



Matter 4 - Employment, Retail and Town Centres **[Representor ID Reference: 600]**

Issue: Is the objectively-assessed need for employment soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Employment

Q.2) Are the requirements of Policy CP5 (Delivering Land for Business) realistic, justified and deliverable?

2.1 RARA is specifically interested in the deliverability of land for business in Princes Risborough, and the context within which that issue is to be considered is comprised of the following factors:

- (1) The proposed new employment sites for Princes Risborough merely replace those lost by the Plan, or have been located unpopularly in the neighbouring town of Longwick.
- (2) WDC are also proposing, however, to allocate 2,650 dwellings to Princes Risborough which, they assert, requires the delivery of a relief road; and
- (3) The proposed relief road route for Princes Risborough, for which there are several time critical hurdles which have to be cleared for it to be delivered, seeks to relocate a major employer (Sumitomo), removing land for business.

2.2 However, RARA seeks to modify the Local Plan by reducing the scale of expansion of Princes Risborough to up to 1,000 homes, a more sustainable level, as detailed in its original representation; and a reduction of this the scale in Princes Risborough) would negate the immediate need for the controversial and sub-optimal proposed relief road and retain existing employment land (see response to Housing allocation in Matter 3) and negate the need to relocate the major employer (Sumito).

2.3 Further, and in direct consequence of seeking the reduced housing allocation to Princes Risborough, RARA also seeks a requirement for an early review (as anticipated by the draft NPPF which will, by then be in force). An early review would:

- (1) Afford WDC time to develop a better considered traffic solution to the whole of the A4010, and better road connectivity for Princes Risborough, thereby opening up possible new opportunities for more sustainable employment land; and would also
- (2) Allow for a thorough review of sustainably located employment land in well-connected areas and settlements across the whole District that would sustain greater housing allocations.

Q.3) Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

3.1 As explained in RARA’s full representation (“Representation on the Publication Version of the Wycombe District Local Plan”), Princes Risborough is not an attractive location for employers as it is remote from major transport routes (see: Tibbalds Issues and Matters, 2014, and regularly and historically reported by WDC in all previous Area and Town Plans). This alone makes the proposed expansion of Princes Risborough unsustainable, with regard matching homes with jobs, as new residents will be forced to commute.

3.5 However, as noted above, RARA seeks to modify the Local Plan by reducing the scale of expansion of Princes Risborough to up to 1,000 homes, accompanied by a consequential requirement for an early review of the Plan. Such a review would enable WDC to re-consider whether the housing shortfall could, as ideally it should, be met in more sustainable locations where there are better employment areas with better road links.

3.6 For example:

(1) The proposed expansion of Marlow’s Globe Park and its improved transport links is welcome for the District, but should - in RARA’s view - be matched by a higher housing allocation to Marlow in order to achieve a more sustainable solution, cutting the need to travel by car. An early review of the Local Plan would enable this alternative properly to be re-considered.

(2) Similarly, the Plan shows no significant increase in industrial capacity in the North of District where it expects to provide most of the new homes. This, too, is an imbalance which runs contrary to the sustainability imperative of cutting the need to travel by car and an early review of the Local Plan would enable this properly to be re-considered also.

Community Facilities

Q.6) Is Policy DM29 (Community Facilities) soundly based and will it provide an effective mechanism for retaining existing and securing future community facilities?

6.1 Chapter 1 and paragraph 4.6.4 of RARA’s full representation (“Representation on the Publication Version of the Wycombe District Local Plan”), attached at **Appendix A**, details the issues and obstacles to improving and enhancing community facilities within the existing settlement boundary, given the highly constrained Conservation Area of Princes Risborough.

6.2 Proposals for improvements to, and additional community facilities at, Princes Risborough are, at best, vague in the Plan. For an expansion at the level proposed for Princes Risborough it should be essential that firm proposals for sports (a wide range), car parking, retail and parks etc. are clearly proposed and that the community has had input into this. This is not the case (see full representation 4.6.4 and Matter 1 Q6).

6.3 The Plan’s suggestions for improved (and approved) car parking solutions are not resolved, yet essential for even the reduced expansion as sought by RARA.

- 6.4 There is no support evidence or documentation on the requirement for additional GP's to support the new population levels. The existing number of GP's for the existing population of Kimble, Longwick and Risborough is, currently, eight. The Local Plan will more than double the population of the area and yet just two additional GPs are proposed. That seems wholly inadequate.
- 6.5 A reduced scale of expansion for Princes Risborough, although reducing the requirements for community facilities, still requires firmer and deliverable solutions to many existing and needed facilities.
- 6.6 An early review of The Plan would allow time to resolve the many issues and obstacles that would still exist for a smaller scale expansion. Better considered solutions will help secure future community facilities.

Town Centres

Q.7) Is Policy CP6 (Securing vibrant and high quality town centres) soundly based and will it provide an effective mechanism for new development in town centres?

- 7.1 For Princes Risborough, the suggestion to enhance the back of the High St/New Road area as improved public realm has been an aspiration of WDC, Princes Risborough Town Council and residents ever since New Road was built on what was Back Lane (1970's). There can be no guarantee that this will ever be a deliverable option.
- 7.2 Princes Risborough has an historic market town centre and a Conservation Area already quite densely built on. As such, it is very hard to effectively deliver new town centre development without compromising car parking or traffic flow.
- 7.3 Where there are development opportunities (Horns Lane), the suggestions for development are not aspirational enough in providing the right mix of housing (including affordable) with retail/business space and car parking. This should be very achievable and, if well considered and implemented, very effective in providing well located homes and businesses as part of a vibrant town centre that supports modern lifestyles.
- 7.4 As discussed in Matter 3, developments in the urban area should have greater density (efficient use of these sites is encouraged by both Green Belt policy and the extant NPPF, and is anticipated to be more greatly emphasised in the new NPPF). Opportunities exist to allocate much more housing/mix use retail across the District by increasing densities with modern and innovative solutions in all the District's urban areas, creating vibrant and future-proof town centres and reducing any need to build on the countryside.
- 7.5 An early review of the Plan would allow time to fix well informed and better solutions to town centres that are deliverable and effective in meeting development need and social need.