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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	Sarah Allom	
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:

Sarah Allom

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

Through out

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.

I object to tge expansion plan as set out below.

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 tax payer's 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 tax payer's 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,
 - o relief road going through AONB and the wider transportation congestion issues
 - o 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.
 - o Lack of employment to justify housing numbers – it is not a sustainable plan
 - o 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 $\frac{3}{4}$ 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 your 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 were 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.

(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.

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