



Matter 2 The Plan's Strategy

[Representor ID Reference: 600]

Q1.) Is the Vision sufficiently aspirational and locally specific to form the basis for Planning in Wycombe over the Plan period?

- 1.1 RARA is specifically interested in the impact the increased housing will have on the town of Princes Risborough, the proposed expansion of which is a core part of the WDC "Vision" for meeting housing need over the Plan-period.
- 1.2 Put shortly, the view of RARA is that the Plan is not aspirational in that it has shown no attractive or sustainable Vision as to how the District should look in the future. The WDC Planners have not considered better ways to address the housing need, they have only thought of dumping the allocation across the boundary of the Green Belt.
- 1.3 The town of Princes Risborough is a small market town with a highly constrained commercial centre, and with limited access and parking. It is partly in the Chilterns AONB and partly within its setting; and is highly visible from all the major viewpoints looking westward. For the following reasons, it cannot sustainably support the increased number of housing that WDC are planning to build there and, for this reason, its Vision cannot remotely be described as "aspirational"; rather it is "unsound", proposing an unsustainable solution to the requirement to meet housing need.
- 1.4 RARA's case in these regards is more fully set out in RARA's "Representation on the Publication Version of the Wycombe District Local Plan", alongside which the following supplementary comments should be read.
- 1.5 Very briefly, however, the key points regarding the delivery of a truly aspirational "Vision" are as follows:
 - (1) Doubling the size of the town would destroy the close-knit community and swamp the town – that is not a Vision to aspire to.
 - (2) It is certainly not a Vision which the local community in the Risborough area sees as aspirational and, as referred to in RARA's representations on Matter One, the scale of the development in Princes Risborough has never been the subject of genuine consultation - the maximum number of 2,650 has been presented to the public as a fait accompli in all official communications.
 - (3) RARA therefore seeks to reduce the proposed scale of expansion for Princes Risborough to a more sustainable and appropriate level, as an essential part of any aspirational Vision for the Local Plan.
 - (4) RARA is, however, supportive of delivering new homes – any aspirational Vision for the District must seek to build the homes (especially affordable homes) for future generations to live in - and appreciates, also, that the unrestricted status of the land adjoining Princes Risborough makes it an option for a proportion of that housing development.
 - (5) Having consulted widely with the Princes Risborough community, producing a community inputted "Better Town Plan" and gathering more than 4,000 signatures of support, RARA feels that Princes Risborough could expand by up to 1,000 homes, which represents approximately 30% growth for Princes Risborough - far more than the District average, and going a long way to helping deliver homes for the District.



- (7) For many that scale of development would still seem too great. However, RARA considers that, although this is still major expansion for the Princes Risborough, and that countryside beyond the Green Belt boundary would most likely have to accommodate some development, the town could sustainably support this level, alongside the required infrastructure improvements.
- (8) At this level of expansion, however, RARA considers that the expensive relief road is not an immediate requirement and affords a timely opportunity as part of the aspirational Vision in the longer term, for better consideration to be given to better long term solutions to the wider A4010 traffic issues and/or a less controversial and community supported route is resolved, noting that:
 - (a) The proposed route is extremely unpopular with the residents and was dismissed by the Steering Group as not being fit for purpose, cutting through both Green Belt and AONB designated land; and
 - (b) Both the residents of Risborough and the Steering Group supported an outer relief road, which not only would properly bypass the town but would give access to the expanded Princes Industrial Estate.

Q2.) Are the Plan's objectives appropriate, positively prepared and justified and are they capable of delivering the Vision for Wycombe District set out in the Plan?

- 2.1 For all of the above reasons (and others set out in RARA's comments on other Matters and in its "Representation on the Publication Version of the Wycombe District Local Plan", the Plan's objectives are inappropriate; negative in outcome; and unjustified.
- 2.2 In particular, and so far as the proposals for Princes Risborough are concerned, the Plan has been drawn up without any regards as to how the town of Princes Risborough should be developed as a thriving community. Rather, what is proposed is a dormitory town. This goes against the principles set out by the government in the NPPF, and also common sense.
- 2.3 For the Plan to be "appropriate, positively prepared and justified" with regards to Princes Risborough, the town, the residents and businesses should be put at the centre of any Plan of this scale. The approach should be:
 - (1) How can the quality of life for the residents be improved?
 - (2) How can the town centre facilities be enhanced?
 - (3) How can we generate more employment?
 - (4) What level of development is sustainable in a town of this size?
- 2.4 However, the WDC approach has been the opposite, little more than: "Where does the Green Belt end? OK that's where we'll dump our housing allocation."

Q3.) Is the Plan's Spatial Strategy (Policy CP2) consistent with the requirement of the NPPF to promote sustainable development?

- 3.1 The planned expansion in Princes Risborough is unsustainable; it is not linked to the location of employment and has not taken into account the transport links:
 - (1) Although Risborough has good rail links, only a small numbers of travel-to-work journeys are by train compared to road.



- (2) The A4010 is already badly congested at both Wycombe and Aylesbury, and additional development in this area would only exacerbate this (noting that large developments in Thame and Chinnor will add to the road and rail congestion).
 - (3) Rush hour trains to London are currently standing room only when they get to Risborough, and with the additional passengers starting their journeys at Thame/Haddenham, it will be even more congested.
- 3.2 For the Plan to be made sound, sustainable, and consistent with the NPPF, the proposed allocation at Princes Risborough has to be reduced to 1,000 homes as set out under Q.1 above. However, RARA fully appreciates that this can only be part of the answer for a truly sound, sustainable and NPPF-compliant Plan. In particular, reducing the numbers built in Risborough to 1,000 homes would create a shortfall of approximately 1,600 houses for the District. This shortfall will have to be promptly addressed; and the Plan modified to secure a means of doing so swiftly and sustainably (noting that RARA considers there to be a number of alternative approaches that have not been fully explored, and would offer better solutions than the current Plan to dump the housing allocation in Princes Risborough).
- 3.3 The best way to address the reduced housing provision would be through a requirement for an early review of the Local Plan (as anticipated by the draft NPPF which will by then be in force), enabling the Council to consider the following options:
 - (1) Whether, under the duty to co-operate, more of its unmet needs might more sustainably be met elsewhere in the Housing Market Area. As Wycombe District is 70% constrained by Green Belt and AONB, more of the housing allocation could be passed to neighbouring Districts, currently only 3,000 out of an OAN of 13,000 have been passed to AYLESBURY VALE DISTRICT COUNCIL.
 - (2) Whether there are additional brownfield sites in and around Wycombe, Bourne End, Flackwell Heath, Stokenchurch and Marlow, which might be identified and utilised. There are a number of sites that have been already noted that could take at least 2,200 houses, and these would be closer to the centres of employment, creating more sustainable developments.
 - (3) Whether more housing can be promoted on unconstrained and/or sustainably located allocated sites (through higher densities or enlargement etc.) than currently proposed.
 - (4) Whether to make greater use of land which is sustainably located on the fringes of the urban areas for development. In particular, there is considerable scope to release low quality Green Belt land at the fringes of Wycombe and Marlow, allowing for more sustainable development than in more remote locations such as Princes Risborough. WDC have already conceded that the exceptional circumstances required to release some land from the Green Belt already exist and yet, by way of just one example, Marlow has only a planned increase of 5% over the Plan period; this is unsustainably small and indicates a requirement to review the Green Belt in this area.
 - (5) Whether to spread some of the housing proportionately throughout the District, allowing additional houses to be built in each village. This, again, would require a release of Green Belt land to which the comments above also apply: WDC have already conceded that exceptional circumstances exist.



- 3.4 A requirement for an early Plan review will bring additional benefits also. In particular:
- (1) The formation of a Unitary Local Authority for Buckinghamshire will allow the re-calculation of the OAN for Bucks and allow the highly constrained areas to spread their housing allocations over the whole of the Unitary Authority, rather than cramming the allocation into a small unsustainable area.
 - (2) The impact that the currently favoured route of the East West road corridor (Oxford to Cambridge) would have on Bucks could be properly considered, and the opportunities that could present for improved and altered transport links, and housing opportunities, in newly created sustainable locations pursuant to Unitary Authority allocations.
- 3.5 Accordingly, and in order to allow the Plan to move forward, RARA suggests that the Plan is modified both by:
- (1) The reduction of the proposed allocation to Princes Risborough; and
 - (2) The requirement that there be an early review to allow, specifically, for a fundamental review of the Green Belt in WDC and to identify sites in sustainable locations and less impacted by AONB designations etc., that can sustainably be released for housing.
- 3.6 Given the proposed Plan-period, and the delivery timetable, there is plenty of time for these reviews to take place without causing adverse impact to the delivery of the housing.
- 3.7 Precedence for the release of Green Belt has been set by Aylesbury Vale District Council, who have released more of the Green Belt in their District, which covers only 5% of the area than WDC have from their 85%.
- 3.8 In addition, if the benchmark for releasing Green Belt is taken as the Poppy Road site, which contains a rare chalk stream and a haven for wildlife but is also prone to flooding, then a large number of sites closer to the urban area and in more sustainable locations would become available.
- 3.9 This would not impact adversely upon the ultimate goal of “building the right homes in the right places”, but fulfil it - through dispersing the required homes proportionately and sustainably across the District rather than dumping them disproportionately in an unsustainable location (Princes Risborough), in the setting of the AONB.