

Penn Parish Council

Penn Church Hall

Church Road

Penn

HP10 8NY

13 May 2019

Dear Sirs,

### Chiltern and South Bucks Local Plan

I am responding on behalf of Penn Parish Council to the publication for Cabinet approval of the Local Development Scheme (LDS) document, April 2019-March 2022, dated April 2019.

The Parish Council welcomes the online release of this document and the very significant progress made by the Planning Policy Team who have delivered this 348 page PDF, while coping with newly merged Chiltern and South Bucks Shared Planning service. They are to be much applauded.

It is important to emphasize that Penn Parish recognize the need for timely delivery of an up to date Local Plan for the Chiltern and South Bucks District. It is our view that the CDC/SBDC area would be substantially disadvantaged were the document not to be adopted prior to creation of the Buckinghamshire Council, in April 2020. In addition we recognize the 'duty to co-operate' negotiations under which CDC's unmet housing of nearly 6,000 homes, is transferred to Aylesbury Vale, depends on its adoption.

It is important also, we believe, that we draw your attention to our concern at the apparent absence of public consultation on the Local Development Scheme (LDS) document, April 2019-March 2022. The Officers proposal is for a public consultation to be undertaken only on 'soundness' and legal conformity, between 7 June -19 July. We feel they are missing a trick. It is our firm view that there should instead be a public consultation and without this exposure the document is more likely to be susceptible to legal challenge.

We suggest a greater effort needs to be made made to publicize the document in other formats, including releasing paper copies to public libraries and through social media and public meetings. We believe the plan would benefit from wider consultation particularly because some proposals have yet to be properly aired. We recognize this will be unwelcome news, as it will slow down delivery, but the plan has already been delayed by the creation of the shared planning service, and it is unacceptable to deny a proper consultation to residents now, in order to make up for lost time.

Turning now to the document, Penn Parish's specific but not exhaustive concerns are :-

1. The Local Development Scheme (LDS), April 2019-March 2022 plan, dated April 2019 is a substantially different document from the draft plan published in October-December 2016, now more than two years ago. During this time the CDC/SBDC Planning Team has undergone structural changes and new Leading Officers and other new faces have been welcomed. It is our view the document naturally reflects these changes of management and style in its substance. It is after all a complete draft Local Plan which now deserves to be considered in its entirety.

2. Removal of settlement from Green Belt: In the draft plan (Feb 16), 12 settlements were proposed to be removed from the washed over green belt. While the Penn Parish supports the removal of Winchmore Hill, it notes changes and additions in the new plan mean 4 settlements have been added to the list which were not included in the Issues and Options Consultation paper published in Feb 2016. In our view, inadequate local consultation and publicity has taken place in respect of these sites, in particular. Penn Parish's reservations about the inclusion of the historic Quaker village of Jordans on the list remain.

3. The PDF document is incomplete. On Page 185 of the Local Development Scheme (LDS), April 2019-March 2022 plan critical figures of the amount and percentages of Green Belt land to be released are omitted. This is critical information and the omission needs to be rectified and the document re-published.

4. Infill development in Green Belt villages (see page 186). This is proposed at Penn and Penn Street village (see maps on page 340, 347) and is proposed without any prior consultation and without adequate regard being given to the Conservation Areas in both villages. The Penn Street Conservation area around the historic Common is completely disregarded on the map (p.340) and the Conservation Area in Penn (p.347) is incorrectly drawn stopping at the Methodist Church on *Church Road*, so it omits the historic and ancient heart of Penn, Village. Even its Grade I listed 12th Century Church is included as a proposed infill site?

*Beacon Hill* which also lies within the Penn Conservation Area as far as Wash Pond is also omitted. Such significant changes and the casual inclusion of valuable heritage assets without any proper consultation cannot go unchallenged or unnoticed. Both maps need to be re-drawn correctly to show the Conservation Areas correctly, which should be clearly excluded from the proposals for infill development.

5. As regards the development proposals for Beaconsfield (on page 216) we are concerned about the scale of development on the town and the lack of any apparent co-ordination particularly as regards traffic congestion between the various Local Plans eg the effect of the development at *Ashwells Gomm Valley* in the Wycombe District Council Local Plan on traffic flows along the A40 when combined with the very substantial proposals for housing development in Beaconsfield. This uncoordinated and piecemeal approach can result in neither sensible responses nor properly weighted decisions.

The Parish Council supported the development of CDC/SBDC's Brownfield Site register and its updating since when little has been heard of it. We suggest it would now be advisable to demonstrate the numerous Brownfield sites identified for development have progressed and when they will be developed, by providing regular updates. This is a requirement if you are to persuade local residents that release of Green Belt land for housing development is albeit reluctantly now necessary.

In summary, we do not feel the current plan Local Development Scheme (LDS) document, April 2019-March 2022, is quite of a standard which meets the threshold for publication. We feel it has

been rather rushed and officers would benefit from being given time to take in any corrections arising from a proper consultation, which would command widespread popular support and reduce the likelihood of the plan being successfully challenged.

Your sincerely,

*Nicole Webster*

Clerk to Penn Parish Council