
Wycombe District Local Plan Examination

Further Written Statement
Submitted on behalf of Gallagher Estates
(ID: 0953)

**Matter 8:
Development Framework - Princes Risborough**

August 2018

Wycombe District Local Plan Examination
Response to Inspector's Matters, Issues and Questions
Matter 8:
Development Framework - Princes Risborough
Barton Willmore LLP on behalf of
Gallagher Estates (ID: 0953)

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INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by Gallagher Estates to submit this further written statement in response to the Inspector's Matters, Issues and Questions. This statement expand upon the representations submitted on behalf of Gallagher Estates at the earlier stages of the Wycombe District Local Plan's preparation.
- 1.2 Gallagher Estates has interests in land off Shootacre Lane on the southern edge of Princes Risborough which is promoted for residential development. The site includes land which is identified as part of the 'Area for Comprehensive Development' in order to provide the southern section of the proposed Relief Road. It is not proposed in the Local Plan as an allocation for residential development; it is an omission site.
- 1.3 Our representations submitted in response to the Regulation 19 Local Plan consultation included a Vision Document which presents our client's development proposals for the site.

RESPONSE TO INSPECTOR'S QUESTIONS – MATTER 8

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

- a) PR3 (Princes Risborough Area of Comprehensive development including Relief Road);*
- b) PR4 (Main Expansion Area and Development Framework);*
- c) PR5 (Settlement Boundary and Strategic Buffer);*
- d) PR6 (Main Expansion Area and Development Principles);*
- e) PR7 (Development Requirements);*
- f) PR12 (Town Centre Traffic and Public Realm Enhancements); and*
- g) PR17 (Princes Risborough Delivery of Infrastructure)*

8.1.1 The following submissions are made without prejudice to our statement for Matter 3 which concluded that the housing requirement in the Local Plan should be increased to a minimum of 775 dpa, In response, our position is that the Local Plan must allocate additional sites to meet an increased housing requirement including land off Shootacre Lane, to the south of Princes Risborough.

8.1.2 Our representations to the Regulation 19 'Publication' version of the Local Plan demonstrate that the site is capable of delivering approximately 350-400 new homes in a sustainable location within a short walking distance of Princes Risborough Train Station. The site is partially within the PR3 Area of Comprehensive Development and our client's development proposals for the site incorporate the section of the southern section of the proposed Relief Road in this location.

8.1.3 Notwithstanding the above, without prejudice, this statement now turns to address other soundness issues related to the relevant plan policies and strategy for growth at Princes Risborough on the presumption that the Inspector concludes that no additional or alternative allocations are required.

8.1.4 Gallagher Estates does not object to the principle of allocating land to the west of Princes Risborough for comprehensive development, forming a key part of the overall strategy for the growth of the town including the Relief Road required to support its delivery.

- 8.1.5 Our main objection is that the Plan's strategy for meet housing needs, at Princes Risborough and the District as a whole, is heavily dependent upon the anticipated delivery of this strategic allocation (see also our statement for Matter 2). Indeed, 1,758 new homes are anticipated to be delivered within the Main Expansion Area over the plan period, consisting of 86% (approx.) of the supply anticipated in Princes Risborough and 16% of the total supply anticipated across the District up to 2033.
- 8.1.6 Paragraph 14 of the NPPF requires Local Plan to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. Paragraph 182 of the NPPF requires Local Plans to be effective - deliverable over the plan period - and consistent with national policy.
- 8.1.7 Taking the above into account, there is insufficient flexibility within the Local Plan capable of responding to realistic delays in bringing forward the development of this allocation, including the necessary supporting infrastructure. In our view, there is a realistic prospect of such delays in the delivery of this complex urban extension which is controlled by multiple landowners and developers/promoters.
- 8.1.8 As submitted, there is a significant risk that the Plan will fail in meeting the (housing) development needs of the District. A significant delay in the delivery of this strategic allocation, or the supply of land for housing more generally, could trigger an early partial or whole review. Relying upon a partial or full review of the Local Plan does not satisfy the requirements for sufficient flexibility to adapt to rapid change, and for the plan to be effective, as required by paragraph 14 (and therefore 182) of the NPPF.
- 8.1.9 We note that the Council's position is that it would "not be appropriate" to include a buffer/allowance for non-implementation (i.e. identify reserve sites) due to the housing target being a "capacity derived target" (see paragraph 7.22 of the Housing Topic Paper)¹. The Council also contend that sites identified are either "deliverable" or "developable" sites, inferring that this of itself negates the requirement for flexibility. We address these points in turn below.
- 8.1.10 Firstly, with respect to the principle of including flexibility in the Plan's approach to housing supply, we are concerned that the Council defends its position on the basis of the MOU.

¹ Council officers have advised during the Stage 1 hearings that any reserve sites could undermine the Memorandum of Understanding (MOU) with Aylesbury Vale District Council (AVDC) regarding unmet housing needs.

8.1.11 Gallagher Estates has not objected to the principle of the cross-boundary approach pursued by the Buckinghamshire authorities. However, the MOU approach is unsound in our view if it prevents Wycombe (and, by implication, South Bucks and Chiltern) from satisfying wider requirements of national policy, including the tests of soundness, as described above.

8.1.12 Secondly, even where it is concluded that all sites identified are “deliverable” or “developable”, that would not override the fact that national policy clearly requires plan to be flexible, recognising that there would remain a prospect of unforeseen delays arising post-adoption.

8.1.13 In conclusion, in order to resolve the soundness issues identified above, we recommend that the Local Plan identifies reserve site allocations. These sites should be capable of being brought forward for development quickly, responding to potential delays including anticipated shortfalls in the District's maintaining a sufficient five year housing land supply.

8.1.14 In addition to the issues addressed above, we consider that the following should apply to the Area of Comprehensive Development and the consideration of opportunities for future development at Princes Risborough:

Princes Risborough Relief Road

8.1.15 We support the recognition in Policy PR3 that the delivery of the Main Expansion Area is dependent on the delivery of the Relief Road.

8.1.16 Paragraph 5.83 of the Princes Risborough Topic Paper advises that *‘the preferred southern alignment of the road is Option c’*. The delivery of this route requires land which is located within the ‘Area of Comprehensive Development’ but is not allocated. The land not allocated includes land off Shootacre Lane which is promoted by Gallagher Estates for residential development.

8.1.17 Thus, the delivery of the Main Expansion Area, the Poppy Road allocation and the overall strategy for Princes Risborough is dependent on the Relief Road including the section identified as coming forward on land promoted by Gallagher Estates.

8.1.18 The Council is understood to have secured funding through the Housing Infrastructure Fund (HIF) towards the construction of the relief road. However, Appendix B of the Princes Risborough Topic Paper states that this HIF funding is intended to help deliver the *'first phases'* of the relief road. Table 1 in Appendix B does not include the section of the Relief Road to the south of the town. As such, it is not clear how this section will be funded.

8.1.19 We therefore consider that the allocation of our client's land for housing, incorporating this section of the proposed Relief Road, would contribute towards the road's delivery. In doing so, this would help to ensure that development is viable and deliverable.

8.1.20 Notwithstanding matters relating to infrastructure funding, viability and the deliverability of housing and supporting infrastructure, the completion of the Relief Road across this land including the junction with the Wycombe Road will have an urbanising effect on the Green Belt and the AONB.

Green Belt

8.1.21 As discussed through the hearing session for Matter 6: Green Belt, The Arup Green Belt Assessment (GB2) identifies that General Area 17, located to the south of Princes Risborough, makes a "Medium" contribution overall to the Green Belt purposes. The Arup Assessment does not identify any General Areas within Wycombe which make a lower ("Weak") contribution and therefore General Area 17 is amongst the most suitable locations to consider Green Belt releases.

8.1.22 Importantly, Arup's assessment took no account of the future baseline position including the southern section of the Relief Road. Therefore, General Area 17 particularly land off Shootacre Lane is the most suitable option for releasing land from the Green Belt. This position is afforded some support by the Council's decision to allocate land to the rear of Poppy Road.

Chilterns Area of Outstanding Natural Beauty (AONB)

8.1.23 As set out in response to Matter 2, having regard to the extent of the AONB to the south, east and north of Princes Risborough, additional allocations of land for future development are likely to involve "major development" within the AONB.

8.1.24 The Council contends that the allocation of major development within the AONB would be contrary to paragraph 116 of the NPPF. This is plainly not the case; paragraph 116 merely sets out that exceptional circumstances would need to be demonstrated. There are numerous examples of recently adopted Local Plans which have included allocations for major development in the AONB.

8.1.25 Thus, the identification of major development to the south of Princes Risborough, as an allocation, as a reserve site, or as Safeguarded Land, would not be inconsistent with national policy. For all of the reasons given, we seek the modification of Policy CP2 to delete the second part of criterion 1. a) i., alongside the identification of land off Shootacre Lane to the south of Princes Risborough for housing development.

Strategic Buffer

8.1.26 We support the definition of a strategic buffer for Princes Risborough in Policy PR5. We consider that the buffer will serve an important role in maintaining the separation between Princes Risborough and the surrounding settlements. Despite this land not being located within the Green Belt or the Chilterns AONB, paragraph 5.3.55 of the Local Plan notes '*once the town has been expanded, future gaps will become critical to the protection of the countryside and surrounding settlements*'.

8.1.27 On this basis, and having regard to the need for additional sites to be considered, if only in the medium to long term, we seek modifications to Policy PR5 to state that the buffer is intended to long term protection and specify that built development, even in the longer term, would be unacceptable in this area.

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

8.2.1 Please refer to response above.

8.3 *Will Policy PR15 (Molins Sports Ground) provide an effective mechanism for bringing Molins Sports Ground back into beneficial use as a sports pitch?*

8.3.1 No comments.

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

a) PR9 – Princes Estate Expansion;

8.4.1 No comments.

b) PR10 – Land North of Lower Ickneild Way;

8.4.2 No comments.

c) PR11 – Land to the Rear of Poppy Road;

8.4.3 As noted above, we anticipate that the provision of the strategic infrastructure required to support development within the Princes Risborough Area of Comprehensive Development will result in significant costs for developers. We also consider that this will be the case for Policy PR11, specifically as a result of the need for an access road connecting with the proposed Relief Road.

8.4.4 As such, there is merit in the southern section of the Relief Road, between Picts Lane and the Wycombe Road, to be partially funded by the development of our client's land for housing.

d) PR13 – Town Centre Site: Land Fronting New Road (Back Lane);

8.4.5 No comments.

e) PR14 – Town Centre Site: Land South of Horns Lane; and

8.4.6 No comments.

f) PR16 – Land at Princes Risborough Station

8.4.7 No comments.

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