



Barafundle
Penn Green
Beaconsfield
Bucks
HP9 2RT
19th February 2019

Dear Sirs,

Planning Ref: 17/01763/OUT

We wish to object to this application because:

General

- In breach of NPPF para 32 “safe and suitable access to the site” CANNOT “ be achieved for all people.” Development should be prevented because “the residual cumulative impacts of development are severe.”
- “Existing dropped kerb crossing points over the London End roundabout will not offer a safe and convenient means for pedestrians and cyclists to move from the site to the centre of Beaconsfield and vice versa” according to BCC.
- Proposed usage of the Community Hub has not been considered for transport impact according to BCC. This would include the café, gallery, football pitches, public car parking, ATC building, matches and visiting teams, sales office, other offices, retail and on-site nursery.
- This development site is NOT in a sustainable location. It is simply too far to be practicable for people to walk between the New Town and this Wilton Park site. It would take about an hour from Holtspur and northern parts of the town and a good 40 minutes from the centre of the New Town.
- Beaconsfield has one of the highest rates of car ownership per capita in the country. 350 homes will mean c.700 extra vehicles plus extra associated with visitors, deliveries, employees and, further, those associated with the offices, nurse, retail, café, visitors to the park and pitches. The impact of this on roads and services will be SEVERE.
- The inclusion of bus stops, pedestrian crossings and 2 roundabouts accessing the development will impede traffic flow on the new relief road.
- An additional c.1,000 people (residents, visitors and employees) accessing the site will impede the relief road.
- PJA refers to a definition of congestion as “the difference between users’ expectations of the road network and how it actually performs.” This means that if we expect Pyebush to operate over-capacity (as indeed Inland tell us it will in their PJA reports) and it does in fact operate over capacity, then it will not be considered “congested”? This is nonsense.



- Improved parking at the railway station and a frequent bus service between Wilton Park and the station will be required but there is no plan set out showing how this would be provided.
- Policy TR7 – parking will not meet the “parking needs associated with the development.” There are too few public parking spaces on site at the football pitches and café. There are no public parking spaces at the eastern and southern green amenity areas. There are no parking spaces to alleviate the parking problems in the Old Town.
- There is no boys’ grammar school in the town. This necessitates transport between Beaconsfield and High Wycombe. This has not been factored into road trip calculations.
- Wycombe Hospital has no A&E department. The town’s GP surgeries are at capacity. There is no plan published for provision of emergency and GP services for the town’s increased population.
- Existing bus services are very infrequent, as shown in Table 3-1 of the PJA Report. Many are only 1 service per day. Some are every 45 – 60 minutes. This is inadequate to support this scheme in its unsustainable location.
- Beaconsfield railway station is well outside the 25 minute walking distance as are most services of the town. This is an unsustainable location.
- There is no public vehicular access across the site to the woodland/green areas to the south and east and no public parking areas there. These areas are inaccessible by car to visitors from other areas of the town.
- Why has Gurney Close (only 6 houses) been included in the PJA traffic survey (for trip generation calculations) when it is only 0.5km from the station and Wilton Park is over 2km away? This is not a like for like comparison. The trip rate calculations are unreliable.
- Our previous 2 letters of objection still apply.

Transport

- Existing bus network is inadequate.
- Beaconsfield has one of the highest levels of car ownership per capita in the country.
- This is a “luxury” scheme and will not be populated by people who want to catch the bus – they will use their cars and it is unrealistic to think otherwise.
- Inadequate parking at the station and in the New Town to accommodate commuters and those visiting the New Town to access services and supermarkets.
- Wilton Park is too far away from the New Town to walk and vice versa.
- A bus stop on the relief road, although needed, would impede traffic on the relief road.
- The relief road will be dangerous for pedestrians and cyclists to cross when accessing the site. A crossing is needed where Minerva Way crosses the new relief road but this will also impede the relief road. No plan has been produced for this crossing.
- The entire Wilton Park estate should be accessible by the general public by car – as it stands, it is a private estate and only the western park and pitches are accessible by the general public by car and the number of parking spaces is inadequate.
- No comprehensive and realistic Public Transport Strategy has been produced.



- No strategy for acceptable access to Seer Green Station has been produced. Access is via a footpath across fields.
- There is no direct vehicular access to Seer Green Station, leading to stress on Beaconsfield Station.
- The current entrance to Wilton Park from Pyebush Roundabout does not resemble a relief road, merely an entrance to an estate. It would need to be up-graded.
- PJA say there are “uncertainties about timescales for delivery of the entire A355 Relief Road” – there must be no uncertainties and the Relief Road must be completed now without further delay.
- Contrary to Core Policy 14, NO “co-ordinated package of measures to improve accessibility” exists. Giving residents a bus timetable does not count as an “accessibility package.”
- BCC concerns over accessibility of the site have certainly NOT been overcome.
- PJA say the London End junction “already operates beyond its theoretical capacity.” This development will stress this junction even further, to an unacceptable and unsustainable degree.
- PJA say because the London End junction operates beyond its capacity currently, the extent of impact cannot be modelled BUT that delivery of, necessary, crossings will cause delays prior to delivery of the Relief Road. Therefore, the Relief Road must be delivered NOW. No development should commence without the Relief Road being in place first.
- Any interim development WILL result in severe impact on the roads because London End junction is already over capacity. This breaches para 32 of the NPPF and para 109 of the revised NPPF.
- The proposed “mitigations” at Pyebush and London End will cause absolute chaos with or without the Relief Road being in place.
- The “mitigation” at Pyebush roundabout consists of lane signage only which is inadequate and would not resolve congestion.
- The current Inland phasing plan is for the southern Relief Road to be delivered at the time 116 homes are built on the Wilton Park Scheme. This is madness – the Relief Road needs to be put into place NOW.
- There is no adequate infrastructure in place currently or even planned which would persuade people to travel between Wilton Park and the New Town on foot or by bike as it is simply too far to be practicable for most people. This is not a sustainable development.
- BCC is correct in saying that “the development will therefore be heavily reliant on the use of the private car contrary to sustainable policies as set out in the NPPF, Core Policy 14, the Wilton Park Development Brief SPD and the aims of Buckinghamshire’s Local Transport Plan 4.”
- Simply put, without the Relief Road being in place NOW, the scheme is not sustainable. Even with the relief road in place, Inland say Pyebush Roundabout will operate over capacity.
- BCC is correct in saying “additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing distributor road network and will not achieve safe and suitable access.”
- PJA say “land required to deliver any improvements to access to Seer Green and Jordan railway stations (sic) is outside the control of the applicant” so, there is no



plan in place for this necessary improvement to provide access to Seer Green Station.

- A contribution to bus service enhancements is only offered “alongside the delivery of the FULL Wilton Park scheme.” There would be a huge chaotic lacuna pending delivery of the entire scheme during which traffic and access would be in chaos.
- PJA say “the proposed signalisation of the London End junction demonstrates that pedestrian improvements can be delivered alongside the full delivery of Wilton Park whilst maximising the operational performance of the junction for vehicle traffic.” Signalisation of London End would lead to chaos on a road network which PJA say “already operates beyond its theoretical capacity.”
- PJA say BCC have “re-emphasised that they would not support a mitigation option that involved the signalisation of London End junction as this goes against the wider transport strategy associated with the A355 Link road.” No solution is therefore offered as to how safe access can be provided to Wilton Park from London End. If the junction is signalised, traffic would be chaotic. If the crossing is not supplied, access would be dangerous.
- No adequate sustainable modes of transport exist currently between Wilton Park and the New Town, nor will residents use them in any meaningful numbers in the future because this development is a “luxury” development to be populated by car owners and drivers. That is the simple fact.
- 350 homes means c.700 cars. The nursery, offices, retail, café/gallery/site office, football matches, park, visitors, deliveries, refuse removal, employees could easily bring this total to 1,000 cars. This will stress the roads to an unacceptable degree.
- PJA say “the diversion of services, and the additional morning and evening buses would initially need to be supported by the developer for a period of three years with a review at that time to meet with possible completion of the full A355 Relief road.” There is no certainty that the Relief Road will be completed now but this is needed now.
- PJA say “to positively encourage residents at Wilton Park to undertake journeys by bus, residents will be provided with a Travel Information Pack upon occupation of the units to make them aware of their various travel options.” This will not work.
- The Public Transport Framework drafted by PJA will not persuade people to travel by bus. It will be a failure.
- PJA describe the “full Wilton Park Scheme “ as including 304 residential dwellings – they have not factored in the additional 46 refurbished ones plus community hub retail and offices, café and nursery.
- The concerns raised by BCC in their letter dated 4th January 2019 to Cullan Riley at PJA have not been satisfactorily dealt with.
- BCC state that the results of the junction model analysis for Pyebush roundabout “are not considered to be truly reliable.”
- Minerva Way will not be traffic free as the listed barn houses are accessed from it, as is the Cricket Club.
- The mitigations for London End Roundabout and Pyebush do not offset the impacts of development at Wilton Park.
- The proposed crossing at Park Lane/London End is only 8m from the give way line, not the recommended distance of 20m which cannot be achieved in this location. As



a result, queueing traffic will ensue and the chance of rear end shunts is increased. Signalisation of this crossing would cause chaos.

- PJA say that the interim development scheme would generate only 16 two-way walking trips in the PM peak hour. This suggests that most of the c.700 residents will indeed not be walking but will be further congesting the roads which are already over-capacity.
- PJA say that a signalised crossing on the A355 Park Lane would result in significant increase in queue lengths and journey times in the Am and PM peak hours. Yes.
- The country footpaths leading to Seer Green station are not made up and are not a safe, convenient route. The boundary of the Wilton Park site does not adjoin the existing footpath.
- The proposal “fails to make adequate provision to allow accessibility to the site by non-car modes of travel” (BCC).
- “The development will therefore be heavily reliant on the use of the private car contrary to sustainable policies as set out in the NPPF, Core Policy 14, the Wilton Park Development Brief SPD and the aims of Buckinghamshire’s Local transport Plan4.” (BCC)
- Residents from the eastern part of the site are located 2.5km from the nearest primary school and 2.7km from the town centre – both outside the “preferred maximum acceptable walking distance stated in “Providing for journeys on foot” (2000)” (BCC)
- The public sports facilities on site amount to relocated football pitches so most residents will have to drive elsewhere to gyms and other leisure activities off site.
- Residents will have to drive to the town’s supermarkets.
- Residents will have to drive to the town’s primary schools.
- Residents will have to travel by car or school bus to the boys’ grammar schools which are out of town in High Wycombe.
- Para.32 of the NPPF says development should be prevented on transport grounds where the residual cumulative impacts of development are severe. The impacts would be severe.
- There are no details of the pedestrian and cycle crossing points on the relief road and the connecting link between the 2 sections of the relief road.
- The buses will not access the private housing estate, only the entrance of the relief road.
- Contrary to Policy 7 of the BCC Local Transport Plan 4, road travel will not be reliable if the Relief Road is not put into place now prior to any development.
- The SPD says “the layout of this junction is not sufficient to cater for the traffic that uses it”, referring to the London End roundabout.
- Policy TR7 “development will only be permitted where...it would not be likely to result in non-residential on-street parking in residential areas.” This scheme breaches TR7.
- Millbarn Medical Centre will shortly close and there is no actual binding plan in place for provision of a GP practice.
- The “convenient” pedestrian and cycle route along Minerva Way is NOT “convenient” as it is too far away from the centre of town.



- Gurney Close should not have been used to calculate “trip generation’ as it consists of 6 detached houses only 0,5km from the station. Likewise The Spinney and Old Town Close are 1km from the station, not over 2. This is not comparing like for like.
- PJA say that Pyebush will be operating over capacity when Wilton Park has been developed. The mitigation proposed at Pyebush Roundabout will not change this as the actual road layout remains the same as existing. Only road markings are proposed. This will have no impact and Pyebush will remain over capacity.

Affordable Housing

- The comments on viability set out in our response dated 19th January 2018 remain valid. Even with contributions towards health and education, buses and roadworks, there is a huge surplus available of over £100 million and that is after allowing developer profit of 17.5%.
- Insufficient affordable housing is included. To comply with the Development Brief, 40% of 350 homes should be affordable i.e. 140 affordable homes. Only 12 affordable rent and 69 shared ownership homes are being proposed which is too few.
- In relation to the affordable homes, the Applicant is offering a commuted sum but the actual housing on site is needed. NPPF para 62 expects affordable housing to be provided on site.
- Vacant Building credit should not be applied as the base was abandoned by the MOD. The ex MOD houses have been or will be vacated for the purposes of redevelopment. 40 homes are to be demolished, the other 46 remodelled as part of the scheme.
- The scheme remains viable to provide 40% affordable housing on site because a surplus (on top of 17.5% profit) of c. £136 million is generated.
- Ironically, the existing ex MOD houses are currently being rented out by the Applicant at rents likely to be lower than the “affordable rent” (i.e. up to 80% of market rent) which is likely to apply once development takes place.
- The shared ownership units cannot be classified as affordable in this area, given the market prices locally.
- The provider of the shared ownership units, a sister company of the Applicant is a “for profit” company rather than a “not-for-profit” housing association.
- The site will be a private estate and a service charge will apply. The service charge should not apply to the affordable housing units and a condition should be imposed in this respect.
- There are no genuine economic constraints to providing the full 40% quota of affordable housing.
- The Applicant is incorrectly calculating percentage of affordable housing on a figure of 264 units – deducting 86 units from the total of 350 units which make up the scheme.
- According to Core Policy 3, two thirds of the affordable homes should be affordable rent or social rent units but this is not being proposed.



- The Applicant does not explain what share of shared housing a salary of £42,000 will buy in relation to a 1 bed flat and £55,000 in relation to a 2 bed flat. Is this only a 25% share? This should be clarified as it is misleading.

Impact on Green Belt

- A very large proportion of the scheme consists of buildings of 3 storeys above ground - the majority are between 2.5 and 4 storeys above ground. Existing buildings are almost exclusively very modestly sized 2 floor buildings, many flat-roofed. This means that, when viewed from the Public Footpath, golf club, surrounding countryside, farms and listed buildings, the scheme is far more obtrusive than existing.
- The scheme is overly dominant.
- The scheme is too prominent.
- The scheme is not screened well from the green belt.
- There are 2 areas of high density over 35dph which spoil the openness of the green belt.
- The parkland, pitches and green space should be dedicated in perpetuity.
- In breach of the NPPF, the scheme does not “meet the needs of the present without compromising the ability of future generations to meet their own needs.”
- In breach of para. 8 of the NPPF, the scheme does not meet the social objective of providing “accessible services and open spaces that reflect current and future needs and support communities health, social and cultural wellbeing.”
- The scheme does not meet environmental objectives.
- Core Policy 12 is breached – at least 10% of energy needs should be secured from “decentralised and renewable or low carbon technologies” but the scheme does not achieve this.
- The disadvantages outweigh any advantages.
- Construction of buildings on green belt is normally “inappropriate” and “should not be approved except in very special circumstances.” As this scheme DOES have a “greater impact on the openness of the green belt than the existing development” and “would cause substantial harm to the openness of the green belt”, it should be refused as it is in breach of Core Policy 14, the Wilton Park Development Brief and NPPF.
- The scheme is in view of listed buildings which are adversely impacted by it.
- The traffic impacts on the local strategic road networks are not mitigated by this scheme.

Please refuse this scheme.

Yours faithfully,

Alison Wheelhouse



THE BEACONSFIELD SOCIETY

Chairman
The Beaconsfield Society