

WDC/4

**Wycombe District Council's
Delivery and Site Allocations Plan
Examination Statement**



MATTER 4 – PRINCES RISBOROUGH

November 2012

Matter 4 – Princes Risborough

1. Are policies PR1 and PR2 sufficiently flexible to make the most effective use of Princes Risborough as a shopping centre?

- 1.1 Princes Risborough is a small but vibrant and historic market town, whose town centre is a popular focus for local day-to-day shopping. Whilst it does not contain large-scale comparison shopping, it is well equipped with local shops and services, such as cafes, banks and newsagents as well as a popular weekly market.
- 1.2 The Council considers that any assessment of the town's effectiveness as a shopping centre should be approached with its strategic context in mind. Specifically, whilst the town serves its own rural catchment area with local day-to-day shopping facilities, it is situated approximately equidistant from the two higher order retail centres of High Wycombe to the south and Aylesbury to the north. Accordingly, Princes Risborough falls into Tier 2 of the Town Centre Hierarchy, as set out in Policy CS10 of the Adopted Core Strategy¹. Its role is therefore defined as being an important service centre serving its rural catchment area, and one in which retail development should not seek to serve residents in other towns, or rural areas outside their primary catchment areas.
- 1.3 The Council notes the representation² expressing concern over the nature of this role. However, it is a role which is rooted in a higher-tier planning document – the Adopted Core Strategy – and is therefore not subject for review in the Delivery and Site Allocations (DSA) Plan. However, the Council can provide reassurance that it is not the aim of this policy to undermine the niche retail outlets currently existing in the town which, whilst in some cases serve markets further afield, are not considered to be of an inappropriate scale or order such as to cause unsustainable shopping patterns. Moreover, the Council fully recognises that some of these outlets are long-standing businesses of great value to the town.

¹ CD5.2.1, Policy CS10: Town Centre Hierarchy

² DSA012/007

- 1.4 The role set out in the Core Strategy is more a reflection of the fact that Princes Risborough is not an appropriate location for large-scale comparison retail, given its function and position in the town centre hierarchy. Indeed, the Council's latest retail studies project limited scope for additional convenience and comparison retail floorspace in the town³.
- 1.5 Turning to the frontage policies, Policy PR1 introduces flexibility for movement between A1 (shops) and A3 (restaurants and cafes) use classes in the town's primary shopping frontage, provided that the result is that no less than 50% of the overall frontage length continues to be in A1 use. This compares with the existing Local Plan policy for primary shopping frontages, which only permits changes from A1 to other A uses in exceptional circumstances⁴.
- 1.6 This more flexible approach has been adopted following extensive consultation and discussion with local stakeholders, including Princes Risborough Town Council. Whilst the latest town centre background paper shows that vacancy rates in the town are currently reasonably low⁵, an extra degree of flexibility is considered appropriate to protect the town from an increase in empty shops in the current uncertain economic climate for retailing, as well as to reflect the wider role for town centres generally. It is also considered that a specifically more permissive approach to A3 uses in primary frontages is appropriate in the town to enable it to widen its offer, particularly in terms of the evening economy, and to expand the offer for tourists and visitors to the town. This approach of allowing more A3 units has been supported by local stakeholders⁶. It is considered that it remains appropriate to maintain stricter control over other A uses which are more likely to have adverse impacts on the frontage as a whole.

³ CD3.3.3 (Appendix B, Table 12B and Appendix C, Table 9C) and CD3.3.6 (Appendix 1, Table 11 and Appendix 2, Table 9). See also inspector's comments in Park Mill Farm decision letter, March 2012 (CD3.11.6, para 132)

⁴ CD5.2.3, Policy S3, p55.

⁵ Town Centre Retail and Frontage Policies Background Paper: Update 2012 (CD2.1), Appendix D

⁶ See CD3.11.5, p6

- 1.7 The Council notes the representation calling for an even greater degree of flexibility. However, it considers that were a policy approach adopted where more than half the frontages in the primary shopping frontage could revert to non-shop use, this could risk undermining the character and role of the town's core shopping area. The Council therefore considers that the approach outlined in the policy strikes the right balance, and is sufficiently flexible for Princes Risborough to continue to perform its role as a shopping centre effectively and successfully. To illustrate the practical implications of the extra flexibility, the 50% minimum proportion of A1 uses stipulated in the policy means that an extra 49m of frontage could change to A3 use. This could equate to between approximately 5 and 12 of the 52 shop units within the frontage being allowed to change.
- 1.8 Were the economic situation in the town to worsen significantly such that the frontage policy was proving to be too inflexible, then the Council could carry out a reappraisal of the policy at a future juncture. However, such a situation is difficult to foresee at the present time. For example, the inspector's decision letter in the recent Park Mill Farm appeal remarked that the High Street "*appears vibrant and well-used*"⁷.
- 1.9 Policy PR2, meanwhile, allows flexibility for movement between A uses in the secondary shopping frontage in Princes Risborough. Again, this is an increased level of flexibility over the current Local Plan policy, which allows changes to non-shops but only where the unit does not adjoin an existing non-shop⁸.
- 1.10 It should be noted, however, that this Local Plan policy also allows for changes to C and D uses in the secondary shopping frontages. The Council now considers that this is not appropriate to retain as it could pave the way for uses at ground floor level which would not have an active frontage. It considers that this could risk undermining the vitality, viability and customer

⁷ CD3.11.6, para 132

⁸ CD5.2.3, Policy S4, p56

attractiveness of the town centre by introducing 'dead' frontages. The policy therefore provides for movement within A use classes only.

2. Is the Council's objective of seeking a comprehensive approach to land between New Road and the High Street (policy PR3) appropriate and deliverable?

- 2.1 Policy PR3 (Land Fronting New Road) sets out a policy approach for small-scale mixed use development to regenerate this centrally-located site, which is located on the A4010 New Road, the town's main traffic thoroughfare. Although it bypasses the town's historic core, this road still constitutes a principal route through Princes Risborough and hence the site is a key 'shop window' for the town. It currently contains a mixture of a car and coach garage, businesses and residential premises together with rear entrances, yards and backlands of properties on the main shopping streets of High Street and Duke Street.
- 2.2 A Local Plan policy for Land Fronting New Road (Policy PR2 of the Adopted Local Plan) was not saved in 2007 following concerns over the deliverability of a scheme, largely due to the fact that the site is in multiple ownership. However, it was reintroduced in the DSA Plan following strong support for its reinstatement from local stakeholders, including Princes Risborough Town Council and other local groups⁹, in particular due to concerns over the ongoing degeneration of the area.
- 2.3 The site currently suffers from a number of shortcomings, including the facts that its unattractive appearance fails to provide a high-quality gateway to the town and that its frontage is punctuated by a number of vehicle access points which serve to disrupt the pedestrian permeability into the site from New Road and onwards through to Duke Street/High Street. The area here constitutes an ideal opportunity to improve legibility and linkages between New Road and

⁹ See summary of additional responses to the 2009 consultation - CD4.5.4, Appendix 5, p147

the heart of the town centre¹⁰, but at the moment the site signally fails to fully optimise this opportunity.

- 2.4 The adoption of a comprehensive policy-led approach to regenerating the site could provide the catalyst for the redevelopment of the site to provide small-scale facilities including main town centre uses and residential development. It could also help to address the locational issues with the site as set out above by providing improved links and connections through the site. However, the Council does not consider that large-scale development is appropriate here given the size of the site, its location within the conservation area and the small-scale nature of the surrounding urban grain.
- 2.5 Whilst some stakeholders have called for a design or development brief for the site, the Council considers that the policy gives sufficient direction to developers over the type and scale of development envisaged, including development requirements and an illustrative diagram indicating possible concepts for the site¹¹. Similarly, there are a number of policies in place to provide guidance on design approaches which are likely to be acceptable, including Core Strategy Policy CS19¹² and policies G3 and G8 in the Adopted Local Plan¹³. These policies are supplemented by the Princes Risborough Conservation Area Character Survey¹⁴, which provides a more locally-focused analysis of the historic built context and a design framework for future developments across the town centre.
- 2.6 As a site in multiple ownership, the Council recognises that it is not one which is straightforward to deliver and it is likely to come forward on a more incremental basis. However, it maintains that it is appropriate to adopt a comprehensive framework within the policy to take advantage of the long-term opportunity offered by this site in terms of an improved range of facilities for the town and environmental enhancements to the townscape at this location.

¹⁰ See also CD3.11.2, p54

¹¹ CD0.1 (Figure 7, p51)

¹² CD5.2.1

¹³ CD5.2.4

¹⁴ Princes Risborough Conservation Area Character Survey (1998): available on the WDC website.

- 2.7 The Council notes concerns highlighted in Harbour Castle Ltd's representation regarding the deliverability of the site, and particularly the uncertainty of providing housing at this location¹⁵. However, it will be for the Council's new Local Plan, work on which is just getting underway, to set the District's housing target and allocations. As such, it is not the purpose of Policy PR3 to provide for a particular quantum of residential development *per se*, and no specific reference to a quantum is included in the policy or supporting text. Rather, its objective is to capitalise on the long-term opportunity offered by the site to deliver new facilities and environmental improvements to support the town centre, via a policy-led approach. This is consistent with Policy CS6 of the Core Strategy, and in particular part 5 which seeks to encourage limited new retail development in or on the edge of the town centre. The potential for environmental enhancements on the site is clear, and the Council notes that the Harbour Castle Ltd's representation acknowledges that the redevelopment of the site would "*improve the look and feel of the area*" and that the proposals for the town centre are "*positive*".
- 2.8 The Council would like to be clear in relation to Harbour Castle Ltd's representation that the issue of the residential development of the Park Mill Farm site (a peripheral greenfield site on the western side of the town) is outside of the scope of the DSA and is a matter for the new Local Plan. The timetable for the preparation of the new Local Plan is set out in the latest Local Development Scheme¹⁶, and is not, and never has been¹⁷, a two year programme. Similarly the Hypnos and Whiteleaf sites at Picts Lane referred to in the statement are not within Princes Risborough town centre and again are not within the scope of the DSA Plan. Harbour Castle Ltd's comments regarding "*town-wide benefits that are desperately needed to remedy the decline*" in the town raise much wider issues than those of the town centre that are a matter for the Local Plan review. They are issues that were also reviewed at some length at the Park Mill Farm inquiry, and the Inspector's and

¹⁵ Representation DSA12/049: Barton Willmore on behalf of Harbour Castle Ltd

¹⁶ CD7.4

¹⁷ See previous Local Development Scheme (CD5.2.5)

Secretary of State's conclusions are set out in the appeal decision letter and accompanying inspector's report¹⁸.

3. Can the land identified in policy PR4 be satisfactorily integrated into the main retail area?

- 3.1 Site PR4 is currently occupied by a parade of shops, a car park, a small public conveniences block and the town's Fire Station. The site allocation in the policy effectively advocates using the site for more intensive mixed-use development, including retail, to support the town centre. The site is a prominent gateway into Princes Risborough, and most of it falls within the town's conservation area. Therefore it will be particularly important to secure a high-quality design in any redevelopment scheme here.
- 3.2 Similarly to site PR3 above, the allocation in Policy PR4 has been identified in the District's various retail studies over recent years as a site with the potential to help deliver new retail floorspace¹⁹. As such, its identification and allocation is an example of positive planning in identifying sites to help meet the identified needs of the area, an approach espoused in the National Planning Policy Framework (NPPF)²⁰.
- 3.3 The site also offers the scope for accommodating an increased range and diversity of facilities, as recommended in the various town centre reports commissioned by Princes Risborough Town Council in 2010²¹.
- 3.4 In terms of how development here could be integrated into the main retail area, it should be noted that, with the exception of the Fire Station, the site falls within the town's primary shopping area (PSA). Indeed, it incorporates one of the town's main anchor food stores (M&S Simply Food), which forms part of the primary shopping frontage. The proximity of site PR4 to the town's

¹⁸ CD3.11.6

¹⁹ See site proforma in CD3.3.1 (Appendix I, Site PR5)

²⁰ CD5.0.1, para 14

²¹ CD3.11.5, p5-9; CD3.11.4, paras 8.3-8.4

main retail thoroughfares (the site is a short, level walk away from High Street and Duke Street) means that it can be satisfactorily integrated into this core shopping area. Moreover, the policy PR4 stipulates that development on the site should front Horns Lane, where there is already a pedestrian crossing linking to the High Street. The improved pedestrian linkages outlined in the policy would have the added benefit of more firmly integrating the site and the town centre with the residential areas north of New Road, potentially increasing footfall into the town centre from this part of Princes Risborough.

- 3.5 The Council considers it to be a long-term development opportunity in what is a compact town centre. Whilst the Council itself owns part of the site (Horns Lane Car Park), it fully recognises that any development on the Fire Station section of the site would be contingent upon finding a replacement site for this facility. The Council will work closely alongside Buckinghamshire Fire and Rescue Service to search for any such sites, prior to any redevelopment progressing.