

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?

1a) PR3 Princes Risborough Area of Comprehensive Development including Relief Road

WDC have failed to meet the requirement of NPPF policies paragraphs 115 and 116 which require that great weight be given to conserving landscape and scenic beauty both within the AONB and in its setting. The Princes Risborough Expansion – Landscape Sensitivity and Capacity Study (Sept 17) concludes ‘Views across the town and wider countryside from the AONB are available from popular viewpoints on the Chiltern escarpment such as Whiteleaf Cross and from the Ridgeway National Trail. Development at Park Mill Farm, land north of Longwick Road, Mill Lane, Crowbrook stream, Alscot and the Culverton area adversely impact such views. With regard to Alscot in particular it notes that any development would either adversely impact on the conservation area or its setting or adversely affect the habitat value. In addition the Relief Road route across Culverton field fails to respect its setting within AONB and Green Belt – ‘the Culverton field has very long distance landscape views and is well connected to the wider countryside. The site has a strong, unspoilt rural character and because of its visual exposure in long and short distance views and its contribution to the amenity of the AONB and a National Trail, the site has very low capacity for development’ (Green Belt Assessment Part 2 July 2016). It is also apparent from sessions already held on Matters 1-6 that putting a road across Culverton field will immediately open it up to housing development.

Recommended changes:

Reduce the footprint of the development to keep it south of the Longwick Bog and Alscott/Crowbrook Stream green corridor; increase housing density in the area within walking distance of the town centre, with more 1 and 2 bed apartments for first time buyers and the inclusion of retirement homes to encourage movement of the elderly residents of the existing town out of properties that can accommodate larger families. Utilise areas within the existing town for residences such as above Tesco car park and within the development of the new town centre, above the retail units – following the model of the new development in Exchange St Car Park in Aylesbury for example. Provide a service road through the new development but provide smart options for travel rather than a relief road – for example utilising smart signage to divert traffic along different routes such as Shootacre Lane/Picts Lane at busy times. Retain a traffic route through the town centre to ensure that the ongoing passing trade continues to keep the town alive.

b) PR4 (Main Expansion Area and Development Framework)

Figure 27 of the Plan shows clearly that significant areas of the development are in areas of flood risk and yet figure 26 reflects that 3 of these areas of high risk are earmarked for housing – at Alscott, along Mill Lane and in Culverton field behind Poppy Lane. Attempts to mitigate flood risk in these areas will likely direct water flow into the protected green areas with unknown environmental impact to these important ecological sites.

Recommended changes:

Development should be limited to the south of the Crowbrook Stream Green Corridor, with increased density of housing in this area which is walkable to the town centre. There should be no development in the established ecological area behind Poppy Road, which is green belt and should remain so.

c) PR5 (Settlement Boundary and Strategic Buffer)

The 'strategic buffer' effectively adjoins the new development with the village of Longwick. Although there is a green area along the edge of the development, this is barely larger than Wades Park, which is certainly not considered to be a segregating green space within the existing town – in fact, if it were so, it would be segregating the old and the new town as the underpass to the new development runs from Wades Park! The fact that the green buffer is identified as playing field means it should be considered *a part* of the new development, not a green buffer area. Therefore, if the settlement were to include that leisure space, the boundary does not keep it separate from Longwick at all.

Recommended changes:

Restrict development to the south of the Longwick Bog and Alscott/Crowbrook Stream green corridor.

d) PR6 (Main Expansion Area Development Principles)

The Local Plan aims to create a unified settlement by integrating the expanded town with the existing one but the area to the north of the Crowbrook Stream Green corridor fails on this objective. By WDCs own admission, this section is accessible only by car. There is no public transport provision to the new development - there will be no public bus service provision only the possibility of a voluntary community bus and it is not possible to access the railway station from this area either.

Recommended changes:

Limit the expansion zone to the area to the south of the green corridor; high density housing that is within easy reach of the town centre, railway station and the Arriva bus network can attract buyers without cars. Utilise areas within the town for starter homes – above car parks/retail units.

e) PR7 (Development Requirements)

The Plan fails to meet one of the fundamental objectives of putting the right homes in the right places. The housing allocation for Princes Risborough has been driven entirely by the need for WDC to place their allocation somewhere, and is not at all driven by the housing needs for the town. WDC have stated openly at consultation meetings that this is the case – there is nowhere else to put

the houses in the District. Other Councils with constraints of AONB have negotiated with Government to reduce their housing allocation to preserve such important landscape settings. The population of Princes Risborough are in favour of development, but at a scale that will complement the existing town, not overwhelm it. Reference the RARA petition which obtained signatures from over 50% of the voting population of Risborough which objects to expansion of the town by over 80%. Such a sizeable expansion will create a dormitory town which is segregated from the existing settlement. The area of development to the south of the Crowbrook Stream Green Corridor is accessible to the town centre, meets the immediate housing needs of affordable, high density housing – this is welcome. The area to the north of the corridor is, by WDCs own admission, segregated – people would have to get into their cars and will instead choose to go to the larger centres at Thame, Aylesbury or High Wycombe, thus not contributing to the revitalisation of the town centre. These houses have no access to the station and will generate significantly more traffic on local roads (contravention of NPPF para 34 and 37).

Recommended changes:

The town needs high density, affordable homes for young people, and attractive retirement communities within easy reach of the town centre to stimulate movement of the existing elderly population out of larger houses, freeing up those houses for families. Redevelopment of the town centre can generate combined retail and residential space (modelling on the new development at Exchange St car park in Aylesbury for example) and utilise more of the existing space such as above Tesco car park. The Mount car park, proposed to be developed as 2 storey parking could instead be placed underground with attractive residential units above. As stated by Rt Hon Sajid Javid ‘we have to build more genuinely affordable homes, make the most of wasted brownfield sites and force developers to build the right mix of housing across the country’.

g) PR17 (Princes Risborough Delivery of Infrastructure) Recommended changes:

Key pieces of infrastructure – the railway bridges and the underpass – will require the cooperation of Chiltern Railways. As such the costs are not contained and the timeline for delivery not within the control of WDC. These pieces of infrastructure could therefore make some elements of the plan undeliverable, with costs spirally beyond what developers are willing to pay. Without the underpass, the new and the old parts of the town would be entirely segregated.

Recommended changes:

Ensure detailed and accurate costings and timetable are negotiated and agreed and included within the Plan.

Policy PR8 (Provision and Safeguarding of Transport Infrastructure)

The keystone to this is the building of a new road across Culverton field which then routes traffic through the new development area and away from the town centre. The Relief Road with its route directly through AONB and Green Belt is within the Bird Conservation Targeting Project for declining and rare farmland birds (Relief Road Southern Options Ecological Appraisal Aug 2017). Culverton field is in an AONB and as such, NPPF paragraphs 115 and 116 require any major development to be refused except in exceptional circumstances. There can be no argument against such a road (wide carriageways carrying HGVs at 50mph with associated noise, lighting and pollution) constituting major development. Sessions already held to discuss Matters 1-6 have highlighted that as soon as a road has been put across AONB land, developers see it as open to development – rules of AONB are already breached. In addition the routing of the road across AONB land justifies WDC putting houses

on green belt land behind Poppy Road, with access to that land from the relief road cutting across Pyrtle Brook, a rare chalk stream. There are no exceptional circumstances requiring the road to be routed across AONB. An alternative route which was shortlisted in the extensive Jacobs report (2016) identified the use of existing Shootacre Lane and Picts Lane as a viable route for traffic to reach the new development area. In addition WDC intend to route all through traffic between Aylesbury and High Wycombe along this new route to avoid congestion in the town centre. The Jacobs report itself identified that any congestion in the town centre is shortlived and it does not in any way compare to the levels of congestion seen at either end of the A4010 at West Wycombe and Stoke Mandeville, and it could therefore be argued that there is no problem to be solved! The traffic modelling for the new route (Preliminary Phasing Strategy Modelling May 2017) reports that congestion along Poppy Road will increase as a result and there is no consideration for the possible creation of a congested and dangerous situation at the railway station with HGV and commuter traffic conflicting with rail commuters trying to access the station at peak times. In fact the requirement for a pedestrian crossing at that junction which will give priority to pedestrians and which will be heavily used during the traffic peak will lead to an increase in congestion – traffic through town currently does not conflict with foot traffic to the station. This was not taken into consideration with the traffic modelling.

Recommended changes:

WDC should be looking at making better use of existing transport infrastructure. Imaginative smart solutions are being utilised by others including Highways England such as Routemaster cameras in the town linked to Sat Nav systems. One solution could be to utilise dynamic signage to route traffic south-north via Shootacre Lane/Picts Lane during times of congestion, with north-south traffic continuing through town thus halving the traffic volume on each route. Furthermore, a 20mph speed limit through the town during rush hour would assist with traffic flow as has been proven on motorways – reductions in speed when traffic is heavy keeps traffic moving. Traffic at weekends should be routed through the town centre to allow leisure users to enjoy Picts Lane to access the wider countryside (and to ensure that the town centre continues to thrive). In addition a strategic solution is needed for traffic levels on the A4010 as a whole through collaboration with Buckinghamshire County Council – it makes no sense to address a small congestion issue in the town when the bigger issues are at the Aylesbury and High Wycombe ends. HGV vehicles from the M40 to Aylesbury could be directed further along to junction 7 and along the A418 for example – and once the new Oxford Cambridge link road is in place this is facilitated further. It makes no sense to spend such an amount on a new road across AONB land when traffic patterns following the Oxford Cambridge link could impact significantly on traffic flow in the wider area.

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

4c) PR11 Land to the Rear of Poppy Road

WDC are destroying a significant wildlife rich open and green space - the land behind Poppy Road earmarked for 58 houses is the site of Pyrtle Brook, a rare chalk stream with established green shrub and woodland. It should be noted that this location was added to the expansion area only in the latest iteration of the local plan and the proper consultation process was not followed. The site should be preserved as a valued ecological site, not destroyed and replaced with an artificially created 'green corridor' in the new development. Figure 27 of the Plan shows clearly that significant areas of the development are in areas of flood risk including Culverton field behind Poppy Lane.

Attempts to mitigate flood risk in this area will likely direct water flow into areas of ecological importance with no way of knowing how this will impact on wildlife

Recommended changes:

The land to the rear of Poppy Road should be removed from the plan.

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

This is an area that should be developed imaginatively and intelligently, with retail units below and accommodation above. A 20mph speed limit on the road through town would preserve the area as a safe one for pedestrians.

4 f) PR16 – Land at Princes Risborough Station

Routing of the relief road through the station hub will result in a congested and dangerous situation at the railway station with HGV and commuter traffic conflicting with rail commuters trying to access the station at peak times. In addition, we need to create the Station as an attractive and welcoming area for visitors – this Plan does nothing to maximise the potential for Princes Risborough as ‘gateway to the Chilterns’ with the opportunities for increasing tourism. If the first thing people see and hear when getting off the train is a busy road, it will not encourage visitors to the town.

Recommended changes:

Delete the proposed relief road running through this site and create a more welcoming environment and more affordable homes.