

Princes Risborough Steering Group scrutiny session

7.00 p.m. Thursday 8 September 2016 at the Princes Centre

Present:	<p>Andy Ball Bill Bendyshe-Brown Rosie Brake Linda Cannon Clegg Ian Churchill Richard Clayton Gary Hall Jeremy Holmes David Johncock</p> <p>Ian Manktelow Ian Parkinson Andy Quigley Jim Stevens Penelope Tollitt Alan Turner</p> <p>Charles Vint Matthew Walsh (Chair)</p>	<p>PRTC Buckinghamshire County Council Principal Planning Policy Officer, WDC Risborough Area Residents Association PRTC Risborough Area Community Partnership PRTC and WDC Askett Society (for Stewart Baxter) WDC Cabinet Member for Planning and Sustainability Spatial Planning Manager, WDC Risborough Area Residents Association Risborough Rangers (for Dan Brown) A4010 / HS2 contact Head of Planning and Sustainability, WDC WDC Deputy Cabinet Member for Planning and Sustainability and PRTC Monks Risborough Society PRTC and Risborough Business Group</p>
Apologies:	<p>Stewart Baxter Dan Brown John Coombs David Knights Ian Moore Rolf Van Apeldoorn Rachel Wileman</p>	<p>Askett Society Risborough Rugby Club PRTC WDC Princes Risborough School Longwick Parish Council BCC Strategic Planning and Infrastructure Manager and BCC Lead for Princes Risborough</p>

Note that Ian Churchill has resigned from PRTC and consequently from the steering group.

The purpose of the meeting is for the group to review the issues considered since the group's inception, improve understanding of how the plan proposals have developed through the work of the group and the supporting officers, and record any outstanding concerns. Highlighted questions were tackled first.

List of questions / issues

1. The numbers: why should so much growth be aimed at Risborough:
a. Why aren't WDC arguing more strongly for special treatment (i.e. a reduction in requirement) in the context of major constraints like the Green Belt and AONB?
b. Why can't other parts of the district take more – shouldn't WDC be

bolder in releasing Green Belt?
c. Alternatively, why can't Aylesbury Vale take more? They have much more available land.
d. How can this level of growth be acceptable in the context of the Chilterns AONB? The Plan fails to protect and enhance the AONB nor does it promote Princes Risborough as a 'Gateway to the Chilterns'.
e. If a fundamental objective of the planning system is the separation of town from country, why does the Risborough expansion propose to engulf Alscot?
f. Why can't officers advise a firm (and stable) limit to the numbers?
<p>IM explained that the current objectively assessed need (OAN) of 15,000 homes for WDC is massively more than when WDC consulted on the plan options in 2014. WDC have to test all options and demonstrate that they have explored every possibility in order to fall back to AVDC for unmet needs.</p> <p>WDC undertook a comprehensive review of economic & brownfield sites – some of which already taken for residential – to help meet needs. But WDC need to balance homes and jobs on a district-wide basis, so protecting the better sites for business.</p> <p>Some of these sites were released early alongside the reserve sites in the High Wycombe area. Local Plan consultation has generated lots of feedback – 3000 comments.</p> <p>He explained that the distribution of growth across settlements doesn't work on a 'fair shares' basis because of the constraints like the AONB.</p>
<p>RC wanted to know why WDC has to take 15,000 when it's a constrained District. IM explained that the need assessment methodology works outside of the constraints. Then you test the all site opportunities to see if you can assemble enough to meet the figure. Our draft plan can only get to 10,000 – which will be tested through the plan process. The Chilterns Conservation Board (CCB) is pushing back on most proposals in the AONB. AVDC are expected to take some of WDC's need but the exact figure remains to be resolved. Disagreeing with Government methodology would not stand scrutiny by the Planning Inspector.</p> <p>RC felt that the 2500 been plucked out of thin air and that the lower options for PR had not been given due consideration – what if we went for 500? IM explained that WDC have to make a judgment and as we're still 5000 short of the target we would need compelling reasons to go smaller. The need was lower at the 2014 options consultation but then the Government changed the rules. PT added that there was a need to make decisions that protect opportunities for future/long term – not entirely a numbers game.</p>

WDC have reviewed the Green Belt (last time 30 yrs ago). WDC went through a proper process but it did not yield as much land as expected. We undertook a two-part process (a broad assessment of the whole county by consultants; then a finer grain review). WDC tested the AONB similarly – see draft Local Plan documents.

JH asked why more had not been allocated at Stokenchurch. IM explained that as it is in the AONB we would need to demonstrate exceptional circumstances to allocate major development there. We need to explore development outside the AONB first.

IP felt this presented a double standard as Princes Risborough is in the setting of the AONB. PT confirmed that while the setting matters, development within the AONB of a different order.

LCC felt that WDC needed to be more transparent on the GB & AONB assessment and that there were inconsistencies in the assessments.

CV asked why Molins Sports Ground appears on the map of speculative developments – why did they apply when it is in GB and AONB? PT replied that it is allocated for sports in the Risborough plan – we don't understand why they're trying to promote residential development there.

CV observed that part 14 of HELAA shows issues at Princes Risborough (eg flooding, views) there seemed to be a leap of logic there in allocating the expansion area. IM said there are always issues with sites at the site level – but these are not fundamental to the principle of development. For example, even the loss of Best and Most Versatile agricultural land (BMV), which can't be mitigated – all those things have to be weighed and balanced versus the requirement to meet housing need.

JH asked how is judgment exercised – about weights accorded to various constraints? E.g. SSSI versus AONB setting, or BMV. PT responded that planners are trained to do this – using the NPPF – and create transparency through reports and their engagement with the public.

CV asked if the costs of mitigating those issues would make some sites unviable. IM responded that we need to demonstrate to the Planning Inspector that the whole plan is viable and this has driven the viability work at Princes Risborough – we have used support from ATLAS and their viability model. The concept plan factors in mitigation such as green infrastructure. Greenfield development generates a lot of value so viability is unlikely to be a problem.

LCC said that AVDC had expressed concern re WDC's approach to unmet need at the Haddenham meeting. RARA have done own work and reckon 5000 could be found on Green Belt sites – AVDC have found 2800. Isn't it the case that WDC could have tried harder and now Risborough are taking the hit? Putting the PRTP in advance of the Local Plan was putting the cart before horse. IM affirmed that the four Districts have been working well together, towards an agreement on numbers, but this was not finalised in June when the draft Local Plan was published for consultation. Since then AVDC have pushed back, but it's fine for them to challenge us and we would expect it. The dialogue continues.

AVDC's critique said that Princes Risborough could take more - bigger/higher density. Even if WDC agreed to the 2800 which their study says we could find elsewhere (which we don't) – we would still only meet our OAN, with the PR

expansion included. We're not in a position of choices.

DJ confirmed that the District Councils in Bucks have been working together for 2.5 years. There is a Memorandum of Understanding (MoU) in place setting out the level of need and what is agreed. AVDC are reacting to the hostile feedback on their own plan. The Hearn report is superficial, for example on the reserve sites, suggesting an approach contrary to planning policy. IP observed that the area of the reserve sites is greater than the PR expansion area but much less has been allocated to them. IM responded that the capacity of the sites gives due regard to issues, so you can't apply a standard figure. PT emphasised that there is a need to build quality places for the future and not simply meet the numbers.

LCC suggested that by publishing plans for Risborough earlier it has become a magnet for speculative development. PT responded that ideally we would have done the plans together (LP + PRTP) – but would have given less protection against speculation. It was a tactic to bring the plan forward to protect Risborough. LP + PRTP will be rolled up but risks loss of protection. The draft PRTP had an influence – even if not accorded weight by Mill Lane Planning Inspector.

CV asked how the top end number had been arrived at. PT said this was the result of working through in the context of the Local Plan and OAN – with an eye to AVDC. We couldn't get the lower numbers to gel, (through an iterative process) and it's difficult to say why not 2500 because of the lack of harm.

IM also explained that the 2600 allocated to Princes Risborough in the draft Local Plan is composed of 2250 in expansion area, plus other sites in town already permitted or expected to come forward, e.g. Picts Lane.

2. The decision to use an Area Action Plan – why couldn't it be a Neighbourhood Development Plan (NDP)?

An NDP has to conform to the current development plan (which for WDC the relevant plan is the Core Strategy) and this set out a low growth scenario at Risborough. A major expansion would not have conformed to this and therefore would have failed. Hence WDC set up the steering group, which is chaired by the Town Council, and made the decision to allocate 25% CIL, as if it had an NDP.

IP asked if this would give 25% control of social housing. PT responded that that is not in the regulations.

3. Why is growth being directed to Risborough when by the evidence, it isn't the best place for business? This will just lead to more commuting.

IM said we don't live in an ideal world. 5,000 of the 10,000 is going to Wycombe – so most of the housing is going to the south of the district where jobs are. Yes it is a flaw in the plan but we formed a judgment. We also allocated some business land at Regent Park. Risborough is relatively well served by rail & bus and it has reasonable critical mass, making it a more sustainable settlement.

GH asked about the 6000 at Aston Sandford and suggested that Chiltern Rail would be emphasising Haddenham Stn. This was referred to Q11.

BBB asserted that historic population growth at Risborough has been zero. PT said that was because of low level of development since the 70's. BBB added that the district has grown elsewhere – so that's where the need must be. People at Risborough will commute south.

PT responded that we are not in the world of choices here and that it's right for Risborough to grow.

4. Is there really such a threat from speculative development? Aren't WDC just shroud-waving?

PT referred the meeting to the plan of speculative development. It is real. There are also pre-application discussions (confidential). It is not self-fulfilling...

For example, Hollands Farm at Bourne End has been optioned for at least a decade – the development industry plays a long game. The site would have come forward if in a plan or not. IM added that at the Local Plan inquiry in 2000, interest was shown even then.

RC said if this plan shows 1700 on smaller parcels why does the expansion have to be so big. PT responded that they are showing solid estates, with no green infrastructure. GH added that the consortium are very keen to get their development away. CV asked what would be the worst case speculative scenario. PT said it might rely on demonstrating 'severe impact' on the highway network, which is a very high test. Developers could build their way out by expanding the Tesco's roundabout.

5. When does growth trigger the need for new road infrastructure? Is it being used to justify the major expansion?

RB explained that the roundabouts in the town centre are over capacity. The alternative to a new road would be intensifying the existing highway infrastructure – inappropriate if the steering group want a people-centred Town Centre. Major expansion gives the opportunity to solve the problem. And if we don't, even a small allocation would send traffic through the town centre.

Question about the wider county function of dedesignation of routes etc – to try to build into County response to plan. This will be addressed at the meeting on Tuesday. Primary purpose of next Tuesday is to present Dan Fenn.

6. Isn't a relief road for Risborough just sticking plaster when there are other bottlenecks along the A4010, especially with all the other growth in Bucks (and the HS2 traffic)? What are WDC proposing to do about this?

To be addressed at the Tuesday meeting.

7. Why shouldn't the relief road (17 or 11b) form the edge of development, for part, or all of, the length? It makes a firm boundary and will improve the quality of life for future residents.

To be addressed at the Tuesday meeting.

8. How do we get development to pay for infrastructure? The early viability work showed there was plenty of value in the land so why is it so difficult to get at?

IM explained that there are two routes: through section 106 agreements, and through the Community Infrastructure Levy (CIL), which is like a roof-tax. For infrastructure to be delivered through s106, it has to be demonstrated that it is reasonably related in scale and kind to the development.

a. If there wasn't the need for the road, wouldn't there be more money for other beneficial measures?

IM: not necessarily – it has to be related to the development. Doesn't mean £50m for road can be re-allocated. S106 agreement where impact is proved. CIL – pooled for infrastructure – a limited amount.

b. Alternatively, why can't we boost funds for the wider, more expensive relief road by sacrificing other bits of infrastructure (e.g. by consolidating the two primary schools)?

RB: the same reasons above apply – each piece of kit has to be justified on its own merits. PT added a tiny rider, which was that if viability is an issue, you might prioritise.

RB added that access to strategic funds through the LEP was unlikely as the LEP had been clear before that Risborough was not a priority – if you look at it in terms of growth across the county, Risborough represents just 5% of the OAN.

BBB said we should try harder with the LEP and argue better.

DJ added that WDC are discouraging use of A4010 as strategic link and looking at alternatives – E-W expressway is an important piece of the jigsaw. AT said we need to push for more from Central Gvt. DJ observed that Govt should invest in infrastructure to boost growth while interest rates are low. RB agreed that that was a positive scenario but the timescales don't work for the plan.

PT said that ultimately the LEP will look at cost vs benefit.

c. Why has only 25% of CIL been granted to the Town Council from growth at Risborough? What guarantee is there that WDC will dedicate the remaining 75% to the town?

RB explained that the revised Infrastructure Delivery Plan (IDP) will show distribution of CIL funds in delivering infrastructure.

DJ cautioned that CIL is decided by Council every year (for 3 yrs) – and that £3m annually is a drop in the ocean. S106 is more significant.

d. Can the plan guarantee the proposed traffic management and public realm improvements for the town centre? What is the alternative if it can't?

IM said this could be CIL but it depends on priorities. For S106 – need to show direct relationship – not impossible, but more difficult.

BBB: BCC on top of this.....

GH: How is the High Wycombe Town Centre work funded? PT – mostly from Local Growth Fund (LGF) – but criteria have changed.

JAS: How confident are we? From Horns Lane/New Road sites? Delivery? IM: put them on map but doesn't guarantee delivery especially w multiple ownerships. However, the retail CIL rate is higher. RB will strengthen relevant policies.

9. The Green Belt study stated that the land identified for the expansion strongly fulfils Green Belt purposes. Therefore, shouldn't the Local Plan propose it as an addition to the Green Belt rather than proposing development there? Alternatively, can that evidence be used to at least protect the future settlement boundary?

Just as exceptional reasons need to be put forward for taking land out of the Green Belt, so do there need to be exceptional reasons for adding land to the Green Belt. In the case of Princes Risborough it is hard to see what reasons might 'stick' against this test. For example, the Gomm Valley was proposed as an addition for the old Local Plan, but this was not accepted by the inspector at that time. See NPPF para 82:

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

10. How can the town centre have capacity to create an appropriate retail offer for all that growth?

GH observed that Aston Sandford may be more attractive to shops and Risbrians – another store is needed, or a bigger Tesco.

IM said there are 2 small sites in town centre now. Old Hypnos site? Not much there. Does this lead to a Supermarket on the expansion area, which the steering group didn't want?

DJ: Supermarkets are trending small – big stores are closing.

AT: Retail study – surprisingly small area - would query that.

RB will circulate link to retail study which is online (IM: it's impenetrable - food retailing relatively low across the district.) See:

<https://www.wycombe.gov.uk/uploads/public/documents/RETAIL-STUDY-2014-FINAL.pdf> and

<https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Wycombe-town-centres-and-retail-study-2016-update.pdf>

Should WDC property look at what can be done? Need bigger units. Don't think big stores are the trend. Compare Whitstable (Coop to Morrisons site). PT want WDC to promote – but timing is key. Steering group should ask the Council to do that.

Action: retail to be added as a standing item on the steering group agenda.

11. The rail services, and the station car park, will be overwhelmed. People have to stand on commuter services today. What is the plan for improving these?

RB: Rail services + car park are the responsibility of Chiltern Rail. Network Rail manages the rail tracks and other asset. EW rail adds capacity and gives connectivity to Milton Keynes + Marylebone which will make Risborough a rail hub as connection point to Banbury & Oxford. So opportunities for extra services at Chiltern Rail. Chiltern Rail know car park is at capacity. Authorities don't have powers over their people.

AT confirmed that a meeting has already been booked with Chiltern Rail.

Relationship with vacant land at station on both sides for parking?

Heritage railway + other tourism potential.

CV observed that the CR franchise expires 2020: need to talk to DfT around now what new contract should contain: parking/stopping frequency. Too close to contract renewal to invest.

JAS: get county to lobby DfT.

12. Why is there no plan for increased capacity at GP surgeries? Why can't the plan deliver more GPs?

RB: CCG was asked twice. They are confident they will not need more space at the moment & plan can deliver capital assets what we can't do is get more GPs.

DJ suggested whether CIL can help facilitate leased clinic that the GP does not have to buy into which may help.

IP: 1500 patients per GP – already at that capacity need 6 or 7 more.

RB: CCG are saying GPs generated by expansion can be accommodated in existing buildings. (*post-meeting note – the expansion generates 3.5 whole-time equivalent GPs*)

IM: ask Gerard Coll if he has the formula etc. that GP provision works to.

AT: CCG man adamant at earlier meeting no need for move. But if they were paid to move they might. Theoretically no problem recruiting GPs to Cross Keys surgery. Question of merging the 2 surgeries: maybe go to practice managers & redevelop old sites.

13. Why does the plan not provide a new secondary school? And how will grammar school places be provided?

RB: Over three forms of entry from expansion, existing secondary school to expand, but quite a lot of pupils coming to school in Risborough from Wycombe, so capacity provided in HW, releasing capacity in PR. So no need for a larger school in PR.

Grammar school places are provided through CIL – up to BCC to say where.

Penn school raised and general discussion.

14. Why does the concept plan show development north of Mill Lane? Traffic on Mill Lane is a problem today and growth will make it worse.

PT: Agree. But a sensible place for the numbers – planning is there to resolve problems like lack of footways safety issues.

Retain rural character.

JH: What is the threshold for safe?

PT: We've got to make changes for peds and cycles.

CV: St Dunstan's location opposite park – introduced problems.

BBB: speed review on Mill Lane and Crowbrook Rd coming up.

JAS: sub-group report – recommendations to meeting on Tuesday.

15.If AVDC are proposing an option for a new settlement for 6000 near Aston Sandford, what does this mean for the plan at Risborough?

IM said there are 3 different options for growth at Haddenham – one is Aston Stanford new settlement, another analogous to PR expansion. Former is one of two options for a new settlement in AV. Both these have impacts across boundary – we're asking for more dialogue – will follow that up. AVDC didn't share new settlement study.

IM added that the County-wide modelling impacts report is on website – this modelled a new settlement at Haddenham.

JAS asked how this would affect the modelling work at Risborough. (RB: to go into next modelling exercise).

IM: Ox/Cam growth corridor + Expressway – promoting adjacent to south/A418 – would provide a faster more direct route to M40 – and help with N-S traffic across county.

IP asked if there would be cross-border cooperation on healthcare & education. PT said this was for AVDC to resolve.

GH felt this changes dynamics of our work – what is plan B? (also Thame/Chinnor etc).

DJ: We will work with other authorities.

BBB asked if the Planning Inspector will look at this and take it into account.

IM said the Planning Inspector will ensure we have met the Duty to Cooperate – will be interested in cross boundary issues.