
From: Planning Secretaries [REDACTED]
Sent: 25 March 2019 14:59
To: NewLocalPlan
Subject: WYCOMBE DISTRICT LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION - 28792
Attachments: 28792 A5 NMS NPN 19 03 25 Main mods reps Issue.pdf
Importance: High

SENT ON BEHALF OF NINA SHARP

On behalf of our client, University of Reading, please find attached representations to the Wycombe District Local Plan Proposed Main Modifications Consultation.

Please confirm that these representations have been received and that they have been registered as having been 'duly made'.

A copy will follow by first class post.

Donna Williams

Secretary to Kim Cohen and the Planning Team



**BARTON
WILLMORE**

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28792/A3/NMS/dw

BY EMAIL: newlocalplan@wycombe.gov.uk

25th March, 2019

Dear Mr. Manktelow,

**WYCOMBE DISTRICT LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION:
REPRESENTATIONS SUBMITTED ON BEHALF OF UNIVERSITY OF READING**

We write on behalf of the University of Reading in response to Wycombe District Council's consultation on the Proposed Main Modifications to the Wycombe District Local Plan (hereafter referred to as 'the Local Plan'). These representations should be read in conjunction with all previous representations submitted to the Local Plan Examination on behalf of the University of Reading in relation Greenlands, Henley Business School, Henley.

Context

The site became the home of a new Administrative Staff College in 1946, first welcoming students in 1948. The College was renamed Henley Management College in 1991 and following the 2008 merger with the University of Reading became Henley Business School. Today, the world-ranked Henley MBA, The Henley DBA and our executive education programmes are delivered at Greenlands. The Greenlands is set within the countryside on the outskirts of Henley-on-Thames, adjacent to the River Thames, with the main building 'Greenlands' a Grade II* listed building.

The Campus also accommodates business facilities (eleven conference rooms and 40 meeting and syndicate rooms are housed within the main Greenlands building and the adjacent River House building) including meeting rooms and conference facilities boasting air conditioning, natural daylight and excellent acoustics, as well as state-of-the-art AV and presentation technology. In addition to this, there are 100 en-suite rooms, some of which have disabled facilities and parking for 200 vehicles. Greenlands, whilst in a countryside setting, is within an hour of Heathrow Airport, and easily accessible to M4, M25 and the M40 as well as rail links and the public transport network.



Registered in England
Number: 00342692



Strategic Policies

PMM1, PMM2 and PMM4

Policy CP2 sets out the Spatial Strategy for the District and in broad terms appears compliant with the aims and objectives of national planning policy in terms of the emphasis placed on protecting and enhancing the AONB and the Green Belt. We have no substantive comment to make in terms of the spatial direction of housing and economic growth other than as relevant to the detail of Policies CM12 and DM44.

We welcome the proposed additional text referring to emerging strategic initiatives, such as the Oxford-Cambridge Expressway, as well as reference to the Council's involvement in strategic planning across Buckinghamshire and the Oxford-Cambridge Growth Arc in PMM1, PMM2 and PMM4. Specifically, for Greenlands, whilst in a countryside setting, is within an hour of Heathrow Airport, and easily accessible to M4, M25 and the M40 as well as rail links and the public transport network and is considered to be of strategic importance.

As noted by the Inspector in Question 2 of the Follow Up Questions (October 2018), significant progress has been made on projects including the Expressway. We therefore consider that reference to the emerging strategic context in which the Local Plan operates is necessary for soundness and that the proposed additions are appropriate.

However, it is unclear how the Local Plan will be reviewed to take account of the emerging strategic context. We note that the Local Plan's Introduction sets out that there are a number of matters at a strategic level that 'could lead to the need for an early review of the Plan' (paragraph 1.18). The trigger for an early review is not specified within the Local Plan and, as such, it is not clear how the need for an early review will be determined.

Furthermore, whilst PMM1 sets out that 'the Council expects to engage in the formation of appropriate governance structures to steer the preparation of formal strategic plans as part of the process of Plan review', it is unclear how a review of the Local Plan will be undertaken in the context of the emerging Buckinghamshire Combined Authority.

Specifically, with regard to Policy CP2 (PMM4), and further to the representations made in respect to Matter 2, Policy CP2 (1) of the new Local Plan is worded in a prohibitive fashion, stating that conserving the landscape and scenic beauty of the AONB will be achieved, in part, by '*not allocating sites that constitute "major development" in the AONB*'. The rationale for not allocating new major sites within the AONB is understood; however, we suggest that is a clear role for existing Major Developed Sites within the AONB/countryside to effectively contribute towards the attainment of sustainability objectives set out in CP1 and consider that this should be recognised within the Spatial Strategy.

PMM10 and PMM64

The University considered that Policy CP11 was not in accordance or consistent with the NPPF (paragraphs 126, 131, 132 and 134) as it did not identify the priority which needs to be given to designated heritage assets, nor did the policy reflect the difference in significance of heritage assets.

Barton Willmore on behalf of the University following an Action Point from the Inspector have liaised with the Council in respect to policies DM31 and CP11 relating to the historic environment to clarify the hierarchy of heritage assets.

With regard to DM31, section 6 of the policy section 6 should be replaced to read (full text appended for ease) (proposed changes by the University are in italics, the Council's text is in black):

6. — Where development would demonstrably harm the significance of a non-designated heritage asset, and having regard to the scale of harm and the significance of the asset, consent will be refused unless this harm is outweighed by other land use planning benefits.

6. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Non-designated heritage assets include:

- a) Locally listed buildings**
- b) Areas of archaeological importance**
- c) Non-scheduled archaeological remains**
- d) Historic parks and gardens on the Buckinghamshire County Register**
- e) Other historic landscapes and features**

It is considered that policy CP11 and DM31 as now proposed and as detailed in Common Ground provides greater clarity with respect to the hierarchy of heritage assets and provides a greater relationship with the overarching principles of the NPPF.

Development Management Policies

PMM56

The University has no objection to the proposed wording of Policy DM20, however, the University considers a consequential amendment could be made to paragraph 6.5 which omits the reference to the June 2018 Frame. This would align with the proposed amendments to the Policy which omits the reference to the 2012 version of the Framework to futureproof the Plan.

PMM58

The addition of section 5 within the proposed policy wording (*Development for C2 residential institutions (and staff accommodation) on existing sites in the countryside will be acceptable where these are required to support an existing enterprise or business.*) is welcome by the University. It is considered that due to the location of Greenlands, it is vital that this policy allows for development within the countryside to support the existing business.

PMM66

As stated in the Matter 5 representations, it is considered that section 3 b) in its entirety can be omitted from the policy as this is not consistent with national policy and unduly restrictive and therefore not justified and not effective or flexible to require 25% of site areas to be covered by tree canopy cover.

PMM75

The insertion of paragraph 6.222 (*This policy aims to support rural enterprises and businesses located in the countryside, recognising that there may be a need for additional development that supports them and the employment generating uses they provide, so that any new development can have a positive impact on the local economy without any further significant impact on the countryside. This will ensure that the existing character is maintained whilst managing development appropriately in the countryside.*) is welcomed as is it considered to adequately reflect the nature of Greenlands that is a Major Developed site is a countryside location.

It is considered that reference should be made to policy proposed policy DM23 - Other Residential Uses within DM44 which would be consistent with the approach to be taken to development at major developed sites in the countryside. The proposed change is detailed below:

POLICY DM44 - DEVELOPMENT IN THE COUNTRYSIDE OUTSIDE OF THE GREEN BELT

1. Within that portion of the countryside outside of the Green Belt, and subject to other relevant policies, permission will only be granted for:
 - a) Development that accords with a made Neighbourhood Plan;
 - b) Development for agriculture and forestry, outdoor sports and recreation, and for cemeteries where there is a genuine need;
 - c) Additional buildings ~~for employment~~ where these are required to support an existing rural enterprise or business located in the countryside, which are proportionate to the existing;
 - d) The construction of additional dwellings and other buildings only within settlement boundaries identified in accordance with CP3 and DM21 as shown on the Policies Map;
 - e) Other residential uses in accordance with DM23;**
 - e) **f)** Rural exceptions housing in accordance with DM25;
 - f) **g)** Sites for travellers in accordance with DM26;
 - g) **h)** Housing for rural workers in accordance with DM27;
 - h) **i)** Extensions and alterations to existing dwellings in accordance with DM36;
 - i) **j)** The conversion of existing buildings in accordance with DM45;
 - j) **k)** The redevelopment of previously developed land, provided this respects the rural character of the surroundings.

We trust that the enclosed representations are duly made and we look forward to receiving confirmation of receipt.

Please contact the writer on 0118 943 0000 should you require any further information or have any queries.

Yours sincerely,



NINA SHARP
Associate

Encs.

cc. C. Reeve, Esq. - University of Reading

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
<p>AP5.2 - WDC in discussion with Historic England and Barton Willmore (Uni. Of Reading) to amend Policies CP11 and DM31 to clarify the hierarchy of heritage assets</p>	<p>CP11 DM31 RJ</p>	<p>Revise policy CP11 to read:</p> <p>CP11:</p> <ol style="list-style-type: none"> 1. Conserving, and where possible enhancing, the significance, special interest, character and appearance of designated and non-designated heritage assets and historic landscapes; and taking opportunities to reinforce the positive contribution to local character and distinctiveness by sustaining the historic environment. 2. Ensuring the setting of designated and non-designated heritage assets and historic landscapes conserves or where possible enhances the special interest of the asset or landscape. <p>Revise policy DM31 to read:</p>	

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
		<p>DM31</p> <p>1. All development is required to conserve and, where possible, enhance the Historic Environment. Great weight will be given to the conservation of a designated heritage asset's significance, their settings, and other character features or positive elements of special interest. Heritage assets include:</p> <p>a) Listed Buildings (including locally listed buildings)</p> <p>b) Scheduled Monuments, and Areas of Archaeological Importance (including non-scheduled archaeological remains)</p> <p>c) Registered Historic parks and gardens, historic parks and gardens on the Buckinghamshire County Register (and other historic landscape features and elements)</p> <p>d) Conservation areas</p>	

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
		<p>Scheduled monuments, registered historic parks and gardens, and conservation areas are shown on the Policies Map.</p> <p>2. Developments likely to affect the significance of designated or non-designated heritage assets, or their setting, are required to evidence a thorough understanding of context the significance of the asset and any potential impacts on that significance through the preparation of a proportionate heritage impact assessment.</p> <p>3. Developments which secure the appropriate conservation of buildings and other heritage assets that are deemed to be at risk by national and local heritage at risk registers will be supported.</p> <p>4. Where development would lead to substantial harm to or total loss of significance of a designated heritage asset, consent will be</p>	

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
		<p>refused unless it can be demonstrated that this is necessary to achieve substantial public benefits that cannot be achieved otherwise and which outweigh that harm or loss, or all of the following apply:</p> <ul style="list-style-type: none"> a) The nature of the heritage asset prevents all reasonable uses of the site; b) No viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; c) Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; d) The harm or loss is outweighed by the benefit of bringing the site back into use. <p>5. Where development would lead to less than substantial harm to the significance of a designated heritage asset, consent will be refused unless this harm is outweighed by the</p>	

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
		<p>public benefits of the proposal, including securing its optimum viable use.</p> <p>6. —Where development would demonstrably harm the significance of a non-designated heritage asset, and having regard to the scale of harm and the significance of the asset, consent will be refused unless this harm is outweighed by other land use planning benefits.</p> <p>Make revisions to the reasoned justification at paragraphs 2.1 and 4.118 to read as follows:</p> <p>2.1 The big challenge is to achieve sustainable development – meeting the needs of today without compromising our ability to meet the needs of tomorrow. We need to provide more homes and jobs, and these need more supporting infrastructure – such as schools, roads and green spaces. We need to make sure</p>	<p><u>6. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</u></p>

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
		<p>the patterns of new development reduce our reliance on the private car; reinforce our town centres to ensure they remain vibrant places; and ensure the District retains and enhances both its historic environment and its strong green infrastructure, particularly the Chilterns Area of Outstanding Natural Beauty, for future generations. In doing so, the wider social, cultural, economic and environmental benefits that conservation of the natural, built, and historic environment can bring in conjunction with new development should be recognised.</p> <p>4.118 Any development proposal that affects the significance or special interest of heritage assets, including by being within their setting, needs to consider the protection, conservation, and enhancement of that significance or special interest. The more important the asset, the</p>	

Action point	Where in R19 Plan	WDC proposed alterations	Proposed Barton Willmore alterations (University of Reading)
		<p>greater the weight will be. The effect of an application on the significance of a non-designated heritage asset will be taken into account in determining the application. In this policy, a non-designated asset of archaeological interest of demonstrably equivalent significance to a scheduled monument shall be treated as a designated heritage asset. Development proposals should be mindful of not only the heritage asset itself, but also its setting and how it fits into the wider historic environment.</p> <p>Wherever possible, new development should reflect and integrate with the existing character of the local area, and seek to avoid the loss of any features of architectural or historical significance.</p>	