

Penn Parish Council

Penn Church Hall

Church Road

Penn

HP10 8NY

10 July 2019

Dear Sirs,

Chiltern and South Bucks Local Plan 2036

The Penn Parish Council recognizes the following realities:-

- Chiltern and South Bucks Planning Officers face unrelenting pressure to accommodate government targets for new homes and pressure from developers.
- Unless there is a Local plan in place the districts could be prey to speculative developers.
- Green Belt which provides vital Green Lungs and valuable amenity for local residents is under existential threat, and
- Officers need to be able to justify the Plan to a critical inspectorate.

It is important to emphasize that Penn Parish recognize the advantage of 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. We also recognize the 'duty to co-operate' negotiations under which CDC's unmet housing of nearly 5,750 homes, is transferred to Aylesbury Vale, depend on the Plan's adoption.

Nevertheless, we wish to draw your attention to our concern at the sparse public consultation on the Plan. There was a 2 year delay in its production, and this ought to have permitted proper public consultation. We recognize the creation of the a new Chiltern and South Bucks shared Planning Service was a the root of much of the delay. Key officers left and new ones were recruited which have restricted the time available. The Officers proposal now is for a public consultation to be undertaken only on 'soundness' and legal conformity, between 7 June -19 July. In our view without proper exposure the document is likely to be susceptible to legal challenge. We believe the plan would have benefitted from wider consultation particularly because many proposals had not been properly aired. Our view is additional weight should therefore be given to comment responses as this is the first time our residents have had an opportunity to comment on the proposals in the final plan eg changes to GB boundaries and plans for infilling in rural villages.

The Local Plan 2036 is a substantially different document from the draft plan published and consulted on in October-December 2016, now more than two years ago. 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.

Turning now to the proposals in detail:-

Spatial Vision

We agree with the proposals on the need to focus on providing affordable market housing, including accommodating the needs of an aging population (p8, paras 3.4.3 and 3.4.5). Also that this needs to be in the context of continuing to 'enhance our treasured local built and undeveloped environments contributing to local identity, community wellbeing and biodiversity'. It is our view that the Chilterns AONB with its a unique chalk land uplands is the jewel in the crown of green spaces and deserves the highest level of planning protection. But we feel more could be done to safeguard it for the future in its entirety by treating it as a single asset. We have written in support of its consideration for a National Park status. We support the presumption against any development, not just major development, unless it can be demonstrated that there are exceptional circumstances and the development is in the public interest (p. 129, DM NP1, 4).

The Council further agree with the reinforcement of the role of Green Belt as valuable 'Green Lungs'. Their essential characteristic is their openness and permanence. Close to London, our country side is under gross pressure from development. The GB deserves particular protection as pressure from development because of its proximity to London. Penn Parish only supports the release of Green Belt for development in limited and exceptional circumstances. While the plan makes much of establishing a 'strengthened GB boundary', we note with concern the GB boundary North of Slough is still subject to review. We are at a loss to understand why this is the case after more than 2 years in development of the Local Plan. Additionally, as regards Penn Parish, there has been no consultation with residents of the changes proposed to the GB boundaries round the villages of Penn, Penn Street, Winchmore Hill and Knotty Green which we feel is a serious omission. Further Protected Places, p.149, para 10.1.7 declare the new boundaries are shown on the Policies Maps but these appear to be missing from the printed plans which were sent out to Councils which suggests there may be procedural flaws in the availability of key documents. The online Policies Maps PDF doesn't include a map of the Knotty Green Settlement, so we cannot comment if there have been any GB boundary changes.

Strategic objectives (p.9)

We support housing development in accessible locations, reducing the need to travel and increasing opportunities for walking, cycling and use of public transport. (p,9 para 3.5.3)

Designing Places (p.14, para 4.1.5)

Requiring applicants to include climate responsive, low carbon and health design features in their homes is a sensible idea. We cannot understand why different requirements are proposed for minor and major developments. Climate change science suggests the same policy for all new development would be more sensible.

Design - Designed Heritage Assets (p.16, para 4.2.4)

Use of local building materials adds to the distinctiveness of the Chilterns and makes an important contribution to its intrinsic character. We agree the use of such materials should be required in the

Chilterns the AONB but would go further and suggest that if the character of the Chilterns area is to be maintained use of local materials is both desirable on environmental grounds and visually beneficial. Hence this requirement should be widened.

Design - Climate Responsive Development (p.21 para 4.6.1)

As this plan will be in place until 2036, our view is these proposals do not go far enough. Proposals for low carbon energy consumption, with at least 20 % of energy derived from renewable sources are welcome but should not be restricted to major developments but required in all new buildings. Higher standards of thermal efficiency in windows, doors and roofs should be adopted as in Germany. Inclusion of water management features proposed at p.30 para 4.15.4 on all new developments, including the planting of trees and hedges is welcome.

Design - Efficient use of Land (p.22 para 4.7.1)

Penn Parish contributed to the development of the Chiltern and South Bucks Brownfield register since when nothing more has been heard. It is not clear what proportion of the sites put forward have been developed, hence whether the release of GB land is really required. There is a lack of transparency. If the Local Plan adopted a clear 'Brownfield first' development ethos, opposition to the release of GB land for development could be addressed. Assurances that 'making best use of this [Brownfield] land is encouraged' is vague and inadequate. Our strategic Local Plan for 20 years to 2036 needs to be much clearer on this important point, and persuasive about the need to release GB land. The plan states the combined Local Housing need from 2016 to 2036 is 15,260 homes or 763 each year. We would welcome if it made clear what proportion of these are to be met from Brownfield site development.

Design - Reducing Reliance on the Private Car (p.24, para 4.9.1)

Inclusion of easily accessible cycle storage close to the entrance of a property is a sensible design innovation and one which is likely to mitigate car use.

Design - outdoor amenity space (p.33, para 4.18.3)

We support the view that where flats are developed the shared outdoor amenity space should be at least equal to the size of the footprint of the house (p.33, para 4.18.3). Further we agree that private house gardens should be at least equivalent to the footprint of the house, or 10m in depth whichever is the greater (p.34 Policy DM DP 18, para 3).

Appendix - DP3 Conservation Area (p.46, para 4.26)

Penn and Tylers Green Village and Church Road Area - we welcome the adoption of this Conservation Area and the recognition of its importance together with that of Penn Street.

6.6 Enterprising Economic Development (p.81, para 6.6.6)

We agree digital education at Pinewoods and the National Film and Television School have the power to drive economic growth. We suggest the Penn School Site on *Elm Road* in Penn, which is owned by the EFA be considered as a new Campus for the NFTS.

We agree permitted development rights should be removed to prevent economic floor space being converted to residential use, in order to protect key economic sites (p.82 para 6.6.10). Such

conversion should require planning permission and we agree with your assessment that De Havilland Court and the Industrial Estate at Penn Street is a key site.

Connected Place (p.96, para 7.0.6)

We agree safe cycle routes need to be provided for cyclists to make it a realistic travel mode. We see little evidence this is happening. In our view the quality of local roads maintenance will need to improve first, to make this aspiration a reality.

Connected - Car parking Standards (p.99 - para 7.3.2)

We suggest all planning permission for new residential development should be conditional on garages being used for car parking. We agree with your proposal to remove permitted development rights for the conversion of internal garages to avoid problems with on street parking. We agree with the new higher parking standards for new development which appear consistent with Wycombe District Council's (p. 110 para 7.9.10). We further agree that a garage should not count as parking unless the developer can demonstrate that vehicles can access the garage without interference from vehicles parked in proposed parking spaces, and that the garage is sufficiently large to accommodate other family requirements (an addition 18 sqm) (p.116, para 7.9.22). We support the provision of electric vehicle charging points in all new residential developments (p.146, para 1)

Winchmore Hill p150, 10.2 Protected - 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 from washed over green belt (p 150, 10.2 Protected Green Belt), we note 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 (p 150, 10.2 Protected Green Belt).

Penn and Penn Street (p.151 para 10.3.1)

Infill development in Green Belt villages (see p150, 10.2) is proposed at Penn and Penn Street villages 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 invisible in this document as is the Conservation Area in Penn. It is our view the historic and ancient heart of Penn Village and Penn Street should be protected and this should be made clear with the provisions of appropriate maps and by safe guarding the Conservation Area. We were assured by CDC Officers prior to the publication of the Local Plan that the maps of the villages of Penn and Penn Street could be amended, so we are particularly disappointed. In our view these maps showing appropriate policies, boundaries and the Conservation Areas are required. Assurances that limited infill development will be permitted of a 'similar plot size, building width, scale and massing to the surrounding development and on the edge of the village' will not in our view adequately conserve Penn or Penn Street village (p.151, Policy DM PP1) and is meaningless in the absence of a map which shows the Conservation Area.

2. We agree that all applicable developments should contribute to the costs of providing or improving infrastructure (p.153, 11.1.3)

In summary, the Council faces Hobson's Choice, the current Local Development Plan 2036 proposals for GB release at Holmer Green, GB boundary changes and the new infill development in villages have not been properly consulted upon as required. We trust the Inspector's Review of the Plan will identify such procedural and process irregularities. It is our view the plan should be re-submitted following a proper consultation, but if the Plan is accepted, special weight should be placed on comment letters to address the consultation deficit.

Your sincerely,

Nicole Webster

Clerk to Penn Parish Council

Appendix 1

We hereby resubmit for consideration as part of the new Joint Local Plan, our earlier comments.

Building - Holmer Green (p.159)

1) *Protected Places*, p.148 declares that 'areas [of green belt] were selected for further consideration because they least met the purpose' is not accurate. The Tralee Farm site off the Amersham Road was rated Medium overall. These fields were clearly assessed by Arup as meeting the purpose of Green Belt. To remove them from the Green Belt would both contradict Policy CP2 and negate the value of Arup's county-wide Green Belt Assessment.

The Arup report concludes that *'The Green belt in Buckinghamshire has, since its original designation, played a crucial role in: preventing the outwards sprawl of Greater London, as well as other large built-up areas throughout Buckinghamshire; maintaining the county's settlement pattern; ensuring the continued openness of the countryside; and protecting the unique rural context of the county's historic towns. It is striking that, many years after its original designation, the green belt continues to perform these roles so strongly.'*

Green Belt Assessment, Part 2 Report, October 2016 states that Part 2 Assessment will look at Arup's findings in more detail to determine the appropriateness of green belt boundaries. But the approach taken is then to segment sites in order to find parcels of land which are capable of being 'picked-off' for development. It is not clear what qualifications the assessors who conducted the Part 2 of the Green Belt Assessment held to enable them to make weighted, consistent decisions, whereas Arup is recognised as a world leading global consultancy.

2) Infrastructure - A housing density of 30-35 dwellings per hectare is substantially higher at the lower end of the range than the figure suggested by Wycombe. In our opinion, there need to be more consistency. The range is inappropriately high for a setting which has a rural character and sits on the edge of Green Belt. The suggested density is substantially higher than, and out of keeping with settlements along Earl Howe Road.

3) The key issue is that this proposal would add to the traffic congestion on the A404 at Hazlemere crossroads. The Draft Local Plan acknowledges that High Wycombe suffers considerable highway congestion, particularly at Hazlemere crossroads. The lack of visibility on traffic flow modelling makes it impossible to say anything sensible other than that extra traffic will have a very damaging impact on local residents who use Hazlemere crossroads. Pre-emptive action, prior to any development, needs to be taken in order to improve traffic flows through Wycombe. We welcome proposed improvement to the A404 junctions and the proposed comprehensive and co-ordinated approach with HW8, Land off the Amersham Road, including Tralee farm, in the Wycombe Local plan to ensure a high quality design and vehicle routing.

We are also concerned about traffic flows through Penn - notably along Gravelly Way, Penn Bottom, Common Wood Lane and Clay Street. This is a 'rat-run' morning and evening to avoid Wycombe/Hazlemere, to get to the M40/M25. Such roads remain essentially rural, used frequently by farm tractors, horse riders and recreational cyclists. Gravelly Way has no fewer than 4 riding stables, whose users ride on or across the road to reach the permitted bridleways. We suggest that infrastructure improvements such as safe cycle/riding lanes, adjacent to these road must be introduced if this proposal is to go-ahead. Large volumes of traffic, plus riders/cyclists on the same busy roads, is a serious hazard. Penn Bottom is part of Route 30 on the National Cycle Network.

Knotty Green

Protected Places

Object: No map is provided of this settlement

Penn

Protected Places : Penn

There has been no previous consultation on these proposals including extensive changes to the GB boundary around Holy Trinity Church, The Crown and Paul's Hill. **Strongly Object** PPC strongly recommend additional protection, via the introduction of Areas of Little Change be introduced to protect the character of the older areas of the village, fronting the War Memorial Common and the 12c Church, consistent with the Conservation Area.

Penn Street

Enterprising Places: Penn Street De Havilland Court and the Industrial Estate become a key Employment Site. **Agreed**

Protected Places: Penn Street

There has been no previous consultation on these proposals including changes to the GB boundary around the village. **Strongly Object** PPC strongly recommend additional protection, via the introduction of Areas of Little Change be introduced to protect the character of the older areas of the village, fronting the Common, consistent with the Conservation Area.

Object: The front of the cricket ground should not be designated as an infill site.

Winchmore Hill

Protected Places: Winchmore Hill

The main village is to come out of Green belt altogether, including the affordable houses and the transport depot off Coleshill Lane. This would allow the development of the Securon Site and one or two smaller ones. **Agreed**. But **Object** that PPC's recommendation that Areas of Little Change be introduced , too protect the character of the older areas of the village fronting the Common and on The Hill.

Object: The area off our Common Track should not be removed from Washed Over Green Belt as there is no space in which to build.