



# Sustainability Appraisal of the Wycombe Delivery and Site Allocations Plan for Town Centres and Managing Development

Final SA Report: Non-Technical Summary

July 2013

<b><u>Contents</u></b>	<b><u>Page</u></b>
Introduction and Background .....	3
The DSA Plan .....	3
The SA/SEA Process .....	4
Assessment of the DSA Plan .....	6
Mitigation .....	7
Monitoring .....	7

## **Tables**

Table 1: Summary of Sustainability Appraisal Conclusions .....	8
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## Introduction and Background

This report contains a non-technical summary of the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) of the Wycombe District Delivery and Site Allocations (DSA) Plan. The DSA Plan was adopted following a lengthy consultation process, which spanned a number of years, and also a process of independent examination by a planning inspector, following submission of the document in June 2012. Following this examination process, which included public hearings in December 2012 and consultation on a number of proposed modifications in Spring 2013, the inspector found the DSA Plan 'sound' in his report of June 2013. The Plan was formally adopted by Wycombe District Council on 16 July 2013.

The SA process is a way of ensuring that all plans and programmes which relate to land use issues are compatible with the aims of sustainable development. It is a requirement of the Planning and Compulsory Purchase Act 2004 and of the National Planning Policy Framework<sup>1</sup>, which states that SA should be "an integral part of the plan preparation process". Consequently, the Delivery and Site Allocations (DSA) Plan is required to be subject to this process.

The origins of the SA process lie with the European Strategic Environmental Assessment (SEA) Directive<sup>2</sup>, which acts to ensure that all plans/policies with land use implications take into consideration environmental issues. Through the Directive, an environmental assessment is formally required for all plans and programmes which are likely to have significant effects on the environment. Again, this means the DSA Plan is required to undergo this process. The aim of the SEA process is to ensure that environmental considerations are integrated into the plan-preparation process.

Government guidance states that the SA and SEA processes can be integrated into one for the purposes of plan-making. The final output of this process is a combined SA and SEA 'Environmental Report' which meets the regulatory requirements for both SA and SEA. This document constitutes the Non-Technical Summary of the SA Report (which in turn constitutes the 'Environmental Report' underpinning the DSA Plan).

### The DSA Plan

The Delivery and Site Allocations (DSA) Plan was initially conceived as the document which would set out site allocations across Wycombe District, following the adoption in 2008 of the Core Strategy, which provided the District's strategic planning framework. However, for various reasons which are summarised in section 2 of the SA Report, the scope of the DSA Plan has evolved over the course of its preparation. So from this initial emphasis on providing site allocations for the whole District, it has evolved into a document focused on town centres. Accordingly, it does not include District-wide strategic housing and employment allocations (which are now to be dealt with in a New Local Plan) but it does include radical plans for transformational change in High Wycombe town centre as part of the Town Centre Masterplan project. It also includes a series of non-strategic site allocations within the District's town centres, as well as some generic and District-wide development management topic policies.

So, in summary, amongst the key proposals in the DSA Plan are the following:

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<sup>1</sup> NPPF para 165

<sup>2</sup> European Directive 2001/42/EC, which is transposed into English law by The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)

- The High Wycombe town centre masterplan proposals to regenerate and improve the town centre, including changes to the town centre road network, public realm improvements and new development sites;
- Proposals for a range of other mixed use sites in the town centres of High Wycombe, Marlow and Princes Risborough;
- Proposals for addressing open space deficiency in the Desborough area;
- A series of 'development management' policies aimed at delivering more sustainable forms of development. These include policies relating to:
  - Sustainable transport requirements and transport improvement lines;
  - Retail issues, including the definition of town and district centres;
  - Scattered business sites;
  - Green infrastructure including policies for green space, biodiversity, and river corridors;
  - Carbon reduction and water efficiency;
  - Infrastructure and viability.

### **The SA/SEA Process**

The SA/SEA process works in a stage-by-stage approach as set out below:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B: Developing and refining the alternatives and assessing effects
- Stage C: Preparing the Environmental Report (or SA Report)
- Stage D: Consulting on the draft plan or programme and the Environmental Report (or SA Report)
- Stage E: Monitoring

Wycombe District Council has followed this process from the outset of the plan preparation, as detailed in the main SA Report. The early scoping work on the Wycombe Development Framework in 2004 identified the relevant plans, programmes and strategies, collected together a large amount of baseline information and from this, was able to identify the main sustainability issues facing the District.

The collection of baseline information, set out in the initial SA Scoping Report, published in 2005, enabled an assessment of the issues present in the District, both those which involved positive characteristics and also those which threw up issues of concern. In summary, the main sustainability issues facing the District, as uncovered by this analysis on information, were as follows:

#### Positive Issues

##### Social Issues:

- An increased level of housing delivery, including affordable housing
- Good access to healthcare
- Large percentage of people who live and work in the District
- Higher than national average of those educated to GNVQ Level 2 or above

##### Environmental Issues:

- A high proportion of development on previously-developed land
- Large amount of high quality landscapes
- Good proportion of District covered by woodland and ancient woodland
- Large number of listed buildings including 19 grade I listed buildings

#### Economic Issues:

- Slightly higher than regional average number of economically active residents within the District
- Levels of unemployment lower than the national average (albeit increased in recent years)
- Average increase in earnings higher than average

#### Issues of concern

#### Social Issues:

- Need for additional housing
- High average house price/average earnings ratio

#### Environmental Issues:

- High level of car ownership and car dependency
- Low levels of recycling and composting
- Air quality in some areas an issue of concern

#### Economic Issues:

- Lower than regional average increase in the number of VAT registered businesses
- Decrease in the overall number of jobs in recent years
- Levels of long-term unemployment have risen (although they are lower than regional and national levels)
- Continuing decline in manufacturing, including the historic furniture industry – regeneration of older industrial areas is therefore a key issue

The SA Scoping Report was updated in 2011 to reflect the revised scope of the DSA Plan, as described in Section 2 of the main SA Report. This SA Scoping Report Update is included within the main SA Report at Appendix 7, and contains a full overview of the current state of the environment in Wycombe District, within the review of Baseline Information at Annex 2. The key environmental issues, both positive and negative, are outlined in paragraphs 4.7-4.8 of Appendix 7.

In producing the Scoping Report Update, it was concluded that generally there had not been any substantive change to the issues summarised above. The reasons for this were:

- The economic downturn since 2008 had resulted in falling house prices but they were still at high levels, resulting in affordability problems;
- Affordable housing completions had increased in recent years but there was still a high need for affordable housing;
- The economic downturn had resulted in increasing levels of unemployment – although these were still similar to the regional level and below the national average – and a decrease in the number of jobs in the District.

It was therefore not considered necessary to make any substantive changes to the framework, objectives or indicators, except for a small number of detailed changes which are explained in the Scoping Report Update.

In addition to the various sustainability issues identified, a number of issues were identified through the various stages of consultation on the DSA. These included a number of site-specific issues and sustainability issues including house prices and limited affordable housing, and increasing unemployment (although this is still close to the regional average and below the national average). These are outlined in Section 5 of Appendix 7.

These various sustainability issues have then been used to construct the sustainability framework, which forms the mechanism for carrying out the appraisal of the plan. The framework consists of a number of sustainability objectives, which relate to social, environmental and economic aims. The sustainability objectives provide a specific focus against which options can be measured as well as providing specific benchmarks. These are applied to policies and site-specific allocations through the use of indicators and criteria.

For the appraisal of the DSA Plan, 20 objectives were developed, including 10 environmental, 5 social and 5 economic. These various objectives do not necessarily have the same weighting – whilst all the objectives illustrate concepts of sustainability, some will be more important than others in considering the overall impact of an option.

The sustainability objectives and indicators have been drawn from a number of sources, to reflect the issues identified through the early SA work. See Tables 1 and 2 in Appendix 1 for a summary of these objectives and indicators.

To carry out the appraisal of each individual site and policy option, the Council uses a scoring system whereby positive effects on objectives are identified with a '+', neutral with a '0' and negative with a '-'. Significant positive or negative effects can be identified with a '++' or a '--', respectively. These are the maximum and minimum scores given for each option to avoid the appearance of a mathematical 'totting up' exercise.

An overall summary is given for the effects on each objective under a particular option, but it should be stressed that SA is not intended to be an arithmetical exercise of adding up pluses and minuses for each option, but is rather to inform the development and refining of different options with an overview of sustainability considerations, in addition to other factors guiding the decision-making process such as consultation responses.

An Overview and Audit Trail Report (appendix 8 of the SA Report) was published alongside the Submission Draft of the DSA Plan, to provide commentary and signposting to the reasons for selecting the various options which were appraised under each policy; a summary of the outcome of each option's appraisal; and an audit of how each policy and proposal has evolved during the plan preparation process.

As the Overview and Audit Trail Report was published alongside the Submission version of the DSA Plan, some further modifications were made to the plan during the examination process. These are explained in the Inspector's Report. Some of these modifications affected the numbering of policies in the plan; therefore the Overview and Audit Trail Report contains some policy numbering which is different from that in the final plan.

## **Assessment of the DSA Plan**

A range of options and alternatives was considered for each policy/site. In all cases, the aim was to assess a range of options sufficient to allow for meaningful results to be

obtained, to inform the decision-making process. In some cases, consultation responses and other input from stakeholders led to new options being appraised. However, it was always borne in mind that alternatives had to be reasonable given the situation on the ground and the policy context.

In terms of site policies, different uses or mixes of use were explored and, in some cases, varying scales of development. For topic policies, greater or lesser degrees of flexibility in terms of development requirements or level of protection proposed were considered and appraised; and, where appropriate, a 'no policy' option was appraised. In terms of the High Wycombe Town Centre Masterplan, the Council, supported by the highway authority, undertook significant options testing and technical assessment work to ensure that the proposals were justified, effective and capable of being delivered. A summary of the reasons for the selection of the alternatives is given under each policy in the Overview and Audit Trail Report, which forms Appendix 8 of the main SA Report.

The detailed appraisal of the various options for the site-specific allocations and area-specific policies are contained in appendices 1-5 of the main SA Report and those of the district-wide development management policies are contained in appendix 6. Table 1 below summarises the scoring conclusions in respect of effects on social, environmental and economic objectives set out in the sustainability framework of the preferred options for each of the policies. For a further commentary on the outcome of the SA, and more on the effects on these objectives, together with reasons for the selection of the preferred option, please see Table 6 of the main SA Report. An outline of the reasons for not taking forward other options is provided under each policy (and alternative option) in the Overview and Audit Trail Report (Appendix 8 of the main SA Report).

In a document such as this which is largely taking forward a series of site allocations, it is difficult to generalise about the effects of the document. Similarly, given the fact that the SA is part of the evidence feeding into the plan-making process rather than the decision-making process itself, it is impossible to outline a list of changes or additions which have been made directly as a result of the SA.

Nevertheless, it can be seen from the summary of scores in Table 1 that the effects of the preferred options which have been taken forward in the DSA are overwhelmingly positive, and in many cases significantly positive. Every policy shows a positive or significant environmental effect and all but two policies show positive or significant positive social effects. In terms of economic effects, a number of the policies have neutral or no effects (either where the policy is geared towards environmental protection or where sites are proposed for developments which do not include employment). Only one policy shows a negative economic effect, and this is Policy DM5 (Scattered Business Sites) where the greater flexibility for changes of use will result in a potential loss of employment land but a corresponding potential for new homes and community facilities.

## **Mitigation**

The SA process is an ongoing process and the detailed appraisals set out where measures can be adopted to minimise or mitigate negative effects identified against individual indicators. The policies within the DSA Plan also set out appropriate mitigation measures to offset negative effects against SA indicators where appropriate. Furthermore, an important role still exists at the individual planning application stage with the more detailed analysis of individual proposals and, where appropriate, the use of Environmental Impact Assessments to ensure that potentially negative effects are avoided or mitigated.

## **Monitoring**

The Council's Monitoring Report will be used to assess the effectiveness of all planning documents through reporting against key targets. It will monitor the impact of the DSA Plan

and sites against some core national indicators and some local indicators. Similarly to plan-making itself, SA is an ongoing process and will be refined when we come to review our plans and policies. This will include monitoring the emergence of new related plans, policies and programmes, including by statutory bodies, to assess their impact on the baseline information, indicators and other aspects of plan-making. The SA of subsequent planning documents will therefore take into account any new sustainability issues emerging as a result of any such changes in the context of the plan-making process.

**Table 1: Summary of Sustainability Appraisal Conclusions**

The tables below provide a summary of the scoring outcome of the SA for the preferred option under each policy. For a further commentary on the outcome of the appraisal, please see Table 6 of the main SA Report.

Please note that, in the table below, for topic policies, short-term, medium-term and long-term effects separated by a ‘:’

Policy	Objectives		
	Social	Environmental	Economic
High Wycombe Town Centre Policies			
<b>High Wycombe Masterplan Preferred Delivery Scenario</b>	+:+:+	+:+:+	+:/+:
<b>HWTC1 High Wycombe Town Centre Vision</b>	++:++:++	++:++:++	++:++:++
<b>HWTC2 Town Centre Environment</b>	++:++:++	++:++:++	+:+:+
<b>HWTC3 Connections, Movement and Access</b>	+:+:+	+:+:+	+:+:+
<b>HWTC4 Economy</b>	+:+:+	+:+:+	++:++:++
<b>HWTC5 Primary Shopping Frontages: High Wycombe</b>	++:++:++	++:++:++	++:++:++
<b>HWTC6: Secondary Shopping Frontages: High Wycombe</b>	+:+:+	++:++:++	++:++:++
<b>HWTC7 Easton Street</b>	+	++	+
<b>HWTC8 Council Offices and Royal Mail Sorting Office</b>	+:	+	++
<b>HWTC9 Land off Duke Street</b>	++	++	+

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<b>Policy</b>	<b>Objectives</b>		
	<b>Social</b>	<b>Environmental</b>	<b>Economic</b>
<b>HWTC10 Swan Frontage</b>	+	+	++
<b>HWTC11 Wycombe Hospital</b>	++	++	+
<b>HWTC12 Chilterns Shopping Centre and Frogmoor East</b>	++	++	+
<b>HWTC13 Lily’s Walk (Former Gas Works site)</b>	++	++	++
<b>HWTC14 Buckingham House and Castle House</b>	+	++	+
<b>HWTC15 Collins House and Corner of Bridge Street/Desborough Road</b>	++	++	+
<b>HWTC16 Oxford Road Roundabout</b>	++	++	++
<b>HWTC17 Bridge Street</b>	+	++	+
<b>HWTC18 Baker Street</b>	++	++	++
<b>HWTC19 Rapid House</b>	+	+	++

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Policy	Objectives		
	Social	Environmental	Economic
<b>HWTC20 Oxford Road (West)</b>	+	++	+
<b>HWTC21 Central Business Centre</b>	+	++	+
Desborough policies			
<b>HW1 Desborough Delivery and Design Framework</b>	+:+:+:+	+:+:+:+	+:+:+:+
<b>HW2 Delivering New Open Space and River Corridor Improvements</b>	+:+:+	+:+:+:+	+:+:+
<b>HW3 Green Street School</b>	+	++	0
Marlow policies			
<b>MR1 Primary Shopping Frontages: Marlow</b>	+:+:+	+:+:+	+:+:+
<b>MR2 Secondary Shopping Frontages: Marlow</b>	+:+:+	+:+:+:+	+:+:+:+
<b>MR3 Riley Road</b>	++	++	+
<b>MR4 Portlands</b>	++	++	+

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Policy	Objectives		
	Social	Environmental	Economic
MR5 Liston Road Car Park	+	++	0
Princes Risborough policies			
PR1 Primary Shopping Frontages: Princes Risborough	+:+:+	+:+:+	+:+:+
PR2 Secondary Shopping Frontages: Princes Risborough	+:+:+	++:++:++	++:++:++
PR3 Land Fronting New Road	+	+	+
PR4 Land South of Horns Lane	+	+	+
District-Wide Development Management Policies			
DM1 Presumption in Favour of Sustainable Development	?/+:?/+?:+/	?/-:?/-:?-	?/+:?/+?:+/
DM2 Transport Requirements of Development Sites	+:+:+	++:++:++	+:+:+
DM3 Transport Improvement Lines	+:+:+	+:+:+	+:+:+
DM4 Former Bourne End to High Wycombe Railway Line	+:+:+	+:+:+	0:0:0

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Please note that, in the table below, for topic policies, short-term, medium-term and long-term effects separated by a ‘:’

Policy	Objectives		
	Social	Environmental	Economic
<b>DM5 Scattered Business Sites</b>	+:+:+	+:+:+:+	-:~-
<b>DM6 Mixed-Use Development</b>	0/? : 0/? : 0/?	+:+:+	+:+:+
<b>DM7 Town Centre Boundaries</b>	+:+:+:+	+:+:+	+:+:+
<b>DM8 The Primary Shopping Areas</b>	+:+:+:+	+:+:+:+	+:+:+:+
<b>DM9 District Centres</b>	+:+:+	+:+:+:+	+:+:+
<b>DM10 Thresholds for the Assessment of Schemes for Town Centre Impact</b>	+:+:+	+:+:+	+:+:+
<b>DM11 Green Networks and Infrastructure</b>	+:+:+	+:+:+	0:0:0
<b>DM12 Green Spaces</b>	+:+:+	+:+:+	0:0:0
<b>DM13 Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance</b>	+:+:+	+:+:+:+	0:0:0
<b>DM14 Biodiversity in Development</b>	+:+:+	+:+:+:+	0:0:0

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Policy	Objectives		
	Social	Environmental	Economic
<b>DM15 Protection and Enhancement of River and Stream Corridors</b>	+:+:+	+:+:+:+	0:0:0
<b>DM16 Open Space in New Development</b>	+:+:+:+	+:+:+:+	0:0:0
<b>DM17 Planning for Flood Risk Management</b>	0:0:0	+:+:+:+	0:0:0
<b>DM18 Carbon Reduction and Water Efficiency</b>	+:+:+:+	+:+:+:+	0:0:0
<b>DM19 Infrastructure and Delivery</b>	+:+:+	+:+:+	+:+:+