

Matter 2 - The Plan's Strategy – Matter 2

(We will be attending and would like to participate at the Hearing on this Matter)

Questions 3 and 5

We wish to respond to questions 3 and 5 on this Matter together as they are very much interlinked, with a particular focus on Princes Risborough

Paragraph 14 of the National Planning Policy Framework (NPPF) states that sustainability is the golden thread which runs throughout our planning system, and that all three pillars of sustainability must be met – social, economic and environmental. We do not believe they have been met either individually or collectively, in particular with regard to Princes Risborough. For example:

Social

- The town needs better healthcare facilities - we are told that there is ample capacity for the local surgeries to expand and recruit more doctors - but they don't, and can't cope with present needs.
- We need an integrated plan for sports and recreation facilities in the town. There are a lot of good intentions in the Plan but there is no integration.
- The Plan (P246) notes that the railway station '*will have a vital role to play in establishing sustainable patterns of commuting for the new population of the town. Direct, safe and attractive access to the station for all modes of travel will be needed, and train services of sufficient capacity to meet peak demands*'. Yet the journey times to London have increased over the last few years and the relief road proposal will create an unsafe and congested environment at the station. The plan for the station area back in 2009 was more acceptable.
- We believe that it is a fundamental principle of Plan-making that the coalescence of definable settlements must be avoided. The proposals would however merge the historic Settlements of Princes Risborough and Longwick.

Economic

The plan recognises but fails to address the economic challenges:

- The Wycombe Commercial Sites Assessment report (2016) identifies that Princes Risborough does not perform strongly on key commercial drivers for national and regional growth trends.
- The Lepus (2015) report notes that there is no significant industry to provide employment in the town. The '*Majority of residents of the Risborough's work outside of the ward*', there are '*Less start up enterprises looking in the area*', and the '*Potential for future growth in industrial units is likely to be limited*'.
- The number of new homes proposed is not proportional to the size of the town. Developers are profit driven not volume driven, flooding the market is not a sustainable option. As noted in the, UK Government Construction Leadership Council's '*Innovation in Buildings*' report (Nov 2017) in relation to private developers, '*Housing completions are typically slowed to match the rates to maintain desired sales prices*'. For anything other than modest housing growth WDC would need to invest in a major public sector housing programme.

Environment

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- The Sustainability Appraisal for Princes Risborough (March 2016) by Lepus Consulting, states (pN9/N10) that *“In general options performed negatively with regards to biodiversity, landscape, cultural heritage, water, climate change mitigation, climate change adaptation and land resources”*. It goes on to state that the larger scale of development proposed now *‘may be more likely to lead to negative environmental effects, in particular on the setting of the nationally important AONB’*.
- The WDC Level 2 Strategic Flood Risk Assessment (Sept 2017) notes (p152) that *‘the planning process should lead to the avoidance of flood risk by where possible steering development towards the areas of lowest flood risk.’* Yet the Plan is steering development into areas of high flood risk!
- The relief road proposed will send heavy goods vehicles through existing and new residential areas, and the new railway station hub. There appears to be no consideration to the pollution and safety issues this would create for residents, cyclists, joggers, pedestrians and horse riders.

The Plan is missing the NPPF golden thread of sustainable development. Yes we need more homes but we must build the right homes in the right places - where homes can be matched with jobs and reduce reliance on the car; and in locations where damage will not be done to the environment or our valued landscapes. More can be done to free up brownfield sites within the town and around the station.

We believe that sustainable planning should demonstrate a close correlation between homes, jobs, and infrastructure and inter connections. The Plan simply presents a proposal to ‘dump’ housing numbers on the town, without any attempt to develop these critical aspects. Few of the new residents will work in or near Princes Risborough, and will be required to utilise travel means which are beyond or near capacities, and could be overwhelmed by such an expansion.

The Plan’s strategy is not consistent with the requirement of the NPPF to promote sustainable development. The proposals for Princes Risborough are not deliverable.

Suggestions for change:

- Agree through the local community a sustainable development plan with new homes, proportionate to the size of the town, its location and setting. We note that a review of the NPPF is currently taking place and suggest that the number of new homes within the Plan period be reduced to circa 1000 pending a further review when the NPPF has been published.
- Get our existing town in order before instigating any new large scale development – including better health care, rail service, and leisure and recreation facilities.
- Undertake a sustainable drainage strategy to mitigate against climate change and risks of flooding.
- Develop our AONB tourist potential with a strategic plan to attract more visitors to the area.
- Make better use of our existing infrastructure rather than destroying our existing farm land, Green Belt and AONB with new infrastructure – we have put forward suggestions in this regard in our Representation section 4.1.

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We need a more imaginative and innovative Plan. We are not opposed to development but opposed to unsustainable development.