



28 June 2020

Councillor M Tett
Leader, Buckinghamshire Council
By email: Martin.Tett@buckinghamshire.gov.uk

Dear Councillor Tett,

Chiltern and South Bucks Local Plan

You may recall that I wrote to the Leaders of Chiltern and South Bucks Councils on 23rd January this year, copied to you, along with seven other signatories, including Joy Morrissey MP. We were calling for the proposed Chiltern and South Bucks (C&SB) Local Plan to be withdrawn. Our reasoning was that circumstances had changed so much since the Plan was drafted that it was no longer relevant and we listed many reasons for coming to that conclusion. But also we felt that it would be a waste of taxpayers' money to pursue a Plan that was almost certainly going to fail, especially since you would soon be starting on a Unitary-wide Local Plan (something you had committed to).

I am sure you don't need me to point out that, since we wrote that letter, the circumstances have changed even more dramatically. Not only has the Pandemic caused an indeterminate delay to the Public Inspection, but the Inspectors have made their views known on the Duty to Co-operate aspect (only the very first stage of the Inspection process). On top of that, the situation regarding many other aspects of the plan has also changed substantially:

1. There are now two more ONS Population forecasts (2016 & 2018) that confirm the rate of growth of the population - and households - is much less than it was in the 2014 forecasts on which the Plan is currently based. Para 31 of the NPPF requires you to use "the most up to date evidence". It is surely inappropriate therefore to use six-year old evidence. This change alone could completely nullify any need to sacrifice any green belt land whatsoever. The 2020 predictions will be released soon and are expected to continue this downward trend of growth expectations.
2. An inspector has very recently overturned a Milton Keynes development plan policy in the light of clear marketing evidence indicating changing shopping habits and a lack of demand for new retail. Considering the draft C&SB Plan has a ridiculous number of retail site allocations (which we had objected to),

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the Inspector on this occasion has agreed with us that the whole retail sector has fundamentally changed. This is a clear indication of the way Inspectors are thinking and would also, on its own, we think be a reason to reject the draft Plan.

3. The Pandemic has also fundamentally changed expectations of the future in so many ways; road traffic, air traffic (the abandonment of Heathrow's Third Runway has big (positive) consequences for South Bucks in particular), increased working from home and lastly, and by no means least, the importance of climate change, the environment and pollution in future planning. This cannot be ignored any longer. The proposed Plan is very far from addressing climate change seriously, as I'm sure you realise.

Frankly, in our opinion (but supported by very strong evidence) the C&SB Local Plan is dead in the water. It surely now has no chance of getting through Inspection. And even if by some miracle it did, it will be at least late 2022, more likely 2023, before there is any chance of it being adopted. You can be sure we will be fighting our hardest to make sure that doesn't happen. If resources are directed to the new Unitary Plan then that should be at least in draft by then. Also by then, you will know that the Wycombe and Aylesbury Vale Local Plans will need updating. To pursue the current Plan is folly of the worst kind, because it means wasting huge amounts of taxpayers' money at a time when we can least afford it. We would urge you yet again to withdraw the plan before any more energy (and money!) is expended on it. We will shortly be producing our own vision for the County to 2050 and instead we would welcome the opportunity to discuss with you how we can help take a positive way forward, in the context of a new Unitary Local Plan.

Please feel free to share this letter with Councillors Darby, Naylor and others you feel appropriate.

Yours sincerely

Neil Salisbury
Trustee and Head of Planning
CPRE Buckinghamshire

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