention of the clear need to protect the hedgerows during any construction period.

? Reasons: Ecological assets such as hedgerows are very sensitive to disturbance and their value would be diminished if construction activity was allowed within the site(s).

? Changes needed, suggested wording, if appropriate: The requirement to protect the hedgerows and sites during any construction period should be added.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.3 Green Lanes

Comments:

Support or object, OBJECT; The requirements do not appear to include a cycle track alongside the existing footpath, and no statement is made concerning the overall width or profile of the corridor.

? Reasons: The encouragement of sustainable transport clearly requires cycling facilities alongside pedestrian facilities.

? Changes needed, suggested wording, if appropriate: The requirement section needs to confirm that Green Lanes includes a cycling facility, and if necessary, converting the footpath RoW into a bridleway. Additionally, statements setting out the profile and dimension are required.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.4 Railway Park

Comments:

Support or object, OBJECT; The requirements do not appear to include a cycle track alongside the footpath, and no statement is made concerning the overall width or profile of the corridor. It is not clear that the path and cycle way will survive Rail-Track's double-tracking and or whether the value of the green corridor will remain.

? Reasons: The encouragement of sustainable transport clearly requires cycling facilities alongside pedestrian facilities, and for them to be maintained in the long term.

? Changes needed, suggested wording, if appropriate: The requirement section needs to confirm that Railway Park includes a cycling facility. Additionally, statements setting out the profile and dimension are required, and any impact of double tracking the railway line.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.7 Woodland, Hedgerow and

Grassland

Comments:

Support or object, OBJECT; This section includes several ecological sites (e.g. Sewage Works Odour Buffer). No details are presented on how such areas will be managed in the long term.

? Reasons: Ecological sites must be protected and managed, not just during any construction period, but also cared for in the long term.

? Changes needed, suggested wording, if appropriate: These sites should be transferred to the ownership of a "public" body, with sufficient funding to take care of their ecological value in the long term. Such an environmentally friendly "public" body such as BBOWT. These sites should be defined, finalised and transferred to the ownership of an environmentally friendly "public" body such as BBOWT BEFORE the construction period is allowed to begin on any adjacent land.

Name, or Organisation:

Section, sub-section/page(s): Green Infrastructure Section 3.6.7 Woodland, Hedgerow and Grassland

Comments:

Support or object, OBJECT; This section includes statements of "Key Elements" that are inconsistent and hence require clarification.

? Reasons: The 'primary use' of this collection of sites is stated to be "biodiversity". However, the primary use of 'streets and development areas' and 'back gardens' is clearly not 'biodiversity' and should be 'recreation' (or similar) to emphasise the difference between locations that are valuable for ecological purposes and those that are less so.

? Changes needed, suggested wording, if appropriate: Exclude 'streets and development areas' and 'back gardens' from this section to avoid diluting the ecological value of the sites covered by this section.

Name, or Organisation:

Section, sub-section/page(s): Drainage Section 3.7

Comments:

Support or object, OBJECT; This section omits any statement concerning the measures required to prevent contaminated run-off from entering the sensitive chalk streams of the area.

? Reasons: Surface water run-off from a highway, such as the proposed Relief Road, may contain polluting contaminants that can damage the sensitive ecology of chalk streams into which it is discharged.

? Changes needed, suggested wording, if appropriate: Include provision for the removal of potential contaminants from run-off into the local streams.

Name, or Organisation:

Section, sub-section/page(s): Movement and Access Section 3.8

Comments:

Support or object, OBJECT; This section is simplistic in being limited to the EA. A greater level of integration into other parts of Princes Risborough and its surroundings is needed.

? Reasons: "Key Destinations" do not include places of work or the 'Top School'. No attempt is made to delineate routes within other parts of Princes Risborough and the surrounding area apart from glib statements.

? Changes needed, suggested wording, if appropriate: Include relevant details for other parts of Princes Risborough to allow an informed judgement.

Name, or Organisation:

Section, sub-section/page(s): Movement and Access Section 3.8

Comments:

Support or object, OBJECT; This section does not include measures describing prioritization for pedestrian and cycle traffic within or without the EA.

? Reasons: Separation and prioritization for pedestrian and cycle traffic is required to encourage the use of sustainable transport for environmental and health benefits..

? Changes needed, suggested wording, if appropriate: Include relevant details for Separation and prioritization for pedestrian and cycle traffic.

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Design Details, section 4

Name, or Organisation:

Section, sub-section/page(s): Design Principles,, section 4.2

Comments:

Support or object, OBJECT; This section does not contain any statement concerning the energy efficiency measures required within the proposed built environment.

? Reasons: Whilst certain expectations are raised by statements of the overall aims such as 'sustainability', there is no mention in the 'Requirements' of the standard of energy efficiency to be provided.

? Changes needed, suggested wording, if appropriate: Include statements requiring a high level of energy efficiency within buildings, including the use of solar power etc..

Name, or Organisation:

Section, sub-section/page(s): Design Principles,, section 4.2

Comments:

Support or object, OBJECT; This section does not contain any statement concerning efficient water utilisation measures that are required within the proposed built environment.

? Reasons: Whilst certain expectations are raised by statements of the overall aims such as 'sustainability', there is no requirement imposed for 'grey water' utilisation or other measures to promote efficient water utilisation. It is widely understood that local ground-water resources are under stress, in spite of what the profit-hungry Thames Water may claim.

? Changes needed, suggested wording, if appropriate: Include statements requiring a high level of efficient water utilisation, within any proposed buildings, including use of grey water.

Name, or Organisation:

Section, sub-section/page(s): Design Principles,, section 4.2

Comments:

Support or object, OBJECT; This section requires Plant Species to be "Predominantly native".

? Reasons: Plant species utilised in any planting schemes should be should be "Native species only" to maximise their value to the local wildlife and biodiversity.

? Changes needed, suggested wording, if appropriate: Plant species requirements should be changed to "Native species only" .

Name, or Organisation:

Section, sub-section/page(s): 'Statement of Consultation'

Comments:

Support or object, OBJECT; This section describes "Community Engagement" and attempts to claim that proper community engagement took place. .

? Reasons: in the opinion of many PR residents, what took place was simply a box-ticking exercise with no true attempt at community engagement as most residents oppose the scale of the proposals. For example, the substantial petition coordinated by RARA was not seriously considered.

? The "Steering Group" contained only parties with vested interests (including the Town Council) in forcing the plan onto the local community without their input and with no independent representation from any part of the community.

? Changes needed, suggested wording, if appropriate: Document must make it clear

that the majority of the local community OPPOSE the proposals described and feel that any consultation process was flawed.

(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.