

Matter 4c) – Is the allocation of Land to the Rear of Poppy Way, Princes Risborough soundly-based, and is there evidence that the development of the site is viable and deliverable?

We believe that the allocation of Land to the Rear of Poppy Way, Princes Risborough, through Policy PR11, is soundly-based, viable and deliverable.

Soundness

To be considered 'sound' a plan must be positively prepared, justified, effective, and consistent with national policy, as laid out in paragraph 182 of the NPPF (2012). We believe that the allocation of this site meets all four criteria, for the following reasons.

Positively Prepared

We believe that this allocation is positively prepared, as it contributes 58 dwellings towards meeting the objectively assessed need of Wycombe District in a sustainable manner. Wycombe District Council has accepted that it is unable to meet its objectively assessed need and has signed a memorandum of understanding with Aylesbury Vale Council, whereby Aylesbury Vale will accommodate 2,275 extra homes in its Local Plan. Given that Wycombe District Council is unable to meet its objectively assessed need, it is essential that it maximises housing delivery from appropriate, sustainably located sites, such as Land to the rear of Poppy Way, Princes Risborough.

Justified

We believe that the allocation of the site is justified, as it is the most appropriate allocation, which has been made based on proportionate evidence, and taking into account reasonable alternatives.

A number of responses to the pre-submission consultation raised concerns regarding the site's proposed removal from the Green Belt. However, this removal is justified by the

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Green Belt Part Two Assessment, which forms part of the evidence base for this examination. This assessment found that the site performs relatively weakly against NPPF purposes, and that its removal from the Green Belt would be acceptable with regards to the general extent of the Green Belt. It also states that the revised boundary would be permanent and robust. It was concluded that the site could accommodate some sensitive development on around 60-70% of the land area given its poor contribution to the Green Belt, and its position adjacent to the existing settlement, which encloses the site in places.

A number of responses to the pre-submission consultation raised concerns regarding the site's impact on the AONB, which comprises a portion of this site. However, the proposed allocation will not have a negative impact on the AONB, as demonstrated by the AONB Site Assessment Report (September 2017), which forms part of the evidence base for this examination. This found that the site has a 'Low' Landscape Character Sensitivity, a 'Low/Medium' Overall Landscape Sensitivity, and a 'MEDIUM' Landscape Capacity. Overall, the site was assessed to have a MEDIUM capacity for development, which means it is able to accommodate sensitive development having regard to the setting and form of the existing settlement. It also found that the development will not constitute major development within the AONB. This demonstrates that development on the site would not have a significant impact on the AONB, and will be acceptable in landscape terms.

A number of responses to the pre-submission consultation raised concerns regarding the biodiversity at the site. However, this has been addressed through the allocation. Paragraph 5.3.164 of the plan states that currently, surface water runoff from Poppy Road runs into Pyrtle Spring, depositing silt and degrading the water quality. This paragraph also requires development on the site to maximise opportunities to preserve and enhance this habitat. Point 1 of Policy PR11 states that a buffer will be created between any development and the Pyrtle Spring, preserving existing vegetation. Point 2 requires that the water quality of the Pyrtle Spring is preserved and enhanced through the provision of alternative means of disposal of surface water runoff from nearby roads. Paragraph 5.3.167 also states that a full ecological assessment should be carried out to inform the nature of the development at the site. It is considered that these requirements sufficiently protect the biodiversity and ecological value of the site.

A number of responses to the pre-submission consultation raised concerns regarding the flood risk at the site. However, the allocation is justified by the Flood Risk Sequential Test Report (September 2017). This determined that most of the site is within Flood Zone 1, with only small areas in Flood Zones 2, 3a and 3b. It was considered that the

extent of Flood Zones 2 and 3 are not expected to increase significantly due to climate change. The sequential test found that there are not enough sites within Flood Zone 1 or 2 to fully meet the Objectively Assessed Need, and so sites at higher levels of flood risk are required. It concluded that subject to site design and layout, appropriate SuDS, access location and road design, residential uses can be safely developed on the site.

A number of responses to the pre-submission consultation raised concerns regarding the level of traffic that may be generated by this development. Whilst a development of 58 new houses will generate additional vehicular movements, these would not cause significant increases in the levels of traffic on nearby roads. Development of this site would also contribute to the construction of the proposed Princes Risborough relief road, which will considerably reduce traffic levels around Princes Risborough, particularly on the heavily congested A4010. Further information can be found in the Transport Statement, which was submitted with our representations to the pre-submission local plan.

A number of responses to the pre-submission consultation, raised concerns regarding the level of consultation that was undertaken regarding the plan overall, and this allocation, more specifically. However, the council has consulted on both the plan and this allocation, in line with its statutory duties, as outlined in the Statement of Consultation, which is found in the examination library.

Effective

We believe that the allocation of the site is effective, as the homes will be delivered within the plan period. The site is under one ownership, and the owners are eager to see the site developed as soon as practicable. The landowners therefore believe that housing development is deliverable on the site, and they will work to ensure that the housing is delivered within the plan period, if the site is allocated in the adopted plan. Deliverability is discussed further below.

Representations submitted by Thames Water to the pre-submission consultation suggest that the water network capacity may need to be upgraded/reinforced to support the allocated development. This does not affect the deliverability of the site, as these issues can be resolved through the payment of agreed developer contributions.

Representations submitted by Buckinghamshire County Council to the pre-submission consultation suggest that the Highway Authority would not want to see a secondary access from Wycombe Road if the primary access is from the Princes Risborough relief road. This does not affect the deliverability of the site, as it still provides for appropriate

access to the site. The Transport Statement submitted with our representations to the pre-submission consultation includes further detail on this.

Consistent with National Planning Policy

We believe that the allocation of this site is consistent with national planning policy because paragraph 14 of the NPPF (2012) outlines the presumption in favour of sustainable development, which runs throughout the whole document. A number of the representations made to the pre-submission consultation stated that the site has poor accessibility is not sustainable. However, we believe that this site allocation is sustainable for two main reasons. The site has excellent access to facilities, with the centre of the town of Princes Risborough approximately 1.2km from the site. The centre of Prince Risborough contains banks, supermarkets, restaurants, pubs and many other facilities, which residents of the site will have easy access to.

Secondly, the site has good public transport links, with Princes Risborough station approximately an 0.7km walk from the site. Bus services 321, 621, 647, Max 300 and X30 all run from a stop on Wycombe Road, approximately 400m walking distance from the centre of the site. More information on the sustainability of the site can be found in the Transport Statement, which was submitted with our pre-submission consultation representations.

Viability

The site is undeveloped greenfield land, which is less costly to develop than brownfield land. The council's May 2017 Viability Assessment found that Princes Risborough is a viable location for new housing development. Whilst this was a broad study, and did not review this site specifically, it still provides a good indication that the site will be viable.

Deliverability

Footnote 11 of the NPPF (2012) states that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

It is considered that this allocated site is deliverable. As previously stated, the site is under one ownership, and the owners are eager to see the site developed as soon as practicable. The landowners therefore believe that housing development is deliverable on the site, and would work diligently to ensure that the housing is delivered within the plan

period, if the site is allocated in the adopted plan. This demonstrates that the site is available now.

The site has been determined to offer a suitable location for development now through the local plan process. Princes Risborough is a Tier 2 settlement and is therefore able to accommodate a considerable quantum of new development. The main constraints on the site are its location within the Green Belt and partly within the AONB, biodiversity, flooding, transport and highways. However, these issues have all been dealt with appropriately, as demonstrated above. As previously stated, the site is located sustainably, and is therefore in compliance with paragraph 14 of the NPPF (2012). This demonstrates that the site offers a suitable location for development now.

Whilst the 2017 HELAA states that the site is deliverable within five years. A November 2016 study by Nathaniel Litchfield and Partners entitled Start to Finish, found that on sites of between 0-99 dwellings, the time from validation of the first planning application to delivery of housing on site was less than three years. There are no site specific factors that would affect delivery rates, and the site comprises greenfield land, which is generally built out more quickly than brownfield land. This information suggests that all of the houses will be delivered on the site within 5 years.

It has been demonstrated that the allocation is viable. The criterion set out in Footnote 11 of the NPPF have therefore been met.

Conclusion

As demonstrated above, the allocation is sound, viable and deliverable. The allocation should therefore remain in the Local Plan in its current form.