



## **WYCOMBE LOCAL PLAN EXAMINATION IN PUBLIC**

## **HEARING STATEMENT**

## **MATTER 8 – DEVELOPMENT FRAMEWORKS PRINCES RISBOROUGH**

### **ON BEHALF OF ENDURANCE ESTATES STRATEGIC LAND**

### **TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004**

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## 1. INTRODUCTION

1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Endurance Estates Strategic Land, which has development interests at land at Culverton Hill, Princes Risborough.

2. **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)**

2.1 The strategy for Princes Risborough as set out in policy PR3 is **not effective** as it seeks to rely upon a single site to deliver a substantial proportion – 86% - of the planned growth in Princes Risborough. With few other sites allocated in the town, the Plan is therefore inherently inflexible. Any delay to the Princes Risborough Expansion Area (PREA) risks housing not coming forward at Princes Risborough and the alternative sites are not capable of making up the shortfall.

2.2 As with any development proposal of a significant scale, the PREA requires a significant amount of up-front infrastructure. In this case, this includes the Relief Road proposal as well as community facilities and social infrastructure (both on and off site). The PREA was subject to a successful Housing Infrastructure Fund bid in 2018 which will contribute towards the cost of altering the railway bridge at Summerleys Road to the south of the area, to unlock the first parcels of development. The bid documents (**INF1**) indicate that only 96 dwellings can be accommodated without the additional infrastructure. Whilst the HIF bid provides some (but not all) up-front funding, capable of providing the southern part of the Link Road and reconstruction of the Summerleys Road bridge, the question remains whether that infrastructure can be delivered on time. That is a matter which the Council has much less control over.

2.3 The first phases of the Relief Road are necessary in order to unlock the first stages of the Expansion Area. However, the route is not straightforward to deliver; it requires the reconstruction of two substandard railway bridges, provision of a pedestrian underpass, and provision of a pedestrian overbridge, as detailed in the Feasibility Study (**TR20**) and Replacement Bridges Report (**TR20.2**). As paragraph 4.2 of TR20.2 notes, the northern bridge at Grove Lane requires a more complex structure than Network Rail's standard design. This

programme therefore not only comes at a substantial cost but is also reliant upon an external body, Network Rail, being able to facilitate the works at the appropriate time.

- 2.4 We note that the Memorandum of Understanding (**MOU9**) does not set out any firm commitments in terms of the timescales, funding and delivery and delivery of the required infrastructure. Paragraph 6.5 sets out an ‘aspiration’ that the infrastructure should be delivered in full during a blockade in 2020 (associated with HS2 works) however paragraph 6.6 notes that full developer contributions may not be available at that time. That is highly likely to be the case here, as the Trajectory shows development will not commence until 2024-25 and therefore the only funding available will be that secured through the HIF to cover the Summerleys Road works only.
- 2.5 Furthermore, policy PR17 indicates that the railway bridge works will be delivered in the period 2023-28, so there is an obvious disconnect between the timescales in the MoU and those within the Plan itself. Given that it is now the second half of 2018, and there is a need to prepare a detailed engineering scheme for the complex bridge reconstruction proposals, it does seem unlikely that this could be achievable by 2020 in any event. It is also noted that the Replacement Bridges report (**TR20.2; page 3**) suggests there may be a need to accommodate works associated with East West Rail’s western section.
- 2.6 We would therefore be very surprised if any of the bridge works could be undertaken at the time envisaged in the MoU and future blockades of the line will be required. As the Feasibility Study notes (**TR20, page 12**), Network Rail typically needs two years’ notice before this can take place as such works are hugely disruptive to passenger services.
- 2.7 In addition to the railway bridge reconstruction, the Relief Road requires a new alignment to the south of Princes Risborough. This section is subject to significant objection from the AONB Board, which considers the provision of a new road alignment to represent ‘major’ development in the AONB. Given that planning permission will be required to deliver the southern alignment, the sensitivity of the location and the AONB Board’s objection, it is likely that a significant amount of design and evidence base work will be needed in order to support a proposal. This introduces the risk that the Relief Road’s southern portion may be delayed.

### **1c: PR5 (Settlement Boundary and Strategic Buffer)**

- 2.8 Policy PR5 in its present form is **not positively prepared** and not effective as the tightly drawn settlement boundary means there are few opportunities to develop additional sites in Princes Risborough, save for windfall or infill schemes. As there is a need to ensure the Plan is more flexible, policy PR5 should be reviewed and the settlement boundary amended to release additional sites for development.

### **1d: PR7 (Development Requirements)**

- 2.9 PR7 is considered **not effective** and **not positively prepared** in respect of its requirements for secondary education expansion. The PREA will give rise to an additional two forms of entry, as set out at paragraph 5.3.97. However, this is subject to planning and there is currently no scheme in place for the expansion of the secondary school. The school is in a sensitive location adjoining the AONB and this could present a challenge if the school is required to expand beyond its existing constrained site. This may result in delays to securing planning consent and could affect the ability of the school to accommodate the pupil yield arising from the PREA.
- 2.10 In order to ensure the soundness of the Plan in providing positively for the expansion of the school, land should be allocated close to the school to facilitate its expansion.
- 2.11 Land at Culverton Hill could provide land to facilitate the expansion of the secondary school, subject to a sensitive scheme design to reflect its location in the AONB, and having regard to CIL Regulations in respect of developer contributions towards infrastructure. This would be a more sensitive location than land to the south of the Upper Icknield Way which could represent a greater incursion into areas of more open AONB than land at Culverton Hill, which is surrounded on three sides by development. Endurance Estates Strategic Land is exploring how the site could best facilitate the school's expansion as part of a residential led scheme, and would welcome continued engagement with the School, AONB Board and the Council on this matter.

### **1g: PR17 (Princes Risborough Delivery of Infrastructure)**

- 2.12 The policy is **not effective** as it introduces something of a disconnect between the agreed MoU and the Local Plan. As set out in our response to Q1a, the

indicative timescales set out at Table 17 in the supporting text shows that the reconstruction of the railway bridges will take place between 2023-2028 with the possibility of early phases being undertaken before then. However, the MoU envisages delivery in 2020 at a time when the railway will be closed for HS2 works. Although the later period seems to be more realistic having regard to the availability of funding, it is not clear whether that 'slots in' with Network Rail's plans. With a two-year lead in before the line can be blockaded, it is difficult to have any certainty over timescales for delivery of these works and in turn, development of the PREA.

**3. 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?**

3.1 For the reasons set out in our response to Q1a and Q17, the Relief Road faces several obstacles to its timely delivery and therefore the policy is **not effective**.

**4. 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**

4.1 Endurance Estates Strategic Land notes with interest the principle of this allocation. The Poppy Road allocation is small in scale, does not require significant new social infrastructure such as new schools or doctors provision (with existing facilities being capable of upgrade), and can be delivered quickly (with a single housebuilder, a scheme of this scale could be completed within around 12-18 months).

4.2 It is considered that this is exactly the kind of site which is needed to provide much needed flexibility in the Plan's strategy for Princes Risborough. It can make not only a helpful early contribution towards the housing land supply in the District but will also deliver sustainable development in a well-served location.

4.3 The Poppy Road allocation also clearly shows that the Council is willing to contemplate development within the AONB where it is appropriate to do so. Having regard to the site-specific opportunities, and the scale of development, the Council concludes that development would not be 'major' development in the

AONB. The AONB Board concurs with this view and has not lodged any objection to the allocation.

- 4.4 Given that there are concerns about the effectiveness of the Plan and its reliance upon the Expansion Area, it is essential that the Local Plan allocates more sites of this size and scale in Princes Risborough. This will provide the necessary flexibility in the Plan.
- 4.5 The Council should therefore take the opportunity to assess other development proposals elsewhere in Princes Risborough, including those sites to the south of the town in the AONB that have established containment.
- 4.6 As set out in greater detail in our Regulation 19 representations, land at Culverton Hill offers the opportunity to deliver not only additional housing as part of a residential-led scheme, but to deliver extensive public benefits which are not provided by the Poppy Road site in isolation. These include significant landscape and ecological enhancements and improved public access to a key 'gateway' point on the Upper Icknield Way. A sensitive, landscape-led approach has been taken to understand the capacity of the site and establish a 'visual envelope' for development. This leaves a significant part of the site undeveloped and suitable for a range of uses. This could include a countryside park with enhanced landscaping and habitat creation (compared with the site's existing arable use) or possible land to facilitate the expansion of the adjacent school. Endurance Estates Strategic Land has engaged with the AONB Board to develop proposals for the site and is committed to working with the Board and the Council to achieve an optimised scheme design.