



**Representor ID Reference: 600**

## **MATTER 8: DEVELOPMENT FRAMEWORK – PRINCES RISBOROUGH**

**Q1. Are the following policies soundly based, justified and will they provide an effective mechanism for delivering and managing the comprehensive development of Princes Risborough?**

1. For the following reasons the policies are not sound or justified. They will not provide an effective mechanism for delivering and managing the comprehensive and sustainable development of Princes Risborough; and they are inconsistent with national policy. RARA has separately submitted to the examination its preferred alternative, "The Better Town Plan".

### **a) PR3 (Princes Risborough Area of Comprehensive Development including Relief Road)**

1. The Main Development Area is within the close setting of, and will cause considerable harm to, the Chilterns Area of Outstanding Natural Beauty (AONB), a protected landscape of equal status to a National Park.
2. Indeed:
  - a. The Council's own "Landscape Sensitivity and Capacity Study" (February 2016) identifies that:
    - i. "The expansion area is visible from the AONB and many parts have strong intervisibility with the Chiltern escarpment" (paragraph 4.8); and
    - ii. "Any proposed expansion of this scale will inevitably adversely affect views from the Chilterns AONB" (paragraph 5.8); and likewise
  - b. The "Sustainability Appraisal" by Lepus Consulting (March 2016) recognises that: "The larger scale of development for higher growth options may be more likely to lead to negative environmental effects, in particular on the setting of the nationally important Chilterns AONB" (paragraphs N9-10).

3. Further, the Alscot Conservation Area is in the setting of the AONB and is under threat of change, altering the nature and character of the area. In particular, the housing development would block views from Alscot to Whiteleaf Cross.
4. In addition, the views out of the AONB from key viewpoints (e.g. from Whiteleaf Cross, Brush Hill Local Nature Reserve and the Ridgeway National Trail) are important assets that should be protected.
5. Finally, the proposed relief road:
  - a. Goes not just through prime agricultural land, the Green Belt, and the setting of the AONB, but the AONB itself;
  - b. Is a "major development" within the meaning of paragraph 172 of, and footnote 55 to, the NPPF (July 2018); and
  - c. There are no exceptional circumstances justifying the harm to the AONB which would be occasioned - the homes that are needed can be allocated elsewhere, in more sustainable locations and causing less harm to valued landscapes. (See also: our response to Q2.)

***b) PR4 (Main Expansion Area and Development Framework)***

1. The Main Expansion Area is at risk of flooding, as recognised in paragraphs 5.3.35, 5.3.36, 5.3.37, 5.3.48 and 5.3.51 of the Plan; and the relief road follows the route of the zone 2/3 flood zones, including the link to the Poppy Road site. (See also: Appendix 1, "Note on Flooding" prepared by Nick Gomersall).
2. It is of profound concern, therefore, that the Environment Agency:
  - a. Consider the Strategic Flood Risk Assessment (SFRA) and flood risk modelling thus far undertaken to be insufficient;
  - b. State that the proposals for Poppy Road, the station and the Expansion Area may not be deliverable; and
  - c. Have identified an issue with flood data regarding Princes Risborough - WDC accept this and propose a Comprehensive Drainage Strategy, but do not know when this will be produced, and we question how useful it will be.
3. Put shortly, it is not just unsound but alarming that the Plan is allocating 25% of its new homes and a relief road in a known flood risk zone, with little credible data to identify the degree of risk. Many of the proposed

new homes are potentially undeliverable; or may require mitigation which will impact on the viability and deliverability of the proposal; and/or put at risk developer financial contributions towards meeting the infrastructural needs that proposal will generate.

**c) PR5 (Settlement Boundary and Strategic Buffer)**

1. The NPPF discourages merging of settlements and, consistent with this, paragraph 5.3.22 of the Plan and Policy PR5 assert the following intentions:
  - a. Avoid coalescence with Longwick; and
  - b. Limit the visual impact of the expansion from the AONB.
2. However, the buffer currently proposed to separate Longwick (Figure 28) is negligible and unfit for purpose. It will not even be visible from the Chilterns, Whiteleaf Cross or The Ridgeway National Trail; and will do nothing to secure the visual or functional separation required in this valued landscape.

**d) PR6 (Main Expansion Area Development Principles)**

1. The Main Expansion Area neither protects nor enhances the setting of the AONB. In particular, it fails to respond to existing landscape features; fails to reduce impacts on important views, especially from the Chilterns AONB; and does not enhance the Alscot Conservation Area and its setting either.
2. In addition, the Plan fails to integrate the proposed Expansion Area successfully with the town. The existing settlement boundary is the railway line, which will remain and be a substantial a barrier to any integration.
3. Further, and for the reasons given under Q.1.c) above, the separation between the Expansion Area and Longwick is entirely inadequate.
4. The Plan also fails to recognise the important role the Lanes play (e.g. Picts Lane, which is used extensively by walkers, horse riders, joggers, and cyclists and is proposed to be severed).

**e) PR7 (Development Requirements)**

1. Point 19 requires an SFRA by developers when this must be the responsibility of WDC and undertaken before the Plan can be found sound.

2. The Jobs and Business section of the Policy should address the need for “sufficient new jobs to meet the needs of the development”, similar to the wording used under Point 10 regarding Primary School places.
3. Paragraph 5.3.95 is the only paragraph in the Plan regarding tourism. It rightly recognises Princes Risborough as the Gateway to the Chilterns. However, this is a major missed opportunity in the Plan as covered under Matter 5.

**f) PR12 (Town Centre Traffic and Public Realm Enhancements)**

1. It is essential that the already constrained Town Centre is developed in line with the housing; otherwise there will be a new town without a new Town Centre.
2. However, the public realm enhancements/traffic calming depend upon the completion of the relief road. As this cannot be completed until (at earliest) 2033, any Town Centre improvements will be delayed until then. Also, there is no committed funding to ensure delivery of those enhancements, when massive extra demand is being imposed. These are clear risks to the soundness, sustainability and deliverability of the Plan.
3. The Plan acknowledges the need for additional parking in the Town Centre. The solution proposed is to double-deck the Mount car park, a suggestion rejected by the Steering Group because that car park:
  - a. Is in the centre of a Conservation Area, opposite the Church; and
  - b. Has very poor access/egress, making it unsuitable for expansion.
4. Better solutions would be to double-deck the station car park and the Tesco car park or create more underground parking, as advised by the CPRE.

**g) PR17 (Princes Risborough Delivery of Infrastructure)**

1. Paragraph 5.3.230 states that “Financial contributions will be adjusted to take into account the costs of any on-site infrastructure required.” This infers that developers may not contribute to the Town’s infrastructure requirements if mitigation measures are required e.g. for flooding or drainage and/or railway access improvements.
2. Further, WDC’s Housing Infrastructure Bid (HIF) is integral to the delivery of the relief road. However, contrary to statements made by WDC during Matter 2 regarding their “successful” bid, RARA understands that the DCLG has introduced a further layer of scrutiny that casts doubt over this

(see: Appendix 2 "Housing Infrastructure Fund – enquiry HIF/MV/000292").

3. Finally, there are profound concerns regarding the Network Rail agreement (MOU 9) and the extent of financial contributions required to be made for allowing work on bridges etc. to enable the development to proceed.

**Q2. Is Policy PR8 (Provision and Safeguarding of Transport Infrastructure) justified and will it provide an effective mechanism for securing new and improved transport infrastructure?**

1. No, it is not justified, is inconsistent with national policy and will not provide an effective mechanism for securing improved transport infrastructure for all of the following reasons.

**AONB**

2. The proposed relief road constitutes major development in the AONB and will be visible from key vantage points (e.g. Whiteleaf Cross, Brush Hill and the Ridgeway National Trail). It offends the Plan's own policy for rural areas (page 275, paragraph 2(a)), being damaging works within the AONB to address county-wide north south connectivity. Other road plans have been turned down because of harm to AONB (e.g. Kent International Gateway). The current proposal should be similarly rejected.

**Need**

3. Whilst the Plan states (paragraph 3.26) that a relief road would be required for any expansion of the town that has not been substantiated – certainly for a smaller housing allocation as RARA propose. Further, no attempt has been made to come up with smart and innovative solutions that would be more sustainable – making better use of existing transport infrastructure.
4. WDC assert that the road will relieve congestion and provide better access to the station. However, the Jacobs Report (May 2017) contradicts this, stating (page 24) that: "The traffic flows on Poppy Road have increased in Scenario 8, which is the result of delays at junctions in the vicinity of the railway station access."

**Flood**

5. PR8 - 4 and paragraph 5.3.138 refer to the flood zones and consequential requirements re. SFRA. At present, however, no accurate flood data is available and there is no guarantee that the road can be built, where it can be built, or what the additional costs might be.

## **Wider Network**

6. A major disappointment is the lack of any strategic alignment with the wider transport network. There is little evidence of any detailed discussion at an appropriate level with relevant stakeholders such as Highways England and no consideration has been given to the effects of new development elsewhere; or the resultant, cumulative, effects of such developments on either adjacent communities or the planned route of the Oxford to Cambridge Expressway link.
7. We need to take traffic off the A4010 between Aylesbury and High Wycombe (40% of traffic is through traffic) because of congestion at either end, not add to it. Buckinghamshire County Council has always maintained that there is no solution to the traffic congestion on the A4010 at West Wycombe.

## **Consultation**

8. RARA note that WDC rejected out-of-hand the Steering Group's preference for the wider bypass Option 17 at an extra cost of c£20m. They did so for reasons of cost. However, the "Princes Risborough Expansion - Viability Report" (March 2017) states that the development would generate a "cumulative project surplus/headroom of almost £70m". This amply demonstrates the lack of proper consideration given even to the WDC-dominated Steering Group's consultation responses, let alone those of the wider Risborough community.

## **Solution**

9. RARA's preferred solution is to reduce the housing allocation to Princes Risborough and make better use of existing infrastructure with more innovative and sustainable solutions. An early review of the Plan will then afford time to consider further whether a wider bypass option is needed and, if so, the preferred route, taking into account:
  - a. The proposed Oxford to Cambridge Expressway;
  - b. The likely Unitary Authority change (DCLG's preferred option); and
  - c. The proposals for development in neighbouring communities (i.e. not only in WDC's area of responsibility, but in Aylesbury Vale and South Oxfordshire also).
10. This approach would better secure longer term traffic relief and connectivity to the wider strategic network than the Plan's proposal.

***Q4. Are the following allocations soundly based and is there evidence that the development of the sites is viable and deliverable?***

#### **4 a) PR 9 – Princes Estate Expansion**

1. The Jacobs “Princes Risborough Transport Study” shows the entrance to the Princes Estate to be over capacity already and, as recognised in the 1997 Local Plan, for the site to reach its full potential better access to the estate is required - something the Plan has not addressed. Further, traffic for the estate will be brought within 200 metres of the entrance but, to avoid a low railway bridge, will have to make a mile plus detour through the proposed new housing estate.

#### **4b) PR10 – Land North of Lower Icknield Way**

1. The two sites only make up for industrial sites lost already or proposed to be lost as part of the Plan, and will not therefore generate the level of jobs needed to support a doubling of the town. (Indeed, if the Molins and Cilag Janssen/Clare Foundation sites four miles away at Saunderton are lost, there will be a net loss of industrial space in the north of the District when the local population is proposed dramatically to increase, unsustainably and significantly increasing the need to travel by car).

#### **4c) PR11 – Land to the Rear of Poppy Road**

1. This allocation is not soundly based and there is no evidence that development of the site is either viable or deliverable. For the following reasons, it should be deleted.
2. The site is in Green Belt and partly within the Chilterns AONB. It is visible from important viewpoints in the AONB and the Ridgeway National Trail. It is not in a sustainable location.
3. The Plan does not demonstrate the exceptional circumstances that justify the site being removed from Green Belt. This site was not one of the areas or sub-areas identified by Arup as performing weakly in their “Green Belt Part 1 Report” (2016). Whilst the “WDC Part 2 Review” (June 2016) considered it for removal, a table on page 29 states that it is not capable of being removed from the Green Belt and no exceptional circumstances exist to justify an alteration to the Green Belt boundary. And yet the Plan is now proposing it as a development site, and proposing to overcome one of the restrictions – road access - by creating a link road across a protected chalk stream into adjacent, farm land, Greenbelt and AONB, in order to connect with the proposed relief road.
4. Parts of the site are within flood zone 2 and 3; and it is also within designated Wycombe Critical Drainage Areas. Developers will need to undertake a SFRA, including detailed hydraulic modelling (paragraph

5.13.165). There is a need to preserve and enhance the water quality of the Pyrtle Spring-fed Culverton stream, mitigate against the effect on views from the Chiltern escarpment and Ridgeway National Trail, and protect important habitats. There is also a need for an ecological assessment to inform the possible extent and nature of development (paragraph 5.3.167).

#### **4 (d) PR13 – Town Centre: Land Fronting New Road (Back Lane)**

1. The Town Centre is very small and constrained by historic buildings, the A4010 and existing developments. It does not benefit from the wide high streets of Thame, Amersham or Beaconsfield, and cannot support a population similar to those towns.
2. With the planned expansion doubling the population of the town, Princes Risborough centre should be sensitively improved, taking into consideration the historic buildings.
3. It is essential that the Town Centre is developed for retail (especially food retail) and leisure activities with the increase in population. The area outlined in PR13 is the main area of the town where this can be achieved. There is an opportunity here greatly to improve a much under-utilised area of the Town Centre.
4. However, the Plan has no details of how this should look; how it will be achieved; and how it has been costed and will be funded.
5. The lack of a comprehensive brownfield site register has hampered the identification of suitable Town Centre sites for development. For example, more residential space could be created on brownfield land by building flats above street level retail, and providing underground parking in the PR13 area. This would be popular with younger age groups and could bring some much needed life into the town.

#### **4 (e) PR14 – Town Centre: Land South of Horns Lane**

1. As with PR13, there is no detail of how the site will be laid out when developed, what it will look like or how it will be achieved. Also, PR14 should allocate funding to support the moving of the fire station to the new development area.
2. RARA does not support double decking Horns Lane car park. It will create an eyesore in the centre of the town that residents want to improve and be very visible from the AONB viewpoints of Whiteleaf and Brush Hill. Most certainly, it will not enhance the AONB's setting. (Horns Lane Car Park has remained undeveloped as it offers clear views into the AONB/Whiteleaf

Cross landmark from the Town Centre. This important vista from the town into the AONB needs to be retained/enhanced with any development being low level). A better solution would be to redevelop the site for retail at ground level with residential above, with underground parking for residents, town visitors and shoppers.

**4 f) PR16 – Land at Princes Risborough Station**

1. The station should be an opportunity to encourage commuters to use a more sustainable form of transport. It should provide a welcoming access to our gateway to the Chilterns AONB (The Ridgeway National Trail, the Chilterns AONB and the National Cycle Route 57 are on the door step, making this a key access point for visitors).
2. However, the proposed relief road will cause a congested and hostile environment at the railway station, with HGV traffic diverted into this hub. According to the Jacobs Report on "Preliminary Phasing Strategy Modelling" (May 2017) (Page 24), the traffic on Poppy Road will have increased at the end of the development and result in "increased delay at junctions in the vicinity of the railway station access", positively discouraging rail commuters. This completely undermines paragraph 5.3.211 of the Plan, which states that "A new road link between Summerleys Road and Picts Lane will relieve traffic on Poppy Road and create more legible connections between the station and the wider road network".