

Consultations and Notification Responses

Parish/Town Council Comments/Internal and External Consultees

Princes Risborough Town Council – Object. The parish council's main concern is to ensure these early applications relative to the emerging Local Plan (LP) reflect the aspirations / intentions of the LP. To accept otherwise at this stage could set a negative precedent for future applications. The Parish feel that this application falls well short of the emerging LP, lack of commitment to numbers of affordable houses, a lack of commitment to funding infrastructure and to the required underpass. As a result, Princes Risborough Town Council would wish this application be refused.

Town Planning Team Network Rail

Comments: Planning conditions recommended to ensure closure of existing at-grade railway crossings and creation of suitable alternatives.

Environment Agency (south-east)

Comments: No objection subject to conditions

Natural England

Comments: No objection. The proposed development would not compromise the purposes of designation or special qualities of the Chilterns AONB.

The Chilterns AONB Planning Officer

Comments: These proposals fall within the wider setting of the Chilterns Area of Outstanding Natural Beauty. This impact is appreciated from views outwards as well as views towards the escarpment and generates the need for mitigation to conserve and enhance the Chilterns, and address the understandably increased number of visitors to it arising from the expansion of Princes Risborough. Chilterns Conservation Board (CCB) has made a series of Local Plan representations, calling for deletion and/or amendment of various policies that affect the Princes Risborough strategic growth allocation. With this application submitted in parallel with the examination-in-public, CCB would request that the application is determined after the Inspector has reported on the Local Plan. Detailed comments provided in relation to Local Plan representations.

In the event that the application were to be determined ahead of the Local Plan examination outcome then CCB recommend that the siting and layout of the application is determined at the outline stage to ensure that:

- a) development is more confined to the eastern part of the site and that
- b) the applicant's LVIA specifically reports back as to how roofscapes / design / density / layout takes account of views down from the escarpment, to ensure that the existing setting is conserved and enhanced, wherever possible. Our interest in protecting the setting of the Chilterns requires that the views outwards from especially popular vantage points are not diminished and protects the setting.

The Environmental Statement (ES) deals with proposed mitigation of AONB impacts through a construction and environmental management plan, including details of lighting and hours of operation (for construction). In delivery of this mitigation we would recommend a series of agreed design codes linked to an approved layout. These should include materials (to blend new with existing roofscapes - when viewed from framed views within the AONB), green buffers and corridors to shield impacts from wider views and a layout that confines most development to the less visible southern end of the site. Views towards appropriate roofscapes, design details and development densities from the escarpment constitute an important objective. The character of the landscape here is of considerable importance and the relationship between the Chilterns National Character Area and the Upper Thames Vale National Character Area means that a careful design is required to achieve an appropriate and sensitive transition.

CCB recommends that the scope of the ES mitigation - construction / environmental management plan is broadened to include vehicular routing. This should avoid construction vehicles traversing the AONB beyond the A 4010.

The green infrastructure proposed should also promote habitat management seeking appropriate conservation gains. Further that there should be an enhancement strategy that funds enhancements to visitor facilities, rights of way and habitat management at Whiteleaf and Brush Hill to accommodate the increased town population using these already popular sites.

Crime Prevention Design Advisor

Comments: Object, some aspects of the design and layout would be problematic in crime prevention terms. The application has not addressed crime prevention of community cohesion comprehensively. Detailed comments provided on parking areas/courts, excessively permeable layout, subway design and site layout

Thames Water Utilities Ltd

Comments: Thames Water have identified an inability of the existing water and foul water network infrastructure to accommodate the needs of this development. A planning condition is recommended to ensure that adequate provision is in place before any houses are occupied. An odour modelling assessment should be submitted in consultation with Thames Water and include an odour mitigation measures strategy.

Bucks County Council Education Department

Comments: Currently, there is 5% surplus capacity across all schools within the Princes Risborough planning area which is in line with the level recommended by the Department for Education that Councils should maintain to allow for volatility in pupil/population trends. The latest five year projections based on current pupil/population migration trends and housing permissions show that there will be a deficit of places in the area. BCC has plans to create additional capacity at both Great Kimble School and Princes Risborough School to meet the increased demand/housing in the area (as well as provide a better distribution of places to meet local demand and reduce car use) which would leave a small surplus to accommodate a further 260 homes.

The proposed submission Wycombe Local Plan (dated October 2017) allocates up to 2460 homes within the Princes Risborough Expansion Area (PREA), 300 homes in Longwick (Policy RUR5) and a further 160 homes in Great Kimble (Policy RUR6). BCC estimates that this will generate the need for over 4 forms of entry of primary school pupil provision. Beyond the current expansion plans at Great Kimble and Princes Risborough, BCC would expect development of this scale in the town to be met through the establishment of new schools. BCC has worked with planning policy colleagues at Wycombe District Council (WDC) to develop a concept plan and identify appropriate sites on the PREA for education use as part of the emerging Local Plan. The agreed location of the sites would ensure sufficient and reasonable access to education facilities within the development itself (NPPF Paragraph 72) and promote sustainable travel (NPPF Paragraph 122).

Policy PR4 (The Main Expansion Area Development Framework) of the emerging Local Plan states that while the concept plan is illustrative the provision of elements, which includes the two primary schools located one each side of the A4129 to minimize the need to cross a main road, is fixed: 'The main expansion area falls naturally into two main development areas (north and south of the Crowbrook green corridor), so a primary school is located in each, taking into account the location of the existing primary schools in the town, and minimising the need for children to cross the main road to Thame in getting to school. This will enable primary education demand to be met locally and encourage safe and sustainable travel to school'. Policy PR7 (Development Requirements) confirms the proposed size of the two new schools: 'The Council will require development within the main expansion area to provide...sufficient new primary school places to meet the needs of the development, including two new primary schools, each of two forms of entry...'

The above local plan policy is in line with Department for Education (DfE) Building Bulletin 95 Guidance which states that 'the location of the school is an important consideration from the point of view of both attracting customers and sustainability. The site should be in the heart of the community so minimising transport use, and allowing safe routes to school and access to public or school transport. School security is also important. For example, a school in a remote area is more vulnerable because it is not overlooked by neighbours.' The location of a school site south of the Longwick Road would also ensure a balanced distribution of provision and sufficient choice of school places is available to the existing and new community in Princes Risborough encouraging effective travel planning (NPPF Paragraph 94). The size of primary school is based on DfE guidance on setting up a mainstream free school (July 2018) which includes an expectation that primary schools have a minimum of 2 forms of entry of 30 pupils to ensure a viable and cost-effective proposal. This is considered to be the optimum size for primary schools supporting long term financial sustainability by achieving greater economies of scale and allowing wider access to staff and other learning resources.

Paragraph 18 of the planning statement confirms that the application does not intend to make provision for a school site of up to 2FE on the basis that the concept plan (which shows a primary school site within the PMF site) is not a 'fixed' proposal and therefore there is no conflict with the emerging plan. The applicant refers to the 2017 appeal Inspector who concluded at the time that there was no specific requirement for a school site in association with PMF. This approach is not consistent with emerging local plan policy (which is based on national guidance) and would undermine the prospects for conveniently and sustainably meeting the education needs of the development.

Emerging Local Plan Policy PR3 (Princes Risborough Area of Comprehensive Development) requires a structured and coordinated planning approach to ensure that policy will deliver the planned growth in a sustainable and desirable manner. Detailed planning guidance, guided by relevant planning policies, is being taken forward by the Council to achieve the following objectives:

- i. Provide a framework for equalisation of infrastructure costs and delivery;
- ii. Support the assessment of planning applications, and negotiation of S106 contributions;
- iii. Further guide the pattern of development, including density, and location of facilities and infrastructure.

The Local Plan has already been developed and consulted on and is currently with the Secretary of State for Examination in Public. Accordingly BCC has concerns regarding how the application site supports the comprehensive planning of the PREA. The application does not make clear what is the framework for delivery of infrastructure or the equalization of costs. The application site also does not allocate land for a school site or identify a suitable alternative site. This application is therefore not considered consistent with the coordinated planning approach required in the emerging Local Plan and as a result the Council is at risk of not being able to meet its statutory duty to provide sufficient school places to meet demand generated from the PREA.

If the underlying concerns were addressed and it were possible to identify another school site that fitted the emerging policy requirements, then it would also be necessary to make a financial contribution towards the proposed new school buildings in accordance with BCC's adopted S106 guidance based on the education infrastructure costs per dwelling.

Bucks County Fire Officer

Comments: Consideration should be given to water supplies for firefighting and access for fire service vehicles when Building Regulations is applied for.

County Highway Authority

Comments: Detailed comments provided in relation to transport sustainability, railway line underpass, use of shared space, layout, trip generation & distribution, transport assessment on the surrounding network and proposed mitigation. Further information requested:-

- How the widened footway/cycle way will be achieved on Longwick Road under the railway bridge
- Detail as to how the bus service provision will be achieved.
- That the Railway Underpass has sufficient provisions in place between all parties and can be delivered within reasonable time scales.
- Detail on the provision of the spine road to the red edge of the application area.
- Agreed trip rates and strategic modelling analysis prior to discussion and submission regarding potential mitigation measures.

County Archaeological Service

Comments: No objection. Archaeological evaluation in the form of a geophysical survey and trial trenching has taken place with no significant remains recorded within this application boundary. As such there is no objection to the proposed development and it is not necessary to apply a condition to safeguard archaeological interest.

County Rights Of Way and Access

Comments: Detailed comments provided about existing rights of ways which cross the application site. Planning conditions recommended regarding creation of and upgrading of existing rights of way.

Control of Pollution Environmental Health

Comments: No objection subject to planning conditions regarding noise protection scheme, remediation and electric vehicle charging points.

Community Housing

Comments: There does not appear to be a specific commitment to deliver policy level affordable housing within the application. If the proposal meets the planning requirements and goes ahead, the housing service would expect to see the provision of an appropriate amount and mix of affordable housing in accordance with planning policy.

Buckinghamshire County Council (Major SuDS)

Comments: Holding objection until the following matters are addressed:-

- Amend masterplan to include reference to the ordinary watercourse
- Further details such as indicative drawings to show how the bridge crossing may be achieved
- FRA should be amended to reflect that no residential development will occur in areas shown as at risk from surface water
- FRA should be amended to take account of the NPPF, particularly in relation to future flood risk associated with the watercourses and climate change
- Review the Princes Risborough Groundwater Flooding Phase 1 Report and amend proposed mitigation measures to reflect the findings of this report
- A reduction of 50% of the proposed discharge rate contained in the FRA
- The Conceptual Surface Water Drainage Layout amended to provide an indication of the possible locations of SUDS features

Representations

Risborough Area Residents Association - RARA does not support this application and believes it to be unsound and particularly untimely considering the site forms part of the Wycombe District Local Plan, currently being examined by the Planning Inspector. We feel that no informed decision on this application can be made until the result of this enquiry has been published and understood.

We note that this application is very similar to three previous applications made in the last five years all of which have been rejected for numerous reasons which this plan has not addressed and so are still valid. We have concerns over the following matters:

- Underpass. We note that an underpass has been included in the northern end of the plan to link it with the town centre through Wades Park. The planning inquiry in 2012

(K0425/A/06/2020104) paragraph 15 was dismissed by the Secretary of State who agreed with the Inspector's findings that the absence of an underpass would be a wasted opportunity to find a solution that would have fully integrated the estate and town from the outset. We also note the concerns that the crime prevention officer raised about this underpass, which match many of our members concerns.

- Flooding. The Environment Agency have reported in their Memorandum of Understanding with WDC, presented at the recent Local Plan Examination, that land within the expansion zone (which this site is part of) is in an area that has the potential to flood and a full study of this now needs to be carried out. As part of this Local Plan it was stated that any underpass would require pumps to be installed to remove water and flooding that will occur in the winter.
- Access. The only entrance/exit for this estate is to the west of the Hypnos factory, which is totally inadequate for an estate of this size. The site to the east of the Hypnos factory is currently under construction and has a separate entrance and access on that side of the factory. Eventually there will be two busy junctions on to the Longwick road within a couple of hundred yards of each other with access to the factory. To have so many junctions within such a short distance will be dangerous. There is another application from Bloor Homes (18/06916/OUTEA) that will enter the north side of the Longwick road opposite the Hypnos factory so potentially there could be four entrances within a limited distance that would be unsustainable.
- Green Zone. RARA appreciates the inclusion of a green zone by the railway line but notes that if the line is to be widened, which is currently an option, this zone will disappear. This uncertainty means it cannot be regarded as a permanent contribution to the green requirement of the overall site or help reduce noise pollution from the line.
Car parking. Buckinghamshire has the third highest ownership of cars in the country and Princes Risborough, with its rural location and shortage of good public transport links, has understandably one of the highest uses within the county. This proposal will only provide car parking spaces based on national figures therefore below what is required. Provision of spaces will be inadequate and consequently issues will emerge with on road parking and traffic flow. We also again note the crime prevention officers concerns that parking 'courts' will create

The following summarised comments have been received objecting to the proposal:

- The application is in advance of the Planning Inspector's decision on the new Local Plan and should be delayed until after the new Local Plan. The proposal does not fit in with the District's strategic plans.
- The site is not suitable for new homes because access to the area is through a narrow railway bridge and existing roads, such as the A4010 are already heavily congested.
- Opposed to building on this greenfield site.
- The location of the site is cut off from the existing town by the railway line and there is no safe crossing of the railway track. The new residents would therefore be cut off from the main town and would be difficult for them to access current facilities.
- The new houses will be for rich people, while what is needed is housing for people on a modest income but who cannot afford to buy.
- Increased flood risk. The application makes no allowance for increased run off into Summerleys Stream which increases flood risk to all properties downstream of the development.
- Loss of amenity from increased foot, cycle and vehicle traffic, construction traffic and restrictions/amendments to footpaths.
- No contribution towards local infrastructure such as school places and local healthcare.
- Local resources are already stretched
- There is no provision for pedestrian access to the railway station for new residents.
- Impact on local wildlife habitat.
- Thames Water have identified the inability of the existing foul water network to accommodate the needs of this development as such there is a risk of untreated sewerage entering the water course with associated health and odour impact.

- Risk of failure of existing Thames Water foul water network
- It is unclear how it will be ensured that Park Mill Lane does not become an informal “rat run” into the new development