
Wycombe District Local Plan Public Examination

Response to Inspector's Matters and Questions
On behalf of University of Reading (UoR)
(Respondent ID:1014)

**Matter 5:
Natural, Built and Historic Environment**

June 2018

**Wycombe District Local Plan
Public Examination**

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Matter 5:**

Natural, Built and Historic Environment

**Barton Willmore LLP on behalf of the University of Reading
(Respondent ID:1014)**

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0.0 INTRODUCTION

- 0.1 Barton Willmore LLP is instructed by the University of Reading (UoR) to submit this written Hearing Statement in response to the Inspector's Matters, Issues and Questions Stage 1. These representations expand upon the representations submitted on behalf of University of Reading at the earlier stages of the Wycombe District Local Plan preparation.
- 0.2 This statement does not respond to all matters and questions as set out in stage 1 as some are directed solely to the Wycombe District Council (WDC) and others are not related to the representations submitted previously.

Greenlands

- 0.4 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.
- 0.5 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.

1.0 RESPONSE TO INSPECTOR'S QUESTIONS - MATTER 5

Issue: Does the Plan provide a framework for the management of the Natural, Built and Historic Environment that is soundly based, justified and consistent with the requirements of national policy?

1.1 The University of Reading principally is concerned with the draft Plan in this Statement that proposed policies CP11 (Historic Environment), DM31 (Development affecting the historic environment) and DM34 (Delivering green infrastructure and biodiversity in development) are not in accordance with or consistent with national policy. As detailed in this Statement, it is considered that draft policies CP11 and DM31 require further modifications as detailed below. It is considered that DM20 should identify paragraphs 131-135 of the Framework to strengthen the justification for Policy DM20 and omit the inconsistency of Policy CP11 interpretation of the Framework. DM34 is also considered not to be consistent with national policy, however, through omitting the reference to future tree canopy would conclude the University to have no further objections as currently worded.

Have the following policies been positively prepared and are they justified, effective and consistent with national policy?

- a) **Policy CP9 (Sense of Place);** (no comments)
- b) **Policy CP10 (Green infrastructure and the natural environment);** (no comments)
- c) **Policy CP11 (Historic environment);**

1.2 The University considers that Policy CP11 is not in accordance or consistent with the NPPF (paragraphs 126, 131, 132 and 134) as this Policy does not identify the priority which needs to be given to designated heritage assets, nor does the policy reflect the difference in significance of heritage assets. Paragraph 126 states that heritage assets should be conserved in a manner appropriate to their significance and that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment.

Paragraph 131 of the NPPF states that Local Planning Authorities should take account of:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.*

Paragraph 132 of the NPPF states that:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 134 of the NPPF states that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

- 1.3 Paragraph 135 of the Framework states that the effect of the significance of a non-designated heritage asset (like designated heritage assets) should be taken into account when determining a planning application and that a balanced judgement should be made having regard to scale, harm and significance.
- 1.4 Whilst it is understood that local planning authorities may identify non-designated heritage assets that have a degree of significance to merit planning consideration, these are not designated, and cannot have the same weight attributed to them when determining significance.
- 1.5 It is considered that Policy as a whole should be revised as it is not consistent with national policy or justified in that it fails to draw an adequate distinction in the application of this policy (as worded) between designate and non-designated heritage assets, or between designated assets of greater importance (as directed by Paragraph 132 of the Framework).

1.6 Proposed Policy CP11 should identify the distinction between designated and non-designated heritage assets and then reference the process which is required to be undertaken to determine extent of harm in accordance with the Framework paragraphs 131, 132, 134 and 135. The NPPF provides in a clear and concise manner the distinction between the significance of the heritage assets and the process that is required by local planning authorities when determining planning applications and there is no justification as to why this process has been altered, nor is it considered acceptable.

1.7 It is suggested that this policy should identify that there is an importance for built heritage conservation and enhancement only the designated heritage assets as non-designated heritage assets are addressed by national policy through Paragraph 135 of the Framework. It is considered that the wording of policy CP11 should be revised as detailed below:

1. Conserving, and where possible enhancing, the character and appearance of designated ~~and non-designated~~ heritage assets and historic landscapes. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be in accordance with the NPPF paragraph 132.
2. Ensuring the setting of designated ~~and non-designated~~ heritage assets and historic landscapes conserves or where possible enhances the character and appearance of the asset or landscape.
3. Ensuring that heritage assets are appropriately managed and promote sympathetic re-use of vacant and "at risk" buildings, to prevent the deterioration of their condition, to aid in their protection, and to reduce the number of heritage assets on the "Heritage at Risk" register.
4. Promoting the understanding of the character of our Conservation Areas through the production and periodic review of Conservation Area Appraisals; and where necessary, employ Article 4 Directions where the identified character of a Conservation Area is at risk from Permitted Development.
5. ~~Promote the understanding and conservation of non-designated heritage assets by maintaining and periodically reviewing a list of locally important assets of historical or architectural merit.~~

6. Promoting the understanding of the special character of our historic centres through the support of the Buckinghamshire Historic Towns Project, and enhancing their special character where opportunities arise to do so, including through improvements to the public realm in our historic centres.
7. Promoting the understanding of historic landscapes which play an important role in the formation of the Historic Environment.
8. Working closely with our partners including Historic England and Buckinghamshire County Council to ensure that records are kept up to date, so the historic environment is cared for in the most appropriate manner."

d) Policy CP12 (Climate change); (no comments)

e) Policy DM30 (The Chilterns Area of Outstanding natural Beauty); (no comments)

f) Policy DM31 (Development affecting the historic environment);

1.8 The University considers that similar to Policy CP11, Policy DM31 is not in accordance with the NPPF (paragraphs 126, 131, 132 and 134) as this Policy does not identify the priority which needs to be given to designated heritage assets, nor does the policy reflect the difference in significance of heritage assets or setting.

1.9 The policy lists the type of heritage asset, however designated and non-designated are not considered to have different priorities in regard to their significance, or their respective setting.

1.10 The Framework defines the setting of a heritage asset relates to the surroundings which influences how the heritage asset is experienced. The extent of the setting of the heritage asset is not fixed and the setting can change as the built environment changes and evolves and therefore the setting is capable of being enhanced as well as degraded and can even have no impact. When assessing this significance, both the physical form and type of designation as well as the setting can have differing significances as well as priorities as detailed in paragraphs 126, 131, 132 and 134 of the NPPF.

1.11 For this policy to be consistent with the Framework, it is therefore considered that policy DM31 like CP11 reference to non-designated heritage assets should be omitted as this is adequately addressed by national policy.

g) Policy DM32 (Landscape character and settlement patterns); (no comments)

- h) Policy DM33 (Managing carbon emissions);** (no comments)
- i) Policy DM34 (Delivering green infrastructure and biodiversity in development)**

1.12 It is considered that section 3 b) 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.

- j) Policy DM35 (Placemaking and design quality);** (no comments)
- k) Policy DM37 (Small scale non-residential development);** (no comments)
- l) Policy DM38 (Water quality and supply);** (no comments)
- m) Policy DM39 (Managing flood risk and sustainable drainage systems);**
(no comments) **and**
- n) Policy DM20 (Matters to be determined in accordance with the NPPF).**

1.13 The University has no objection to the proposed wording of Policy DM20; however, the University considers a consequential amendment could be made to address our concerns with regard to Policy CP11 and DM31. Policy CP11 fails to identify paragraphs 126, 131, 132, 134 and 135 of the Framework which relates to conserving and enhancing the historic environment, and therefore DM20 could therefore identify the priority that needs to be given and the difference in significance to statutory and non-statutory heritage assets.