

Wycombe District Draft Local Plan - Comments from PPC

Summary

1. Penn Parish Council are deeply concerned about the effect the proposals in the Wycombe District plan will have upon the community in Penn and its infrastructure. As direct neighbours to Wycombe we would ask that strong weight is given to our comments.

2. The lack of co-ordination between the timing of the consultations on the Wycombe and the Chiltern Local Plans and the Sustainability Appraisals means no 'overall vision' is presented. We do not feel that this piecemeal approach can result in either sensible responses or properly weighed decisions. For example, Chiltern District Council also have proposals to build in Holmer Green adjacent to HW 8. We see no evidence that the combined effect of the two Councils' development proposals has been considered.

3. Proposals to take land out of both Greenbelt and AONB are deeply troubling, in particular HW 12. The claim that CDC is considering land off the Penn Road is premature as Chiltern's Local Plan will not be published until October 2016.

4 Infrastructure in Penn is unable to cope with thousands of extra car journeys in the morning and evening created from the proposed new 1,200+ pupil Penn Senior School. Given its location, the vast majority of students would come from some distance and would need road transport. The B474 is already under great pressure and there is a particularly narrow, somewhat hazardous bend and junction within yards of the school entrance. Road widening is not possible at that point, as the road is both in a conservation area and bordered by listed buildings. Traffic problems will be exacerbated by the proposed changes to home school transport policy. Any traffic calming measures to try to ease congestion and reduce the hazards would need to be so significant as to radically impact on the heart of the conservation area and of the village. Access to the Rayners site which is located in a conservation area, is a wholly inadequate single gate. If it goes ahead, a new senior school will radically alter the context and environment of Penn village. We have not yet seen figures which justify the case for this new school, especially given that work is planned to expand some other schools and a feasibility study to grow another school is underway?

5. Consultation on the M40 Junction 3A proposal and it's the effect on the traffic on the A40 and very probably up through Penn needs to be incorporated into the schemes. In particular the spine road through HW 6 needs to be designed so this doesn't become an attractive by-pass north through Penn, avoiding the congested centres of Wycombe and Hazlemere.

HW 6 Gomm Valley and Ashwells

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 cycleway. We would prefer to see new road deliberately designed to discourage its use as an attractive through route between the London Road and Penn, then northbound. In order to discourage traffic from using Penn as a rat run we suggest that the Cock Lane be closed in favour of the new spine road which will be far more suitable for traffic.'

HW 7 Terriers Farm and Terriers House (HW 7 p.71) - 380-540 houses

1) The parking problems at the previous Taylor Wimpey development, at the Wellsbourne site, opposite HW 7 continue to cause misery. We encourage WDC use its powers to set local parking standards, to ensure more sensible residential parking standards, congruent with the number of bedrooms (as provided under NPPF para 39).

2) The way is left open for a proposed new two vehicle access onto the A404 Amersham Road (2.a) ii, p 71) although no detail is provided. The key issue is that this proposal would add to the traffic congestion on the A404 at Hazlemere crossroads. The Local Plan acknowledges that High Wycombe suffers considerable highway congestion, particularly at Hazlemere crossroads (Para 5.1.36, p.77). The lack of detail or 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.

3) Proposed provision of primary schooling at Gomm Valley and Ashwells for Terriers Farm (5.1.31, p 74) is odd on the basis there is no direct bus service and it will introduce a large number of car journeys adding to the traffic congestion on the A404 at Hazlemere crossroads and increase car journeys through Penn and Tylers Green. The primary school catchment area requires clarification.

HW8 Tralee Farm (HW 8 p.75) - 240-320 houses

1) *Local Plan Policy CP2 – Spatial Strategy*, declares that 'only sites which perform weak Green Belt functions will be allocated' for building (pp.21, 23). 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.

2) We are concerned about the impact on traffic flows through Penn Parish of this site - 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 roads 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.

Land off Penn Road, Hazlemere (HW12 p.83) - unknown number of houses

WDC are 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 the Local Plan's view that 'there is more uncertainty about this site' (p.xv).

The Local Plan specifies key issues (HW 12 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.

In the view of the PPC, this land serves an essential purpose which is to separate the settlement of Hazlemere from Penn (and Tylers Green) - such that each village retains its own character and identity.

The *Buckinghamshire Green Belt Assessment*, by Arup, numbered these fields at the side of Penn Road/Hazlemere Road as 33a. They did not identify this site as performing weakly, hence Chiltern District Council did not propose this site for further testing (*Chiltern and South Bucks Local Plan, March 2016*). We feel the statement that Chiltern District Council are considering the land adjacent to this site is misleading and premature. We note here CDC's Local Plan is to be published 4 months hence, in October 2016.

Local Plan Policy CP2 – Spatial Strategy, declares that 'only sites which perform weak Green Belt functions will be allocated' for building (pp.21, 23). 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 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 provides a welcome visual reminder that we are on the edge of the countryside.

Furthermore 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).

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

We disagree that the south side of the Ancient Woodland of Common Wood is a suitable green belt boundary. The present hedge line meets all the requirements for a clearly established boundary. We note with concern that under the proposals this Ancient Woodland would be bounded on three sides by roads or housing to the detriment of the quiet enjoyment of the woodland by riders, cyclists and pedestrians.

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 National Planning Policy Framework (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 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 requirement 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 was permitted the setting of the neighbouring Ancient Woodland (Common Wood) which is in the AONB and the views from it would be seriously damaged.

We have been contacted by a number of local riders. They highlight the detrimental impact of the loss of this Green Belt and AONB site for stabling and grazing and the impact on recreational riding. Grazed chalk land is a haven for wildlife and insects. Hares, deer and bats have been seen at the site. HW12 provides an essential safe route into Common Wood for the many horse-riders who would otherwise have to take to the main road. Finally we note with concern the combined impact on local riders of the loss of three important sites HW12, Terriers Farm (HW 7) and Holmer Green (HW 8) for grazing and stabling and the lack of suitable local alternatives.

Traffic congestion

Another key issue, and a very important one, is that this proposal would add to the traffic congestion on Penn Road, at Elm Road/Hazlemere Road, at Potter Cross - a dangerous junction 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 in the summary are agreed, they would increase traffic along Hazlemere Road and through Penn to an alarming and unacceptable degree. No traffic modelling has been carried out to determine the cumulative effect on traffic volumes of the combined sites, including Chiltern's plans.

The site is not on any bus route so there is no public transport provision which further increases car journeys.

Land at Queensway (HW19, p.92)

1) PPC together with 2 other Councils (Hughenden and CWPC) own a ransom strip which surrounds the entire site. As such, the Councils' agreement would be required for change of use. Councillors note that the site is Green Belt and AONB and that it passed *The Buckinghamshire Green Belt Assessment*, by Arup scoring medium (site 33a).

WDC and CDC Development summary

Housing

Penn Road housing site in WDC (numbers of housing unknown) - land taken out of Green belt and AONB (pp.83)

Hazlemere Road housing site in CDC (numbers of housing unknown) - land taken out of Green belt and AONB - unsubstantiated

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)

Tralee Farm on A404 - 240-320 houses on site taken out of Green Belt (pp.75-77)

Land adjoining Tralee Farm up to Earl Howe Road, in Chiltern District - 300? houses on land taken out of Green Belt

Terriers - housing for up to 540 house (pp.73-74)

Schools

Penn School, a large secondary school with 6 forms in each year, i.e. over 40 forms, and over 1200 pupils (Appx F, p.206) - target opening day presently September 2018

Sir William Ramsay School - an increase of one form entry (Appx F, p.206). Already underway

Hazlemere C of E School and Cedar Park School - 6 form entry increase for primary level (Appx F, p.207)

Home-school bus services for secondary schools - Proposed cancellation or charges by County will result in many more car journeys

Penn Surgery - increased capacity (Appx F, p.208)

Infrastructure Junction 3A

There is also the very real threat of a new Junction 3A connecting the M40 directly down to the London Road near Gomm Road and hence to the proposed spine road up the Gomm Valley to Cock Lane which could then become 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.

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