



6<sup>th</sup> October 2016

Dear Penelope

I hope this finds you well.

Now that sufficient time has elapsed following both Town Plan and Local Plan Consultations and Q and A feedback I am writing as Chairman of Risborough Area Residents Association (RARA) on behalf of our members to:

- 1) Outline our concerns regarding the general consultation '**process**' for the Town Plan and Local Plan
- 2) Ascertain when key **feedback** of responses following the Town Plan and Local Plan Consultations will be published to residents of Princes Risborough and Wycombe District and how you will be using and applying the main themes and concerns which have emerged to revise both the Town and Local plans to make them acceptable.
- 3) Provide you with information from **independent research** carried out to identify alternative housing potential in the WDC area
- 4) Ask key questions

## Process and Feedback

- i. The Town Plan Consultation ended on 28<sup>th</sup> March 2016 and despite some initial brief feedback published by WDC on 19<sup>th</sup> July, largely in response to repeated requests from RARA, there is still no official feedback from WDC to reassure people these concerns are being taken seriously. RARA would like to see evidence that purposeful dialogue and consideration has taken place with reference to circa 350 responses to the Princes Risborough Town plan consultation and an 'overwhelming' 3,000 responses from the Local Plan consultation. Without transparent communication from WDC as to how these concerns are being addressed, will only perpetuate current opinion gaining in momentum, that both the Town plan and Local Plan were a 'fait accompli'. A view we believe is reinforced by your strategy to sequence the Town Plan consultation in advance and in isolation to that of the Local Plan Consultation. This has served to polarise solutions, avoiding the wider local view. RARA believes a more considered plan, with LOCAL consultation is the only way forward. (Note, this is a key concern from the public consultation). Currently it is apparent you are dictating to the residents and electorate of WDC, not consulting.
- ii. We note your provision of Q & A sessions last month to manage the wealth of responses to the Local Plan as you said 'your department was overwhelmed and could not possibly respond on a one-to one'. From RARA's attendance at all these sessions we observed at no point was a summary of the concerns formally published or discussed. Instead, the format involved answering further questions raised by those in attendance, some taking up significant amounts

of time on individual issues. Not at any time were concerns managed shown to be important nor feeding into the Local Plan and Town Plan. It is RARA's belief that the Consultation processes for both the Town Plan and Local Plan are deeply flawed and at serious odds with the aims and principles of the National Planning Policy Framework (NPPF 2012).

- iii. Regarding feedback for the Town Plan, at the Steering Group Scrutiny meeting on 5<sup>th</sup> September, RARA requested formal publication of overdue information and were told such feedback to the Town Plan Consultation had been sent to the District Council (6 months ago). You agreed this had been 'sat there' for some time and for too long. The obvious disregard for this valuable feedback RARA believes is a waste of tax payer's time and money and the consultation was merely an exercise or 'hoop' for local residents to jump through. RARA questions why considerable 'noise' was made by WDC about the consultation process at the initial stage but upon receiving responses shows little regard for the information received. This is considerably at odds with the ethos of collaboration outlined within the NPPF.

*'This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them'. (NPPF 2012)*

**RARA asks:**

- Q) Why was the Town Plan Consultation carried out in isolation and not considered as part of an overarching Local Plan?
- Q) Early release of the Town Plan for consultation based on the 'maximum' housing number of 2600 homes, but in isolation of the completed Local Plan has resulted in premature 'crystallization' of this number (which had always been presented as a maximum but unlikely number by WDC). Why has the housing number for Princes Risborough not been revisited now that the wider Local Plan has come together?
- Q) The early release of the Princes Risborough Town Plan based on the 'maximum' housing number of circa 2,600 has made the 'expansion area' site a magnet for developers. Can you confirm and evidence that the action of early release of the Town Plan has not prematurely skewed the deliverability of housing on the site in favour of development, prior to the completion of a balanced assessment and the Local Plan?
- Q) Further to the above, how can 'sustainability' issues be properly considered in isolation in terms of wider economic, social and environmental needs?
- Q) Who made the decision and why was it made to send the (circa) 350 responses resulting from the Town Plan Consultation to the District Council over 6 months ago?
- Why hasn't your department responded to the very people who have taken the time to make these representations?
  - Why has so much time elapsed without a response being received from the District Council?
  - When will formal recommendations from this feedback be published and how do you intend to use and apply them?
- Q) Why was the Local Plan Consultation process under resourced leading to your department being 'overwhelmed'?

- Why were the arrangements for providing feedback i.e. the second part of the consultation process, in the case of both the Town Plan and Local plan insufficiently resourced?
  - Was this stage overlooked or was it just deeply flawed due to unexpected levels of response?
- Q) Do you have any intention to properly assess all feedback and communicate to residents of WDC how you intend to apply it?
- Q) In light of the NPPF statement, '*we are allowing people and communities back into planning*' do you believe your use of the consultation process has met the NPPFs expectations of true community engagement? If so how?

### **Steering Group and Focus on Relief Road**

- iv. Regarding the Town Plan, yourself and your colleagues emphasised the importance of the establishment of a Steering Group last year to inform planning for Princes Risborough. This strategy is clearly reflective of NPPF 'best practice' to work in partnership with the community. WDC went one step further by enabling the role of the chair of this vital group to be taken by the Leader of the Town Council and Mayor. It was a key decision by WDC to hand over the chair role to give the 'balance of opinion' to the very people who lived in the town to '*include people and communities*' (NPPF). A valuable strategy but one that now creates retrospective concern that there was a growing 'conflict of interest' as former Mayor and Chair of the Steering Group was this year appointed Deputy Cabinet Member for Planning for WDC. RARA believes he could not have led the Steering Group with objectivity but was compromised by his need to respond to government targets and the work of the Planning Department for WDC to meet them.
- v. We are aware the Steering Group was comprised of professionals from WDC planning department, members of the Town Council, and key stakeholder groups. We know the group received intensive training to become better informed about planning to fulfil their roles on this committee but many of these sessions lacked complete and regular attendance with some stake holders attending once. RARA has raised concerns about the lack of consistent membership leading to impaired coherence in its decision making ability, particularly when the chair was becoming progressively more conflicted.
- vi. To illustrate the above, we have framed many questions regarding how the Steering Group arrived at 2,600 homes as a 'number', which no member of the group, including the Princes Risborough Town Councillors can answer. From minutes of the group, the 'number' has not been challenged but was part of a circular discussion and intrinsically interwoven within the debate about the relief road which quickly disappears once the numbers are reduced.
- vii. RARA are firmly of the opinion this number was imposed subjectively and strategically on Princes Risborough to satisfy meeting WDC's target of finding circa 15,000 homes without comprehensive and objective 'testing' of land available across WDC in relation to existing land parcels and green belt (a matter we come onto in the 'Independent Research' section below).
- viii. The relief road proposal is one of the most contentious issues with regard to the Local Plan. We don't see any need for it at this time and understand that options tabled previously have now been discarded for an alternative WDC road proposal that runs through Green Belt and AONB land. Again this is an example of WDC completely ignoring the views of the community and totally disregarding our setting within the Chilterns AONB. We will respond separately on

transportation issues but must insist that any proposal for a relief road that hasn't gone through the due planning process and consultation with the local community be omitted from the plan at this time.

- Q) With the former Chair of the Steering Group becoming more involved at a strategic level within WDC's Planning Cabinet why did WDC believe there was no conflict of interest in his leadership of the Steering Group for Princes Risborough?
- Q) How was the number of circa 2,600 homes to be built in the Princes Risborough area determined? How was this introduced to the Steering Group, and to what extent were they then been permitted to 'steer' it?
- Q) High numbers of housing development in isolation of employment opportunity and sufficient transport capacity and connectivity is detrimental to the economic quality of a settlement. How is the identity, character and quality of the town being considered and protected whilst determining the housing number target for Princes Risborough?
- Q) Why wasn't the 'circular argument' of the number of homes, entwined with funding the relief road, set aside by the Steering Group and a proper dialogue developed by the chairman to discuss the actual numbers of houses Princes Risborough could sustainably support?

## Independent Research

- viii. As raised by RARA at the recent Steering Group 'Scrutiny' meeting on 5<sup>th</sup> September and Q & A on 12<sup>th</sup> September, we believe through our own independent research there is greater potential for building homes at alternative sites across WDC than is currently proposed. In AVDC's recent letter (dated 8<sup>th</sup> August), to your planning department in response to the Local Plan, AVDC rigorously challenge your long held assumption they will 'take' your 'unmet need' of 5,000 homes on the basis that your planning department has not applied rigorous enough 'testing'. Worryingly, they quickly identify weaknesses in your assessment of existing areas by commissioning consultants G. L. Hearn who independently reviewed the work undertaken so far by WDC as set out in the Local Draft Plan. Their findings were:

*'Fundamentally this review demonstrates that a more thorough and rigorous assessment of land availability should be progressed by Wycombe District Council, against a context of unmet housing need'*

They conclude over 2,800 homes can still be found:

*'The headline figures from this initial assessment indicates there is an estimated additional development potential in your district of 2,800 dwellings, over and above that which has been identified in the draft Wycombe District local plan'.*

- Q) If AVDC can find this number of homes, how many others have not been identified by your planning department across WDC to populate the Local Plan?

- ix. We strongly question whether you have tested the capacity of parcels of land rigorously and consistently enough and whether you have sufficiently explored more widely the potential of Green Belt in formulating the draft Local plan. If it had been we believe the Draft Local Plan would look very different. By providing Princes Risborough Steering Group with a 'fait-a-complis' of 2,600 homes which accounted for one-fifth of your overall target of 15,000 homes and

assuming AVDC would take your 'unmet need' of 5,000 homes, RARA believes you became complacent. By initially reducing your housing target of 15,000 by 50%, impaired the future depth of 'testing' of the whole district. This positioned Princes Risborough as an isolated 'corner stone' of the Local Plan rather than a town emerging with a sustainable number of new homes, such as 1,000, as part of a coherent and sustainable wider assessment of need.

- x. RARA has carried out its own research, rather like G. L. Hearn which supports AVDC's findings and beyond. We have identified opportunities for circa 5,000 more homes using not only existing parcels of land but use of the ARUP Report on Green Belt. Our work on this has also recognised worrying inconsistencies in WDC's approach to decision making which have defined the choices for the Local Plan.

To demonstrate our concerns, we have compared some other sites in WDC to the proposed Princes Risborough expansion area site of Park Mill.

- a) More homes can be found in existing alternative areas using the relevant criteria, including average density per hectare, proximity to infrastructure for social and economic sustainability and a careful consideration of the relevant purposes of Green Belt and sensitivity to AONB.

We believe that these criteria have not been applied even-handedly across the sites in WDC. To demonstrate this concern we have considered the Abbey Barns North site.

This site lies on the outskirts of the Wycombe conurbation, with good infrastructure and high density housing. The site is conveniently located to an industrial area that would support high density housing of at least 35 home per hectare, if not higher. The restrictions on housing density proposed by WDC are based on concerns around the impact on views, that are not even from an AONB site. However, there is already a prominent electricity pylon behind the site, and there are plans in the local plan to build apartments within half a mile and within direct sight from any view. The need for a green path connection is relatively low here, but this is suppressing housing density numbers.

Conversely, the impact on the view from the AONB above Princes Risborough appears to feature very lightly on the assessment of the proposed Princes Risborough expansion site. Furthermore, the need for a green path connection is much higher on the Park Mill site to link between Princes Risborough town and the Phoenix Trail, an important part of tourism so a needed contributor to the local economy.

The arguments presented by WDC to keep housing densities low in Abbey Barns North has not been applied equally when assessing the proposed site at Princes Risborough.

- b) The example below illustrates a judgement made by WDC with regards to the proximity to sites near an AONB boundary.

Development of the Wood Farm site at Stockenchurch would be a logical extension of the town and good use of a disused farm site. However, the effect on a grade 2 listed building is limited, compared with the effect existing housing has had. Views from a north facing slope of the AONB are limited and are already affected by pylons in the vicinity. The noise effect of the M40 is limited compared to most of the current housing in Stockenchurch which is much closer to the motorway.

However, development of the Park Mill site in the proposed Princes Risborough expansion area will effect a nationally recognised elevated viewing point from the AONB. Local traffic noise due to the proposes relief road will be significant when compared to levels today.

It appears that WDC are not being even handed when valuing views from AONB, and the impact of road noise.

- c) To demonstrate the value of considering the release of Green Belt we have considered Oak Tree Farm East and West. Neither site scores well at meeting the purpose of Green Belt. The high score of 3 suggesting it is open country is debatable as it is encircled by buildings. The function of segregating Marlow Bottom and Marlow is better achieved by other sites, as your own analysis confirms. Whilst Section106 investment would be required to improve infrastructure and an improved bus service would be required, these are not practical reasons to limit development on these sites

Conversely, the Park Mill site scores almost twice that of Oak Tree Farm at meeting the purpose of Green Belt. It is key to maintaining the segregation or Princes Risborough from Longwick. There is poor transport connection and substantial Section 106 funding in required.

WDC has however concluded that Park Mill should be developed, apparently simply because it is not in Green Belt, and in spite of all the points above.

We are aware Buckinghamshire as a whole is releasing Green Belt for housing sites at a significantly lower level than all the other home counties, yet WDC is is keen to develop the very areas which the ARUPs Report recommends as highly meeting the purpose of Green Belt, and that are suggested to be converted to Green Belt to prevent 'sprawl' within the Risborough Area Town Plan. (Town Plan areas 101 to 104). A stark contradiction of values.

RARA also draws attention to the arbitrary manner in which economic sustainability has been considered. Princes Risborough has little to no existing economical infrastructure and there are no proposals to provide a net increase built into the plan. The plan does not solve the serious lack of employment and unsustainable transportation networks both micro and macro to enable the future 20,000 residents of Princes Risborough to travel outside of the town to daily seek employment and attend work. Quoting from concerns briefly summarised in your bulletin of 19<sup>th</sup> July, employment and the knock on effects such as provision of roads and railways etc. was one of the greatest features of this Town Plan as stated:

*'The proposed number of houses is too large for an area where there is little local employment' again reinforcing the approach to Princes Risborough in isolation from the rest of the district without taking a wider, view of the district as a whole'.*

This is juxtaposed by another unanswered concern but this time from a wider view:

*'Why is so much growth planned at Princes Risborough and very little for Marlow, which has better shopping and services?'*

RARA has asked again and again why other areas of WDC with greater potential for economical growth and which are closer to transport networks and main national arteries have received a 'light touch' approach regarding possible build and density 'testing'.

In light of the above, RARA is most worried by a response to a recent Q & A on 12<sup>th</sup> September to a member of the public's question who asked,

*'Who makes the final decision?' The response was given, 'Ultimately, it is David Johncock's plan and David Johncock makes the final decision'.*

RARA is very concerned that such decisions can be made arbitrarily.

In summary, RARA seeks answers to the above questions and asks some final questions which are of a broader nature:

- Q) What organisation or body is accountable for achieving a positive strategic outcome across neighbouring District Councils? If such a body exists, what is their view of how well the development of the Local Plans satisfies their objectives?
- Q) What evidence can you provide of the content and level of dialogue you are engaging in with AVDC's Planning Cabinet regarding the proximity of 2,600 homes in Princes Risborough and 7,000 homes just across the council boundary in Haddenham and the considerable economic and social impact this will have?
- Q) What consideration has been given to dialogues with the Highways Agency and Network Rail Providers and franchise operator specifiers to service such a mass population?
- Q) What discussions have been carried out with AVDC regarding cross boundary planning and sustainability?

The latter large scale development at Haddenham recently came as a surprise to the residents of the Risborough area who are rapidly losing confidence in the planning process WDC have so far engaged in and deserve much better.

Applying a wider perspective to planning with higher quality liaison between planning departments across councils is now an approach advocated by RARA who propose that in terms of government housing targets, tax payers' money would be better spent by looking at the Local Plan from scratch and within the wider Bucks context, which is something the government might have to do if this plan fails.

We look forward to receiving your responses to our questions which we will be publishing to our RARA membership.

On behalf of the RARA committee and membership

With best regards

Linda Cannon Clegg

**Chairman RARA**

**Copied to:**

**Rt. Hon. John Bercow** Member of Parliament

**Rt. Hon. David Liddington** Member of Parliament

**Karen Satterford** Chief Executive WDC

**David Johncock** Cabinet Member for Planning WDC

**Alan Turner** District Councillor The Risboroughs and Deputy Cabinet Member for Planning WDC

**David Knights** District Councillor The Risboroughs

**Bill Bendyshe-Brown** County Councillor

**Carl Etholen** County Councillor

**Graham Peart** District Councillor Lacey Green, Speen and The Hampdens

**Tracey Aldworth** Director AVDC

**AVDC** Planning Policy Department

**Matthew Walsh** Town Mayor & Chairman **Princes** Risborough Town Council

**Gary Hall** District and Town Councillor Princes Risborough

**Rosie Brake** Principle Planning Officer WDC