

PTGRS response to Wycombe District Council August 2016

We have now submitted our full response to the Wycombe District Council Draft Local Plan. The following letter was copied to all Local, District and County Councillors.

It is important at the start to emphasise that we recognise three realities :

- a) that there is an urgent national need for housing ;
- b) that WDC faces unrelenting pressure from Government and potential developers to build more houses,
- c) that WDC has to be able to justify the resulting Local Plan to a critical Inspectorate.

It is important also, we believe, that we draw your attention to our concern at the apparent absence of any co-ordination between the timing of the consultations on the Wycombe and the Chiltern Local Plans and particularly on the consultation on the M40 Junction 3A proposal ; this latter seems likely to have a near overwhelming effect on the traffic on the London Road and very probably up through Tylers Green. This lack of coordination and consultation appears to extend also to the consequences of the proposal for Penn School (which seems to creep in at Appendix F) and which, if it were to remain as reported, will have devastating consequences on traffic flows in the locality. It is our firm view that this uncoordinated and piecemeal approach can result in neither sensible responses nor properly weighed decisions.

To turn now to specific areas :

Land off Penn Road, Hazlemere (p.83)

WDC is seeking views on whether the fields off Penn Road, Hazlemere, should be taken out of the Green Belt (GB) and developed for housing. The fields are also in the Area of Outstanding Natural Beauty (AONB). Hence, presumably, the Local Plan's view that 'there is more uncertainty about this site' (p.xv).

The Local Plan specifies key issues (p.83) as:

a) How important the fields are in preventing unrestricted sprawl and encroachment into the countryside – two important purposes of the Green Belt:

The Buckinghamshire Green Belt Assessment, by Arup, numbered these fields at the side of Penn Road/Hazlemere Road as 33a. The same number covered the fields in both Hazlemere and Penn, running from the edge of Burrows Close up to the Hazlemere Crossroads, including Queensway. Following specifications laid down by the National Planning Policy Framework (NPPF), every area was graded from 0 (Does not meet purpose) to 5 (Meets purpose strongly). These fields were rated 3 (Meets purpose) for 'checking the unrestricted sprawl of large built-up areas into open land', and also rated 3 for 'safeguarding the countryside from encroachment'. Overall, the rating was Medium out of a gradation of Weak/Medium/Strong. The assessment then gave further consideration to see if there was scope for subdivision of weaker parts of general areas and drew up a list of such sites. **This list did not include 33a.**

Local Plan Policy CP2 – Spatial Strategy, declares that 'only sites which perform weak GB functions will be allocated for building (pp.21, 23)'. These fields were clearly assessed by Arup as meeting the purpose of GB and their inclusion was apparently a last-minute addition at the suggestion of a developer. To remove them from the GB would both contradict Policy CP2 and negate the value of Arup's county-wide Green Belt Assessment. The same applies to the Tralee Farm development off the Amersham Road, which was also rated Medium overall.

The weakest part of 33a's assessment was a score of only 1 (meets the purpose weakly) for 'preventing merging of the gap between settlements including ribbon development along the side of the road'. We have to acknowledge that the other side of the Penn Road has already been built up, but, nonetheless, the gap does avoid continuous ribbon development, it does still indicate a separation of settlements, and it provides a welcome visual reminder that we are on the edge of the countryside.

The proposal is in effect for continuous development from High Wycombe town centre to Penn, yet the whole thrust of the Local Plan calls for maintenance of the separate identity of communities. The High Wycombe Area is described as 'made up of a number of distinctive settlements and communities' and names both

Hazlemere and Tylers Green' (Para 5.1.2, p.54). One of the declared Principles for the High Wycombe Area is 'to respect and improve the physical and community identity of the adjoining settlements to High Wycombe'(p.55), and the Plan affirms that 'The council is not proposing that these villages become part of High Wycombe, rather, for planning purposes, they can be seen to be part of a larger High Wycombe area'(Para 4.20, p.26). For the Gomm Valley and Ashwells proposals, Policy HW6 includes 'Respect the physical separation between High Wycombe and Tylers Green' and proposes an undeveloped break of 170m, which is described as a key issue (pp.66/7).

b) whether a satisfactory new green belt boundary can be achieved

The southern boundary of Common Wood, an Ancient Woodland, is the only clear line. The present hedge line meets all the requirements for a clearly established boundary.

c) whether development of this area would constitute major development in the Area of Outstanding Natural Beauty either the part within Wycombe District by itself or with the addition of the adjoining land in Chiltern District.

The council has a legal duty to conserve and enhance the natural beauty of the AONB (p.166). The NPPF (Para 115) advises that 'great weight should be given to conserving landscape and scenic beauty in the AONB which has the highest status of protection in relation to landscape and scenic beauty'.

Conserving and enhancing the natural beauty of the landscape of the Chilterns AONB is central to the strategy of the Local Plan (Para 3.5, p.17). The Council will not permit any development that would unacceptably harm its natural beauty (Para 6.85, p.167). Policy CP8 - Sense of Place (p.47), promises to protect the AONB from harmful development, observes that AONB is 'the jewel in the crown'.(Para 4.66, p.47) and that it is one of the assets which should be used positively in development to establish a sense of place (Para 4.67, p.48). The fields also provide an essential safe route for the many horse-riders who would otherwise have to take to the main road.

The NPPF (para 116) requires that planning permission should be refused for major developments in the AONB other than in exceptional circumstances and where it can be demonstrated they are in the public interest. The requirements it sets out in such cases are to assess the need for the development, the scope for developing elsewhere, and any detrimental effect on the environment, the landscape and recreational opportunities.

'Major' development is not defined by the NPPF and so the Local Plan proposes that it should be considered not as a question of the size of the development but as a matter of the impact or extent of harm on the AONB in each specific context. **Our conclusion is** that to build houses on these AONB fields would indeed be a major development because it would entirely change the local context and effectively remove them from the AONB. Views out of the AONB from visitor viewpoints can also be very significant (Para 6.83, p.166) and, if building were to be permitted, the setting of the neighbouring Ancient Woodland (Common Wood), which is in the AONB, and the views from it would be seriously damaged.

Traffic congestion

Another key issue, and a very important one, is the cumulative effect that all the proposals in the Tylers Green/Hazlemere area would add to the traffic congestion through Tylers Green, on the Penn Road and at Hazlemere Crossroads. The Local Plan acknowledges that High Wycombe suffers considerable highway congestion, particularly at Hazlemere crossroads (Para 5.1.36, p.77). If all the new proposals from both Wycombe and Chiltern Councils listed below are agreed, they would increase traffic along Hazlemere Road and Penn Road to an alarming and unacceptable degree. School traffic is a particular problem. *Home-school bus services for secondary schools* - The proposed cancellation or charges by County will result in many more car journeys.

We cannot stress too strongly the considerable worry we have that the cumulative consequences of the Council's development proposals on traffic congestion have not been given the detailed and comprehensive scrutiny which they demand.

Proposed schemes which will increase traffic substantially are:

- a) *Gomm Valley & Ashwells* housing development, up to 640 houses and a new one form entry primary school with a spine road up from the London Road (pp.66-70).
- b) *Penn School* - A secondary school with 6 forms in each year, i.e. over 40 forms, and over 1200 pupils (Appx F, p.206). We have already commented in our second paragraph on the most unsatisfactory manner in which this extraordinary proposal appears in the Draft Plan. There is no information as to its origin and there has been no discussion about it in the Liaison Groups or any other body with which the Residents Society is connected ; it is not included in the Education Section of the "Wycombe Reserve Sites Draft Infrastructure Delivery Plan" (January 2016) nor in the "Report of Consultation for that Delivery Plan" (June 2016) .Such a school would result in an increase of more than 13 times the number of pupils than at the previous school on the site. Given that most of the students will be from some distance away and that school bus transport is a thing of the past, the traffic implications are unimaginable. We assess that it would be much more disruptive to the heart of the Penn / Tylers Green village area than even the Gomm Valley development. The roads are quite unsuitable and the entrance itself wholly inadequate.
- c) *Penn Road* housing site in WDC.
- d) *Hazlemere Road* housing site in CDC.
- e) *Sir William Ramsay School* - an increase of one form entry (Appx F, p.206). Already underway
- f) *Hazlemere C of E School and Cedar Park School* - 6 form entry increase for primary level (Appx F, p.207).
- g) *Penn Surgery* - increased capacity (Appx F, p.208).
- h) *Cemetery at Queensway* (p.92).
- i) *Tralee Farm on A404* - 240-320 houses on site taken out of Green Belt (pp.75-7)
- j) *Land adjoining Tralee Farm* up to Earl Howe Road, in Chiltern District - 300? houses on land taken out of Green Belt.
- k) *Terriers* - housing for up to 540 houses - a confusingly worded Local Plan para 5.1.31 suggests children from Terriers will have to go to the new primary school in the Gomm Valley. This would add unnecessarily to school traffic and needs clarification.
- l) *Junction 3A* - There is also the very real threat of a new Junction 3A connecting the M40 directly with the London Road near Gomm Road and hence to the proposed spine road up the Gomm Valley to Cock Lane. This would inevitably provide an attractive by-pass north, avoiding the centre of Wycombe. WDC has been working with Highways England on this 'Access to Wycombe' project (pp.xv, 56) which would radically alter the traffic flows on which our part of the Local Plan is based, and it is highly regrettable that there will no consultation on this until the autumn.

Gomm Valley and Ashwells

The detail of these proposals is being considered separately, and a public consultation on the development brief is expected in September, but there are two key issues in this Local Plan:

1) *The proposed new spine road* linking the London Road to Cock Lane thus providing a two-lane route up to New Road (see plan p.70). Para 3b of Policy HW6 (p.67) reads:

'Provide a new spine road between Cock Lane in the north and Gomm Road in the south extending along the length of the site to access the development parcels. The spine road should include a footpath and cycle-way.'

We should like to see the final sentence read:

'The spine road should include a footpath and cycle-way ***and will be deliberately designed to discourage its use as an attractive through route between the London Road and Tylers Green.***'

2) *Separation of High Wycombe and Tylers Green* - para 1b) of Policy HW6 (p.66) declares that an undeveloped break of approximately 170m (measured at their closest point) should be retained. There is no government

definition of what may constitute an acceptable distance, but 170m is very much less than we were expecting, and we consider it inadequate and inappropriate.

I am copying this letter to Cllrs Katrina Wood, David Johncock, David Shakespeare and Lawrence Wood (WDC) and to Aude Pantel, Robert Harrison and Alastair Nicholson.

PTGRS Secretary 1 August 2016