

Delivery and Site Allocations Plan

Sustainability Appraisal Final Report (July 2013)

Appendix 8

Overview and Audit Trail Report (Originally published June 2012; updated March 2013)



Contents

1. Introduction and Purpose of the Report	5
2. Overview of the preparation of the Delivery and Site Allocations Plan.....	5
3. Audit Trail.....	10
4. List of policies	
HWTC1 Delivering the Town Centre Vision	14
HWTC2 Town Centre Environment.....	16
HWTC3 Connections, Movement and Access	17
HWTC4 Economy	18
HWTC5 Primary Shopping Frontages: High Wycombe	19
HWTC6 Secondary Shopping Frontages: High Wycombe.....	23
HWTC7 Easton Street	25
HWTC8 Council Offices and Royal Mail Sorting Office.....	28
HWTC9 Land off Duke Street	31
HWTC10 Swan Frontage.....	34
HWTC11 Wycombe General Hospital.....	42
HWTC12 Chilterns Shopping Centre And Frogmoor East	44
HWTC13 Lily's Walk (Former Gas Works Site)	47
HWTC14 Buckingham House and Castle House.....	55
HWTC15 Collins House and Corner of Bridge Street/Desborough Road	59
HWTC16 Oxford Road roundabout.....	62
HWTC17 Bridge Street	67
HWTC18 Baker Street	71
HWTC19 Rapid House	76
HWTC20 Oxford Road (west)	79
HWTC21 Central Business Centre	81

Desborough		
HW1	Desborough Delivery and Design Framework	83
HW2	Delivering New Open Space and River Corridor Improvements	85
HW3	Green Street School.....	88
Marlow		
MR1	Primary Shopping Frontages: Marlow	90
MR2	Secondary Shopping Frontages: Marlow	93
MR3	Riley Road.....	96
MR4	Portlands	98
MR5	Liston Road	102
Princes Risborough.....		
PR1	Primary Shopping Frontages: Princes Risborough	105
PR2	Secondary Shopping Frontages: Princes Risborough.....	109
PR3	Land Fronting New Road	113
PR4	Land South of Horns Lane	115
Development Management Policies		
DM1	Transport Requirements of Development Sites.....	118
DM2	Transport Improvement Lines	120
DM3	Former Bourne End To High Wycombe Railway Line	122
DM4	Scattered Business Sites	125
DM5	Mixed-Use Development.....	128
DM6	Town Centre Boundaries	131
DM7	The Primary Shopping Areas	134
DM8	District Centres	137
DM9	Thresholds for the Assessment of Schemes for Town Centre Impact.....	141
DM10	Green Networks and Infrastructure	145

DM11	Green Spaces	148
DM12	Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance	152
DM13	Biodiversity In Development.....	155
DM14	Protection and Enhancement of River and Stream Corridors.....	157
DM15	Open Space in New Development	160
DM16	Planning for Flood Risk Management	163
DM17	Carbon Reduction	165
DM18	Infrastructure and Delivery	168

1. Introduction and Purpose of the Report

- 1.1 This overview and audit report outlines the preparation process of the Delivery and Site Allocations Plan (hereafter referred to as the DSA) and an audit of how each policy and proposal has evolved during that preparation process.
- 1.2 Section 2 of the report (the overview) explains how the document has evolved over a relatively lengthy preparation process to respond to changing circumstances, explaining the reasons for the different stages in its preparation.
- 1.3 The audit of individual policies and proposals in section 3 outlines the main changes that have been made to policies and proposals during the preparation process, highlighting the key issues from consultations and how they were taken into account, and also how the sustainability appraisal has affected the shaping of policies and proposals where appropriate as well. In addition the influence of key technical work and other factors that have emerged during the process have also shaped the policies and proposals and the audit explains how. Appropriate cross references are made to key technical documents and to the sustainability appraisal as appropriate.
- 1.4 The DSA has been through a robust preparation process and the Council believes that the policies and proposals within it are both legally compliant and sound.

2. Overview of the preparation of the Delivery and Site Allocations Plan

- 2.1 The system of producing Local Development Frameworks consisting of a suite of development plan documents and other local development documents came into force in September 2004. Local authorities at that time were expected to prepare their suite of documents within a three year period – hence the three year period up to September 2007 when existing local plan policies remained in force before having to go through the process of being saved and extended.
- 2.2 In response to this agenda the Council set out an initial Local Development Scheme in 2004 which sought to put in place 3 key development plan documents, two in place by March 2007 – namely the Core Strategy and the Site Allocations and Designations DPDs, with a third DPD, a Development Control Policies DPD to follow after these two. The Core Strategy and Site Allocations and Designations DPDs were to be prepared and submitted in parallel with the examination hearing for the

Site Allocations and Designations DPD to follow shortly after completion of the examination of the Core Strategy. This approach meant that the Core Strategy and the Site Allocations and Designations DPDs would share key elements of the evidence base. As a result early stage consultations on the Core Strategy also including consultations on key sites.

- 2.3 However advice from the Government Office which aimed to prioritise the preparation of Core Strategies and to ensure procedurally that Core Strategies were in place to inform site allocations DPDs meant that the Council amended the Local Development Scheme to delay the preparation of the Site Allocations DPD so that it was one step behind the Core Strategy process. Thus as the Council consulted on the Preferred Options version of the Core Strategy in September 2005, it also consulted on the Issues and Options stage for the Site Allocations DPD.
- 2.4 The Council was a front runner in the South East with the preparation of the Core Strategy, being one of the first authorities in the region to submit its Core Strategy in April 2006. It should be noted that being a front runner the idea of including strategic allocations in the Core Strategy was not generally considered appropriate and that this was an issue for Site Allocations DPDs. The idea of including strategic allocations came through in 2008 with the 2008 Act and the revised version of PPS12. As such more reliance was placed at this stage on the role of the Site Allocations DPD with Core Strategies being higher level strategic documents only.
- 2.5 The Core Strategy was delayed in reaching the hearing stage of the examination due mainly to issues raised by the Government Office. Pre-examination changes were proposed to the Core Strategy in February 2007, but the Council also took the opportunity to progress the Site Allocations DPD to the Preferred Options stage at the same time. The Preferred Options document not only included proposed site allocations and designations at a district-wide level but also a series of draft development control/management policies on key issues that the Council considered needed addressing early on (ie before the preparation of a Development Control Policies DPD).
- 2.6 The Core Strategy was adopted in July 2008 following the Inspector's report in May 2008. The Inspector recommended a number of binding changes to the Core Strategy which had implications for the Site Allocations DPD. In particular he recommended deletion of one of the High Wycombe 'Areas of Change' relating to High Wycombe Town Centre and in particular the Town Centre Masterplan, due to concerns over the deliverability of the road changes proposed in the Masterplan. He left this issue to be resolved through a subsequent DPD, although expressed doubts over whether the Site

Allocations DPD was the appropriate vehicle for concentrating attention at the level of detail necessary to provide a satisfactory framework for delivering the amount and complexity of change contemplated in the Masterplan.

- 2.7 The Inspector also recommended changes to the Housing Provision policy of the Core Strategy in the light of what was then the relatively new PPS3. This also had implications for the Site Allocations DPD, particularly in terms of extending the timeframe for assessing housing land supply and for allocating sites, and removing the ability to take account of windfall development in the future assessment of housing land supply. In addition the Council's housing target had increased as a result of the Panel Report on the submitted South East Plan.
- 2.8 Following adoption of the Core Strategy the Council prioritised the preparation of the Site Allocations DPD. Consideration was given to whether it was appropriate to address High Wycombe Town Centre Masterplan issues in an area action plan rather than in the Site Allocations DPD. However the benefits to the user of a joined up approach of including all site specific proposals into one document and the associated joined up consultation and evidence base production meant that the Council decided to continue to address the Masterplan in the Site Allocations DPD. The Council considered that the scope always existed for the Site Allocations DPD to include more detail in relation to the High Wycombe Town Centre Masterplan compared with other proposals (along with the necessary level of supporting evidence base) and that there was therefore no need to produce a separate DPD with its own separate preparation process. Subsequent events, both with the reduction in scope of the DSA to focus on just town centre site specific proposals and not District-wide allocations, and the NPPF seeking to reduce the number of DPDs/Plans produced by local authorities, lend more recent support to the Council's decision at that time.
- 2.9 The Local Development Scheme was subsequently updated to make clear that the Site Allocations DPD would include the vision and policies for High Wycombe Town Centre, as well as site specific issues, to make clear that it was addressing those aspects that would otherwise have been covered in the Core Strategy.
- 2.10 Changes to the Core Strategy in its adopted form, including those highlighted above, resulted in the need to undertake more technical work for the Site Allocations DPD and consult on this work and options for changes to the document. This was the purpose of the (renamed) Delivery and Site Allocations DPD Update Consultation in June 2009. Key updates that were consulted on included the High Wycombe Town Centre Masterplan (and an expanded evidence base for it) and options for addressing the housing supply issues outlined above, including a consideration of the greenfield housing options and options

for housing in the RAF Daws Hill/Abbey Barn area. The opportunity was also taken to consult on some additional development management issues, including an expanded approach to green infrastructure.

- 2.11 The consultation document published at this stage was an update to the aspects of the Preferred Options document from 2007, not a replacement of it in its entirety. As such there were some issues that were not covered in the 2009 Update as no update from the 2007 document was considered necessary. As such the 2009 and 2007 documents had to be considered alongside each other. In addition aspects of the 2009 document involved consultation on options rather than a preferred approach as new issues had arisen that required a consultation on options first.
- 2.12 The further Update Report published for consultation in June 2010 was a more limited update on a number of aspects of the plan, including the Town Centre Masterplan, meeting housing requirements and some development management issues. In some instances, where options had been consulted on in 2009, it set down the Council's preferred approach.
- 2.13 The 2010 Update also highlighted that the Council would review its approach to housing requirements and housing supply including the issue of greenfield site release in the light of the then recent announcements from the new Government regarding the revocation of the Regional Spatial Strategy (in Wycombe District's case, the South East Plan, adopted in 2009). Subsequently the Council confirmed through a review of its Local Development Scheme (LDS)(brought into force in August 2011) that it would remove the strategic housing issues from the DSA with the 'allocations' part of the DSA focusing on the proposals in the three town centres of the District. It committed through the LDS to reviewing the Core Strategy to set new housing targets for the District and to address other strategic housing issues including housing and mixed use allocations, as well as the protection and provision of employment land. The Core Strategy review would also review existing Core Strategies and replace remaining saved policies in the Local Plan, both as appropriate. The Government did not object to this change of approach following submission of the LDS to them.
- 2.14 This change of approach in relation to strategic housing issues avoided the need to effectively go through the housing allocations process twice in close proximity. A continuation of the DSA in its original form with housing allocations included would have been followed rapidly by a local setting of the Council's housing target through a Core Strategy review and a subsequent round of new or reviewed housing allocations to address that target. This decision was taken in the light of a healthy housing land supply, and this has been endorsed more recently on appeal in relation to the Council's 5 year housing land supply position. In July 2011 the Council published a Position Statement on Housing and Land for Business outlining its

current housing land supply position and its position in relation to a number of key sites and issues that would no longer be included in the DSA. The Council's latest housing land supply position is reported on each year in the Annual Monitoring Report.

- 2.15 Given the resulting reduced and revised scope of the DSA it was considered appropriate to provide a final opportunity for the public and stakeholders to comment on the document in its revised form before proceeding to the publication stage. This opportunity was provided by publishing a full draft document for comment in September 2011. The document has been updated in the light of this consultation in the form of the publication (ie proposed submission) version. The document is now referred to as the DSA Plan to reflect the language of the NPPF which has moved away from reference to 'documents' and towards 'plans'.

Concluding Comments

- 2.16 The DSA has been subject to a lengthy preparation process with extensive public and stakeholder consultation at a number of different stages. This engagement has not just been limited to 'formal' consultation stages. There has been an ongoing dialogue and sharing of evidence and information with key stakeholders to help shape the proposals and policies.
- 2.17 At each key consultation stage updates to the evidence base have been fully exposed with new or updated evidence prepared as appropriate, including in response to consultation feedback at an earlier stage. The sustainability appraisal has also been updated at each stage as well. As a result of various updates some of the earlier evidence base has been superseded by more recent evidence base reports. As such some of the superseded evidence base reports are no longer required to support the publication and later submission of the DSA for examination. However the Council has compiled a list of superseded evidence reports and copies are still available if required to assist the process.
- 2.18 The nature of the preparation process has been influenced by changing circumstances both locally and nationally. The Council has responded to these changes to ensure that the DSA remains fit for purpose whilst ensuring that both the plan itself and the process by which it has been prepared is sound.
- 2.19 Looking ahead the DSA will form part of the new Local Plan for the District and will sit alongside the Core Strategy review/new Local Plan to be prepared in the light of the NPPF in the post-RSS world. The current intention is that the new

plan will not include any aspects of the DSA within its scope. The Council is currently reviewing the timetable and approach for the preparation of the new plan in the light of the NPPF including the advice in Annex 1 on implementation and on keeping plans up-to-date. Subject to the outcome of that review this may trigger a review of the Local Development Scheme later in 2012.

3. Audit trail

- 3.1 The following tables set out an audit trail for each of the policies that have been included in the DSA, identifying how each policy has evolved from the issues and options stage in 2005 to the submission version of the DSA. The audit for each policy is compiled in a table that sets out the overall approach of the policy at each stage in the production process, identifying what changes were made at each stage (where appropriate) and the justification for those changes. Where appropriate the justification section cross references to evidence produced, consultation responses or the sustainability appraisal. to support an approach or change.
- 3.2 The audit table also summarises the consultation responses received at each stage of the DSA production as set out in consultation feedback reports for each consultation stage, the sustainability appraisal of the final policy and the options that were appraised for each policy (see final sustainability appraisal report)
- 3.3 The audit also refers to other factors that have influenced the focus of a policy or informed the choice made, where issues that are not covered directly by either the Sustainability Appraisal or consultation feedback, such as deliverability issues in relation to specific sites or the changing economic conditions that have occurred during the production of this document.
- 3.4 At each consultation stage of the DSA development management colleagues have been consulted on the approach and applicability of policies to ensure that when a site or policy is applied policies are drafted in a suitable and clear manner, and their comments have informed the wording of policies.
- 3.5 It should be noted that not all policies were consulted on at the initial issues and options stage in 2005 as they came forward at a later stage in production of the DSA, in these circumstances the issues/options around them were considered in later consultation documents.

4. High Wycombe

- 4.1 The progression and development of policies HWTC1 – 4 which set out the strategic objectives and proposals for High Wycombe town centre is set out within High Wycombe Town Centre Masterplan: Option Development and Appraisal Report (WDC, May 2012) (Core Document CD3.10.3). The results of the SA for these policies are outlined below, and are followed by a full account of the evolution of the remainder of the policies.

HWTC Delivery Scenarios and Policies HWTC1-HWTC4 SA summaries

CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report sets out in detail the development and appraisal of the masterplan delivery scenarios and policies HWTC1-4, including the technical work and public engagement which has informed the proposals since 2004. The tables below set out results of the Sustainability Appraisal of the policy and delivery scenario options which forms part of the wider appraisal framework set out in CD3.10.3.

Delivery Scenarios

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Seven scenarios were appraised which reflect different extents of implementation of the town centre masterplan proposals, including highway and public realm changes.		
Options appraised¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<u>Preferred Option</u> Scenario C – Implementing & protecting opportunities to 2026 and beyond	<p>Social This scenario has a positive effect on social objectives as it brings improvements to the public realm and environment of the town centre, whilst protecting opportunities for further improvements in the future.</p> <p>Environmental This scenario has potential to have some positive impact on achieving environmental objectives as the scenario proposes improvements to the natural and built environment within the town centre.</p> <p>Economic This scenario has potential to have a positive impact on achieving economic</p>	<p>This option was accepted as the preferred option as, taking into account the complexity and scale of the masterplan proposals, and viability and deliverability evidence, this option brings forward the implementation of physical works and improvements across the town centre by 2026, whilst protecting longer-term opportunities for further improvements.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there have been no further changes in approach since.</p>

¹ See 2012 SA main report

	<p>objectives as the scenario supports new development opportunities within the town centre which will bring increased employment opportunities. Improvements in the public realm will also contribute to the investment potential of the town.</p>	
<p>Scenario A – Full Implementation</p>	<p>Social This scenario has potential to have a significant positive impact on achieving social objectives, as it improves the physical environment in which people live, work and visit and offers residents and visitors improved access to services and facilities.</p> <p>Environmental This scenario has potential to have a significant positive impact on achieving environmental objectives as the scenario proposes significant improvements to the natural and built environment within the town centre.</p> <p>Economic This scenario has potential to have a significant positive impact on achieving economic objectives as the scenario proposes significant development opportunities within the town centre which will bring increased employment opportunities. Improvements in the public realm will also increase the investment potential of the town.</p>	<p>This option was rejected as although it performed well against the SA objectives, infrastructure costings work demonstrated that the cost of this option was the highest and deliverability evidence could not support its implementation within the plan period.</p>
<p>Scenario B – Comprehensive Implementation</p>	<p>Social This scenario has potential to have a significant positive impact on achieving social objectives, as it improves the physical environment in which people live, work and visit and offers residents and visitors improved access to services and facilities.</p> <p>Environmental This scenario has potential to have a significant positive impact on achieving environmental objectives as the scenario proposes significant improvements to the natural and built environment within the town centre.</p> <p>Economic This scenario has potential to have a significant positive impact on achieving economic objectives as the scenario proposes significant development opportunities within the town centre which will bring increased employment opportunities. Improvements in the public realm will also increase the investment potential of the town.</p>	<p>This option was rejected as although it performed well against the SA objectives, infrastructure costings work demonstrated that the cost of this option was the highest and deliverability evidence could not support its implementation within the plan period.</p>

<p>Scenario D – Do Minimum</p>	<p>Social This scenario has limited beneficial effect on social objectives as it does not address the causes of the problems identified.</p> <p>Environmental This scenario has limited beneficial effect on environmental objectives as the scenario proposes improvements to the natural and built environment within the town centre, but does not address the causes of the problems identified.</p> <p>Economic This scenario has potential to have a limited positive impact on achieving economic objectives as the scenario supports new development opportunities within the town centre which will bring increased employment opportunities.</p>	<p>This option was rejected as it had a limited impact on achieving the SA objectives, as it does not deliver the longer term benefits of the masterplan.</p>
<p>Scenario E – Do Nothing</p>	<p>Social This scenario has limited beneficial effect on social objectives as it does not address completely remove the causes of the problems identified.</p> <p>Environmental This scenario has very limited beneficial effect on environmental objectives as improvements to the public realm of the town centre could be implemented but the scenario does not completely address the causes of the problems identified.</p> <p>Economic This scenario has potential to have a limited positive impact on achieving economic objectives as the scenario supports limited new development opportunities within the town centre which will bring increased employment opportunities.</p>	<p>This scenario was rejected as it does not achieve the SA objectives, particularly as it does not protect the opportunities for the implementation of the town centre vision in the medium-longer term.</p>
<p>Scenario F – At-grade Abbey Way</p>	<p>Social This scenario has potential to have a positive impact on achieving social objectives, as it improves the physical environment in which people live, work and visit and offers residents and visitors improved access to services and facilities.</p> <p>Environmental This scenario has a beneficial effect on environmental objectives as the scenario facilitates improvements to the natural and built environment within the town centre.</p> <p>Economic</p>	<p>This option was rejected in 2011 as the evidence did not support that this option was deliverable in relation to cost and available and funding and impact on the town centre network operation.</p>

	This scenario has potential to have a positive impact on achieving economic objectives as the scenario supports new development opportunities within the town centre which will bring increased employment opportunities. Limited improvements in the public realm will also contribute to the investment potential of the town.	
Scenario G – Cross-town route via Lily’s Walk	<p>Social This scenario has potential to have a significant positive impact on achieving social objectives, as it improves the physical environment in which people live, work and visit and offers residents and visitors improved access to services and facilities.</p> <p>Environmental This scenario has potential to have a significant positive impact on achieving environmental objectives as the scenario proposes significant improvements to the natural and built environment within the town centre.</p> <p>Economic This scenario has potential to have very positive impact on achieving economic objectives as the scenario proposes significant development opportunities within the town centre which will bring increased employment opportunities. Improvements in the public realm will also increase the investment potential of the town.</p>	This option was rejected in 2011 as although it achieves some of the SA objectives, the transport assessment work demonstrated that there would be negative impacts on network operation and that this option limited the ability to achieve the policy objectives for HWTC10 Swan Frontage.

Policy HWTC1: High Wycombe Town Centre Vision

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Three options were appraised to reflect different approaches in ensuring that future development within the town centre contributed to the delivery of the town centre vision.		
Options appraised²	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred option – All development within the town centre contributes to, and does not prejudice, the delivery of the town centre vision	<p>Social This option will have a significant positive effect on social objectives, as development is required to contribute to the delivery of the town centre vision in a comprehensive way.</p> <p>Environmental This option has the potential to have a significant positive effect on</p>	<p>This option was chosen as the preferred option as it has a significant positive impact on achieving the SA objectives and ensures that all development within the town centre, and not just those sites with site specific policies, contribute to achieving the town centre vision.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there has been no change in</p>

² See 2012 SA main report

	<p>environmental objectives, as development is required to facilitate and protect future opportunities for environmental enhancement within the town centre.</p> <p>Economic This option has the potential to have a significant positive effect on economic objectives, as development is required to focus economic growth and development in the town centre, through a diverse range of uses.</p>	<p>circumstance to warrant further changes.</p>
<p>Alternative Option 1 – Development contributes to the town centre vision through financial contributions</p>	<p>Social This option will have a positive effect on social objectives, as development will contribute to the delivery of the town centre vision.</p> <p>Environmental This option has the potential to have a positive effect on environmental objectives, as development will facilitate opportunities for environmental enhancement within the town centre through financial contributions.</p> <p>Economic This option has the potential to have a positive effect on economic objectives, as development d will focus economic growth and development in the town centre, through a diverse range of uses and will contribute to the delivery of environmental improvements through financial contributions.</p>	<p>This option was rejected, as although it has a positive impact on achieving the SA objectives, it does not require development to contribute to the town centre vision through their design and land use, which urban design and transport assessment work had shown would be important elements in contributing to achieving the town centre vision. The introduction of the Wycombe Community Infrastructure Levy also meant that a policy requiring financial contributions from development would be duplicating policy and potentially conflicting with the CIL regime.</p>
<p>Alternative Option 2 – No strategic vision policy. Delivery of vision sought through individual site specific policies</p>	<p>Social This option will have a positive effect on social objectives, as individual developments will contribute to the delivery of the vision in their immediate vicinity. Developments not subject to specific site policy requirements will not be required to contribute to overall environmental objectives for the town centre.</p> <p>Environmental This option has the potential to have a positive effect on environmental objectives, as individual developments will be required to enhance the environment around their development, through site policy requirements. Developments not subject to specific site policy requirements will not be required to contribute to overall environmental objectives for the town centre.</p> <p>Economic This option has the potential to have a positive effect on economic objectives, as site allocations identified will focus economic growth and development in the town centre, through a diverse range of uses.</p>	<p>This option was rejected as it does not provide a strategic context for the future growth and development of the town centre and does not ensure that development contributes to the delivery of the town centre vision in a complementary and integrated way.</p>

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Policy HWTC2: Town Centre Environment

SUSTAINABILITY APPRAISAL		
<p>Options selected for appraisal: Two options were appraised which set out different scenarios for the extent of public space to be provided in the town centre. In a change from the 2011 draft DSA, draft policies HWTC2 Townscape and HWTC3 Public Realm were combined to make policy HWTC2 Town Centre Environment in the Proposed Submission version of the DSA 2012.</p>		
Options appraised ³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option – Improved public space network encompassing new and existing public spaces</p>	<p>Social This option will have a significant positive effect on social objectives as improvements to the environment of the town centre will help encourage a sense of identity and community within the town centre.</p> <p>Environmental This policy has a significant positive effect on environmental objectives as the proposed public space network addresses issues of open space deficiency within the town and proposed significant improvements to the natural and built environment within the town centre.</p> <p>Economic This option has the potential to have a positive effect on economic objectives, as it proposes improvements to the town centre environment which would be likely to increase the town's reputation and standing as a business location as well as its attractiveness to visitors.</p>	<p>This option was accepted as the preferred option as it delivers additional new public spaces within the town centre, as well as improving existing public spaces, which is in line with the town centre vision and objectives. Opportunities to implement new public spaces were identified within the urban and highway design assessments undertaken.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there has been no change in circumstance to warrant further changes.</p>
<p>Alternative Option – Improvements to existing public spaces only (Frogmoor). No new public spaces created.</p>	<p>Social This option will have a limited positive effect on social objectives as improvements to the environment of the town centre will help encourage a sense of identity and community within the town centre.</p> <p>Environmental This policy has a positive effect on environmental objectives as improvements to Frogmoor would create a high quality public space within the town centre.</p> <p>Economic This option has the potential to have a limited positive effect on economic</p>	<p>This option was rejected as it does not deliver additional new public spaces within the town centre and therefore does not support the achievement of the town centre vision.</p>

³ See 2012 SA main report

	objectives, as it proposes limited improvements to the town centre environment which would be likely to increase the town's reputation and standing as a business location as well as its attractiveness to visitors.	
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Policy HWTC3: Connections, Movement and Access

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options were appraised to reflect the different design standards that could be adopted for the design of new highway and highway changes.		
Options appraised ⁴	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option: Changes to highway network including downgrading of Abbey Way Flyover – designed to Manual for Streets standards	<p>Social This scenario has beneficial effect on social objectives as it brings improvements to the public realm and environment of the town centre, whilst protecting opportunities for further improvements in the future.</p> <p>Environmental This scenario has potential to have some positive impact on achieving environmental objectives as the scenario proposes improvements to the natural and built environment within the town centre.</p> <p>Economic This option has the potential to have a positive effect on economic objectives as the proposed changes to the highway network allow for further development opportunities within the town centre.</p>	<p>This option was accepted as the preferred option as it requires highway changes to be designed to Manual for Streets standards which is supported by the highway and urban design work undertaken and the results of the transport assessment work. The use of Manual for Streets supports the achievement of SA objectives by requiring improvements to the public realm.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there has been no change in circumstance to warrant further changes.</p>
Alternative Option: Proposed changes to the highway network are not required to be designed to the principles of Manual for Streets.	<p>Social This scenario has limited beneficial effect on social objectives as it brings limited improvements to the public realm and environment of the town centre, as has the potential to replicate problems of division elsewhere in the town centre.</p> <p>Environmental This scenario has potential to have some positive impact on achieving environmental objectives as the scenario proposes some improvements to the natural and built environment within the town centre.</p> <p>Economic</p>	<p>This option was rejected as by not requiring Manual for Streets standards it has more limited impacts on achieving the SA objectives and it does not meet the objectives set for the performance of the highway network, as set out in the highway design and transport assessment reports.</p>

⁴ See 2012 SA main report

	<p>This scenario has potential to have a positive impact on achieving economic objectives as the scenario supports new development opportunities within the town centre which will bring increased employment opportunities. Improvements in the public realm will also contribute to the investment potential of the town.</p>	
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Policy HWTC4: Economy

SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options were appraised to assess whether or not a policy is required.		
Options appraised ⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option – Town centre is the focus for retail activity and other main town centre uses and has a central role for quality office development, particularly at defined locations.</p>	<p>Social This option has the potential to have a positive effect on social objectives as it concentrates services and facilities within an accessible town centre location.</p> <p>Environmental This option has a positive effect on environmental objectives as it helps bring forward a transformation in the environment of the town centre and locates services and facilitates in an accessible location.</p> <p>Economic This option has a significant positive benefit on economic objectives as it proposes high value employment uses within the town centre, including high quality office development, which would raise High Wycombe's economic profile and encourage business and investment within the town centre.</p>	<p>This option was accepted as the preferred option as it sets out the objectives for the town centre in relation to economic development. It also provided as site dimension to the policy and identifies how the principles of the policy will be delivered.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there has been no change in circumstance to warrant further changes.</p>
<p>Alternative Option – No policy.</p>	<p>Social A 'no policy' option is likely to have a neutral effect on social objectives.</p> <p>Environmental A 'no policy' option is likely to have a neutral effect on environmental objectives.</p> <p>Economic A 'no policy' option is likely to have a neutral effect on economic objectives.</p>	<p>This option was rejected as it does not achieve the SA objectives and does not set out the Council's vision and aspirations for the economic development of the town centre.</p>

⁵ See 2012 SA main report

Other Policies

Policy HWTC5 Policy Development	Primary Shopping Frontage Zones: High Wycombe Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). • Question asked as to whether designations remain or do they need to be altered. • Question asked as to whether Desborough Road should be designated as a secondary shopping frontage. 	Justification <ul style="list-style-type: none"> • No changes to Local Plan boundaries
	Preferred Options IF4 <ul style="list-style-type: none"> • Maps accompanying Policy A11 set out the extent of primary shopping frontage zones for High Wycombe, Marlow and Princes Risborough. • Oxford Road (northern side) and Collins House added to the primary shopping frontage (though both later returned to the secondary frontage). • Castle Street (northern side, western section), small section of the High Street (southern side) and Frogmoor (western side) excluded from primary shopping frontage. • Policy does not allow for loss of A1 uses in these frontage zones apart from moves to A3 or A4 in High Wycombe in certain circumstances. 	Justification <ul style="list-style-type: none"> • Policy based on local plan, national policy and traditional primary frontage policy approach. • A degree of flexibility for High Wycombe introduced as recommended by the 2004 Retail and Town Centre Uses study.(para 10.53). • Additions to primary shopping frontage due to westward movement of shopping area through the Eden development. • Exclusions from primary shopping frontage following recommendations of 2004 Retail and Town Centre Uses Study (see para 9.49).
	Update Consultation 2009 <ul style="list-style-type: none"> • Policy HWTC5 - Introduction of a percentage-based approach to protecting A1, and an element of flexibility for changes of use from A1, the degree of which varies between different parts of the primary frontage zone. • Chilterns Shopping Centre/Frogmoor East, LDO area, Collins House and Oxford St (northern side) removed from the primary frontage. 	Justification for change <ul style="list-style-type: none"> • Economic downturn and relocations from old parts of the town centre to Eden led to a significant increase in vacant units during 2008-9 (evidenced by Town Centre Vacancy Survey in January 2009 – the results of which were highlighted in the 2009 Update Consultation document); therefore a more flexible and nuanced policy was considered more appropriate than a traditional primary shopping frontage policy. • Vacancy levels were particularly severe in the areas removed from the primary frontage.

	<p>Update Report 2010 - none</p> <p>2011 consultation draft</p> <ul style="list-style-type: none"> • Policy HWTC6 - percentage target approach to protecting A1 uses maintained; minor adjustments to the targets set for particular areas of the town centre. Wording changes to set maximum percentage of non-A1 use rather than minimum of A1 use. • Chilterns Shopping Centre/Frogmoor East reinserted into the primary shopping frontage, albeit with a flexible approach to proposed changes of use. 	<p>Justification for change</p> <ul style="list-style-type: none"> • Support for the more flexible and nuanced approach in SA and general consultation responses. • Strong objection from owners of the Chilterns Shopping Centre to their proposed removal from the primary shopping frontage.
	<p>2012 Proposed Submission Document</p> <ul style="list-style-type: none"> • Policy HWTC5 - wording of policy adjusted to express percentage-based approach in positive terms (i.e. the Council will allow certain changes of use) • Minimum percentages adjusted and in some cases now include a built-in allowance for A3 uses. • Wording of policy clarifies that applicants will need to provide the up-to-date use class survey evidence that their proposal complies with minimum percentages; and clarifies that changes will be restricted to particular use class, notwithstanding the provisions of the use classes order. • Further flexibility provided for the Chilterns Shopping Centre/Frogmoor East area (now termed a Special Retail Area within the Primary Shopping Frontage). • Oxford Road (north) removed from primary shopping frontage. • Policy incorporates the contents of previous draft policy (Policy HWTC8 in 2011 document) on the Town Centre Local Development Order. 	<p>Justification for change</p> <ul style="list-style-type: none"> • Overall support for approach in consultation • To provide further flexibility given high vacancy rate in some areas of the town centre due to the continuing economic downturn. • To reflect the role of non-A1 uses in centres, particularly the role of A3 uses, in maintaining vitality and viability and customer attractiveness – in line with Town Centre Retail and Frontage Policies Background Paper Update. • To clarify how the policy will be implemented. • LDO text incorporated as separate policy considered not to be required.
Consultation responses	<p>IF3 2005 (No responses received on policy)</p> <p>IF4 2007 No responses received on policy.</p> <p>Update Consultation 2009 13 comments</p> <ul style="list-style-type: none"> ▪ Overall support for approach ▪ Particular comments included highlighting that MU11 Lily's Walk has the potential to be designated as Primary Shopping Frontage once new retail development on the sites has been implemented; and concern at the removal of Chilterns Shopping Centre from Primary Shopping Frontage Zone, described as being unacceptable and unnecessary. <p>Update Report 2010 – N/a (No. of responses received)</p>	

	<p>2011 consultation draft: 5 comments</p> <ul style="list-style-type: none"> • Overall support for approach. • One comment highlighting that Cressex Island site is well suited to retail uses, as it falls within an established area of retail, leisure and commercial activity. A flexible approach to this site will ensure it is brought into active use thus providing employment opportunities and securing investment. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Three options appraised based on varying rates of flexibility towards changes of use which were considered to be reasonable in this frontage. Due to different circumstances present in different parts of the frontage, it was also considered reasonable to select a further option providing different levels of flexibility in different areas.</p>		
Options appraised⁶	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred option⁷: Area-based approach to mix of uses (varying degree of flexibility ranging from no loss of A1 to maximum flexibility for non-A1 uses).</p>	<p>Social Policy would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses targeted at individual sectors of the primary frontage. This would assist in maintaining the vitality and viability of the primary shopping frontage as a whole. It would thereby have positive effects on social objectives.</p> <p>Environmental No direct negative impacts and policy would encourage an appropriate mix of town centre uses in accessible locations.</p> <p>Economic Policy could have a significant positive impact by creating the framework to enable a wider range of developments to come forward which would assist the local economy.</p>	<p>Significant increase in shop vacancy rate in parts of the town centre at the onset of the economic downturn in 2008 led to the need for a more dynamic approach than traditional frontage policies. This option enabled more flexible approaches to frontages were applied to certain more vulnerable parts of the town centre, whilst others were subject to stricter rules to protect the percentage of A1 units.</p> <p>Selected as a preferred option in 2009 and the persistence of the uncertain economic outlook, particularly for the retail industry, meant that the factors influencing the choice of his option as the preferred alternative in 2009 were still present at the time of the Submission DSA Plan in 2012.</p>
<p>Alternative Option 1: No loss of A1 (shop) uses except in certain circumstances, to A3 and A4 – to apply across the primary frontage where no more than 1 in 5 consecutive non-A1 uses.</p>	<p>Social Option would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the primary shopping frontage as a whole, although it continues to focus retail development across the frontages rather than targeting different mixed for individual sectors. Overall option is likely to have positive effects on social objectives.</p> <p>Environmental Policy will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport. Significant positive effects on environmental objectives therefore likely.</p>	<p>Whilst this option offered some degree of flexibility, it was considered that the extent of the shop vacancy problem, and the fact that different parts of the town centre were suffering from varying vacancy rates and problems, meant that a more dynamic and nuanced approach was required rather than a blanket approach applying across the primary frontage as a whole.</p>

⁶ See 2011 SA main report

⁷ See 2012 detailed SA

	<p>Economic Policy promotes retail uses which can have a positive impact on the economy within the existing town centres. However not as targeted as the above option to the needs of individual sub-sectors of the primary frontage.</p>	
<p>Alternative Option 2: Maximum flexibility for any changes of use away from A1 (maintenance of active ground floor frontage required).</p>	<p>Social Option continues to focus retail and other town centre development in specific areas to maintain vitality and accessibility, but loss of retail frontage could undermine vitality and viability. Exact effect depends on which uses take place in which exact areas but overall the option risks having negative effects on social objectives.</p> <p>Environmental Policy option will consolidate retail and uses in existing developed areas where they are most accessible by sustainable modes of transport so no negative effects likely.</p> <p>Economic Loss of retail development within the identified zones could undermine the viability of centres and retail employment, although other uses could provide employment. Overall effect on economic objectives likely to be neutral.</p>	<p>Whilst this option provided for maximum flexibility of movements between use classes, it was considered that this was not appropriate in a primary frontage where an undue loss of the scale of retail units could severely undermine vitality, viability and customer attractiveness of the town centre as a whole. It was considered that as some parts of the primary frontage were not suffering as high levels of vacancy as others, that a stricter approach to changes of use would still be appropriate for these sub-areas within the frontage.</p>
<p>Alternative Option 3: Less flexibility – allow no exceptions for changes of use so no change to non-A1 uses.</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility, but for the High Wycombe frontages, too strict an approach risks the further spread of void units, undermining vitality and viability and thereby having a negative effect on social objectives.</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but reduced opportunities for alternative uses would undermine any accessibility benefits. Overall modest positive effects on objective.</p> <p>Economic Policy option promotes retail uses but given the vulnerability of some of the sub-areas of the High Wycombe primary frontage, a lack of flexibility for any other uses could damage business viability, and thereby have negative effects on economic objectives.</p>	<p>It was considered that an option allowing for minimal flexibility would be inappropriate given the current vacancy rates exhibited in some parts of the primary frontage, and that it could risk the further spread of void units, undermining further the vitality, viability and customer attractiveness of the town centre as a whole.</p>
<p>Other factors</p>	<p>Wider economic trends; Corporate objective to assist the local retail economy, especially in areas suffering from high vacancies;</p>	

Policy HWTC6	Secondary Shopping Frontage Zones: High Wycombe	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). • Question asked as to whether designations remain or do they need to be altered. • Question asked as to whether Desborough Road should be designated as a secondary shopping frontage. 	Justification <ul style="list-style-type: none"> • No changes to Local Plan boundaries
	Preferred Options IF4 <ul style="list-style-type: none"> • Maps accompanying Policy A12 show the extent of the Secondary Shopping Frontage Zones for High Wycombe, Marlow and Princes Risborough. • Desborough Road (northern side) included as secondary shopping frontage. • Oxford Road (northern side) and Collins House both excluded from secondary frontage (but both later returned to it) – see above policy. • Castle Street (northern side, western section), small section of High Street (southern side) and Frogmoor (western side) added to secondary frontage. • Policy allows for any changes within the A uses classes in High Wycombe (and also changes to community uses with active shop frontage); stricter approach in Marlow and Princes Risborough. 	Justification <ul style="list-style-type: none"> • Policy based on previous Local Plan policy with extra flexibility for High Wycombe. • Desborough Road included as secondary shopping frontage to reflect recommendations of the 2004 Retail and Town Centre Uses Study (paras 9.14 and 9.47). • Additions to secondary frontage were areas formerly in the primary frontage considered to require extra flexibility – largely emanating from conclusions in the 2004 Retail and Town Centre Uses Study.
	Update Consultation 2009 <ul style="list-style-type: none"> • Policy HWTC7 – separated out for High Wycombe. Same approach to loss of A1 – any other A uses acceptable. • Collins House and North side of Oxford St added to the secondary shopping frontage zone. 	Justification for change <ul style="list-style-type: none"> • Changes reflect peripheral locations of areas taken out of primary shopping frontage as well as extra flexibility required in areas suffering from high vacancies (as evidenced by the January 2009 Town Centre Vacancy Survey, the results of which were highlighted in the 2009 DSA Update Consultation document). • No objection to general approach and supported by SA conclusions.
	Update Report 2010 - none	Justification for change
	2011 consultation draft <ul style="list-style-type: none"> • Policy HWTC7 - Same approach to loss of A1. Any other A uses permitted. 	<ul style="list-style-type: none"> • Support for approach in consultation responses and SA.

	<p>2012 Proposed Submission Document</p> <ul style="list-style-type: none"> • Policy HWTC6 – largely the same as above but with extra wording to clarify definition of community facilities for the purposes of this policy. • Oxford Road (northern side) added to the secondary frontage. 	<p>Justification for change</p> <ul style="list-style-type: none"> • To clarify definition of community facilities to aid implementation of the policy. • Minor change to frontage boundary to reflect the fact that, despite westward shift of the town centre, this section still not considered to be part of the retail core of the town centre.
Consultation responses	<p>IF3 2005 (No responses received on policy)</p> <p>IF4 2007 No comments received on policy.</p> <p>Update Consultation 2009: (1 comment received) Support for approach. Recognises that the approach to the retail core responds to current economic climate and considers that this should be monitored closely and policies should be sufficiently flexible to respond to changing circumstances.</p> <p>Update Report 2010 – N/a (No. of responses received)</p> <p>2011 consultation draft: (3 comments received) Support for the policy</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Three options appraised based on varying rates of flexibility towards changes of use which were considered to be reasonable in this frontage.</p>		
Options appraised	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred option⁸: No net loss of frontage lengths in Class A use; only exceptional changes away from this (to Community use where active frontage retained).</p>	<p>Social Policy would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the District's town centres including secondary frontage zones, and therefore have a positive effect on social objectives.</p> <p>Environmental No direct negative impacts and policy would encourage an appropriate mix of town centre uses in accessible locations and keep the town centre as a whole vital and viable. Significant positive environmental effects therefore likely.</p> <p>Economic Option could have a significant positive effect by creating the framework to enable a wider range of developments to come forward which would assist the local economy.</p>	<p>This option was accepted as it was considered that it represented an appropriately balanced approach in allowing for a range of uses, and movements between use classes, whilst also protecting units for uses containing an active ground floor frontage, and preventing those which would create a 'dead' frontage. It was therefore considered that this option would maintain the vitality and viability of the frontage and the town centre as a whole.</p> <p>This option was established as the preferred approach at Preferred Options stage (2007) and there were no subsequent changes in circumstances to merit changing this.</p>

⁸ See 2012 detailed SA

<p>Alternative Option 1: More flexible – allow some changes of use away from A uses.</p>	<p>Social Policy option could lead to the loss of active frontages providing main town centre uses, which would undermine long-term vitality and viability of the town centre.</p> <p>Environmental Policy option will consolidate retail and other uses in existing developed areas where they are most accessible by sustainable modes of transport. However, spread of non-A uses could mean loss of such facilities, undermining accessibility benefits of option.</p> <p>Economic Loss of retail development within the identified zones which could undermine the viability of centres although the effects are uncertain.</p>	<p>Whilst this option allowed for flexibility for businesses in the secondary frontages, it was considered that it could allow for too much movement away from uses which contain an active ground floor frontage, i.e. that it could allow uses that create a 'dead' frontage in the town centre. It was considered that this would be an inappropriate approach in a secondary shopping frontage.</p>
<p>Alternative Option 2: Less flexible – no loss of A1 shop uses.</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility, but failure to cater adequately for other services could undermine these objectives</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but could divert other town centre uses to less sustainable locations</p> <p>Economic Policy option promotes retail uses which can have a positive impact on the economy within the existing town centres but restricting other uses could undermine their vitality and viability.</p>	<p>This option was rejected as it was considered to be overly inflexible for a secondary shopping frontage, where there a range of non-A1 uses are considered appropriate.</p>
<p>Other factors</p>	<p>Wider economic trends; Corporate objective to assist the local retail economy, especially in areas suffering from high vacancies;</p>	

<p>Policy HWTC7 Policy Development</p>	<p>Easton Street Issues and Options IF3 -2005 MPTC1 – proposed as mixed use site with focus on offices but including residential, leisure and retail</p>	<p>Justification Site identified in Wycombe Economy Study as having potential to accommodate mixed use development.</p>
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	<p>Preferred Options IF4 – 2007 MU10 – site boundary extended to Saffron Road Mixed use site predominantly office with limited residential and leisure uses Development principles drafted</p>	<p>Justification To include adjacent non-residential uses in policy area Proposed in Wycombe Economy Study as an employment led mixed use redevelopment</p>
	<p>Update Consultation 2009 Site identified as a prime business area (PBA10) Site specific policy includes mainly B1 uses, other town centre uses to be part of comprehensive scheme Proposals should reflect heritage interest to south of site and include pedestrian links to station</p>	<p>Justification PBA designation allows for a degree of flexibility in terms of other uses in the area, focus on retaining business uses as part of mixed use in the area</p> <p>To protect heritage character of area and better integrate site with adjacent railway station</p>
	<p>Update Report 2010 No change</p>	<p>Justification Ongoing discussion with EA (comments reflected in HWTC2 in 2012 Document)</p>
	<p>Draft for Consultation 2011 Site specific allocation HWTC9 reflecting prime business area designation Primarily B1 office Other town centre uses permissible as part of comprehensive redevelopment Inclusion of key considerations</p>	<p>Justification To reflect changed focus of document and there being no PBA policy In line with economy study</p>
	<p>Proposed Submission Document 2012 HWTC7 References to heritage and comprehensiveness removed Inclusion of limited residential added</p> <p>Green Space removed from allocation boundary</p>	<p>Justification</p> <p>To remove duplication with other policies and reflect unlikelihood of buildings that dominate the area being redeveloped – BT exchange, Multi-storey car park and Church</p> <p>To remove conflict with green space policy</p>
Consultation responses	<p>IF3 2005 (3 responses received) General support, issues raised in relation to impacts upon the transport network, public transport and identification of green infrastructure.</p> <p>IF4 2007 (3 responses received) Comments made in relation to the need for an archaeological assessment/evaluation of the site, water supply, sewage capacity and highways.</p> <p>Update Consultation 2009 (1 response received) Site in Water Source Protection Zone 1, used for public water supply, allocation needs to refer to the impact on groundwater as a factor in the acceptability of proposed B1 uses and use of SUDs</p> <p>Update Report 2010 – (No responses received)</p> <p>Draft for Consultation 2011 - (5 responses received) Mix of comments No infrastructure concerns regarding Water Supply capability, but sewage capacity would require investigating if whole site redeveloped Case not made for comprehensive redevelopment. Policy provides insufficient protection of historic buildings - their retention should be stressed.</p>	

	Some residential provision is also considered appropriate.	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised, one encompassing mixed-use (including offices, main town centre uses and residential) given the current nature and location of the site, and another encompassing residential, given location of site adjacent to residential areas. No other options deemed to be reasonable alternatives.		
Options appraised⁹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred option¹⁰: Predominantly offices but with scope for main town centre uses and residential	<p>Social Policy has positive effect due to site being well located in relation to services and facilities</p> <p>Environmental Policy has positive effect on environmental objectives due to site being well located, previously developed, not subject to flood risk and offering potential to improve and enhance the conservation area</p> <p>Economic Policy has positive effects on economic objectives as a result of maintaining site in employment use and allowing other employment generating uses</p>	<p>This option was accepted as it was supported by the outcome of the SA and the recommendations of the Economy Study.</p> <p>This option was selected as the preferred approach at Preferred Options stage (2007) – whilst details of the policy requirements have altered, there has been no change in circumstances to merit altering the overall approach to mix of uses since then.</p>
Alternative Option: Residential	<p>Social Option has positive effect due to being a large site and close to town centre and facilities</p> <p>Environmental Option has positive effect on environmental objectives due to site being well located, previously developed, not subject to flood risk and offering potential to improve and enhance the conservation area</p> <p>Economic Redevelopment of site for residential uses would have a very negative effect social objectives due to loss of employment land and offices.</p>	<p>This option was rejected as it was not supported by the recommendations of the Economy Study that the site had potential for mixed-use development, and it was considered that the option would have negative economic effects due to the loss of employment land and offices in this location.</p>
Other factors	<p>Site owner engagement – No</p> <p>Positive response to allocation – no response</p> <p>Contingency position if site not delivered - strategy is not dependent on delivery of this site, main aim is to reinforce economic role and secure improvements to the area when opportunities arise</p>	

⁹ See 2011 SA main report

¹⁰ See 2012 detailed SA

Policy HWTC8	Council Offices and Royal Mail Sorting Office	
Policy Development	Issues and Options IF3 -2005 N/a	Justification
	Preferred Options IF4 – 2007 Two separate sites Council offices and St Johns Court GBA14 – general business area Sorting office MU13 – mixed use site	Justification To introduce flexibility to uses that could be provided on-site
	Update Consultation 2009 PBA12 – Prime business area Policy drafted allocating as prime business area and including sorting office Retail/leisure acceptable on ground floor and part of comprehensive scheme	Justification In line with economy study which identified no change envisaged due to good condition of all buildings To deliver active frontages and encourage comprehensive development
	Update Report 2010 No change	Justification n/a
	Draft for Consultation 2011 HWTC10 Town centre business/mixed use area Primarily B1 office other town centre uses on ground floor Relocation of sorting office included in supporting text	Justification To reflect changed focus of document and there being no PBA policy In line with economy study To reflect consultation responses
	Proposed Submission Document 2012 Minor changes to policy wording Relocation point added to main policy text	To reflect importance of area as a town centre employment location To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach To reflect consultation responses
Consultation responses	<p>IF3 2005 (No responses received)</p> <p>IF4 2007 (1 response received) Concern about impact on Strategic Road Network.</p> <p>Update Consultation 2009 (3 responses received) Objection based on no plans to relocate sorting office, site could not be delivered comprehensively, should be a mixed use site (in response to 2007 document). Site is in Source Protection Zone 1, protecting an abstraction in the Town Centre, used for public water supply. Allocation needs to refer to the impact on groundwater as a factor in the acceptability of proposed B1 uses and use of SUDs</p> <p>Update Report 2010 – (No. of responses received)</p> <p>Draft for Consultation 2011 - (3 responses received) Concern with proposal for primarily B1 development Royal Mail has no intention of vacating or disposing of site Request that it be allocated for a mix of town centre uses including B use classes. Proviso on Royal Mail finding an alternative site should be in the policy; should receive assistance for their relocation.</p>	

	No infrastructure concerns regarding water supply capability. The sewerage network capacity is unlikely to support the demand anticipated for this development Would like to see some protected status for the Sorting office, WDC office and the library buildings as they are an important part of the architectural heritage of High Wycombe.	
SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised, one encompassing mixed-use (including offices, main town centre uses and residential) given the current nature and location of the site, and another encompassing residential, to test an alternative approach to the use mix. No other options deemed to be reasonable alternatives		
Options appraised¹¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred option¹²: Town Centre Business Area with flexible uses (main town centre uses) on ground floor.	<p>Social Policy likely to have a positive effect on social objectives due to being a town centre site with good access to facilities and open space.</p> <p>Environmental Policy is likely to have a positive effect on environmental objectives due to having good public transport accessibility, being a brownfield site and being mainly an area of low flood risk</p> <p>Social Policy is likely to have a positive effect on economic objectives</p>	This option was accepted as it was supported by the outcome of the SA and the evidence base, with the Economy Study having found that the site contained buildings in good condition and therefore that there should be no change to the current mix of uses. The location of the site within the Town Centre Boundary indicated that a policy allowing for main town centre uses on ground floors would be appropriate. This option was selected as the preferred approach at Consultation Draft stage (2011) to reflect the changed scope of the document following the dropping of the prime business area policy (which had previously been the proposed designation for the site) and no change of circumstances since then to merit changing this approach.
Alternative Option: Redevelopment for Residential use	<p>Social Overall positive effect due to being a large site and close to town centre and facilities</p> <p>Environmental Overall positive effect on environmental objectives due to site being well located, previously developed land, not subject to flood risk, but careful consideration needed for the historic buildings and conservation area.</p> <p>Economic Redevelopment of site for residential uses would have a significant negative effect on economic objectives.</p>	This option was rejected as it was not supported by the recommendations of the evidence base and it was considered that the option would have negative economic impacts due to the loss of employment uses in this location.
Other factors	<p>Site owner engagement – three site owners (incl. District Council) –engagement via consultation</p> <p>Positive response to allocation – mixed – pre-application discussions with owners of St Johns Court resulted re-refurbishment and re-letting of offices, Post office seeking mixed use allocation but not seeking to move, District Council is third land owner.</p> <p>Contingency position if site not delivered - site not required for implementation of masterplan, no impact on strategy if site not redeveloped, , redevelopment could come forward incrementally without undermining strategy</p>	

¹¹ See 2011 SA main report

¹² See 2012 detailed SA



Policy HWTC9	Land off Duke Street	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> Part of MPTC2: High Wycombe Railway Station potential allocation. Options outlined: Mixed-use development including a transport interchange to improve the setting and quality of the station. 	Justification <ul style="list-style-type: none"> See IF3 Economy and Land for Business Background Paper (p10)
	Preferred Options IF4 <ul style="list-style-type: none"> Allocated under Policy A5 (site MU23). Allocation specified that site could provide parking for the station together with residential and potential for some office development. 	Justification <ul style="list-style-type: none"> In line with economy study suggesting potential for mixed use development.
	Update Consultation 2009 <ul style="list-style-type: none"> Policy MU23 took forward allocation for site. Site allocated for residential and office use with some level of car parking retained. Development requirements that level of car parking provision dependent on appropriate provision of parking for rail users on Railway Station site; and that development should minimise visual impact due to valley-side location. 	Justification for change <ul style="list-style-type: none"> No major concerns in consultation over nature of uses proposed on the site. Conclusions of SA supported mixed-use approach.
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> Policy HWTC11 - no change to mix of uses or policy 	Justification for change <ul style="list-style-type: none"> No major concerns to approach in consultation Some responses highlighted need to retain certain amount of car parking and assess impact on visibility of the site given the local topography.
	2012 Proposed Submission Document <ul style="list-style-type: none"> Policy HWTC9 takes forward approach of above policy and mix of uses but stipulates that development proposals should include no net loss of B use floorspace. 	Justification for change <ul style="list-style-type: none"> 'No net loss of B-use floorspace' stipulation included to reflect current level of employment use on the site and to reflect policy aspiration for retention of town centre employment uses. Consultation responses supported a mixed-use approach to site. Also supported by SA conclusions.
Consultation responses	IF3 2005 (No responses received on policy, although 4 responses on High Wycombe Railway Station site policy, indicating general support but need for linkages with general public transport improvements) <p> IF4 2007: (4 comments received) <ul style="list-style-type: none"> Mixed response – support expressed for a residential-led redevelopment of the site along with car parking for the railway station but also concern expressed that redevelopment of the site for mixed-use is not viable, and that it should be retained in its present use. Particular concerns regarding impact on the Strategic Road Network </p> Update Consultation 2009: (4 comments received) <ul style="list-style-type: none"> Retention of car park on this side of the station is important Topography and visibility of the site means that the design needs to be of a high standard 	

	<p>Update Report 2010 – N/a (No. of responses received)</p> <p>2011 consultation draft: (5 comments received)</p> <ul style="list-style-type: none"> • General support for approach although responses highlighted that car parking should be maintained for the station. • Call for bicycle parking facilities should be provided at the entrance site to the station; description of site to include mention of older commercial premises dating back to the 1960s; policy heading should refer to Duke St and adjoining land. • Suggestion that acceptable uses should include business/office use - to retain degree of flexibility. • Re-timing, requested that it should say 2012-21. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Three options selected, encompassing a status quo option (i.e. no redevelopment of site), and two mixed-use options (both encompassing residential and office given current use and location of the site), one with a requirement for no net loss of B use class floorspace and one with no such requirement. Due to size of site, there were not considered to be any further reasonable alternative options.</p>		
Options appraised¹³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred option¹⁴: Mixed-use development including residential and/or office use with some car parking retained. No net loss of B use class floorspace.</p>	<p>Social By providing new development on what is a very accessible town centre site, policy is likely to deliver positive effects on social objectives.</p> <p>Environmental The mix of uses in an accessible site means that policy is likely to have positive effects on environmental objectives.</p> <p>Economic The mix of uses envisaged under this policy, including the provision of business use (and the stipulation of no net loss of B uses), means that it is likely to have positive effects on economic objectives.</p>	<p>This option was accepted as the preferred approach as it was supported by the evidence base (the Economy Study), the SA conclusions and consultation responses. The requirement for no net loss of B use class floorspace was selected as it reflected the aspiration for the retention of town centre employment uses.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and no change in circumstances since then to merit changing this approach.</p>
<p>Alternative Option 1: No redevelopment on the site</p>	<p>Social Leaving the site in its current guise would mean no effect on social objectives.</p> <p>Environmental Leaving the site in its current guise would have no overall effect on objectives although no effect on the townscape would be a positive effect.</p> <p>Economic Maintaining the status quo on this site would fail to deliver new employment facilities here and therefore have no effect on economic objectives.</p>	<p>Whilst no redevelopment of the site may have a beneficial impact in terms of no redevelopment impacting on the townscape, it was considered that an approach of advocating no redevelopment on the site would fail to optimise the potential benefits of the site in terms of its potential for mixed-use development, providing new housing and employment opportunities in the town centre.</p>

¹³ See 2012 SA main report

¹⁴ See 2012 detailed SA

<p>Alternative Option 2: Mixed-use development including residential and/or offices but no requirement for no net loss of B use class floorspace.</p>	<p>Social By providing new development on what is a very accessible town centre site, option is likely to deliver positive effects on social objectives</p> <p>Environmental The mix of uses in an accessible site means that option is likely to have positive effects on environmental objectives</p> <p>Economic The mix of uses envisaged under this option could potentially have positive effects on economic objectives. But this may be undermined if there is a net loss of B uses.</p>	<p>Whilst this option would still secure a mixed-use development, it was considered that the omission of the requirement for no net loss of B uses on the site could fail to deliver the aspiration to retain town centre employment uses.</p>
<p>Other factors</p>	<p>Site owner engagement: Yes through consultation Positive response to allocation?: Yes - support for mixed-use approach to allocation Contingency position if site not delivered: Further engagement with site owners, non implementation on site does not affect delivery of town centre masterplan</p>	

Policy HWTC10	Swan Frontage	
Policy Development	<p>Issues and Options IF3 MPTC8 Fire Station / Swan Frontage Option for university expansion Site boundary encompassing existing fire station and Royal British Legion and part of eastern ramp of Abbey Way flyover</p> <p>MPTC10 “New open space” Abbey Way flyover could be closed to remove traffic from the town centre and free land for development and open space. With Abbey Way moved, space will be created for new public open space in the town centre. 3 new public ‘squares’ could be created. Open space in this location referred to as “Marlow Place” Site boundary encompassing Abbey Way gyratory.</p> <p>“Re-shaping High Wycombe” background paper identified the site as “Phase Three – Reclaiming the Marlow Hill Gyratory” with the ambition of creating a ‘new’ greenspace and riverside setting, defined by landmark buildings. Includes the relocation of existing uses in this location and reconfiguration of the junction layout, expansion of the university and a new urban square.</p>	<p>Justification The David Lock Associates masterplan report (2004) had identified this site for a new open space and additional development opportunities in this location following the diversion and closure of Abbey Way flyover. Reflected in the further masterplan work and in IF3 report.</p>
	<p>Preferred Options IF4</p> <ul style="list-style-type: none"> • Known as MU15 Swan Frontage (including Fire Station, Liberal Club, Police Station and Royal British Legion) • Identified as a Mixed Use site. • Preferred mixed use / key requirements – Long term redevelopment opportunity for education or cultural/entertainment (including theatre) use. Also scope for office or hotel development. Requires satisfactory relocation of existing uses. A key gateway site to the town centre requiring a high quality landmark development. Scope for improved connectivity of green spaces (The Rye and the Abbey Way roundabout, to the Town Centre). • Boundary of site tight around existing Royal British Legion, fire station, Liberal Club and Police Station. Does not cover highway, including Abbey Way gyratory. Abbey Way flyover and western and northern arm of gyratory shown as “Indicative road line – alignment to be agreed as part of re-development proposals.” 	<p>Justification</p> <ul style="list-style-type: none"> • Site identified as key gateway site into the town through background masterplan work. Expansion of education facilities identified as part of work on BNU Gateway Building project. • Strategic masterplan issues included with submission version of Core Strategy so IF4 document concentrating on site specific issues.

	<p>Update Consultation 2009</p> <ul style="list-style-type: none"> • Site allocated for mixed use predominantly office development with scope for other uses including cultural/entertainment, retail, hotel and residential • Site boundary expanded to include land to the north-west of Legion (including youth centre and small pubs and retail units), Abbey Way flyover eastern ramp and northern and western arm of Abbey Way gyratory <p>Key development requirements (including):</p> <ul style="list-style-type: none"> • Highway network changes • Satisfactory relocation of existing uses • Provision of open space, including opening of River Wye • High quality landmark development • Site redevelopment to contribute towards delivering strategic objectives and actions identified in strategic town centre policies. <p>Anticipated timing of development – 2014 - 2019 Table 11 identified “Marlow Hill gyratory reclaimed to create green public space” and “town centre office developments start to come forward, including at the Swan Frontage” as taking place between 2015-20 (indicative phasing).</p> <p>Site expected to make financial contribution (in addition to standard developer contributions) towards implementation of the town centre vision</p>	<p>Justification for change</p> <ul style="list-style-type: none"> • Site identified as a potential key site for office development within Wycombe Sustainable Economic Prosperity Strategy (WDC, 2009). Location at gateway to town centre was felt to support high quality, HQ type office development. • Expansion of boundary reflected technical work which had identified the necessary changes to the highway network and design work which identified opportunities for new development blocks in this location, including in spaces realised through removal of flyover ramps. • Technical work identified necessary highway changes • Policy requirement to ensure existing uses relocated satisfactorily to ensure community facilities not lost and fire service delivery not negatively impacted • Design work also undertaken on proposed new public space and identified opportunities for de-culverting of River Wye in this location • Inclusion of strategic policies for town centre masterplan, following deletion from Core Strategy. • Timing reflected phasing of masterplan infrastructure works, informed by technical work. • Requirement reflecting financial delivery mechanisms identified HWTC4 Funding the Town Centre Vision
	<p>Update Report 2010</p> <ul style="list-style-type: none"> • Proposed to amend site boundary to remove police station from allocation <p>Table 10 Proposed revised indicative phasing periods, including</p> <ul style="list-style-type: none"> • 2021-26 – re-location of fire station (if required / practicable); removal of Abbey Way flyover ramps; town centre development sites come forward in space realised through removal of elevated ramps; creation of high quality public open spaces at Oxford Road roundabout and Swan 	<p>Justification for change</p> <ul style="list-style-type: none"> • The police station fronts onto Queen Victoria Road and as such would not contribute significantly to development at Swan Frontage. Timescales for the redevelopment of the police station are potentially outside the timescales for the redevelopment of the Swan Frontage. • Phasing periods refined to reflect further technical work and assessment on intermediate period of infrastructure works and to reflect complexity of site redevelopment, including relocation of existing uses

	<p>Frontage begins, including opportunities for de-culverting of River Wye</p>	
	<p>2011 consultation draft</p> <p>Known as HWTC12 Swan Frontage</p> <ul style="list-style-type: none"> • Site allocated for mixed use development, including identifying individual development blocks for specific uses <ul style="list-style-type: none"> • Block 1 – A1, A3 and A4 uses on ground floor, with B1 office and/or residential on upper floors • Blocks 2 & 3 – B1 and/or education facilities. Active ground floor frontages, including A1, A3 and A4 • Principles relating to design of development blocks and design of public spaces. Includes requirement for high quality design, consideration of important views of the Swan Theatre and All Saints Parish Church and no net loss of green space. • Highway requirements identified, including retention of west-bound access to Eden car park and former gas works site • Policy requirement for identification of alternative sites and enabling re-provision of existing uses on alternative sites before re-development can be undertaken. Supporting text recognises desire and necessity to relocate fire station. Re-location of legion and liberal club identified as desirable but not essential. • Clause that shorter-term development proposals should not prejudice longer-term aspirations for the site. <p>Anticipated timing of development: 2021-2026 Table 2 Indicative timing of key elements of town centre masterplan, including</p> <ul style="list-style-type: none"> • 2021 onwards – major town centre developments come forward at Swan Frontage and Oxford Road roundabout • Re-location of High Wycombe Fire Station <p>Site boundary amended to exclude police station and to include northern and western arms of Abbey Way gyratory and green space.</p>	<p>Justification for change</p> <ul style="list-style-type: none"> • Urban design work identified potential individual development blocks within the site and suitable uses for them in the context of their town centre location and the objectives relating to public realm in this area. • Outcome of urban design work and in response to consultation • Findings from latest technical work, including modelling assessment of the operation of Eden car park • Policy requirement to ensure existing uses relocated satisfactorily to ensure community facilities not lost and fire service delivery not negatively impacted. Reflecting feedback from engagement with stakeholders. • Anticipating that part of site may come forward for development before masterplan highway changes implemented and necessary to ensure that proposals do not prejudice delivery of town centre vision • Phasing periods refined to reflect further technical work and assessment on intermediate period of infrastructure works • The police station fronts onto Queen Victoria Road and as such would not contribute significantly to development at Swan Frontage. Timescales for the redevelopment of the police station are potentially outside the timescales for the redevelopment of the Swan Frontage. • Green space included in boundary to reflect policy requirement that there be no net loss of green space during redevelopment.

	<p>Proposed Submission Document 2012</p> <p>Known as HWTC10 Swan Frontage</p> <p>Allocates site for mixed use development comprising main town centre uses and residential uses and public space. Consideration also should be given to opportunity for higher educational uses on this site.</p> <p>Identifies opportunities for public space improvements outside the Swan Theatre and establishes design principles. Reflects revised approach within DSA which sees retention of Abbey Way flyover ramp to end of the plan period and beyond.</p> <p>Anticipated timing of development: 2018 onwards Box 2 identifies from 2018 onwards:</p> <ul style="list-style-type: none"> • Potential re-location of High Wycombe fire station • Reconfiguration of Abbey Way gyratory, with environmental improvements and development opportunities created in Swan Frontage area <p>Site boundary – amended to remove land to the north-west of Legion (including youth centre and small pubs and retail units), part of Abbey Way flyover eastern ramp, and western arm of Abbey Way gyratory and green space within gyratory</p>	<p>Justification for change</p> <ul style="list-style-type: none"> • Allocation for town centre uses reflects sustainable central location of site within town centre. Acceptable in principle that some of site could be for residential development. Revised approach with retention of flyover ramp means individual development blocks identified in 2011 are superseded. Policy now establishing development principles for development proposals which may come forward. • Reflects revised approach to retaining flyover ramp and further design work undertaken to identify opportunities for public realm improvements within this context. • Phasing periods refined to reflect further technical design and assessment work on retention of Abbey Way flyover to single carriageway • Removal of land to the north and part of flyover ramp reflects change in approach to retain flyover ramp beyond the plan period. Green space removed from allocation as covered by Green Space designation (avoidance of duplication).
<p>Consultation responses</p>	<p>IF3 2005: 5</p> <ul style="list-style-type: none"> • There is a varied response as to the future use of this site with some interest being expressed to incorporate the site into the expansion of the university. However, there is also a request for the site to provide a form of community use. Redevelopment may impact the trunk road network and there is a request for its integration with the public transport system. • No opposition to the proposals but there is a request for further work in order to determine the site's best use. There is also the request for any redevelopment to incorporate public transport. <p>IF4 2007: 5 comments</p> <ul style="list-style-type: none"> • Support the identification of this site as a site for mixed use development, including amenity space in front of the theatre, connections to the Rye and Marlow Hill • Arts quarter should have connectivity to Town Hall and the Library with a view to making provision for visual arts. 	

	<p>Update Consultation 2009: 13 comments</p> <ul style="list-style-type: none"> ▪ Support for creation of green space at this location and the linking of this green space to river ▪ A water feature would not be suitable here, would like to see actual river ▪ Further consideration needs to be given to design, including ensuring that the existing buildings (especially the Swan Theatre and BNU building) are not hidden from view by new landmark buildings ▪ Public square that is created from the demise of Abbey Way is very large, and potential windswept - next iteration of the plan will need to show how this can be better contained. ▪ Possibility of relocating the fire station to the Staples site, and Staples to the Gas Works site. Could the Royal British Legion and Liberal Club be relocated to the old library site? ▪ Policy should refer to reducing and managing flood risk ▪ On the basis of the timescales for delivery of the town centre vision, it is unlikely that the Swan Frontage site would be available for redevelopment until the latter part of the plan period. Therefore it seems optimistic for the Council to anticipate timing of the development between 2014 and 2019. <p>Update Report 2010: variety of responses received</p> <ul style="list-style-type: none"> • Further detailed consideration needs to be given to the design of development blocks in this area and the public spaces. • Educational and cultural uses should be prioritised over other uses, particularly at ground floor level – this would maintain an active frontage and synergy and integration with BNU’s development and the Swan Theatre. • Question the rationale for excluding the police station from the Swan Frontage allocation. No reason why police station relocation should be treated differently to fire station relocation. <p>2011 consultation draft: 14 comments</p> <p>Infrastructure</p> <ul style="list-style-type: none"> • Comments on water supply and sewerage network capacity. • Cycle lanes should be incorporated into any development in this part of the town. 3(a) should have cycle access <p>Uses, Design and Public Realm</p> <p>Supportive of improving pedestrian routes into town, creation of a new public space and opening up of River Wye</p> <ul style="list-style-type: none"> • Supportive of the creation of A1, A3, A4 facilities on ground floor and possible use being further/higher education or offices B2 on upper floors. • The proposed building in front of the university is too big and imposing; it should compliment the university and should not dominate the green area. The building should be architecturally significant and be rethought to provide the appropriate sense of place at this location. There should be public access to the building and both sides of the river. • The view of the town from Marlow Hill should be good to welcome visitors - green space would be preferred. Re-siting the Fire Station and Liberal Club are essential to ensure this good view. <p>Other</p> <ul style="list-style-type: none"> • Challenges of relocating the fire station are significant due to the appliances held at the station. Current site has limitations but it is considered adequate for its current use. • Police station should be included in allocation - it remains feasible that the redevelopment of the police station could broadly coincide with the Swan Frontage redevelopment.
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Three options were appraised to reflect future potential roles for the site, taking into account its gateway location and proximity to other existing uses (e.g. proximity to the theatre).</p>	

Options appraised ¹⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred option¹⁶ – Mixed-use main town centre uses and residential, with opportunity for provision of higher education facilities; public spaces within the site (including green space at Abbey Way Gyratory); proposals not to prejudice long-term aspirations for the removal of eastern flyover ramp. Relocation of Fire Station, Royal British Legion and/or Liberal Club desirable but not essential.</p>	<p>Social This option has the potential to have a positive impact on achieving social objectives, as it improves the physical and natural environment in this location. The addition of a landmark development on a key site will establish a key node at one of the gateways into the town centre of High Wycombe. The development of this site can reinforce the identity for High Wycombe in addition to other key town centre redevelopments.</p> <p>Environmental This option has potential to have a positive impact on achieving environmental objectives as the option proposes significant improvements to the natural and built environment on the site.</p> <p>Economic This option has the potential to have a significant positive impact on achieving economic objectives as the option proposes significant employment-generating uses on site. Improvements in the public realm at this gateway location will also increase the investment potential of the site and wider town centre.</p>	<p>This option was accepted as the preferred option as it recognises the potential of this site as a key gateway site into the town centre, identified through the studies supporting the masterplan proposals, and the opportunity for a mixture of uses to achieve the objectives for the site. It recognises existing adjacent users, such as the BNU building and the Swan Theatre that complement the aspirations for a cultural quarter in this area and the option facilitates the expansion of BNU if appropriate. This option facilitates but does not require the relocation of the existing uses, which is in line with the financial and deliverability evidence.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors. Further changes to the detailed wording of the policy in relation to the operation of the fire station have been proposed (FC44) but this does not change the overall approach of the policy.</p>
<p>Alternative Option 1 – Mixed use development, consisting of education or cultural/entertainment use. Also scope for office or hotel development. Requires satisfactory relocation of existing uses. Scope for improved connectivity of green spaces (The Rye and the Abbey Way gyratory, to the town centre); proposals not to prejudice long-term aspirations for the removal of eastern flyover ramp.</p>	<p>Social This option has the potential to have a positive impact on achieving social objectives, as it improves the physical and natural environment in this location. The addition of a landmark development on a key site will establish a key node at one of the gateways into the town centre of High Wycombe. The development of this site can reinforce the identity for High Wycombe in addition to other key town centre redevelopments.</p> <p>Environmental This option has potential to have a positive impact on achieving environmental objectives as the option proposals significant improvements to the natural and built environment on the site.</p> <p>Economic This option has the potential to have a positive impact on achieving economic objectives as the option proposes employment generating uses on site. Improvements in the public realm at this gateway location will also increase the investment potential of the site and wider town centre.</p>	<p>This option was rejected as it restricts the mixture of uses considered appropriate on the site, including residential, which does not reflect the town centre location of this site. It also relies on educational/cultural proposals coming forward and the relocation of existing uses neither of which could be guaranteed based on the evidence base available and feedback from stakeholder engagement.</p>

¹⁵ See 2012 SA main report

¹⁶ See 2012 detailed SA

<p>Alternative Option 2 – Mixed use predominantly office development with scope for other uses including cultural/entertainment, retail, hotel and residential. Requires satisfactory relocation of existing uses. Creation of new open space and improved connectivity between the Rye and the Abbey Way roundabout; proposals not to prejudice long-term aspirations for the removal of eastern flyover ramp.</p>	<p>Social This option has the potential to have a positive impact on achieving social objectives, as it improves the physical and natural environment in this location. The addition of a landmark development on a key site will establish a key node at one of the gateways into the town centre of High Wycombe. The development of this site can reinforce the identity for High Wycombe in addition to other key town centre redevelopments.</p> <p>Environmental This option has potential to have a positive impact on achieving environmental objectives as the option proposals significant improvements to the natural and built environment on the site.</p> <p>Economic This option has the potential to have a significant positive impact on achieving economic objectives as the option proposes significant employment generating uses on site. Improvements in the public realm at this gateway location will also increase the investment potential of the site and wider town centre.</p>	<p>This option was rejected as the financial viability and deliverability assessment work undertaken did not support a predominantly office-led development. The option also required the relocation of existing uses which could not be guaranteed based on the evidence base available and feedback from stakeholder engagement.</p>
<p>Other factors</p>	<p>Stakeholder engagement</p> <p><i>Bucks Fire and Rescue Service</i> On-going discussions with BFRS have identified the operational requirements of the fire service. BFRS currently undertaking assessment of potential alternative site within the town centre. Current location operates satisfactorily with regards to service delivery and any potential alternative site will need to meet these needs.</p> <p><i>Royal British Legion</i> Engagement with RBL undertaken. RBL have a desire for town centre location and have indicated that there could be plans for redevelopment of existing site in the longer-term. Re-development of Swan Frontage site could involve retention of existing RBL building or re-provision within the site, if relocation elsewhere within the urban area not feasible or practicable.</p> <p><i>Liberal Club</i> Engagement with Liberal Club undertaken. Liberal Club have indicated a preference for a central location, with re-provision of existing facilities. Re-development of Swan Frontage site could involve retention of existing building or re-provision within the site, if relocation not feasible or practicable.</p> <p><i>Bucks New University</i> Through written representations, BNU have proposed the prioritisation of education and cultural uses over other uses in this location. This is supported by the Concept Statement and Masterplan which was developed for the Queen Alexandra Road campus alongside the planning application process for the university Gateway Building (opened 2009). The concept statement identifies the potential for the expansion of the university campus with a creative arts facility into the Swan Frontage site, following the removal of the Abbey Way flyover ramp. The proposed HWTC10 policy identifies the potential for higher education facilities within any redevelopment of the site although this may be restricted somewhat by the retention of the flyover ramp beyond the end of the plan period. The Council is not aware of any further developed plans for the expansion of the BNU campus beyond that identified in the concept statement.</p>	

	<p><i>Thames Valley Police</i></p> <p>Through written representations Thames Valley Police have indicated that in the longer term the relocation of the existing station and redevelopment of the existing site may be undertaken, provided a suitable affordable alternative site can be identified. Police station site no longer included within this site allocation, but wider town centre policies would support redevelopment of this site within the town centre boundary.</p> <p>Contingency</p> <p>Proposed highway changes in this area, including the reduction of Abbey Way flyover to single carriageway and the closure of the northern arm of the gyratory to general traffic, can be implemented without the redevelopment of the existing uses on site.</p> <p>Public realm improvements in the area outside the Swan Theatre can be implemented independently of relocation of uses and redevelopment of the site.</p> <p>Re-development of the site is contingent on the acceptable re-location of existing uses elsewhere within the town or the re-provision of existing uses on site.</p> <p>The re-location of uses is not dependent on each other and could be undertaken separately or jointly. If re-location of one or more of the uses cannot be secured, then redevelopment proposals will need to take into account retention of the use on site and/or may be delayed until relocation can be secured.</p>
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Policy HWTC11	Wycombe General Hospital	
Policy Development	Issues and Options IF3 • n/a	Justification •
	Preferred Options IF4 • n/a	Justification •
	Update Consultation 2009 • Policy MU31 allocated site for continuing hospital use and associated car parking, with flexibility for supporting residential and office uses on identified segments of the site. • Top (southern-most section) identified as appropriate for residential and /or offices uses if released/required. • Flexibility for town centre uses, particularly offices, on the northern end of the site, including the adjoining Staples site.	Justification for change • Policy introduced following discussions with Hospital Trust, to reflect aspirations of the trust in committing future operations at the site whilst providing flexibility for supporting/alternative uses on particular areas within the site.
	Update Report 2010 - none	
	2011 consultation draft • Policy HWTC13 - no change to general approach/mix of uses in policy – exclusion of Staples site.	Justification for change • No major concerns over approach of the policy in consultation. • Conclusions of SA supported approach in policy.
	2012 Proposed Submission Document • Policy HWTC11 – policy wording adjusted but essential principles and mixes of use envisaged in the above policy remain.	Justification for change • Overall support for policy approach in consultation • Minor policy adjustments to improve the coherence and clarity of the policy.
Consultation responses	IF3 2005 n/a IF4 2007 n/a Update Consultation 2009: (3 comments received) <ul style="list-style-type: none"> ▪ Nature of the facilities offered by the hospital is more the problem (although acknowledge that this is outside of the remit of the DSA document) ▪ Contradictory to be looking at maintaining or increasing car parking while encouraging people to use sustainable means. Update Report 2010 – N/a 2011 consultation draft: (5 comments received) <ul style="list-style-type: none"> • Support for maintaining hospital presence on the site. • One comment suggesting that the site is sequentially unsuitable for retail development as it is not well linked to the core shopping area/primary shopping frontage. 	

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised to assess what were considered to be the reasonable alternatives for using this site; one providing a degree of flexibility for other uses including residential and offices, on parts of the site. The other option does not provide this flexibility for supporting uses.		
Options appraised¹⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred option¹⁸: Continuing hospital use with flexibility for residential and office uses on parts of the site.	<p>Social Policy would have a positive effect by allowing a mix of uses in an accessible location and by supporting continuing operation of the hospital at this town centre site.</p> <p>Environmental Policy could provide environmental enhancements for a key part of the town centre. No significant adverse effects likely under any of the sub-categories.</p> <p>Economic Policy would help maintain future use of site as both operational hospital use and with a supporting mixture of supporting uses, would have positive effects on economic objectives.</p>	<p>This was selected as the preferred option because it was considered to allow for an appropriate degree of flexibility to allow for supporting uses on parts of the site, which would in turn help ensure continuing operational hospital use on the bulk of the site.</p> <p>This was selected as the preferred option at Update Consultation stage (2009) and there were no further changes in circumstances to merit changing this approach.</p>
Alternative Option: Continuing hospital use but with no flexibility for other uses (i.e. status quo).	<p>Social Option would largely have a neutral effect on objectives but could potentially have a negative effect by being too inflexible and thereby not allowing the hospital the requisite to tailor the mix of land uses on the site to meet its requirements. This could ultimately lead to a risk that the current range of facilities offered at the hospital site could reduce.</p> <p>Environmental 'No change' option so would have no effect on environmental objectives.</p> <p>Economic 'No change' option so no effect on economic objectives.</p>	<p>This option was rejected as it was considered that it would not provide the degree of flexibility required to tailor the mix of land uses on the site to allow for continuation of the current range of facilities offered at the hospital on this site.</p>
Other factors	<p>Site owner engagement: Yes</p> <p>Positive response to allocation?: Yes – policy drafted in response to emerging plans outlined by the Hospital Trust and dialogue with representatives of the Hospital Trust.</p> <p>Contingency position if site not delivered: Further engagement with site owners although non-delivery would simply mean no change as hospital is already <i>in situ</i>, non implementation on site does not affect delivery of town centre masterplan</p>	

¹⁷ See 2012 SA main report

¹⁸ See 2012 detailed SA

Policy HWTC12	Chilterns Shopping Centre and Frogmoor East	
Policy Development	Issues and Options IF3 • n/a	Justification •
	Preferred Options IF4 • n/a	Justification •
	Update Consultation 2009 • Policy MU27 allocated site for mixed-use development with predominantly retail use. • Possible land uses included retail, restaurants, pubs, hotel, commercial leisure, residential on upper floors.	Justification for change • Following the economic downturn and the implementation of the Eden town centre redevelopment scheme, the extent of vacancies in the old part of the town centre increased significantly. This rise was particularly acute in the Chilterns Shopping Centre area (as evidenced in the January 2009 Town Centre Vacancy Survey, the results of which were highlighted in the 2009 DSA Update Consultation Document). • Therefore it was felt appropriate to allow for increased flexibility for uses here, but also to support proposals which would deliver a comprehensive redevelopment of the site, to aid regeneration efforts.
	Update Report 2010 - none	
	2011 consultation draft • Policy HWTC14 - No change to general approach/mix of uses outlined in 2009 policy.	Justification for change • No major concerns to the preferred approach expressed in consultation responses – see primary shopping frontages policy for how the concerns over the non-inclusion in this frontage were dealt with.
	2012 Proposed Submission Document • Policy HWTC12 – general approach of above policy taken forward • Minor wording changes to exclude mention of “predominantly retail” on Frogmoor frontage – retail now mentioned as one of the acceptable land uses. • Reference to residential uses on upper floors removed from policy. • Removal of reference to financial contributions.	Justification for change • Support for approach in consultation. • To provide greater flexibility for non-retail uses given current level of vacancy in this area of the town centre, and reflect mixed-use aspirations for the site outlined and supported in the consultation responses. • High Wycombe Retail Strategy 2012 recommendations advocating greater flexibility for uses at the site. • Residential removed to reflect reality of student housing currently being built above the ground floor of the Chilterns Shopping Centre. • Financial contributions reference removed as this topic will be dealt with via emerging CIL.
Consultation responses	IF3 2005 n/a IF4 2007 n/a Update Consultation 2009: (13 comments received) ▪ Mixed response to the proposed removal of the Chilterns Shopping Centre from the Primary Shopping Frontage although this included strong opposition to from the owners of the centre.	

	<ul style="list-style-type: none"> ▪ Support for conversion of upper floors to residential ▪ Frogmoor should be made more attractive ▪ Proposed land uses need to be set in the context of reducing the late night/early morning activity in Frogmoor ▪ Crucial to ensure that Oxford Road and southern end of Frogmoor remain on the main 'retail' loop of the town by overcoming the barrier of the roundabout asap. ▪ Possible potential for Hughenden Stream within this site ▪ <p>Update Report 2010 – N/a</p> <p>2011 consultation draft: (6 comments received)</p> <ul style="list-style-type: none"> • Various degrees of support for policy and suggestions on future uses for the site/area/ • Support for the creation of a café/restaurant culture in the area. • Support for use of upper floors for residential. • Comments on the importance of links from the area to the rest of the core of the town centre. 		
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised to cover reasonable redevelopment options (mixed-use, either including or excluding residential) and one option advocating a status quo situation (i.e. maintaining a strict approach of allowing only retail uses on the site).</p>			
Options appraised¹⁹	Summary of the outcome of the Sustainability Appraisal		Reasons for accepting/rejecting option
<p>Preferred Option: Mixed-use allocation comprising retail, restaurants, hotels, pubs, commercial leisure. Residential acceptable (on upper floors and on ground floor where no loss of retail frontages)</p>	<p>Social Option would be a catalyst to regenerating a key town centre site including provision of new housing, shopping and other facilities which would be used by the wider community; therefore likely to have significant positive effects on social objectives.</p> <p>Environmental Option would provide environmental enhancements for a key part of the town centre. No adverse effects likely.</p> <p>Economic Option would help regenerate site and assist economy of the district by providing facilities for a mix of uses including residential development.</p>	<p>It was considered that this option would maximise the potential of the site in delivering an improved range of facilities for the town as well as regenerating a site where the proportion of empty shop units has increased substantially since the onset of the economic downturn. The provision for residential development on upper floors would enable greater flexibility for development options here and encourage sustainable town centre living, whilst retaining active ground floor frontages.</p> <p>This option was selected as the preferred approach at Update Consultation stage (2009) due to the onset of the economic downturn and the effect of the opening of the Eden Centre in 2008. There have been no changes to circumstances since then to merit changing this approach.</p>	
<p>Alternative option 1²⁰: Mixed-use allocation comprising retail and restaurants, hotels, pubs and commercial leisure.</p>	<p>Social Policy would be a catalyst to regenerating a key town centre site including the provision of new shopping and other facilities which would be used by the wider community; therefore likely to have significant positive effects on social objectives.</p>	<p>It was considered that this option would maximise the potential of the site in delivering an improved range of facilities for the town as well as regenerating a site where the proportion of empty shop units has increased substantially since the onset of the economic downturn.</p>	

¹⁹ See 2012 SA main report

²⁰ See 2012 detailed SA

	<p>Environmental Policy would provide environmental enhancements for a key part of the town centre. No adverse effects likely.</p> <p>Economic Policy would help regenerate site and assist economy of the District by providing facilities for a mix of uses.</p>	
<p>Alternative Option 2: Stricter approach to uses – strict adherence to retail-only rules.</p>	<p>Social Option would have no discernable impact in terms of social benefits as no change would be envisaged to a failing part of the town centre.</p> <p>Environmental No adverse effects likely from this option but no significant enhancements either.</p> <p>Economic Option would do nothing to assist with regenerating a key part of the town centre which is currently struggling.</p>	<p>It was considered that this option would fail to provide for or encourage improvements to a site which has been suffering from a substantially increased proportion of empty shop units in recent years. It was considered that an overly restrictive approach at this site would therefore be inappropriate.</p>
<p>Other factors</p>	<p>Site owner engagement: Yes Positive response to allocation?: Yes – objected to taking the site out of the primary frontage (see above) but support for greater flexibility outlined allocation. Contingency position if site not delivered: Further engagement with site owners, non implementation on site does not affect delivery of town centre masterplan</p>	

Policy HWTC13	Lily's Walk (Former Gas Works Site)	
Policy Development	<p>Issues and Options IF3</p> <ul style="list-style-type: none"> • MPTC7 Gas Works Site • Option for redevelopment of retail and leisure • Site boundary reflected ownership of National Grid. • Line for possible improved route / new road identified on eastern boundary of site. • "Re-shaping High Wycombe" background paper identified the site within "Phase Two – Accommodating Traffic", with the ambition of accommodating traffic in place of the Abbey Way flyover, with a new route linking Abbey Way gyratory and West Wycombe Road. Identifies need to establish a new link road on the Gas Works / BCUC site. Identifies line of link road along eastern boundary of the site. 	<p>Justification</p> <ul style="list-style-type: none"> • Existing Local Plan allocation for leisure, residential and retail warehousing (Policy HW5). Outline planning application for retail and residential development submitted April 2000. • The David Lock Associates masterplan report (2004) had identified the provision of a link road in this vicinity for providing part of the alternative route through the town centre.²¹ Line identified on eastern edge of site to address levels differences and reduce land take requirements on gas works site.
	<p>Preferred Options IF4</p> <ul style="list-style-type: none"> • Known as MU11 Lily's Walk (former Gas Works) – western part • Identified as a Mixed Use site. • Preferred mixed use / key requirements – Town centre mixed uses including large format retail restricted to a range of goods typically associated with retail warehousing, residential and some scope for commercial leisure, community uses, hotel, offices • Provision of new link road linking Queen Alexandra Road and Lily's Walk and widening of Lily's Walk / Desborough Road as well as the link road. • Boundary of site amended to remove eastern part of site (east of bridleway). Eastern section included in HE1 site (expansion and consolidation of campus). • Proposals map shows existing historic Transport Improvement Line on western boundary of site – identified as "retained pending review" 	<p>Justification</p> <ul style="list-style-type: none"> • Wider allocation of uses reflects comments received in previous consultation. Restriction on retail elements reflects findings of negative impacts on unrestricted retail on town centre through SA process. Inclusion of residential reflects positive impact on social objectives in SA plus residential element of extant outline planning permission granted in April 2005. • Reflected highway design work being undertaken by David Lock Associates and Peter Brett Associates. • Eastern section of site incorporated into HE1 site to reflect emerging concept statement for the new university campus in this location. • Map amended to show existing transport improvement line. As part of outline permission for the site, the development was required to provide a link between Queen Alexandra Road to part way along Rutland Street (to replace the steepest section of Rutland Street, while providing access to

²¹ A Vision for High Wycombe: High Wycombe Masterplan (David Lock Associates, August 2004) Part Seven: Strategic Options – Part 2 Diversion of Abbey Way and Archway p.8. See also Chapter 3 of High Wycombe Town Centre Masterplan – Option Development and Appraisal Report (WDC, May 2012)

	<ul style="list-style-type: none"> Proposals map shows indicative line of “upgraded/new roads” on eastern boundary of site (linking Queen Alexandra Road and Desborough Road). 	<p>site)</p> <ul style="list-style-type: none"> Further option appraisal of gas works link road undertaken.²² Work concluded that while a link diagonally through the site would address topographical issues, the design would wipe all development value from the site and contribute to higher speeds. Concluded that the link would have to pass either to the west or east of the site.
	<p>Update Consultation 2009</p> <p>Known as MU11 Lily’s Walk (former Gas Works site)</p> <p>Site boundary amended to include area on eastern edge of site (east of bridleway).</p> <p>New site identified in southwest corner (RES56 – west of link road) which covers part of previous allocation.</p> <p>Site allocated for mixed use development. Including large format retail and residential development above retail units.</p> <p>New road link identified on western boundary of site.</p>	<p>Justification for change</p> <p>Response to consultation responses. BCUC identified eastern part of site as potential campus expansion opportunity in the longer term within campus concept statement but no further development of plans and part of site retained in National Grid ownership.</p> <p>Identification of site RES56 through highway assessment and urban design work. Site allocated for residential use.</p> <p>Allocation reflecting existing outline consent for site (plus reserved matters application submitted 2008) and reflecting comments received during consultation. See also comments above relating to BCUC expansion.</p> <p>Further design work undertaken on options for link road.²³ Considered seven different alignments for link east or west of the site. Link to east of site recommended (addressing issues of topography). However road alignment would have to avoid existing pressure reduction station in south east corner (cost of relocation prohibitive) and would therefore have implications for land take on university site. Considered that necessary university land would not be available and therefore alignment on western side of site considered a practical design solution (including existence of existing transport improvement line in this location). Further design work in January 2009 supported these conclusions.²⁴</p>

²² Re-shaping High Wycombe: Stage Two of Developing a Masterplan for High Wycombe – Reconfiguring Highway Infrastructure Options Paper (Peter Brett Associates, September 2005)

²³ High Wycombe Masterplan – Development of Gas Works site – Link Road Alignment Options Final Report (PBA; Dec 2007)

²⁴ High Wycombe Development Framework – Development of Gas Works Site – Appraisal of Link Road Design Alignment Option 2 – Final Report (PBA, January 2009)

	<p>Development of this site should include the provision of a new link road linking Queen Alexandra Road and Lily's Walk. Development of site required to not compromise link road. Site expected to provide either part of the new link road or make a financial contribution towards delivery of the road.</p> <p>Anticipated timing of development – 2009 - 2014 Table 11 identified "Creation of an alternative route to A40 and local traffic management changes" as taking place between 2009-14 (indicative phasing).</p>	<p>Existing outline consent S.106 agreement required provision of part of link road (and reflected in reserved matters submission).</p> <p>Timing reflected phasing of masterplan infrastructure works, informed by technical work and feedback from site owner on site redevelopment timescales.</p>
	<p>Update Report 2010</p> <p>Reported on further technical design and assessment work on gas works link road, including alignments and junction configuration. Micro-simulation modelling of link indicated that a free flow link, with a pre-signal on Lily's Walk demonstrated the best performance.²⁵ Technical work identified that access into site from link road may be unacceptable in relation to safety and network operation.</p> <p>Table 10 Proposed revised indicative phasing periods, including</p> <ul style="list-style-type: none"> • 2011-2016 – implementation of key highway linkages, including gas works link and Westbourne Street Link <p>2010 background paper identified estimated developer contributions from site redevelopment as "on-site provision of part of the Gas Works Link road". Value of infrastructure works estimated at £300,000 (Appendix 7).</p>	<p>Justification for change</p> <ul style="list-style-type: none"> • Phasing periods refined to reflect further technical work and assessment on intermediate period of infrastructure works and to reflect comments relating to development timescales for Octagon Parade
	<p>2011 consultation draft</p> <p>Known as HWTC15 Lily's Walk (former Gas Works site)</p> <p>Site allocated for mixed use development, comprising town centre uses and residential uses. Retail proposals which propose sale of comparison and/or convenience goods (as opposed to bulky goods already deemed acceptable on site) must be subject to (a) a sequential test, and (b) a retail impact assessment.</p>	<p>Justification for change</p> <p>Allocation for town centre uses reflects sustainable central location of site within town centre boundary and response to requests for flexibility through consultation. Removes restriction on residential on upper floors (except on Lily's Walk) in response to consultation feedback. Retail impact tests required to ensure proposals support but do not detract from retail core of the town centre.</p>

²⁵ Gas Works Link, High Wycombe – Option Identification and Analysis (Jacobs for Transport for Buckinghamshire, June 2010)

	<p>Principles relating to design of frontages, including restriction of ground floor residential development fronting onto Lily's Walk.</p> <p>Development site required to provide new link road running north to south linking Desborough Road/Lily's Walk and Queen Alexandra Road at eastern end of site</p> <p>Anticipated timing of development: 2011-2016 Table 2 Indicative timing of key elements of town centre masterplan, including</p> <ul style="list-style-type: none"> • Creation of an alternative cross-town route, linking Marlow Hill to West Wycombe Road • Key town centre development sites start to come forward, including the former Gas Works site and in the Baker Street area <p>Site boundary amended to reflect deletion of site RES56 from DSA. Boundary amended to reflect National Grid ownership.</p>	<p>Approach reflecting new highway design approach to Manual for Streets guidelines.</p> <p>Provision of link road through site can be physically related directly to development</p> <p>Phasing periods refined to reflect further technical work.</p> <p>Site RES56 deleted due to issues relating to deliverability.</p>
	<p>Proposed Submission Document 2012</p> <ul style="list-style-type: none"> • Known as HWTC13 Lily's Walk • Allocates sites for mixed used development, comprising town centre uses and residential uses. Proposal should include a mix of uses on site. • Design principles amended to ensure consistency with HWTC3. Removal of requirement for active frontages. • Development of site required to provide the necessary land for new link road at western end of site. Extent of land to be in accordance with the revised Transport Improvement Line to be designated on site. • If development requires part of link road to give access then highway must be provided in a way which is consistent with the proposed design of whole link road. Or if all of link road required to mitigate development impacts, then road must be provided in way which is consistent with strategic town centre vision and Policy HWTC3. <p>Anticipated timing of development: 2013 and 2018 onwards Box 2 identifies from 2013 onwards:</p> <ul style="list-style-type: none"> • Creation of an alternative cross-town route, linking Marlow Hill 	<p>Justification for change</p> <ul style="list-style-type: none"> • Important that edge-of-centre site includes range of main town centre uses but also proximity to residential areas means residential development highly desirable. • To reflect feedback from consultation and further urban design consideration. • Reflects feedback from consultation and discussion with site owner with regards to delivery of link road. Principle of provision of land acceptable. Further design work has identified the proposed revised Transport Improvement Land and land take requirements. • Aims to relate provision of link road by site developer only if required to support development (in line with CIL regulations). Uncertainty around type and extent of redevelopment proposals, mean requirements for part or all of link road to support development currently unknown. To be determined through Development Management process. Access points onto site also to be determined through Development Management process. • Phasing periods refined to reflect further technical design and assessment work on retention of Abbey Way flyover to single

	<p>to A40 West Wycombe Road and the A4128 Glenisters Road</p> <ul style="list-style-type: none"> • Key town centre development sites start to come forward, including the former Gas Works site and in the Baker Street area <p>Site boundary as before. Proposals map shows proposed link road on western edge of site and related junction improvements.</p>	<p>carriageway</p> <ul style="list-style-type: none"> • To reflect further design work.
<p>Consultation responses</p>	<p>IF3 2005: 5 comments There is a mixed response over the future use of this site with some interest expressed to incorporate it into the university expansion. Range of uses under the “options” for the site should be extended to included University expansion (in accordance with emerging concept for a new university campus), residential (being considered by site owners and part of extant outline planning permission) and a wider mix of other town centre uses. Site has the potential to impact on the trunk road network and any redevelopment would require integration with the public transport system.</p> <p>IF4 2007: 6 comments Comments relating to proposed uses on site – mixed opinion of inclusion of educational facilities on site, request for large format open A1 retail, objection to quantum of residential proposed in allocation. Concerns regarding the transport implications of the development of the site, including on the Strategic Road Network. Objection to inclusion of link road on the site. Concerns regarding Water Supply Capability and Waste Water Services in relation to this site. Specifically, the network in this area is unlikely to be able to support the demand anticipated from this development (1)</p> <p>Update Consultation 2009: 3 comments Other town centre uses should also be listed as potential uses for this site, including leisure uses (reflected in current Local Plan allocation) and hotel, offices and leisure uses (included within adjacent site policies). Allocation for residential development “above retail elements” is too prescriptive. Extent of impact of highway works connected with the implementation of the town centre vision on this site and adjacent sites needs to be clarified and set out in relevant policies. Concern over extent of expected developer contributions, including the delivery of part of link road on site Site expected to be developed in 2009-2014</p> <p>Update Report 2010 (variety of responses received, most relating to the overall town centre masterplan proposals, and not site specific)</p> <ul style="list-style-type: none"> ▪ The Council has not yet resolved the issue of whether the gas works link road and re-routed A40 will be fit for purpose. Concern that the evidence base does not justify the inclusion of the Gas Works Link Road in all four development scenarios. No assessment of environmental impacts of diverting traffic undertaken. ▪ A more preferable route for the link road would be to the south east of the gas works site. ▪ As there is no final design for the Link Road an improvement line cannot be identified for protection and the affected landowners cannot assess the implications of the link road on the re-development options for the affected site ▪ Imposition of further access constraint (from link road) will, combined with existing constraints (such as Eden car park location), prevent the site reaching its full potential. ▪ Land take form site should be reflected in the wider package of contributions which the Council expects development sites to deliver. 	

	<p>2011 consultation draft: 11 comments</p> <p><i>Uses</i></p> <ul style="list-style-type: none"> • Other uses that could be considered include relocation of the Fire Station, enterprise units or creative studio space, live-work units, park. • Development of residential accommodation might impact future developments on that end of Bucks Uni campus-request residential housing is not built up to the boundary and that the retail element would sit better here. • Support range of uses proposed, including recognition that the site is suitable for larger retail uses and agree that proposals that propose the sale of comparison and/or convenience goods will be subject to the sequential and impact tests. <p><i>Link Road</i></p> <ul style="list-style-type: none"> • Supportive of the delivery of the new link road. • Don't agree that the Gas Works Link Road is essential to delivering the vision for High Wycombe - evidence base deficient in this regard. • Concerns about design of the road, including land take, restrictions on access arrangements, impact on • Object to the requirement that development of site should not only set aside land for the Link Road but that any development should fund the entirety of the road itself. Contributions should be sought from other town centre sites. • Development of site will need to demonstrate consideration of existing bridleway which gives pedestrian access to the hospital from the town centre and C of E junior school. Also access points need to take into account parking arrangements on Suffield Road. <p><i>Other</i></p> <ul style="list-style-type: none"> • Construction of anything other than low height buildings will require piling which will probably release contaminants from the site. • Wording on active frontages is ambiguous and should require active streetscapes as active frontages not possible on the entire site. • Realistic prospects of delivering site by 2016 need to be reconsidered, particularly as the Council has sought to use the site in sequential terms to counter bulky goods retail on other sites. • No infrastructure concerns regarding Water Supply capability at this site but the sewerage network capacity is unlikely to support the demand anticipated for this development and further investigations are necessary. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Four options selected, to reflect potential range of future land uses on the site, and also to assess provision/non-provision of link road through the site connecting Desborough Road and Queen Alexandra Road.</p>		
<p>Options appraised²⁶</p>	<p>Summary of the outcome of the Sustainability Appraisal</p>	<p>Reasons for accepting/rejecting option</p>
<p>Preferred Option²⁷: Mixed-use development of main town centre uses and residential development. Includes provision of land for link road connecting Desborough Road and Queen Alexandra Road.</p>	<p>Social This option has the potential to have a significant positive impact on social objectives as it proposes the development of a currently redundant site bringing forward housing and other services within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it develops a currently redundant site within the town centre.</p>	<p>This option was accepted as the preferred option as a mixed use development makes the most of the site's edge-of-centre location including the proximity of the site to residential areas of the town centre. The requirement for the provision of land for the link road protects the opportunity for implementing the town centre masterplan proposals and was agreed with the site owner through engagement in advance of publishing the proposed submission version of the DSA. Following engagement with the site owner, it was felt not to be appropriate or in line with Regulation 122 of the CIL 2010 Regulations to require the provision of the link road within the policy when the quantum of development on the site was at this stage unknown.</p>

²⁶ See 2012 SA main report

²⁷ See 2012 detailed SA

	<p>Economic This option has the potential to have a significant positive effect on economic objectives as it proposes the re-use of a currently vacant town centre site for employment-generating uses (subject to any retail proposals being in accordance with the town centre sequential and impact tests as set out in national planning policy), in conjunction with residential development. In addition the provision of land for the link road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors. A further change has been proposed to the policy (FC17) regarding the provision of highway works in line with the wider town centre proposals but this does not change the overall approach of the policy.</p>
<p>Alternative Option 1 – Retail allocation (not including residential as in Preferred Option). Includes provision of land for link road described in preferred option</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the development of a currently redundant site bringing forward retail development within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it develops a currently redundant site within the town centre.</p> <p>Economic This option has the potential to have a positive effect on economic objectives as it proposes the re-use of a currently vacant town centre site for employment-generating uses (subject to any retail proposals being in accordance with the town centre sequential and impact tests as set out in national planning policy). In addition the provision of land for the link road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was rejected as it does not make the most of the site's proximity to residential areas of the town on its southern and western boundaries and the opportunity to create a sustainable mixed-use development within the town centre.</p>
<p>Alternative Option 2 – Car Parking. Includes provision of land for link road connecting Desborough Road and Queen Alexandra Road</p>	<p>Social This option would have a limited impact on social objectives as development proposed does not create an active use within the town centre.</p> <p>Environmental This option would have a positive benefit on environmental objectives as it would reuse a currently redundant site but careful consideration would need to be given to design to ensure that there is not a negative impact on its surrounds.</p> <p>Economic This option will have very limited beneficial effect on economic objectives, as it does not propose any employment opportunities. In addition the provision of the link road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was rejected as the results of the sustainability appraisal demonstrated that this option would have only limited positive impact on the achievement of the sustainability objectives and would not make the most of the site's edge-of-centre location.</p>
<p>Alternative Option 3 – Mixed use development of main town</p>	<p>Social This option has the potential to have a positive effect on social objectives as it</p>	<p>This option was rejected as it does not protect the opportunity for the implementation of the town centre masterplan proposals and therefore, as</p>

<p>centre uses and residential development. No requirement for land for link road, connecting Desborough Road and Queen Alexandra Road.</p>	<p>proposes the development of a currently redundant site bringing forward housing and other services within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive effects on environmental objectives as it develops a currently redundant site within the town centre.</p> <p>Economic This option has the potential to have a positive effect on economic objectives as it proposes the re-use of a currently vacant town centre site for employment generating uses, in conjunction with residential development. However the absence of the link road does not support the vision and masterplan for the town centre, including the objective for increasing its overall economic competitiveness.</p>	<p>demonstrated through the SA results, brings about lower economic benefits and does not support the wider vision and objectives for the town centre. Following engagement with the site's landowner prior to the publication of the proposed submission version of the DSA, agreement was reached on the principle of the site providing the land for the link road.</p>
<p>Other factors</p>	<p>Stakeholder engagement</p> <p>The Council has been undertaking on-going consultation and engagement with the site owner both during and outside the formal consultation periods. In particular, discussions have taken place regarding the proposed uses for the site, in conjunction with development proposals being developed by the site owner. Significant discussion has taken place regarding the necessity and delivery mechanisms for the gas works link road. Through negotiation, the principle of the site owner/developer providing the land for the link road (subject to land take extents) has been agreed. As the development proposals for the site are currently unknown, the requirement for part or all of the link road itself are yet unknown, and will be decided through the development management process. The Council has undertaken further design work on the link road to identify necessary land take requirements and inform the proposed revised Transport Improvement Line. The transport consultant for the site owners has inputted into this design work.</p> <p>Contingency</p> <p>The delivery of the gas works link road is not dependent on the gas works site coming forward for redevelopment. The majority of the land is protected by an existing Transport Improvement Line, which will be amended to reflect the latest design of the link road if the town centre proposals contained within the Delivery & Site Allocations Plan are adopted. The Council will continue on-going dialogue and negotiation with the site owner to acquire the land as is necessary. The funding of the link road is not dependent on a financial contribution from the gas works site development, although no or reduced CIL receipts from this site will have an impact on overall CIL monies available.</p>	

Policy HWTC14	Buckingham House and Castle House	
Policy Development	Issues and Options IF3	Justification
	<ul style="list-style-type: none"> n/a 	<ul style="list-style-type: none"> n/a
	Preferred Options IF4	Justification
	<ul style="list-style-type: none"> Allocated under Policy A5 (site MU14) as a site for town centre mixed uses including ground floor large format retail (restricted to retail warehousing and subject to demonstrating need and assessing town centre impact), commercial leisure, community uses, hotel, offices and residential on upper floors. Allocation stated that development should provide active ground floor frontage and provide for the widening of Desborough Road. Road improvement line between two buildings 	<ul style="list-style-type: none"> Sites outlined as potential development sites in 2004 Retail and Town Centre Uses study (see Appendix I – Sites HW9 and HW16)
	Update Consultation 2009	Justification for change
<ul style="list-style-type: none"> Policy MU14 took forward allocation for site – no change to policy mix or development requirements. Deletion of road improvement line 	<ul style="list-style-type: none"> Further technical work on town centre masterplan led to road improvement line no longer being required 	
Update Report 2010	Justification for change	
<ul style="list-style-type: none"> Proposed to add in requirement for contribution to/provision of new road linking Queen Alexandra Road & Lily's Walk 	<ul style="list-style-type: none"> To reflect the necessity of land requirements at this location for implementation of Gas Works Link Road. 	
2011 consultation draft	Justification for change	
<ul style="list-style-type: none"> Policy HWTC16 allocated site for mixed-use development, comprising town centre uses and residential development. Policy changed to include reference to provision of a new route between Marlow Hill and the A40 West Wycombe Road, not prejudicing in longer-term comprehensive redevelopment of the entire site and how Rutland Street would be incorporated into a comprehensive redevelopment of the site. 	<ul style="list-style-type: none"> Further design work showed that land in the site was required to deliver the link road. To introduce flexibility in short term Transport assessment work identified that provision of link road could lead to closure of Rutland Street, thereby offering transport and development opportunities and benefits. 	
	2012 Proposed Submission Document	Justification for change
	<ul style="list-style-type: none"> Policy HWTC14 takes forward allocation. Addition of reference to revised Transport Improvement Line 	<ul style="list-style-type: none"> Further design work published in 2012 identifies location of new Transport Improvement Line, to provide location and indication of amount of land required
Consultation responses	IF3 2005 (No responses received on policy) n/a IF4 2007: No specific comments <ul style="list-style-type: none"> Update Consultation 2009: (3 comments received) <ul style="list-style-type: none"> Will part of this site be required to help deliver the link road? If so, this needs to be reflected in policy wording. Concern as to whether large format retail would work here with the limited parking on offer. 	

	<p>Update Report 2010 – No specific comments</p> <p>2011 consultation draft: 6 comments</p> <ul style="list-style-type: none"> • Any loss of car parking at Buckingham House is unacceptable as it would diminish our ability to attract office tenants. • Not feasible for Rutland St to be closed at its junction with Desborough Road as this is the principal entry route to Buckingham House. Access from Rutland St should therefore be retained. • Pedestrian crossing opposite Buckingham House should be retained. • Needs to be more clarity about the amount of contribution required to the new Link Road. Contribution should be proportionate to the effects of the development proposed and should be referred to in the text. • Concern about the different timescales of this site compared to HWTC15 and the impact this will have on the likely delivery of the Link Road. • The mix of uses should provide as much flexibility as possible and not necessarily limit the development to four storeys. • The full scope of retail uses should be considered suitable on the ground floor and not necessarily limited to the sale of bulky goods - consideration should also be given to leisure uses. • Welcome the inclusion of Castle House and Valley House as part of the mixed use redevelopment proposals. • It should be clear that residential accommodation may include student accommodation. • There should be no blanket restriction on ground floor residential uses-given the scale of the site, there may be ground floor locations with no interface with the public and therefore could be suitable for residential use. Policy currently precludes this. • There should be no specific restriction on the height of buildings to 'four storeys'. Should be left open for consideration as part of the development management process-higher development may be consistent with good planning and protect the wider character of the area. • Inclusion of 2c) is welcome but should not preclude the re-use/conversion of existing buildings for alternative uses. • No infrastructure concerns regarding Water Supply capability at this site. • The sewerage network capacity is unlikely to support the demand anticipated for this development - investigations into the impact would be necessary and take 12 weeks. A paragraph to be included has been proposed. • The nearest sewer is of insufficient size to take the proposed flow. There are also some historic network issues downstream. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Four options selected, to reflect potential range of future land uses on the site, and to appraise contribution/non-contribution to provision of new link road connecting Desborough Road and Queen Alexandra Road.</p>		
<p>Options appraised²⁸</p>	<p>Summary of the outcome of the Sustainability Appraisal</p>	<p>Reasons for accepting/rejecting option</p>
<p>Preferred option²⁹: Mixed use development of town centre uses (all forms of retail and other town centre uses) and residential development on upper floors. Includes contribution to provision of new link road connecting Desborough Road and Queen</p>	<p>Social This policy has the potential to have a positive impact on social objectives as it proposes the redevelopment of a site for housing and other services within an accessible town centre location.</p> <p>Environmental This policy has the potential to have significant limited positive benefit on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p>	<p>This option was accepted as it makes the most of this edge-of-centre site and recognises that retail uses could be an acceptable use subject to the necessary sequential and impact assessments. The requirement for the provision of land for the link road protects the opportunity for implementing the town centre masterplan proposals.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there has been no change in circumstances since.</p>

²⁸ See 2012 SA main report

²⁹ See 2012 detailed SA

Alexandra Road.	<p>Economic This policy has the potential to have a positive benefit on economic objectives as it proposes the redevelopment of a town centre site for employment generating uses, in conjunction with residential development. In addition, contribution towards the provision of the link road will help deliver the vision and masterplan for the town centre.</p>	
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<p>Alternative Option 1: Mixed Use development - Ground floor retail (limited to retail warehousing selling bulky goods only), commercial leisure, community uses, hotel, offices, with residential on upper floors. Includes contribution to new link road as described in preferred option.</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the re-development of a site for forward housing and other services within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses (and retaining existing employment opportunities), in conjunction with residential development. In addition contribution towards the provision of the link road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was rejected as it restricts the options for retail uses and therefore does not make the most of the site's edge-of-centre location.</p>
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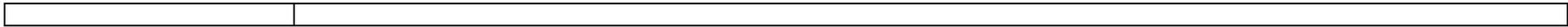
<p>Alternative Option 2: Allocation of site for business use. Includes contribution to new link road.</p>	<p>Social This option has the potential to have a limited positive impact on social objectives as it proposes the re-development of a site within an accessible town centre location but does not propose any residential or community uses.</p> <p>Environmental This option has the potential to have limited positive benefit on environmental objectives as it proposes the redevelopment of a prominent site within the town centre. However no significant environmental resources are impacted on or improved.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses (and retaining existing employment opportunities). In addition contribution towards the provision of the link road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was rejected as it restricts the land uses considered suitable at this site, and the results of the SA demonstrate that the lack of residential or community uses results in a limited positive impact on the social objectives. It also does not allow for retail uses and therefore does not make the most of the site's edge-of-centre location.</p>
<p>Alternative Option 3: Mixed use development of town centre uses on ground floor and residential development on upper floors. <u>No</u> contribution to provision of new link road connecting Desborough Road and Queen Alexandra Road.</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the re-development of a site for forward housing and other services within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses, in conjunction with residential development. However the absence of the link road does not support the vision and masterplan for the town centre, including the objective for increasing its overall economic competitiveness.</p>	<p>This option was rejected as it does not protect the opportunity for the implementation of the town centre masterplan proposals and therefore, as demonstrated through the SA results, brings about lower economic benefits and does not support the wider vision and objectives for the town centre.</p>
<p>Other factors</p>	<p>Site owner engagement: Yes – for both parts of site. Positive response to allocation?: Yes but Buckingham House owners sought clarification on land take issues. Contingency position if site not delivered: Further engagement with landowners and negotiation with them on acquisition of land for the link road.</p>	

Policy HWTC15	Collins House and Corner of Bridge Street/Desborough Road	
Policy Development	Issues and Options IF3 • n/a	Justification • n/a
	Preferred Options IF4 • Allocated under Policy A5 (site MU8 – named 'Corner of Bridge Street and Desborough Road) as a site for town centre mixed uses including ground floor retail, commercial leisure, community uses, hotel, offices with scope for residential on upper floors. • Allocation stated that development should provide active ground floor frontage and provide for the widening of Desborough Road and possible junction improvements with Bridge Street.	Justification • Adjacent to town centre development area – outlining site as mixed-use opportunity in line with area of search approach in 2004 Retail and Town Centre Uses Study.
	Update Consultation 2009 • Policy MU8 took forward allocation for site (site named Collins House/Corner of Bridge Street/Desborough Road) – no change to policy mix or development requirements.	Justification for change •
	Update Report 2010 No change	Justification for change • N/a
	2011 consultation draft • Policy HWTC17 allocated site for mixed-use development, comprising town centre uses and residential development. ○	Justification for change No change to principle of policy or mix of uses.
	2012 Proposed Submission Document • Policy HWTC15 takes forward allocation.	Justification for change • No change to principle of policy or mix of uses.
Consultation responses	IF3 2005 (No responses received on policy) n/a IF4 2007: No specific comments Update Consultation 2009: 2 comments ▪ Policy should refer to reducing and managing flood risk at this site. Update Report 2010 – No specific comments 2011 consultation draft: 2 comments • General support for policy	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options selected to appraise potential future land uses for the site (reflecting site's location in the town centre).		

Options appraised ³⁰	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option³¹ – Mixed-Use development of main town centre uses and residential development on upper floors	<p>Social This policy has the potential to have a significant positive impact on social objectives as it proposes the redevelopment of a site for housing and other services, including community facilities within an accessible town centre location.</p> <p>Environmental This policy has the potential to have significant positive benefit on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This policy has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment-generating uses, in conjunction with residential development. In addition the provision of the junction improvements and treatment of street network will help deliver the vision and masterplan for the town centre.</p>	This option was accepted as it was supported by the evidence base (in the form of the 2004 Retail and Town Centre Uses Study, which outlined the site as a mixed-use opportunity. Also supported by the outcome of the SA. This option was selected as the preferred approach at Preferred Options stage (2007) and no change to circumstances since then to merit changing this approach.
Alternative Option 1: Site allocated for B1 Offices	<p>Social This option has the potential to have a limited positive impact on social objectives as it proposes the re-development of a site within an accessible town centre location but does not propose any residential or community uses.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses (and retaining existing employment opportunities). In addition the provision of the junction improvements and treatment of street network will help deliver the vision and masterplan for the town centre.</p>	This option was rejected as, whilst it had positive economic benefits, it would not provide the range of facilities as provided by the preferred option, and it would be contrary to the evidence base (the 2004 Retail and Town Centre Uses study).
Other factors	<p>Site owner engagement: Yes – WDC owned. Positive response to allocation?: Yes Contingency position if site not delivered: Small site – no impact on strategy.</p>	

³⁰ See 2012 SA main report

³¹ See 2012 detailed SA



Policy HWTC16	Oxford Road Roundabout	
Policy Development	<p>Issues and Options IF3</p> <ul style="list-style-type: none"> • MPTC10 “New open space” • Abbey Way flyover could be closed to remove traffic from the town centre and free land for development and open space. • With Abbey Way moved, space will be created for new public open space in the town centre. 3 new public ‘squares’ could be created. Open space in this location referred to as “Oxford Place” • Site boundary centred on Oxford Road roundabout area. Touches corners of surrounding development blocks. • “Re-shaping High Wycombe” background paper identified the site as “Phase Four – Transforming the Oxford Road Roundabout” with the ambition of creating an attractive urban green space within the town centre. Includes the enlargement of Octagon Parade building over the space left after Abbey Way is removed, to provide enclosure to the new urban green space. 	<p>Justification</p> <ul style="list-style-type: none"> • The David Lock Associates masterplan report (2004) had identified the site for a new open space in this location following the diversion and closure of Abbey Way flyover. Reflected in the further masterplan work and in IF3 report.
	<p>Preferred Options IF4</p> <ul style="list-style-type: none"> • Known as MU24 Octagon Parade site • Identified as a Mixed Use site. • Preferred mixed use / key requirements – Opportunity for long term redevelopment to enhance the sites retail offer with scope for mixed uses on upper floors. • Boundary of site tight around existing Octagon Parade building 	<p>Justification</p> <ul style="list-style-type: none"> • SA framework identified positive effects on economic, social and environmental objectives through a mixed use development • Strategic masterplan issues included with submission version of Core Strategy so IF4 document concentrating on site specific issues. • Other sites surrounding Oxford Road roundabout area (Eden and Sainsbury’s) identified as Retail Mixed Use (RET)
	<ul style="list-style-type: none"> • Update Consultation 2009 • Known as MU24 Octagon Parade (including land at Abbey Way flyover (western end) and Oxford Road roundabout) • Site boundary expanded to include Abbey Way western flyover ramp, land to the south of flyover ramp (outside Tesco) and eastern side of Oxford Road roundabout. • Mixed use development including retail, office and hotel uses. • Identified provision of new open space within site boundary, including improved pedestrian links, re-opening of the River Wye or feature representing the river and landscaping. • Site redevelopment to contribute towards delivering strategic objectives and actions identified in strategic town centre policies. 	<p>Justification for change</p> <ul style="list-style-type: none"> • Boundary expanded to reflect further technical and design work undertaken on town centre masterplan. Work had identified opportunity for redevelopment and expansion of Octagon Parade site and for new development opportunity outside of Tesco entrance (once flyover ramps removed). • Hotel use included to reflect imminent submission for part redevelopment of Octagon Parade site for hotel (Travelodge). • Design work also undertaken on proposed new public space and identified opportunities for de-culverting of River Wye in this location • Inclusion of strategic policies for town centre masterplan, following deletion from Core Strategy.

	<ul style="list-style-type: none"> • Anticipated timing of development – 2019 - 2026 • Table 11 identified “Development at Archway and Oxford Road roundabout” and the “creation of an urban public space at Oxford Road roundabout and re-opening of the River Wye” as taking place between 2021-26 (indicative phasing). • Site expected to make financial contribution (in addition to standard developer contributions) towards implementation of the town centre vision 	<ul style="list-style-type: none"> • Timing reflected phasing of masterplan infrastructure works, informed by technical work. • Requirement reflecting financial delivery mechanisms identified HWTC4 Funding the Town Centre Vision
	<p>Update Report 2010</p> <ul style="list-style-type: none"> • Proposed to identify two separate developable areas within allocations (Site 1 - outside Tesco and Site 2 – existing Octagon Parade building) and appropriate uses for these sites • Proposed to amend site boundary to include all of Oxford Road roundabout <p>Table 10 Proposed revised indicative phasing periods, including</p> <ul style="list-style-type: none"> • 2016-2021 – potential ‘intermediate stage’ of closures of Abbey Way, including the potential removal of Oxford Road roundabout and/or improvements to pedestrian connectivity through roundabout in light of reduced traffic flow • 2021-26 – creation of high quality public open spaces at Oxford Road roundabout and Swan Frontage begins, including opportunities for de-culverting of River Wye 	<p>Justification for change</p> <ul style="list-style-type: none"> • In response to consultation comments and to recognise separate land interests and constraints within the allocation • To ensure that requirements for the provision of open space at this location are reflected within the allocation • Phasing periods refined to reflect further technical work and assessment on intermediate period of infrastructure works and to reflect comments relating to development timescales for Octagon Parade
	<p>2011 consultation draft</p> <ul style="list-style-type: none"> • Known as HWTC18 Oxford Road roundabout. • Identifies two separate development blocks and allocates them for town centre uses. • Principles relating to design of development blocks and design of open space. • Clause that shorter-term development proposals should not prejudice longer-term aspirations for the site. <p>Anticipated timing of development: 2021-2026 Table 2 Indicative timing of key elements of town centre masterplan, including</p> <ul style="list-style-type: none"> • 2016-2012 – removal of Oxford Road roundabout and environmental improvements to this area 	<p>Justification for change</p> <ul style="list-style-type: none"> • In response to consultation comments and to recognise separate land interests and constraints within the allocation. Allocation for town centre uses reflects sustainable central location of site within town centre. • Anticipating that part of site may come forward for development before masterplan highway changes implemented and necessary to ensure that proposals do not prejudice delivery of town centre vision • Phasing periods refined to reflect further technical work and assessment on intermediate period of infrastructure works

	<ul style="list-style-type: none"> • 2021 onwards – major town centre developments come forward at Swan Frontage and Oxford Road roundabout <p>Site boundary expanded to include all of Oxford Road roundabout</p> <p>Proposed Submission Document 2012</p> <p>Known as HWTC16 Oxford Road Roundabout</p> <ul style="list-style-type: none"> • Identification of two separate development blocks removed and site boundary amended (no longer includes southern half of flyover ramp or land adjacent to Tesco entrance) • Residential uses on upper floors considered acceptable. • Anticipated timing of development: 2018 onwards • Box 2 identifies from 2018 onwards: • Reconfiguration of Oxford Rod roundabout junction, with environmental improvements and development opportunities created in this area • Site boundary – amended to remove land south of flyover (outside Tesco) and southern lanes of flyover ramp. 	<ul style="list-style-type: none"> • To ensure that requirements for the provision of open space at this location are reflected within the allocation <p>Justification for change</p> <ul style="list-style-type: none"> • Reflects change in overall approach to masterplan delivery (no longer planning for full closure and removal of Abbey Way flyover within plan period and therefore development not anticipated in area adjacent to Tescos) • Consistent approach to other town centre development sites which promote a mix of uses. Restricted to upper floors to ensure active frontages delivered on ground floor. • Phasing periods refined to reflect further technical design and assessment work on retention of Abbey Way flyover to single carriageway • Removal of land south of flyover (outside Tesco) and southern lanes of flyover ramp reflects change in approach to retain flyover ramp beyond the plan period.
<p>Consultation responses</p>	<p>IF3 2005 3 comments</p> <ul style="list-style-type: none"> • No opposition to the proposals but there is a request for further work to determine the site's best use • Request for any redevelopment to incorporate public transport • Greening of the town should incorporate measures to improve biodiversity as well as visual attractiveness <p>IF4 2007: 1 comment</p> <ul style="list-style-type: none"> • Particular concerns regarding impact on the Strategic Road Network (Highways Agency) <p>Update Consultation 2009: 10 comments</p> <ul style="list-style-type: none"> ▪ Further design required on the proposed space and the massing of building surrounding it. Support for instatement of the river with naturalised banks as far as possible, water feature thought not to be appropriate. ▪ Access to Tesco/Eden multi-storey should be by rear access only - pedestrians can then walk on ground level with ease, without crossing numerous streams of traffic. This would be of particular importance for the Frogmoor area ▪ Policy needs to refer to reducing and managing flood risk ▪ Vision for Octagon Parade must not be at the expense of retailers who currently trade from this part of the town centre. ▪ Should it become apparent in the future that the removal of Oxford Road roundabout and/or the elevated section of Abbey Way is not feasible before 2021, then the principle of the described mixed used development within the MU24 area would still be appropriate (albeit it would involve development on a more restricted footprint). 	

	<p>Update Report 2010 (various)</p> <ul style="list-style-type: none"> • Support the principle of de-culverting the River Wye in this location as long as this does not impact on the proposed physical development at MU24. • Welcome commitment to the removal of Oxford Road roundabout and the flyover at the earliest opportunity. • Further design work required on short-term opportunities for improvements to pedestrian links across the Oxford Road roundabout and how a downgraded Abbey Way flyover could look. • Would prefer to see the eastbound carriageway removed or downgraded as early as possible. • Important for the policy to recognise that, in the period leading up to removal of the Oxford Road roundabout, interim development or change of use of Octagon Parade should be allowed where this does not prejudice the long term development aspirations within the policy and where it is appropriate to the town centre location. <p>2011 consultation draft: 10 comments</p> <ul style="list-style-type: none"> • Further design work need on what a de-culverted river channel could look like. • Consider the early reconfiguration of the Oxford Road roundabout and improvement of pedestrian links between Frogmoor/Oxford St/Octagon Parade and Eden is critical to the desired enhancement of the shopping environment of the town centre area as a whole. Policy should be flexible enough to allow implementation much earlier than 2021. • Suggest that the wording in the document relating to the indicative timing of development of site HWTC 18 should be flexible enough to allow implementation much earlier than 2021 where it can be demonstrated that this would not prejudice the proposed changes to the wider town centre street network; and it would represent beneficial early regeneration of this key site and act as a valuable catalyst for early implementation of other elements of the town centre vision. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised, both appraising mixed-use development but one appraising development which enables major changes to the highway network and one which doesn't.</p>		
<p>Options appraised</p>	<p>Summary of the outcome of the Sustainability Appraisal</p>	<p>Reasons for accepting/rejecting option</p>
<p>Preferred Option – Mixed-use development including main town centre uses and residential on upper floors; new public space and removal of Oxford Road roundabout. Any proposals not to prejudice the longer-term removal of Abbey Way flyover western ramp.</p>	<p>Social Option has the potential to have a significant positive impact on achieving social objectives, as it improves the physical and natural environment in this location. The addition of a landmark development on a key site will establish a key node at one of the gateways into the town centre of High Wycombe. The development of this site can reinforce the identity for High Wycombe in addition to other key town centre redevelopments.</p> <p>Environmental Option has potential to have a significant positive impact on achieving environmental objectives as the option proposes improvements to the natural and built environment on the site.</p> <p>Economic Option has the potential to have a significant positive impact on achieving economic objectives as the option proposes significant employment-generating uses on site. Improvements in the public realm at this gateway location will also increase the investment potential of the site and wider town centre.</p>	<p>This option was chosen as the preferred option as the land use allocation reflects the site's town centre location and facilitates the delivery of new public space and highway changes in line with the town centre vision and masterplan proposals. Significant engagement was undertaken with the site owners who supported this option.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors and there has been no significant changes since this time to warrant any change.</p>

<p>Alternative Option 1: Mixed-Use development on existing footprint of Octagon Parade site. No new public space and no change to existing highway network</p>	<p>Social Option has limited positive benefits on social objectives, as the retention of the highway network as existing prevents opportunities being realised for environmental and public realm improvements.</p> <p>Environmental This option has the potential to have a limited positive impact on environmental objectives as it proposes the redevelopment of a poor quality building but opportunities are still limited by the retention of the highway network as existing.</p> <p>Economic This option has the potential to have a positive impact on economic objectives as it proposes the redevelopment of a site for employment and residential uses within the town centre. However the extent of these opportunities are much more limited as development floorspace is limited by the retention of the existing highway network.</p>	<p>This option was rejected as it does not protect the opportunity for the implementation of the town centre masterplan proposals and therefore, as demonstrated through the SA results, brings about lower economic benefits and does not support the wider vision and objectives for the town centre.</p>
<p>Other factors</p>	<p>Site owner engagement The Council has been in on-going discussions with the owners of the Octagon Parade site throughout the development of the site policy. Engagement has been through regular meetings and through submission on comments during the formal consultation periods. Discussions around the proposed redevelopment of Phase II of the site (the first phase, a 120-bed hotel was completed in 2011) has informed the allocation - in particular, the proposed expansion of the site footprint and the timing of redevelopment. Timing of redevelopment is closely linked to the implementation of highway changes as part of the wider town centre masterplan. Technical work has looked at the potential for undertaking highway changes at Oxford Road roundabout earlier than was previously indicated, to match the indicative timing of the redevelopment of the Octagon Parade site.</p> <p>The Council also discussed the proposals for redevelopment in the area immediately in front of Tesco, with Tesco in the context of any future redevelopment of the existing superstore. Tesco indicated that would not be promoting development in this location as part of any redevelopment / improvements to the existing store. They identified that the existing access and egress points to the car park would need to be retained. Development in this location is no longer being promoted by the Council through the DSA as the flyover ramps are proposed to be retained post the lifetime of the Plan.</p> <p>Contingency If it is found that traffic levels through the Oxford Road roundabout cannot be reduced to a level where the Oxford Road roundabout can be removed and the junction simplified, then the expansion of the Octagon Parade site footprint cannot be undertaken. Redevelopment of the site would have to take place within the existing footprint.</p> <p>If the Oxford Road roundabout were to be removed but the Octagon Parade site did not expand its footprint westwards this would have implications for the design of the junction and the surrounding public spaces. Detailed consideration will have to be given to the design of this space to address concerns around massing/extent of open space and protection from weather elements.</p> <p>Delivery and funding of highway infrastructure changes in this area is not financially dependent on the redevelopment of the Octagon Parade site.</p>	

Policy HWTC17	Bridge Street	
Policy Development	Issues and Options IF3 -2005 Part of MPTC3 "land between Desborough Avenue and Bridge Street Mixed Use development including Employment; Car park; Student accommodation; Amersham and Wycombe College.	Justification In line with economy study which identified potential for site to be redeveloped for residential/retail/mixed use, retaining some employment
	Preferred Options IF4 - 2007 Mixed use site MU7 – no site specific policy drafted	Justification
	Update Consultation 2009 Policy drafted for mixed use site MU26 – retail/offices/residential Key principles and requirements set out Identifying where specific uses should be located Pedestrian link through the site Off site contributions towards town centre environmental improvements Site boundary reduced to the corner fronting oxford road and fronting two thirds of bridge street	Justification In line with economy study which identified potential for site to be redeveloped for residential/retail/mixed use, retaining some employment. To identify key deliverables from development proposals and better link town centre to Desborough for pedestrians To reflect site assessed by economy study and make more deliverable due to mix of ownerships and no indication from land owners that all sites available.
	Update Report 2010 No change	Justification N/a
	Draft for Consultation 2011 HWTC19 Minor word changes specifying use classes removing, off site contribution for open space, requiring uses in specific locations and adding requirement for high quality design Site boundary reduced to the corner fronting oxford road and bridge street	Justification To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach, bring in line with introduction of CIL, make policy more flexible and reflect prominent location of site To further make allocation deliverable
	Proposed Submission Document 2012 Policy simplified Site boundary increased Addition of retail test to supporting text	To make more flexible and increase likelihood of site redevelopment To maximise redevelopment opportunities and as a result of consultation responses Site is outside primary shopping area
Consultation responses	IF3 2005 (3 responses received) General support, issues raised in relation to impacts upon the transport network, public transport and identification of green infrastructure and that 50% of site should remain in employment use	

	<p>IF4 2007 (3 responses received) Support the allocation for mixed use Concerns regarding Water Supply Capability and Waste Water Services network and impact on Strategic Road Network</p> <p>Update Consultation 2009 (4 responses received) Development of site should allow for a pedestrian link between Eden and Desborough, expansion of the bus station on the ground floor, refer to reducing and managing flood risk at this site and make reference to the need to reopen the river in this location</p> <p>Update Report 2010 – (No. of responses received) n/a</p> <p>Draft for Consultation - (3 responses received) No concerns about water supply, surrounding sewer network may have issues accommodating the proposed flow. There is also a history of downstream issues. Site should be extended and re-worded to make more flexible.</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Six options appraised to reflect potential future land uses on the site (also testing a 'no change' option; and options also appraised covering the wider block and a smaller site area.</p>		
Options appraised³²	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option³³: Mixed-use development of main town centre uses and residential development on upper floors. Improved pedestrian linkages through site. Site to cover entire block stretching westwards to Westbourne Street.</p>	<p>Social This policy has the potential to have a positive impact on social objectives as it proposes the redevelopment of a site for housing and other services within an accessible town centre location.</p> <p>Environmental This policy has the potential to have significant positive benefit on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This policy has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses, in conjunction with residential development. In addition the treatment of street network and public realm on Bridge Street and Oxford Road will help deliver the longer-term vision and masterplan for the town centre.</p>	<p>This option was accepted as it was supported by the evidence base (the Economy Study identified potential for the site to be redeveloped for residential/retail/mixed use), supported by the SA outcome and wider linkages to Desborough supported in consultation responses.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) following consultation responses advocating wider area to enable improved linkages and maximise redevelopment opportunities. No changes in circumstances since then to merit changing this approach.</p>
<p>Alternative Option 1: As above but smaller site area</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the redevelopment of a site for housing and other services within</p>	<p>This option was rejected because, although it provided for a mix of uses, it did not provide as much potential for improved linkages as the preferred option. This option had been selected as the preferred option at Update Consultation</p>

³² See 2011 SA main report

³³ See 2011 detailed SA

	<p>an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses, in conjunction with residential development. In addition the treatment of street network and public realm on Bridge Street and Oxford Road will help deliver the vision and masterplan for the town centre.</p>	<p>stage (2009) as this mix of uses proposed was supported by the evidence base (the Economy Study had identified potential for site to be redeveloped for residential/retail/mixed use, retaining some employment), but was superseded by the preferred option at Proposed Submission for the reasons explained above.</p>
<p>Alternative Option 2:– No Change</p>	<p>Social This option has the potential to have limited positive benefits on social objectives as although site is in an accessible location, the continuation of the existing situation will not make the most efficient and intensive use of the site.</p> <p>Environmental A “no change” option is unlikely to have significant positive or negative impact on the key environmental objectives</p> <p>Economic This option will have limited beneficial impact on economic objectives as a “no change” option retains the existing limited employment opportunities on site and does not expand or improve these opportunities.</p>	<p>This option was rejected as it was not supported by the evidence base (with the Economy Study having identified potential for the site to be redeveloped).</p>
<p>Alternative Option 3: Large format retail</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the re-development of a site for retail development within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has limited positive benefit on economic objectives as employment opportunities may be created in association with the development of this site but may also detract from other retail employment opportunities within the town centre.</p>	<p>This option was rejected as it was not considered to offer the range of benefits that the preferred option would entail, including contribution to the town centre vision and masterplan; also had potential to impact on existing retail in the town centre.</p>

<p>Alternative Option 4: Residential and Offices</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the re-development of a site for housing within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefit on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses. In addition the treatment of street network and public realm on Bridge Street and Oxford Road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was rejected as it was not considered to contain the range of benefits as encompassed in the preferred option. It was considered appropriate to advocate a range of main town centre uses at this location.</p>
<p>Alternative Option 5 : Mixed-Use redevelopment - ground level retail (street front), additional student accommodation, with some scope for commercial leisure, offices and potential for limited conventional residential</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the re-development of a site for housing and other services within an accessible town centre location.</p> <p>Environmental This option has the potential to have significant positive benefits on environmental objectives as it proposes the redevelopment of a prominent site within the town centre.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives as it proposes the re-development of a town centre site for employment generating uses, in conjunction with residential development. In addition the treatment of street network and public realm on Bridge Street and Oxford Road will help deliver the vision and masterplan for the town centre.</p>	<p>This option was rejected because, although it offered the same benefits as the preferred option, it was considered that the option for residential types on the site should remain more flexible; also site area increased as explained above.</p>
<p>Other factors</p>	<p>Site owner engagement – Mixed – main landowners (District Council and University) aware of allocation Positive response to allocation – no responses received Contingency position if site not delivered - site not required for implementation of masterplan, redevelopment could come forward incrementally without undermining strategy. Preferred option offers the most flexible and comprehensive redevelopment opportunity</p>	

Policy HWTC18	Baker Street	
Policy Development	<p>Issues and Options IF3 2005 – MPTC3 “land between Desborough Avenue and Bridge Street Mixed Use development range of options including employment; car park; student accommodation; New site for Amersham and Wycombe College.</p>	<p>Justification</p> <p>In line with economy study identifying potential for mixed use development</p>
	<p>Preferred Options IF4 2007 – known as MU6 Baker Street</p> <p>Key principles and requirements set out</p> <p>Short-term: surface car-parking. Longer term: mixed use redevelopment taking advantage of proximity to the Eden development, including multi-storey parking, substantial area of open space, business (2ha) and residential. Flexibility on affordable housing (40%) to assist in delivery of open space</p> <p>Provision of a link between Oxford Road and Desborough Road Provision of pedestrian and cycle links between the town centre and Desborough</p>	<p>Justification</p> <p>Policy worded to reflect stage in preparation of LDF</p> <p>In line with town centre parking and access strategy In line with economy study and consultation response In line with open space background paper</p> <p>Allowing potential to vary affordable housing requirement will make delivery of open space, business uses and contributions towards the new link road more viable. In line with town centre masterplan Create better pedestrian linkages between town centre and Desborough area</p> <p>Different site identified for Amersham and Wycombe College and student accommodation</p>
	<p>Update Consultation 2009 Site boundary changed</p> <p>Identified as a “western town centre site” Identifies links to delivery of other town centre policies Refers to making a “contribution to and provide land for “ a new link road Specifies 50% business and 50% housing,</p> <p>Locating business development to the north of site</p> <p>Reference to 8m buffer along River Wye.</p> <p>Reference to larger residential units</p>	<p>Justification for change</p> <p>To reflect WDC owned land and link to delivery of link road</p> <p>Assist in geographical reference to sites</p> <p>Emphasise link to delivery of town centre masterplan To deliver intensification on site, make policy more specific, based upon existing amount of employment floorspace.</p> <p>Take advantage of new frontage created by the new link road on main route into town. Reflect standard Environment Agency approach</p> <p>To meet local needs identified in consultation events</p>
	<p>Update Report 2010 - none</p>	

	<p>2011 consultation draft Policy updated No net loss of existing floorspace Single access' onto Westbourne Street Addition of reference to role of open space by river assisting in managing flood risk</p>	<p>to make consistent with other policies and offer degree of flexibility to ensure function of site as an employment location is retained to assist in flow of traffic as identified by transport modelling work In response to consultation</p>
	<p>Proposed Submission Document 2012 Added reference to transport improvement line Reference to design of link road Removal of reference to active frontages onto new link</p>	<p>Justification To provide clarity of location of proposed link To ensure road is capable of serving as strategic alternative route for town centre traffic To remove duplication dealt with in policy HWTC3</p>
Consultation responses	<p>IF3 2005 (3 responses received) General support, issues raised in relation to impacts upon the transport network, public transport and identification of green infrastructure and that 50% of site should remain in employment use</p> <p>IF4 2007 (4 responses received) Unsuitable for residential use: should concentrate upon multi-storey car parking and business use. Subject to satisfactory FSEC computer modelling, this site should be identified for a new fire station and safety centre. Reference should be made to the need for archaeological assessment/evaluation of the site. Concerns regarding Water Supply Capability and Waste Water Services in relation to this site. Specifically, the network in this area is unlikely to be able to support the demand anticipated from this development Particular concerns regarding impact on the Strategic Road Network.</p> <p>Update Consultation 2009 (3 responses received) Support for the provision of open space along the Wye Support for flexibility in relation to the proportion of residential development if that resulted in a larger open space Restoration of River Wye should create a semi-natural habitat where possible The design and layout of this site should also address flood risk management and reduction, and the open space could contribute to this objective</p> <p>Update Report 2010 – N/a</p> <p>Draft for Consultation 2011 - (4 responses received) Overall support No infrastructure concerns regarding Water Supply capability at this site, but sewerage network capacity is unlikely to support the demand anticipated for this development An alternative of using the lower end of Desborough Avenue as the A40 link road instead of an alignment along Westbourne Street.</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Six options appraised, encompassing different mixes of potential future land uses on the site, with provision of link road between West Wycombe Road and Desborough Road; option tested without the provision of link road; also an option tested encompassing mixture of short and long-term approaches to the site.</p>		

Options appraised ³⁴	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>This option was chosen as the requirement for the provision of land for the link road protects the opportunity for implementing the town centre masterplan and therefore has a positive impact on achieving economic SA objectives. Following engagement from stakeholders, it was felt that it was not in line with Regulation 122 to require the provision of link road itself within the policy when the quantum of development on the site was at this stage unknown. This also reflects the policy approach to the provision of land taken under Policy HWTC13.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) due to the above factors. A further change has been proposed to the policy (FC18) regarding the provision of highway works in line with the wider town centre proposals but this does not change the overall approach of the policy.</p>	<p>Social Option has the potential to have a significant positive impact on social objectives as it proposes the development of a currently under-utilised site bringing forward housing and other services within an accessible town centre location.</p> <p>Environmental Option has potential to have a significant positive impact on achieving environmental objectives as the option proposes improvements to the River Wye corridor and the provision of additional public open space.</p> <p>Economic Option has the potential to have a significant positive benefit on economic objectives as it proposes the re-development of a site for employment generating uses, in conjunction with residential development. In addition the provision of the link road will help deliver the longer-term vision and masterplan for the town centre.</p>	
<p>This option was rejected as it was felt that it was not in line with Regulation 122 to require the provision of link road itself within the policy when the quantum of development on the site was at this stage unknown.</p>	<p>Social Option has the potential to have a significant positive impact on social objectives as it proposes the development of a currently under-utilised site bringing forward housing and other services within an accessible town centre location.</p> <p>Environmental Option has potential to have a significant positive impact on achieving</p>	

³⁴ See 2011 SA main report

	<p>environmental objectives as the option proposes improvements to the River Wye corridor and the provision of additional public open space.</p> <p>Economic Option has the potential to have a significant positive benefit on economic objectives as it proposes the re-development of a site for employment generating uses, in conjunction with residential development. In addition the provision of the link road will help deliver the vision and masterplan for the town centre.</p>	
Alternative Option 2: No change	<p>Social The option has a neutral effect on achieving social objectives, as by retaining the existing uses and layout opportunities for improvements to the area are not realised.</p> <p>Environmental Option has limited positive benefits on environmental objectives, as it does not make the most of the opportunities to improve the environmental quality of this area.</p> <p>Economic Option has limited positive effect on economic objectives, as leaving the site in its current use does not achieve its full economic potential.</p>	This option was rejected as it has limited positive impact on achieving the SA objectives and does not make the most of the potential of this edge-of-centre site. In particular it does not protect the opportunity for delivering the town centre masterplan, as set out in policies HWTC1-HWTC4.
Alternative Option 3: Large-format retailing and car parking. Provision of link road.	<p>Social Option will have a limited positive benefit on social objectives as option may not address issues of open space deficiency.</p> <p>Environmental Option likely to have limited positive benefits on the environmental objectives, as it may not make the most of the opportunities to improve the environmental quality of this area.</p> <p>Economic Option will have a limited positive effect as it creates employment opportunities but of a limited nature and the type of jobs already offered within the town centre retail offer.</p>	This option was rejected as it achieves limited social and environmental benefits by not securing the provision of open space and enhancements to the River Wye corridor.
Alternative Option 4: Retail and leisure (with residential component). Provision of link road.	<p>Social Option has the potential to have a positive impact on social objectives as it proposes the development of a currently under utilised site bringing forward employment opportunities and housing within an accessible town centre location.</p>	This option was rejected as this site is identified as an important employment site within the urban area (currently designated as an E3 Employment Area) and an allocation for retail and leisure would not support this employment role. The type of jobs offered would be similar to those already offered within the town centre and thereby would have more limited impact on achieving economic objectives.

	<p>Environmental This option likely to have limited positive benefits on the environmental objectives, as it may not make the most of the opportunities to improve the environmental quality of this area.</p> <p>Economic Option will have a positive effect as it creates employment opportunities within the town centre.</p>	
<p>Alternative Option 5: Short-term: Surface-level car parking and road link. Medium and long-term: Business, residential and open space with potential for multi-storey car park. Provision of road link.</p>	<p>Social The option has the potential to have a positive effect on achieving social objectives through the longer term proposals for a mixed use development within the town centre.</p> <p>Environmental This option has the potential to have a significant positive impact on environmental objectives in the longer term when improvements to the River Wye Corridor and open space improvements may come forward as part of a mixed use development.</p> <p>Economic Both the shorter and longer term options support the economic activity of the town centre. The provision of car parking will assist in supporting the longer term viability of existing town centre shopping areas by providing potential customers with an opportunity to drive to the town centre. The mixed use development on the site offers a reasonable opportunity to achieve a range of key economic objectives for the benefit of the immediate locality and High Wycombe.</p>	<p>This option was rejected as it was felt that the retention of an allocation for car parking in the shorter term may stymie any development proposals coming forward on the site. In particular, engagement with the site owner indicated that redevelopment proposals could be forthcoming in the shorter-term.</p>
<p>Alternative Option 6: Mixed-use business and residential. No provision of link road.</p>	<p>Social This option has the potential to have a positive impact on social objectives as it proposes the development of a currently under-utilised site bringing forward housing and other services within an accessible town centre location. The lack of link road however will mean that the site is not visibly prominent within the town centre.</p> <p>Environmental This option has potential to have significant positive impact on achieving environmental objectives as the option proposals improvements to the River Wye corridor and the provision of additional public open space.</p> <p>Economic This option has the potential to have a positive benefit on economic objectives</p>	<p>This option was rejected as it does not protect the opportunity for the implementation of the town centre masterplan proposals and therefore, as demonstrated through the SA results, brings about lower economic benefits and does not support the wider vision and objectives for the town centre.</p>

	as it proposes the re-development of a site for employment generating uses, in conjunction with residential development. However, failure to provide the link road will not assist in the delivery of the vision and masterplan for the town centre.	
Other factors	Site owner engagement – Yes through consultation, Council is main landowner Positive response to allocation – yes Contingency position if site not delivered - part of site required for link road key for masterplan, however as land is in Council ownership this does not prevent link road being delivered, CIL contributions will be made available to deliver the link road.	

Policy HWTC19	Rapid House	
Policy Development	<p>Issues and Options IF3 -2005 Part of MPTC3 "land between Desborough Avenue and Bridge Street Mixed Use development including employment; Part of the site used as a car park; Additional student accommodation; New site for Amersham and Wycombe College.</p>	Justification
	<p>Preferred Options IF4 - 2007 Site proposed to be part of general business area (GBA30) with site – suitable for B1,B2 and B8 with some flexibility for other employment generating uses.</p>	Justification Site in full use and in good condition – mistakenly assessed with Baker Street Area and identified as having potential for mixed use.
	<p>Update Consultation 2009 No change</p>	Justification n/a
	<p>Update Report 2010 No change</p>	Justification n/a
	<p>Draft for Consultation 2011 Part of HWTC21 covering two sites on both sides of Oxford road</p>	Justification To ensure all employment areas within the town centre boundary are covered by policy reflecting decision to not include Prime and General Business Area policies in the DSA To reflect that there was no anticipated change of uses on the site
	<p>Proposed Submission Document 2012 Site allocated for mixed use redevelopment Includes reference to retaining equivalent amount of business floorspace, retaining Sikh temple and design to allow for new road link between west Wycombe Road and Westbourne Street.</p>	Justification To reflect discussion with site owner regarding redevelopment and reconfiguring of site To deliver comprehensive development of site, meeting residential and business needs as well as protecting a community facility
Consultation responses	<p>IF3 2005 (3 responses received) General support, issues raised in relation to impacts upon the transport network, public transport and identification of green infrastructure and that 50% of site should remain in employment use</p> <p>IF4 2007 (No. of responses received) Concerns regarding impact on the Strategic Road Network if use of site is intensified or site is redeveloped</p> <p>Update Consultation 2009 (1 response received) Site holds the key to the opening up of the River Wye. Land immediately adjacent to this site could be used to re-open the river at this location. May be appropriate to include a separate designation for this land, or to incorporate into GBA30 policy.</p> <p>Update Report 2010 – (No. of responses received) N/a</p> <p>Draft for Consultation 2011 - - (4 responses received) No infrastructure concerns regarding Water Supply capability at this site, but concerns about sewerage network capacity policy could include residential use above office accommodation</p>	

	Council met with site owners in early 2012 to discuss potential to redevelop site and possibility of including an allocation in DSA, identifying willingness to reconfigure and retain current amount of office floor space in redevelopment proposals.	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Three options appraised, encompassing potential future uses at the site (uses reflecting its existing use, its location and nearby uses).		
Options appraised³⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option³⁶: Mixed-use development consisting of main town centre uses and residential uses. No net loss of existing employment floorspace. Designed to take into account Sikh temple Take into account design requirements of new link road,	<p>Social Overall positive effect due to site being well located in relation to services and facilities and provision of residential uses.</p> <p>Environmental Overall positive effect on environmental objectives due to more efficient use of previously developed land within an accessible location.</p> <p>Economic Overall positive effect on economic objectives as a result of retaining existing employment floorspace on site, whilst allowing other town centre and residential uses.</p>	<p>This option was accepted as it was considered to provide the best overall benefits for the site, encompassing residential and business needs as well as protecting a community facility, and supported the future potential of the site in terms of redevelopment and reconfiguration.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) following dialogue with owners of the site and consideration of potential for comprehensive development at the site. There have been no changes in circumstances since then to merit changing this approach.</p>
Alternative Option 1: Residential	<p>Social Overall positive effect due to site being well located in relation to services and facilities although noise could be an issue for residential development.</p> <p>Environmental Overall positive effect on environmental objectives due to more efficient use of previously developed land within an accessible location.</p> <p>Economic Redevelopment of site for residential uses would have a significant negative effect on economic objectives.</p>	This option was rejected as it was considered that it would harm economic objectives in terms of the loss of offices currently located on the site with no replacement of employment floorspace.
Alternative Option 2: Offices only (as currently in situ)	<p>Social Overall positive effect due to site being well located in relation to services and facilities.</p> <p>Environmental Overall positive effect on environmental objectives due to site being well located, previously developed land, and not subject to flood risk.</p> <p>Economic</p>	This option was rejected because, although it reflected the current quantum of employment uses on the site, it did not recognise the potential of the site for mixed-uses to support other objectives such as reconfiguration of the site.

³⁵ See 2011 SA main report

³⁶ See 2011 detailed SA

	Overall positive effect on economic objectives as a result maintaining site in employment use and allowing other employment-generating uses.	
Other factors	Site owner engagement – yes Positive response to allocation – yes Contingency position if site not delivered - site not required for implementation of masterplan, redevelopment could come forward incrementally without undermining strategy.	

Policy HWTC20	Oxford Road (west)	
Policy Development	Issues and Options IF3 -2005 N/a	Justification
	Preferred Options IF4 – 2007 Site proposed to be part of general business area (GBA30) with site – suitable for B1,B2 and B8 with some flexibility for other employment generating uses.	Justification In line with economy study assessment for site in terms of no change envisaged – site should have been identified as Prime Business area
	Update Consultation 2009 No change	Justification n/a
	Update Report 2010 No change	Justification n/a
	Draft for Consultation 2011 Site specific policy drafted – HWTC21 Includes retaining office use on site and small scale complementary uses excluding residential	Justification To ensure all employment areas within the town centre boundary are covered by policy reflecting decision to not include Prime and General Business Area policies in the DSA In line with economy study and reflecting approach set out initially in relation to prime business areas
	Proposed Submission Document 2012 No change	Justification
Consultation responses	IF3 2005 (No responses received) IF4 2007 (No responses received) Concerns regarding impact on the Strategic Road Network if use of site is intensified or site is redeveloped Update Consultation 2009 (No response received) Update Report 2010 (No responses received) Draft for Consultation 2011 – (4 responses received) No infrastructure concerns regarding Water Supply capability at this site, but concerns about sewerage network capacity policy could include residential use above office accommodation.	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised, reflecting potential future uses for the site given its current use and location.		
Options appraised ³⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option ³⁸ : Offices	Social Overall positive effect due to site being well located in relation to services and	This option was accepted as it was supported by the evidence base (the Economy Study found that there should be no change on the site in terms of

³⁷ See 2011 SA main report

³⁸ See 2011 detailed SA

	<p>facilities.</p> <p>Environmental Overall positive effect on environmental objectives due to site being well located, previously developed land, and not subject to flood risk.</p> <p>Economic Overall positive effect on economic objectives as a result maintaining site in employment use and allowing other employment-generating uses.</p>	<p>uses) and the SA in terms of allowing small-scale supporting uses. This option was selected as the preferred approach at Consultation Draft stage (2011) – previously it had no site policy but fell under the General Business Area policy – site policy was drafted to reflect altered scope of the document meaning that the site was not covered by an overall designation. No further change in circumstances to merit altering this approach. Policy reflected previous approach enshrined in General Business Areas policy.</p>
Alternative Option: Residential	<p>Social Overall positive effect due to close to town centre and facilities</p> <p>Environmental Overall positive effect on environmental objectives due to site being well located, offering potential to re-open part of the Wye and being previously developed land.</p> <p>Economic Redevelopment of site for residential uses would have a significant negative effect on economic objectives.</p>	<p>This option was rejected as it was not supported by the evidence base (Economy Study), the SA or any other factors.</p>
Other factors	<p>Site owner engagement – no Positive response to allocation – n/a Contingency position if site not delivered - does not apply as allocation confirms current use and proposes no fundamental change</p>	

Policy HWTC21	Central Business Centre	
Policy Development	Issues and Options IF3 -2005 N/a	Justification
	Preferred Options IF4 - 2007 Site proposed to be part of general business area (GBA16) with site – suitable for B1,B2 and B8 with some flexibility for other employment generating uses.	Justification In line with economy study assessment for site in terms of no change envisaged
	Update Consultation 2009 No change	Justification
	Update Report 2010 No change	Justification
	Draft for Consultation 2011 Site policy drafted HWTC22 Includes restricting uses to B1, B2 AND B8 and other employment generating uses which are small scale complementary and support business use of area	Justification To ensure all employment areas within the town centre boundary are covered by policy reflecting decision to not include Prime and General Business Area policies in the DSA In line with economy study and reflecting approach set out initially in relation to general business areas
	Proposed Submission Document 2012 No change	
Consultation responses	IF3 2005 (n/a) IF4 2007 (1 response received) Concerns regarding impact on the Strategic Road Network if use of site is intensified or site is redeveloped Update Consultation 2009 (No responses received) Update Report 2010 – (No responses received) Draft for Consultation 2011 - (3 responses received) No infrastructure concerns regarding Water Supply capability at this site, but concerns about sewerage network capacity policy could include residential use above office accommodation Proposed Submission Document 2012 - (No. of responses received)	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised, reflecting potential future uses for the site given its current use and location.		
Options appraised ³⁹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option ⁴⁰ : Light Industrial	Social Overall positive effect due to site being well located in relation to services and facilities.	This option was accepted as it was supported by the evidence base (the Economy Study found that there should be no change on the site in terms of uses) and the SA in terms of allowing small-scale supporting uses.

³⁹ See 2011 SA main report

⁴⁰ See 2011 detailed SA

	<p>Environmental Overall positive effect on environmental objectives due to site being well located, previously developed, and not subject to flood risk.</p> <p>Economic Overall positive effect on economic objectives as a result maintaining site in employment use and allowing other employment-generating uses.</p>	<p>This option was selected as the preferred approach at Consultation Draft stage (2011) – previously it had no site policy but fell under the General Business Area policy – site policy was drafted to reflect altered scope of the document meaning that the site was not covered by an overall designation. No further change in circumstances to merit altering this approach. Policy reflected previous approach enshrined in General Business Areas policy.</p>
Alternative Option: Residential	<p>Social Overall positive effect due to provision of housing and site being well located in relation to services and facilities.</p> <p>Environmental Overall positive effect on environmental objectives due to site being well located, previously developed land and potential enhancements to biodiversity.</p> <p>Economic Redevelopment of site for residential uses would have a significant negative effect on economic objectives.</p>	<p>This option was rejected as it was not supported by the evidence base (Economy Study), the SA or any other factors.</p>
Other factors	<p>Site owner engagement – no Positive response to allocation – n/a Contingency position if site not delivered - does not apply as allocation confirms current use and proposes no fundamental change</p>	

Desborough

Policy HW1	Desborough Delivery and Design Framework	
Policy Development	<p>Issues and Options IF3 -2005 Options identified for a number of sites in Desborough area including mixed use, open space and residential uses, Desborough also identified as an area suffering from a deficiency of open space.</p> <p>Preferred Options IF4 – 2007 Number of sites identified for mixed use, general business areas and residential uses, open space deficiency dealt with in a specific policy A19</p> <p>Update Consultation 2009 Specific Desborough Policy drafted – D1 Setting out how vision and framework for the area will be delivered, identifying sites, and uses, type of housing, linkages and design. Concept diagram produced</p> <p>Update Report 2010 No change</p> <p>Draft for Consultation 2011 Policy HW1 changed to remove references to specific sites and re-written Area identified on proposals map</p> <p>Proposed Submission Document 2012 Reference to addressing open space deficiency removed</p>	<p>Justification</p> <p>Justification In line with economy study, urban capacity study and open space background paper</p> <p>Justification In line with adopted CS policy CS4.1 and the requirement for “a place making and urban design framework” To illustrate spatially where changes would occur</p> <p>Justification</p> <p>Justification To reflect changed focus of document, include a more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach and clarify area policy applies to.</p> <p>Justification Remove duplication with policy HW2</p>
Consultation responses	<p>IF3 2005 (No responses received) IF4 2007 (No responses received) Update Consultation 2009 (8 responses received) Overall support for the policy comments relating to flexibility, identification of heritage feature on plan and nature of open space along river Update Report 2010 – (No responses received) Draft for Consultation 2011 - (7 responses received) General support for policy but clarity required of 'opening up' the River Wye</p>	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: One option selected to encompass the vision and framework as set out by Core Strategy Policy 4.1 As this approach is guided by adopted higher-tier planning document, not considered to be any reasonable alternatives.		
Options appraised ⁴¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option ⁴² : Preferred	Social	This option accepted as it was considered to be in accordance with Core

⁴¹ See 2011 SA main report

Option as set out in policy	<p>This policy has a positive impact over a range of areas, including open space, housing and economic regeneration.</p> <p>Environmental This policy addresses the legibility of Desborough and as a consequence increases opportunities for cycling, walking and biodiversity enhancement and movement, particularly around the River Wye.</p> <p>Economic This policy has a positive impact on economic objectives as it seeks to secure regeneration and ensure low-cost start-up units and opportunities for emerging businesses are not lost to housing, whilst also enhancing the wider environment.</p>	<p>Strategy 4.1 in terms of providing an overall vision and framework for Desborough.</p> <p>This option was selected as the preferred approach at Update Consultation stage (2009) following adoption of Core Strategy Policy CS4.1 in 2008. No further change in circumstances to justify altering this approach.</p>
Alternative Option: (No Alternative Option appraised as policy is derived from Core Strategy policy CS4.1)	n/a	N/a
Other factors	<p>Site owner engagement – n/a (see HW2) Positive response to allocation – n/a (see HW2) Contingency position if site not delivered - n/a</p>	

⁴² See 2011 detailed SA

Policy HW2 Policy Development	Delivering New Open Space and River Corridor Improvements	
	Issues and Options IF3 -2005 Options identified for a number of sites in Desborough area including mixed use, open space and residential uses.	Justification
	Preferred Options IF4 – 2007 Number of sites identified for mixed use, general business areas and residential uses	Justification In line with economy study and urban capacity study reports
	Update Consultation 2009 Policy D2 drafted to meet open space needs and improvements to river corridor. Identifies 3 sites as potential sites for residential/open space mixed use, specifying 50% for open space. 1 of the 3 being acceptable and the other reverting to general business area. <ul style="list-style-type: none"> • The timber yard west of Oakridge Road • The business site east of Oakridge Road • The Riverside Business Centre, Victoria Street Reference to Open Space on Green street Improvements to river corridor as other sites come forward Differentiation between eastern and western parts of Desborough in terms of open space requirements Number of sites identified for mixed use, general business areas and residential uses Requiring all other sites coming forward to make off site contribution to meeting open space needs	Justification To deliver open space to meet deficiency, improving quality of existing open space and promote regeneration of area, in line with economy study. To make appropriate provision in line with Open Space background paper In line with economy study and urban capacity study reports To assist in meeting open space deficiency
	Update Report 2010 Site east of Oakridge Road extended to include Abercromby Works and site adjacent Policy changed to allow all 3 sites to be redeveloped for residential/open space mixed use Separate policy for Abercromby Works D3 requiring re-provision of business floor space. Illustrative layouts included	Justification Original site too small and in response to representations by site owners To fully meet open space requirements in Desborough area Due to size of site and based upon viability assessment of three sites and as a result of consultation
Draft for Consultation 2011 Policy HW2 changed to a criteria based policy for site adjacent to the river to be redeveloped requiring: <ul style="list-style-type: none"> • 50% open space and alongside river • Allow for buffer along river • Re-provision of a proportional amount of business space 	Justification To maximise potential to regenerate area, meet open space needs and make policy flexible by not limiting implementation of the policy to only 3 sites as a result of consultation and discussions with landowners	

	<p>Proposed Submission Document 2012 Inclusion of named streets the policy applies to Addition to supporting text that employment sites covered by policy are not subject to scattered employment sites policy</p>	<p>Justification To identify area policy applies to To remove conflict between policies if proposals come forward that conform with policy HW2 .</p>
<p>Consultation responses</p>	<p>IF3 2005 (2 responses received) Preference for the site to remain in employment use with some concerns over potential impact upon the trunk road network.</p> <p>IF4 2007 (No responses received) Update Consultation 2009 (No responses received)</p> <p>Update Report 2010 – (7 responses received) Overall support for policy, but should refer to: buffer strip for the river and its banks sensitivities of protecting ecological value of river corridor, evidence for deficiency in open space in the area and to ensure there is no conflict between public access to the river and the provision of a suitable river corridor habitat</p> <p>D3 related responses (4 responses received) Support for improvements to the river corridor. Objective supported but concerns that policy as drafted is not viable or feasible as a result of the amount of business and open space proposed. Policy needs to include a buffer strip for the river which will help enable a functioning semi-natural eco-system. Site in Flood Zone 2 – FRA will be required and should include reduction and management of flood risk on site. Recommend that sites which are allocated in areas of flood risk should have site-specific criteria in the allocation policy requiring applicants to manage the flood risk and where possible reduce the risk</p> <p>Draft for Consultation 2011 - (13 responses received) Concerns over viability of proposals does not reflect council's viability evidence and the specifying amount of open space required to meet deficiency, small sites should not be required to provide new commercial uses. Support for policy in terms of access to river, but concerns about amount of access, policy needs to read in conjunction with DSA13</p>	

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised, to test the approach of flexibility for uses to enable open space to be delivered (to reflect the identified need to relieve open space deficiency in the area and enhancements to access to the River Wye), and a status quo option of continuing policy protection for existing employment use.		
Options appraised⁴³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁴⁴: Allow redevelopment of employment land for mix of uses to provide open space	<p>Social Policy would have a positive impact upon the community in terms of access to open space and the resulting health and integration benefits.</p> <p>Environmental Policy would have a significant positive effect on environmental objectives in Desborough. Opening up the Wye and increased green space will enhance biodiversity whilst also providing routes for cycling and walking.</p> <p>Economic Positive effect as a result of encouraging regeneration, provision of modern business space and potentially creating jobs in area.</p>	<p>This option was accepted as it was considered to be in line with the approach to the Desborough area in the Core Strategy (in Policy CS4.1, regarding the need for regeneration, open space improvements and enhancements to public access to the river), and supported by the evidence base (with the Economy Study advocating regeneration in the area and the Open Spaces Background Paper highlighting an open space deficiency in the area).</p> <p>Whilst this option has become a criteria-based approach from initially being conceived as a site-specific option, the overall aim of achieving regeneration and open space improvements, and enhanced access to the river, was established as the overall aim of the policy at Preferred Options stage (2007). There have been no subsequent changes in circumstances to justify altering this fundamental approach.</p>
Alternative Option: No policy – continue protection for existing employment uses	<p>Social Overall unclear what effect of not having policy would be on social objectives.</p> <p>Environmental Overall neutral effect of not having this policy in place. No policy results in limited if no opportunity to comprehensively improve the River Wye.</p> <p>Economic Overall negative impact due to restricting extent of regeneration in this area.</p>	<p>This option was rejected as it was not considered to offer the benefits of the preferred option in terms of enhanced access to the River Wye, open space improvements and regeneration opportunities.</p>
Other factors	<p>Site owner engagement – yes as a result of consultation Positive response to allocation – mixed response from site owners Contingency position if site not delivered - evolution of policy seeks to deliver improvements without being dependant upon specifically identified sites</p> <p>One of the overriding issues for this area is the deficiency in open space and limited opportunities to deliver new spaces, linking this with making improvements to river corridor can deliver an innovative solution.</p>	

⁴³ See 2011 SA main report

⁴⁴ See 2011 detailed SA

Policy HW3	Green Street School	
Policy Development	Issues and Options IF3 -2005 Site proposed as a potential housing site MPD8	Justification In line with urban capacity study
	Preferred Options IF4 - 2007 Site identified as a mixed use site MU3 Preferred uses residential and open space plus retaining existing community use	Justification In line with urban capacity study and open space study and emerging core strategy policy to protect community facilities
	Update Consultation 2009 Policy drafted for the site MU3, no change to preferred option, setting out detail of preferred uses incl. number of dwellings and type of open space	Justification To assist in implementation of preferred approach and provide clarity in terms of requirements and expectations
	Update Report 2010 No change	Justification
	Draft for Consultation 2011 Policy changed to: Identify specific location for open space provision on site Link acceptability of residential development with provision of open space	Justification To integrate with existing adjacent play area To ensure redevelopment of site contributes towards open space deficiency in Desborough area
	Proposed Submission Document 2012 No change	
Consultation responses	<p>IF3 2005 (No responses received)</p> <p>IF4 2007 (2 responses received) Concerns that water supply network in this area is unlikely to be able to support the demand anticipated from this development and impact on the Strategic Road Network</p> <p>Update Consultation 2009 (4 responses received) Retention of former school removes need for any further community facility and remainder of site should be redeveloped for residential development (24 units) Mix of uses would conflict with each other Remainder of the site should be redeveloped to provide astro-turf or a Multi-Use Games Area. There should be no residential of any kind on the site – already sites in the area earmarked for residential. Could build on the adjacent playground and incorporate this facility into the site. There is a need for a larger hall in the area for community events. The site should not lie unused anymore and could be used for football and parking before being redeveloped. Existing community hall needs to be furnished with a play area, sports hall, and seminar and training rooms. MU3 should incorporate commercial development such as start-up units for employment.</p> <p>Update Report 2010 – (No responses received)</p> <p>Draft for Consultation 2011 - (2 responses received) Support plans for open spaces. Should include consideration for fronts to and from the facility and car (and cycle) parking.</p>	

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options selected encompassing reasonable options for future uses at the site given its current use and location, i.e. residential only, and a mixture of residential and community use.		
Options appraised⁴⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁴⁶: Mixed Use- Residential and community/open space	<p>Social Site has good access to town centre and policy offers scope for significant improvements to community identity and well being. Significant deprivation in a range of areas, which have potential for improvement.</p> <p>Environmental Significant potential to improve townscape and locality through redevelopment of the site. Pedestrian linkages between surrounding sites can also be enhanced through redevelopment.</p> <p>Economic No opportunities will be created in association with the development of this site.</p>	This option was accepted as it was considered to be in line with the approach in the Core Strategy (regarding open space and protection of community facilities) and the evidence base (regarding open space and urban capacity). This option was selected as the preferred approach at Preferred Options stage (2007) and, whilst the detailed wording of the policy has evolved (regarding location of the open space provision within the site and linking residential element with the provision of open space) there has been no subsequent change in circumstances to justify altering this overall approach.
Alternative Option: Residential only	<p>Social Site has good access to town centre and could contribute towards meeting overall housing needs, but land values mean finding loss of the community facility would outweigh this.</p> <p>Environmental Significant potential to improve townscape and locality through redevelopment of the site, site is previously developed and in an area of low flood risk. Pedestrian linkages between surrounding sites can also be enhanced through redevelopment.</p> <p>Economic No opportunities will be created in association with the development of this site.</p>	This option was rejected as it was not considered to be supported by Core Strategy, outcome of SA or evidence base regarding provision of open space and protection of community facilities.
Other factors	<p>Site owner engagement – yes</p> <p>Positive response to allocation – ongoing discussion</p> <p>Contingency position if site not delivered - site is small and non-delivery would not have significant impact on meeting needs of area, part of site currently being used for open space in addition to existing community facility.</p>	

⁴⁵ See 2011 SA main report

⁴⁶ See 2011 detailed SA

Marlow

Policy MR1	Primary Shopping Frontage Zones: Marlow	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). Question asked as to whether designations remain or do they need to be altered. 	Justification <ul style="list-style-type: none"> No changes to Local Plan boundaries
	Preferred Options IF4 <ul style="list-style-type: none"> Maps accompanying Policy A11 set out the extent of primary shopping frontage zones for High Wycombe, Marlow and Princes Risborough. Policy does not allow for loss of A1 uses in these frontage zones in Marlow apart from in exceptional circumstances. 	Justification <ul style="list-style-type: none"> Policy based on local plan, national policy and traditional primary frontage policy approach.
	Update Consultation 2009 <ul style="list-style-type: none"> no change 	Justification for change <ul style="list-style-type: none"> n/a
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> No change to policy 	Justification for change <ul style="list-style-type: none"> General support for approach in consultation
Consultation responses	2012 Proposed Submission Document <ul style="list-style-type: none"> Policy MR1 Addition of changes of use from A1 to A3 subject to 60% of the overall frontage being maintained in A1 use. Other changes only in exceptional circumstances. Justification for change <ul style="list-style-type: none"> To reflect feedback and support for more flexible approach from local stakeholders in the town, including the Town Council and Marlow Society. To reflect the changing and broadening role of town centres in general, and the particular importance of A3 uses in Marlow in particular. To reflect support for a more balanced approach to different uses outlined by local stakeholders. Target percentage of A1 maintained to reflect (a) the important shopping role of the core of the town centre and (b) the success of the centre in having a very low rate of vacancies. 	
	IF3 2005 (No responses received on policy) n/a IF4 2007 (No responses received on the policy) Update Consultation 2009: (2 comments received)	

	<ul style="list-style-type: none"> ▪ General support for approach, particularly for protection of A1 against A3 uses <p>Update Report 2010 – N/a (</p> <p>2011 consultation draft: (received)</p> <ul style="list-style-type: none"> • Generally supportive of approach in policy – mixed views on the need for flexibility between A1 and A3 uses. • Various detailed comments including that consideration should be given to the positioning of more cycle racks-needed outside Lloyds Bank, the back of Boots and in future proposals (including Sainsburys); that a cycle route around the back of Sainsburys should be considered to be used as a link between North and West Marlow; traffic issues and conservation issues regarding shop front design. 	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Four options appraised based on varying rates of flexibility towards changes of use which were considered to be reasonable in this frontage.		
Options appraised⁴⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁴⁸: Some flexibility for changes of use away from A1, especially to A3 (<i>plus exceptions for preservation or rehabilitation of listed buildings</i>)	<p>Social Policy continues to focus retail and other town centre development to specific areas to maintain vitality and viability.</p> <p>Environmental Policy will consolidate retail and some A3 uses in existing developed areas where they are most accessible by sustainable modes of transport so no negative effects likely.</p> <p>Economic Policy promotes retail uses and supporting A3 uses, which can have a positive impact on the economy within the town centre, with the latter being particularly important for the tourism industry.</p>	<p>This option was accepted as the preferred approach as it was considered that the wider role for town centres in the current economic context meant that a more flexible approach than the traditional primary frontage model was required. It was considered that this would enable a good mix of A uses in the primary frontage, whilst protecting a core proportion of A1 shop uses, to support town centre vitality and viability. This approach received support from local stakeholders.</p> <p>This was option was selected as the preferred approach at Proposed Submission stage (2012) following consultation with local stakeholders and ongoing challenges for the retail industry, and the factors for this choice remain extant.</p>
Alternative Option 1: No net loss of A1 frontage length – exceptions for preservation or rehabilitation of listed buildings	<p>Social Option would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the primary shopping frontage. Overall option is likely to have positive effects on social objectives.</p> <p>Environmental Policy will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport and exceptions in option could benefit listed buildings. Significant positive effects on environmental objectives therefore likely.</p>	<p>Whilst this option offered flexibility for changes of use in exceptional circumstances, it was considered that the more mixed nature and role for town centres meant that a more flexible approach was required to allow for a balanced mix of uses and to protect the centre against any increase in vacancy rates.</p> <p>This option had previously been the preferred approach at Preferred Options stage (2007) but was superseded by the above option in 2012 due to the ongoing uncertain economic outlook for the retail industry and after further stakeholder consultation supported greater flexibility of uses.</p>

⁴⁷ See 2012 SA main report

⁴⁸ See 2012 detailed SA

	<p>Economic Policy promotes retail uses which can have a positive impact on the economy within the existing town centres.</p>	
<p>Alternative Option 2: Maximum flexibility for any changes of use away from A1 (maintenance of active ground floor frontage required)</p>	<p>Social Option continues to focus retail and other town centre development in specific areas to maintain vitality and accessibility, but loss of retail frontage could undermine vitality and viability. Exact effect depends on which uses take place in which exact areas but overall the option risks having negative effects on social objectives.</p> <p>Environmental Policy option will consolidate retail and uses in existing developed areas where they are most accessible by sustainable modes of transport so no negative effects likely.</p> <p>Economic Loss of retail development within the identified zones could undermine the viability of centres and retail employment, although other uses could provide employment. Overall effect on economic objectives likely to be neutral.</p>	<p>Whilst this option provided for maximum flexibility of movements between use classes with an active ground floor frontage, it was considered that this was not appropriate in a primary shopping frontage where an undue loss of A1 shop units on a large scale could significantly undermine the vitality, viability and customer attractiveness of the town centre as a whole.</p>
<p>Alternative Option 3: Less flexibility – allow no exceptions for changes of use so no change to non-A1 uses</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility. However too strict an approach risks causing an increase in empty units if the local economy takes a downturn, and thereby having a negative effect on social objectives.</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but reduced opportunities for alternative uses would undermine any accessibility benefits and the potential for rehabilitation of listed buildings. Overall modest positive effects on objective.</p> <p>Economic Policy option promotes retail uses but a lack of flexibility for any other uses could damage business viability, and thereby have negative effects on economic objectives.</p>	<p>It was considered that an option allowing for minimal flexibility would be inappropriate given the current mix, nature and role of the town centre and the important role which A3 uses play in Marlow. Despite Marlow's current low vacancy rate, it was considered that an approach of minimal flexibility for changes could obstruct businesses and lead to an increase in the vacancy rate in the frontage.</p>
Other factors	<ul style="list-style-type: none"> • General economic trends relating to town centres and the retail industry 	

Policy MR2	Secondary Shopping Frontage Zones: Marlow	
Policy Development	Issues and Options IF3	Justification
	<ul style="list-style-type: none"> Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan (so they are not repeated in the maps in this document). Question asked as to whether designations remain or do they need to be altered. 	<ul style="list-style-type: none"> No changes to Local Plan boundaries
	Preferred Options IF4	Justification
	<ul style="list-style-type: none"> Maps accompanying Policy A11 set out the extent of the secondary shopping frontage zones for High Wycombe, Marlow and Princes Risborough. In Marlow the policy only allows for development which does not result in a net loss of A use floorspace; does not result in more than 2 non-shop (non-A1) units in any 5 consecutive original units; and retains an active shop frontage. 	<ul style="list-style-type: none"> Policy is stricter than in the Local Plan (where Policy S4 allowed for any changes within A use class and to C and D use classes where the unit was not adjoining an existing non-shop unit) but is more in accordance with national policy which allows for town centre uses, and traditional secondary frontage policy approach.
	Update Consultation 2009	Justification for change
	<ul style="list-style-type: none"> Policy MR2 addition of percentage-based approach to measuring and protecting A1 uses rather than measuring row of consecutive uses. 	<ul style="list-style-type: none"> to provide more flexibility following onset of economic downturn.
Update Report 2010 - none		
2011 consultation draft	Justification for change	
<ul style="list-style-type: none"> Policy MR2 addition of allowing changes as long as not resulting in more than 60% of frontage length being non-A1; and maintains an active ground floor frontage. 	<ul style="list-style-type: none"> Greater flexibility for non-A1 uses to reflect the existing split of uses in the frontage, which was already nearly 60% non-A1 (in the April 2011 survey). 	
2012 Proposed Submission Document	Justification for change	
<ul style="list-style-type: none"> Policy MR2 removal of 60% threshold 	<ul style="list-style-type: none"> Greater flexibility extended to allowing for all A uses without stipulating a percentage. Approach more in line with traditional secondary frontage policy and with national guidance advocating mix of town centre uses in secondary frontages. Also reflects feedback from local stakeholders on the role of other non-A1 uses in the town. To reflect feedback from local stakeholders on the need for flexibility between uses. 	
Consultation responses	IF3 2005 (No responses received on policy) IF4 2007 (No responses received on policy)	

	<p>Update Consultation 2009: (2 comments received)</p> <ul style="list-style-type: none"> ▪ General support for approach <p>Update Report 2010 – N/a</p> <p>2011 consultation draft: (1 comment received)</p> <ul style="list-style-type: none"> • General support for approach 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Four options appraised based on varying rates of flexibility towards changes of use which were considered to be reasonable in this frontage.</p>		
Options appraised⁴⁹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁵⁰: No net loss of frontage length in A use.</p>	<p>Social Policy would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the secondary frontage, and therefore have a positive effect on social objectives.</p> <p>Environmental No direct negative impacts and policy would encourage an appropriate mix of town centre uses in accessible locations and keep the town centre as a whole vital and viable. Significant positive environmental effects therefore likely.</p> <p>Economic Policy could have a significant positive effect by creating the framework to enable an appropriately wide range of developments to come forward which would assist the local economy.</p>	<p>This option was selected as it was considered to represent an appropriately balanced approach in allowing for a range of uses appropriate to a secondary frontage, whilst also protecting units for uses containing an active ground floor frontage, and so preventing those which would create a 'dead' frontage. It was therefore considered that this option would maintain the vitality and viability of the town centre as a whole.</p> <p>This alternative was selected as the preferred approach at Proposed Submission Document stage (2012) following consultation with local stakeholders and reflecting the wider role for town centres. There have been no subsequent changes in circumstances to merit changing this approach.</p>
<p>Alternative Option 1: No net loss of frontage lengths in Class A use and only stipulated proportion of non-A1</p>	<p>Social Option would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the District's town centres including secondary frontage zones, and therefore have a positive effect on social objectives.</p> <p>Environmental No direct negative impacts and option would encourage an appropriate mix of town centre uses in accessible locations and keep the town centre as a whole</p>	<p>This option was rejected because whilst it allowed for some degree of flexibility, it was considered that for a secondary frontage it was more appropriate to allow a maximum mix of A uses rather than stipulate any proportion of A1 uses to be retained.</p> <p>This option was selected as the preferred approach at Preferred Options stage (2007) but superseded by the above option in 2012 due to the ongoing uncertain outlook for the retail industry and after stakeholder consultation supported flexibility of uses.</p>

⁴⁹ See 2012 SA main report

⁵⁰ See 2012 detailed SA

	<p>vital and viable. Significant positive environmental effects therefore likely.</p> <p>Economic Option could have a significant positive effect by creating the framework to enable an appropriately wide range of developments to come forward which would assist the local economy.</p>	
<p>Alternative Option 2: More flexible – allow some changes of use away from A uses</p>	<p>Social Policy option could lead to the loss of active frontages providing main town centre uses, which would undermine long-term vitality and viability of the town centre.</p> <p>Environmental Policy option will consolidate retail and other uses in existing developed areas where they are most accessible by sustainable modes of transport. However, spread of non-A uses could mean loss of such facilities, undermining accessibility benefits of option.</p> <p>Economic Loss of retail development within the identified frontage could undermine the viability of centres although the effects are uncertain.</p>	<p>Whilst this option provided for maximum flexibility of movement between A use classes, it was considered that allowing movements away from A use classes would be inappropriate in a secondary frontage, where it was important to retain units with an active ground floor frontage, to help maintain town centre vitality and viability, and to prevent uses which could create a 'dead' frontage. It was considered that this would be an inappropriate approach in a secondary shopping frontage.</p>
<p>Alternative Option 3: Less flexible – no loss of A1 shop uses</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility, but failure to cater adequately for other services could undermine these objectives</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but could divert other town centre uses to less sustainable locations</p> <p>Economic Policy option promotes retail uses which can have a positive impact on the economy within the existing town centres but restricting other uses could undermine their vitality and viability.</p>	<p>This option was rejected as it was considered to be overly inflexible for a secondary shopping frontage, where a range of non-A1 uses are considered to be appropriate.</p>
<p>Other factors</p>	<ul style="list-style-type: none"> • General economic trends relating to town centres and the retail industry 	

Policy MR3	Riley Road	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> Suggested site M8: Riley Road Options: Retail and car parks 	Justification <ul style="list-style-type: none"> Suggested by landowner Taken forward from Adopted Local Plan (Policy M4)
	Preferred Options IF4 <ul style="list-style-type: none"> RET3 policy identified site for expansion of food store as part of mixed-use redevelopment. 	Justification <ul style="list-style-type: none"> Carried forward from the Local Plan.
	Update Consultation 2009 <ul style="list-style-type: none"> Site policy drafted MU28 for mixed-use development primarily for retail use. Food retail acceptable as a primary use. 	Justification for change <ul style="list-style-type: none"> Taking forward Local Plan allocation and requirements of Riley Road Development Brief (April 2009)
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> MR3 contained the same policy and development requirements with the exception of the requirement for 40% affordable housing, which was removed. 	Justification for change <ul style="list-style-type: none"> Planning permission was granted for the new foodstore on the site in July 2010 (application ref: 09/05165/FUL). Affordable housing requirements dealt with in other policies.
	2012 Proposed Submission Document <ul style="list-style-type: none"> No change to policy (MR3) 	Justification for change n/a
Consultation responses	IF3 2005: (5 comments received) Mixed response to the development of this site for retail and car parking. Some concerns regarding parking whilst there is also a level of support for its development.	
	IF4 2007: (2 comments received) <ul style="list-style-type: none"> Call for planning brief to be drawn up for site. 	
	Update Consultation 2009: (69 comments received) <ul style="list-style-type: none"> General support for comprehensive redevelopment of site One objection to expansion of retail on this site Comment calling for consideration of a second food store for Marlow - competition in Marlow would help pricing and choice of products, and encourage people to shop locally – other comment opposing such a second store stating insufficient quantitative capacity to warrant an additional food store allocation. Comment calling for development should be directed to an enlarged Riley Road site Parking and traffic concerns. 	
	Update Report 2010 – N/a (
	2011 consultation draft: (10 comments received)	

	<ul style="list-style-type: none"> • Comment that provision of public car parking as part of the site redevelopment should be a priority. Quantum should be the maximum that the site can accommodate to assist in the aspiration to make Marlow an accessible place. • Comment that alternative potential commercial uses should not be restrictive and should not preclude retail use so the site can achieve a viable and sustainable mix of uses on this important site. • 	
SUSTAINABILITY APPRAISAL Options selected for appraisal: Only one option appraised – retail-led mixed use development. This is because development already progressing at the time of the plan preparation, in line with previous Local Plan policy and adopted Development Brief for the site, thereby limiting the reasonable alternative approaches available in relation to the site.		
Options appraised	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁵¹: Preferred Option: Retail-led mixed use (Only one option appraised as construction of development progressing)	<p>Social By providing new development on what is a very accessible town centre site, policy is likely to deliver significant positive effects on social objectives.</p> <p>Environmental By leading to mixed-use development in an accessible town centre location, policy is likely to lead to significant positive environmental effects.</p> <p>Economic By providing for a range of new shopping facilities and new employment opportunities, policy is likely to lead to positive effects on economic objectives.</p>	<p>This option was selected as it was in line with existing Local Plan policy and adopted development brief, and was considered to be an appropriate approach in this town centre location, on a site which had been recommended for this approach in the Council's Retail and Town Centre Use Study and by the previous Local Plan Inspector's Report.</p>
Alternative Option:	n/a	
Other factors	<p>Site owner engagement: Yes Positive response to allocation?: Yes – planning application was submitted and granted for superstore expansion Contingency position if site not delivered: Majority of site delivered by way of expanded Sainsbury's foodstore; further engagement with site owners regarding the remainder of the site if necessary.</p>	

⁵¹ See 2012 detailed SA

Policy MR4	Portlands	
Policy Development	Issues and Options IF3	Justification
	<ul style="list-style-type: none"> Housing site M4 (Portlands, Marlow) Options: Housing 	<ul style="list-style-type: none"> Taking forward Adopted Local Plan Allocation (Policy M5)
	Preferred Options IF4	Justification
	<ul style="list-style-type: none"> RES31 flagged up site as a Housing site with guideline dwelling number of 70. Development principles outlined on p96 of the Preferred Options Document 	<ul style="list-style-type: none"> Site allocation carried forward from Local Plan. Development brief for the site adopted in September 2005. Guideline dwelling number based on area of site.
	Update Consultation 2009	Justification for change
	<ul style="list-style-type: none"> No new policy but site flagged up as a possible site for food store (p126 of document). Benefits and disbenefits listed. 	<ul style="list-style-type: none"> Council was consulting on possible alternative food store sites given expenditure capacity projections showing scope for new food store and the fact that the extension permitted on Riley Road store was only modest in size.
Update Report 2010	Justification for change	
<ul style="list-style-type: none"> Policy RES31 reaffirmed site as housing site with an indicative yield of 70 dwellings. 	<ul style="list-style-type: none"> Dwelling number based on previous guideline dwelling number. Following implementation of the Waitrose basket store at Chapel House (for which permission was granted in March 2010 – application ref: 09/06294/FUL), there was no requirement for a further site for convenience retail – therefore it was considered that the housing allocation on the site should remain. 	
2011 consultation draft	Justification for change	
<ul style="list-style-type: none"> Policy MR4 took forward allocation 	<ul style="list-style-type: none"> No major changes to policy or development requirements 	
2012 Proposed Submission Document		
<ul style="list-style-type: none"> Policy MR4 takes forward allocation. Policy changes wording of allocation to “predominantly residential”. Policy specifies access access to the site from the south and reaffirms requirement for new section of link road. Policy omits dwelling number, specific mention of affordable housing requirement, and a number of other development requirements 	<ul style="list-style-type: none"> The word “predominantly” added after consultation with local stakeholders highlighted support for small-scale supporting uses – new criterion added into the policy to guide such uses (point 2 of policy). Affordable housing requirement dealt with via other policies and viability appraisal. Other development requirements omitted as dealt with via the emerging Community Infrastructure Levy regime. Dwelling number taken out to make policy more flexible and deliverable; not required as no specific housing target for Marlow. 	
Consultation responses	<p>IF3 2005: (4 comments received) Some support for housing development on this site due to its inclusion within the adopted Local Plan and the potential to deliver in the region of 70 dwellings. However, some opposition to the proposal as it is considered as over-development.</p> <p>IF4 2007: (3 comments received)</p>	

- Reference should be made to the need for archaeological assessment/evaluation of the site. (1)
 - Site should be considered as an alternative location to Riley Road for retail development. This may prevent the centre of gravity for retail from drifting away from the High Street area and allow designs more in keeping with the town.(1).
- Update Consultation 2009:** (69 comments received)
- Mix of responses with some supporting a retail store at the site, and others supporting housing on the site. General support for some form of development on site and support for mix of uses with housing and small shops.
 - Concern over loss of car parking and traffic impact.
- Update Report 2010:** (6 comments received)
- Support allocation and proposal needs early implementation.
 - Support for draft policy but reserve comments on the design and form of any proposed development.
 - Support the site allocation for exclusively housing.
 - Objection to the need for the link road. It is sufficient that the two roads, one from Pound Lane and the new one from West Street, should be joined solely for the use of emergency vehicular traffic. It would serve no purpose to reduce traffic in the High Street.
 - Policy should state that the site is “predominantly” for residential use, as this will offer opportunities in the future to the benefit of the community.
- 2011 consultation draft:** (64 comments received)
- General**
- A number of objections to link road but some support too.
 - Concern over evidence base, feasibility and/or viability analysis and site boundary from owners of site.
- Housing**
- Support for housing and broad number of dwellings indicated although some concern over high densities envisaged and implications for traffic and parking.
- Traffic**
- Consideration will need to be given to the impact of additional car traffic running North-South and potentially increasing traffic volume using double roundabout and crossing bridge.
 - To improve traffic flow along the High Street vehicles should be prohibited from parking on the wrong side of the road and car parking facilities on the High Street should be removed during the working day - pavements could then be made wider for pedestrians.
 - Congestion is not a real problem on High Street-alternative routes can be used and traffic does move quickly.
 - Junction of Pound Lane and High Street is already busy and difficult to cross - dangerous for small children. Crossing facilities would need to be improved on Pound Lane and The Causeway.
 - Parking should be banned on High Street north of Pound Lane, enabling widening of the pavements and a better pedestrian environment. The parking spaces lost could be accommodated in the parking provision required by MR4 - the wording needs amending to reflect this.
- Retail**
- Response objecting to the possibility that John Lewis may expand their sales area into this site.
 - Any shortfall in proposed retail space could be met by a westerly lateral extension of the Sainsbury's store which would more than meet the forecasts.
 - Other response suggesting that the site is ideally suited for retail development. Change of mind on this site would mean more competition and regenerate this stagnant part of the town centre in a way this proposal would not.
 - New Waitrose is a basket store and is totally inadequate. Onerous conditions restricting its operation mean it will close in the future once Sainsburys opens.

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised to cover the reasonable alternatives in terms of uses (residential and retail). Given size and constraints on the site, no other alternatives considered reasonable in terms of mix of uses. One further option appraised to cover the site going forward without the section of West Street Car Park and the provision for the Portlands Link Road.		
Options appraised⁵²	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Residential use; smaller site area to exclude West Street Car Park. This option contains no requirement relating to the provision of the Portlands Link Road.	<p>Social By providing new development on what is a very accessible town centre site, option is likely to deliver significant positive effects on social objectives.</p> <p>Environmental By delivering housing development in an accessible town centre location, option is likely to lead to significant positive environmental effects. This is provided that the development can demonstrate that it will have no unacceptable impact on the existing transport network, given that this option will not provide for the Portlands Link Road.</p> <p>Economic By adding to the labour force, option is likely to lead to positive effects on economic objectives.</p>	<p>Option would provide for the delivery of key housing site for Marlow, in a very constrained area with few development opportunities. Whilst it would not provide for the Portlands Link Road, this is a requirement which should be led by the highways authority, and to specify it as a stand-alone development requirement in the absence of the necessary supporting evidence could be considered to be unreasonable. In the absence of the Portlands Link Road, West Street Car Park is not required for the development and can therefore be excluded from the site area, although any future developer will have to satisfy the highway authority's requirements in relation to satisfactory access to the site.</p> <p>This was selected as the preferred option during the examination process when it became apparent that the highway authority no longer saw a strategic reason to keep the road improvement line for the Portlands Link Road.</p>
Alternative Option 1 Residential – this option includes provision for the delivery of the Portlands Link Road and, therefore, includes West Street Car Park in the site area	<p>Social By providing new development on what is a very accessible town centre site, policy is likely to deliver significant positive effects on social objectives.</p> <p>Environmental By delivering housing development in an accessible town centre location, policy is likely to lead to significant positive environmental effects.</p> <p>Economic By adding to the labour force, policy is likely to lead to positive effects on economic objectives.</p>	<p>Option would provide for the delivery of key housing site for Marlow, in a very constrained area with few development opportunities. It would also provide for the delivery of the Portlands Link Road to help alleviate congestion on the High Street, whilst retaining the current quantum of parking currently on West Street Car Park. Requiring development to provide for the link road, however, could be an unreasonable approach if not backed up by supporting evidence To justify it.</p> <p>This had previously been the preferred approach but was superseded by the above option during the plan examination process when it became apparent that the highway authority no longer a strategic reason to retain the road improvement line for the Portlands Link Road.</p>
Alternative Option 2: Retail-led mixed-use	<p>Social By providing new development on what is a very accessible town centre site, option is likely to deliver significant positive effects on social objectives.</p> <p>Environmental By delivering mixed-use development in an accessible town centre location, option is likely to lead to significant positive environmental effects.</p>	<p>Following the implementation of the Waitrose basket store at Chapel House, it was considered that there was no requirement for further retail allocations as the identified scope for extra convenience floorspace had been met. It was also considered that this site was more suitable for housing for a number of factors, including its lack of a frontage, its poor pedestrian linkages to the rest of the town centre shopping area and the very significant heritage and tree-related constraints on the site.</p>

⁵² See 2012 SA main report

	<p>Economic By adding to the labour force and providing for some employment, option is likely to lead to positive effects on economic objectives.</p>	
Other factors	<p>Site owner engagement: Yes Positive response to allocation?: General support for mix of uses Contingency position if site not delivered: Further engagement with site owners</p>	

Policy MR5	Liston Road Car Park	
Policy Development	Issues and Options IF3	Justification
	<ul style="list-style-type: none"> Suggested Site M11 (Land at Liston Road SCP) Options: Affordable Housing 	<ul style="list-style-type: none"> Suggested by landowner
	Preferred Options IF4	Justification
	Site not proposed for development	<ul style="list-style-type: none">
	Update Consultation 2009	Justification for change
	<ul style="list-style-type: none"> Policy M1 outlined two options for the site: retail (potentially with residential above) or residential with decked car parking. Site was considered for potential food store site – benefits and disbenefits listed on p126. 	<ul style="list-style-type: none"> Site included to enable it to be considered for future redevelopment options. Council was consulting on possible alternative food store sites given expenditure capacity projections showing scope for new food store and the fact that the extension permitted on Riley Road store was only modest in size.
Update Report 2010		
<ul style="list-style-type: none"> Policy M1 allocated site for residential with decked car parking, rather than retail. 	<ul style="list-style-type: none"> Following implementation of the Waitrose basket store at Chapel House (for which permission was granted in March 2010 – application ref: 09/06294/FUL), there was no requirement for a further site for convenience retail – therefore it was considered that the housing allocation on the site should remain. 	
2011 consultation draft	Justification for change	
<ul style="list-style-type: none"> No change to policy 	<ul style="list-style-type: none"> n/a 	
2012 Proposed Submission Document	Justification for change	
<ul style="list-style-type: none"> MR5 took forward the residential allocation, but omitted the words “decked car parking” 	<ul style="list-style-type: none"> Dialogue with local stakeholders highlighted support for keeping options open for how replacement car parking was provided (albeit continuing to stress that any development on the site should provide for an equivalent amount of public parking). Some concern in consultation but policy makes it clear that replacement parking would be provided. 	
Consultation responses	<p>IF3 2005 (5 comments received)</p> <ul style="list-style-type: none"> Concern at potential loss of town centre car park but some recognition of site being worthy of further investigation for redevelopment. <p>IF4 2007 No responses received on policy</p> <p>Update Consultation 2009: (19 comments received)</p> <ul style="list-style-type: none"> Concern over potential development on site and its impact; one response recognising potential of site for redevelopment. <p>Update Report 2010: (8 comments received)</p> <ul style="list-style-type: none"> General concern over impact of development on the site – impact on parking provision and conservation area - although some degree of support for draft policy. <p>2011 consultation draft: (16 comments received)</p>	

	<ul style="list-style-type: none"> • Concern over development and impact on conservation area, parking provision and neighbouring residences. • Some degree of support for policy. • 	
SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised, to cover decked parking/residential and mixed residential/retail use to cover what were considered to be the potential mixes of use available on the site. Not considered to be any further reasonable alternatives.		
Options appraised ⁵³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option ⁵⁴ : Decked parking and residential	<p>Social This development would be a more intensive use of an existing car park site. It is near to facilities and services. The policy would therefore have positive effects on social objectives.</p> <p>Environmental The site is previously developed land and policy is therefore likely to have positive effects on environmental objectives.</p> <p>Economic There will be no new or retained employment. The car parking itself is important in terms of local economy. Overall effects on economic objectives likely to be neutral.</p>	This option was accepted as it was considered to offer the potential for additional housing in a very constrained area with few development opportunities, whilst protecting the existing quantum of car parking. This option was selected as the preferred approach at Update Report stage (2010) and no change in circumstances since then to merit changing this approach.
Alternative Option: Retail with residential development	<p>Social This development would be a more intensive use of an existing car park site. It is near to facilities and services. The option would therefore have positive effects on social objectives.</p> <p>Environmental The site is previously developed land and option is therefore likely to have positive effects on environmental objectives.</p> <p>Economic Option would provide employment opportunities but the car parking itself is important in terms of local economy. Overall effect on economic objectives likely to be neutral.</p>	Following the implementation of the Waitrose basket store adjacent to this site, it was considered that there was no requirement for further retail allocations as the identified scope for extra convenience floorspace had been met. Therefore it was considered that this option would provide a less overall benefits to the plan objectives than the preferred option.
Other factors	<p>Site owner engagement: Yes – Council-owned site Positive response to allocation?: Yes Contingency position if site not delivered: No impact on strategy</p>	

⁵³ See 2012 SA main report

⁵⁴ See 2012 detailed SA



Princes Risborough

Policy PR1 Policy Development	Primary Shopping Frontage Zones: Princes Risborough Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). • Question asked as to whether designations remain or do they need to be altered. 	Justification <ul style="list-style-type: none"> • No changes to Local Plan boundaries
	Preferred Options IF4 <ul style="list-style-type: none"> • Maps accompanying Policy A11 set out the extent of primary shopping frontage zones for High Wycombe, Marlow and Princes Risborough – only minor change in Princes Risborough (section of Market Sq taken out of primary frontage and included in secondary). • Policy does not allow for loss of A1 uses in these frontage zones in Princes Risborough apart from in exceptional circumstances. 	Justification <ul style="list-style-type: none"> • Policy based on local plan, national policy and traditional primary frontage policy approach. • Minor amendment to reflect location of site in the town centre.
	Update Consultation 2009 <ul style="list-style-type: none"> • Policy PR1 continues strict approach of not allowing for loss of A1 uses in frontage apart from in exceptional circumstances. 	Justification for change <ul style="list-style-type: none"> • n/a
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> • No change to policy 	Justification for change <ul style="list-style-type: none"> • General support for approach in consultation
	2012 Proposed Submission Document <ul style="list-style-type: none"> • Policy PR1 says changes of use from A1 only allowed where proposed change is to A3 use and would result in no less than 50% of the overall frontage being maintained in A1 use. Other changes only in exceptional circumstances. 	Justification for change <ul style="list-style-type: none"> • To reflect feedback from local stakeholders advocating greater flexibility. • To reflect the changing and broadening role of town centres in general. • To reflect support for a more balanced approach to different uses outlined by local stakeholders, especially in encouraging more A3 uses to the town centre.

		<ul style="list-style-type: none"> Target percentage of A1 maintained to reflect the important shopping role of the core of the town centre.
Consultation responses	<p>IF3 2005 (No. of responses received) n/a</p> <p>IF4 2007 (No comments received on policy)</p> <p>Update Consultation 2009: (11 comments received)</p> <ul style="list-style-type: none"> General support but also concern expressed at the retail offer in Princes Risborough town centre suffering major decline compounded by economic situation; evidenced by empty retail units, high business rates and rents. <p>Update Report 2010 – N/a</p> <p>2011 consultation draft: (1 comment received)</p> <ul style="list-style-type: none"> Support for approach 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Four options appraised based on varying rates of flexibility towards changes of use which were considered to be reasonable in this frontage.</p>		
Options appraised⁵⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁵⁶: Some flexibility for changes of use away from A1 – especially to A3 uses (plis exceptions for preservation or rehabilitation of listed buildings).</p>	<p>Social Policy continues to focus retail and other town centre development in specific areas to maintain vitality and accessibility.</p> <p>Environmental Policy will consolidate retail and some A3 uses in existing developed areas where they are most accessible by sustainable modes of transport so no negative effects likely.</p> <p>Economic Policy promotes retail uses and supporting A3 uses, which can have a positive impact on the economy within the town centre, with the latter being particularly important for the tourism/leisure industry.</p>	<p>This option was accepted as the preferred approach as it was considered that the wider role for town centres in the current economic context meant that a more flexible approach than the traditional primary frontage model was required. It was considered that this would enable a good mix of A uses in the primary frontage, whilst protecting a core proportion of A1 shop uses, to support town centre vitality and viability. This approach received support from local stakeholders.</p> <p>This was option was selected as the preferred approach at Proposed Submission stage (2012) following consultation with local stakeholders and ongoing challenges for the retail industry, and the factors for this choice remain extant.</p>
<p>Alternative Option 1: No net loss of A1 frontage length – exceptions for preservation or rehabilitation of listed buildings</p>	<p>Social Option would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the primary shopping frontage. Overall option is likely to have positive effects on</p>	<p>Whilst this option offered flexibility for changes of use in exceptional circumstances, it was considered that the more mixed nature and role for town centres meant that a more flexible approach was required to allow for a balanced mix of uses and to protect the centre against any increase in vacancy rates.</p>

⁵⁵ See 2012 SA main report

⁵⁶ See 2012 detailed SA

	<p>social objectives.</p> <p>Environmental Policy will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport and exceptions in option could benefit listed buildings. Significant positive effects on environmental objectives therefore likely.</p> <p>Economic Policy promotes retail uses which can have a positive impact on the economy within the existing town centres.</p>	<p>This option had previously been the preferred approach at Preferred Options stage (2007) but was superseded by the above option in 2012 due to the ongoing uncertain economic outlook for the retail industry and after further stakeholder consultation supported greater flexibility of uses.</p>
<p>Alternative Option 2: Maximum flexibility for any changes of use away from A1 (maintenance of active ground floor frontage required)</p>	<p>Social Option continues to focus retail and other town centre development in specific areas to maintain vitality and accessibility, but loss of retail frontage could undermine vitality and viability. Exact effect depends on which uses take place in which exact areas but overall the option risks having negative effects on social objectives.</p> <p>Environmental Policy option will consolidate retail and uses in existing developed areas where they are most accessible by sustainable modes of transport so no negative effects likely.</p> <p>Economic Loss of retail development within the identified zones could undermine the viability of centres and retail employment, although other uses could provide employment. Overall effect on economic objectives likely to be neutral.</p>	<p>Whilst this option provided for maximum flexibility of movements between use classes with an active ground floor frontage, it was considered that this was not appropriate in a primary shopping frontage where an undue loss of A1 shop units on a large scale could significantly undermine the vitality, viability and customer attractiveness of the town centre as a whole.</p>
<p>Alternative Option 3: Less flexibility – allow no exceptions for changes of use so no change to non-A1 uses</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility. However too strict an approach risks causing an increase in empty units if the local economy takes a downturn, and thereby having a negative effect on social objectives.</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but reduced opportunities for alternative uses would undermine any accessibility benefits and the potential for rehabilitation of listed buildings. Overall modest positive effects on objective.</p> <p>Economic Policy option promotes retail uses but a lack of flexibility for any other uses</p>	<p>It was considered that an option allowing for minimal flexibility would be inappropriate given the mix, nature and role of the town centre and the beneficial impact which more A3 uses could have in Princes Risborough. It was considered that an approach of minimal flexibility for changes could obstruct businesses and lead to an increase in the vacancy rate in the frontage.</p>

	could damage business viability, and thereby have negative effects on economic objectives.	
Other factors	<ul style="list-style-type: none"> • General economic trends relating to town centres and the retail industry 	

Policy PR2	Secondary Shopping Frontage Zones: Princes Risborough	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). • Question asked as to whether designations remain or do they need to be altered. 	Justification <ul style="list-style-type: none"> • No changes to Local Plan boundaries
	Preferred Options IF4 <ul style="list-style-type: none"> • Maps accompanying Policy A11 set out the extent of the secondary shopping frontage zones for High Wycombe, Marlow and Princes Risborough - only minor change in Princes Risborough (section of Market Sq taken out of primary frontage and included in secondary).. • In Princes Risborough the policy only allows for development which does not result in a net loss of A use floorspace; does not result in more than 2 non-shop (non-A1) units in any 5 consecutive original units; and retains an active shop frontage. 	Justification <ul style="list-style-type: none"> • Policy is stricter than in the Local Plan (where Policy S4 allowed for any changes within A use class and to C and D use classes where the unit was not adjoining an existing non-shop unit) but is more in accordance with national policy which allows for town centre uses, and traditional secondary frontage policy approach. • Minor amendment to reflect location of site in the town centre.
	Update Consultation 2009 <ul style="list-style-type: none"> • Policy PR2 introduces a percentage-based approach to measuring and protecting A1 uses rather than measuring row of consecutive uses. 	Justification for change <ul style="list-style-type: none"> • No change to the proportion of A1 to be protected (40%). Change to percentage approach to provide more flexibility following onset of economic downturn.
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> • Policy PR2 says Council will only allow development which does not result in a net loss of A use frontage length; does not result in more than 60% of frontage length being non-A1; and maintains an active ground floor frontage. 	Justification for change <ul style="list-style-type: none"> • Greater flexibility for non-A1 uses to reflect the existing split of uses in the frontage, which was already close to 60% non-A1 (in the April 2011 survey).

	<p>2012 Proposed Submission Document</p> <ul style="list-style-type: none"> Policy PR2 says the Council will allow changes of use which do not result in a net loss of A use classes; and which maintains an active ground floor frontage. 	<p>Justification for change</p> <ul style="list-style-type: none"> Greater flexibility extended to allowing for all A uses without stipulating a percentage. Approach more in line with traditional secondary frontage policy and with national guidance advocating mix of town centre uses in secondary frontages. Also reflects feedback from local stakeholders on the role of other non-A1 uses in the town.
Consultation responses	<p>IF3 2005 (No. of responses received)</p> <p>IF4 2007 No comments received on policy</p> <p>Update Consultation 2009: (1 comment received)</p> <ul style="list-style-type: none"> Support for approach <p>Update Report 2010 – N/a</p> <p>2011 consultation draft: (1 comment received)</p> <ul style="list-style-type: none"> Support for policy 	
<p>SUSTAINABILITY APPRAISAL</p> <p>Options selected for appraisal: Four options appraised based on varying rates of flexibility towards changes of use which were considered to be reasonable in this frontage.</p>		
Options appraised⁵⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁵⁸: No net loss of frontage length in Class A use</p>	<p>Social Policy would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the District's town centres including secondary frontage zones, and therefore have a positive effect on social objectives.</p> <p>Environmental No direct negative impacts and option would encourage an appropriate mix of town centre uses in accessible locations and keep the town centre as a whole vital and viable. Significant positive environmental effects therefore likely.</p> <p>Economic Policy could have a significant positive effect by creating the framework to enable an appropriately wide range of developments to come forward which would assist the local economy.</p>	<p>This option was selected as it was considered to represent an appropriately balanced approach in allowing for a range of uses appropriate to a secondary frontage, whilst also protecting units for uses containing an active ground floor frontage, and so protecting against those which would create a 'dead' frontage. It was therefore considered that this option would maintain vitality and viability of the town centre as a whole.</p> <p>This alternative was selected as the preferred approach at Proposed Submission stage (2012) following consultation with local stakeholders and reflecting the wider role for town centres generally in the current economic context. There have been no subsequent changes in circumstances to merit changing this approach.</p>
Alternative Option 1: No net	Social	This option was rejected because whilst it allowed for some degree of

⁵⁷ See 2012 SA main report

⁵⁸ See 2012 detailed SA

<p>loss of frontage lengths in Class A use and only stipulated proportion of non-A1</p>	<p>Option would enable the development of appropriate town centre uses including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the District's town centres including secondary frontage zones, and therefore have a positive effect on social objectives.</p> <p>Environmental No direct negative impacts and option would encourage an appropriate mix of town centre uses in accessible locations and keep the town centre as a whole vital and viable. Significant positive environmental effects therefore likely.</p> <p>Economic Option could have a significant positive effect by creating the framework to enable an appropriately wide range of developments to come forward which would assist the local economy.</p>	<p>flexibility, it was considered that for a secondary frontage it was more appropriate to allow for maximum flexibility between A uses rather than stipulate any proportion of A1 uses to be retained. This option was selected as the preferred approach at Preferred Options stage (2007) but superseded by the above option in 2012 due to the ongoing uncertain economic outlook for the retail industry and after stakeholder consultation supported flexibility of uses.</p>
<p>Alternative Option 2: More flexible – allow some changes of use away from A uses</p>	<p>Social Policy option could lead to the loss of active frontages providing main town centre uses, which would undermine long-term vitality and viability of the town centre.</p> <p>Environmental Policy option will consolidate retail and other uses in existing developed areas where they are most accessible by sustainable modes of transport. However, spread of non-A uses could mean loss of such facilities, undermining accessibility benefits of option.</p> <p>Economic Loss of retail development within the identified frontage could undermine the viability of centres although the effects are uncertain.</p>	<p>Whilst this option provided for maximum flexibility of movements between A use classes, it was considered that allowing movements away from A use classes would be inappropriate in a secondary frontage, where it was important to retain units with an active ground floor frontage, to help maintain town centre vitality and viability, and to protect against uses which could create a 'dead' frontage. It was considered that this would be an inappropriate approach in a secondary shopping frontage.</p>
<p>Alternative Option 3: Less flexible – no loss of A1 shop uses</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility, but failure to cater adequately for other services could undermine these objectives</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but could divert other town centre uses to less sustainable locations</p> <p>Economic Policy option promotes retail uses which can have a positive impact on the economy within the existing town centres but restricting other uses could</p>	<p>This option was rejected as it was considered to be overly inflexible for a secondary shopping frontage, where a range of non-A1 uses are considered to be appropriate.</p>

	undermine their vitality and viability.	
Other factors	General economic trends relating to town centres and the retail industry	

Policy PR3	Land Fronting New Road	
Policy Development	Issues and Options IF3	Justification
	<ul style="list-style-type: none"> Town Centre Site PR6: Rear of High Street Options: Small-scale retail development opportunities 	<ul style="list-style-type: none"> See IF3 Town Centre Uses Background Paper (p9).
	Preferred Options IF4	Justification
	<ul style="list-style-type: none"> No policy 	<ul style="list-style-type: none">
	Update Consultation 2009	Justification for change
	<ul style="list-style-type: none"> No policy 	<ul style="list-style-type: none">
Update Report 2010	Justification	
<ul style="list-style-type: none"> Policy MU36 introduced to allocate site for small-scale mixed use development incorporating residential, community uses, business, hotel, retail and leisure development, including frontage development, rear servicing and car parking. 	<ul style="list-style-type: none"> Policy had been deleted but reintroduced to reflect the concerns of local stakeholders about the continuing degeneration of the area, and the view that it failed to provide a sense of place in a key gateway to the town. 	
2011 consultation draft	Justification	
<ul style="list-style-type: none"> Policy PR3 continued overall approach to site – only minor wording changes. 	<ul style="list-style-type: none"> General support for policy in consultation. Minor changes to policy/development requirements to reflect issues flagged up in the consultation responses. 	
2012 Proposed Submission Document	Justification	
<ul style="list-style-type: none"> Policy PR3 takes forward policy with no major changes. 	<ul style="list-style-type: none"> General support for approach in consultation. 	
Consultation responses	<p>IF3 2005: (5 comments received) There is generally a positive response for the development of this site for small-scale retail opportunities as it is considered that the current use is unattractive and hence under-utilised.</p> <p>IF4 2007 No responses received on policy</p> <p>Update Consultation 2009 (2 comments received)</p> <ul style="list-style-type: none"> Continuing degeneration of this land and urge discussions with WDC as to how this might be addressed. The last Local Plan had requirements to carry out a developers brief for the backlands on New Road and Horns Lane. This requirement for a developers brief should be transposed into the new document. <p>Update Report 2010: (4 comments received)</p> <ul style="list-style-type: none"> General support for policy. However, one response stating that no explanation as to whether the issue of deliverability has been overcome and, if so, how. <p>2011 consultation draft: (4 comments received)</p> <ul style="list-style-type: none"> General support for policy but one response stating that not set out why the site is now deliverable when previous Local Plan policy was deleted for this reason. If site is not fully deliverable then cannot be considered as a viable option for bringing forward regeneration benefits. Incremental steps identified 	

	<ul style="list-style-type: none"> ▪ would not bring benefits for Core Strategy objectives. ▪ Archaeological assessment and evaluation would be necessary on these historic town centre sites - works to historic buildings may also reveal significant features. ▪ . 						
SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options selected which, whilst both advocating mixed-use developments, encompassed different scales of development as these represented the alternative ways of developing this site. Not considered to be any further reasonable alternatives in terms of uses or approaches on this site.							
Options appraised⁵⁹	<table border="1"> <thead> <tr> <th>Summary of the outcome of the Sustainability Appraisal</th> <th>Reasons for accepting/rejecting option</th> </tr> </thead> <tbody> <tr> <td> Social Positive effect on social objectives – policy would be a catalyst to regenerating a town centre site with benefits for the wider town. Environmental Policy would provide environmental enhancements for a key site in the town centre. Adverse effects unlikely. Economic Positive effect. Policy would help regenerate site with a mix of uses including those which would support employment and tourism. </td> <td> This option was accepted as the preferred approach as it was considered that it would provide a catalyst to regenerating this site and also provide environmental enhancements at the site. It was also supported by local stakeholders. This option was selected as the preferred approach at Update Report stage (2010) and no change in circumstances since then to merit changing this approach. </td> </tr> <tr> <td> Alternative Option⁶⁰: Radical redevelopment of the site encompassing large development sites along the frontage Social Positive effect on Social Objectives – policy would be a catalyst to regenerating a town centre site with benefits for the wider town. Environmental Option would provide some environmental benefits but there is potential for significant adverse impacts on the heritage features of the town centre. Economic Positive effect. Option would help regenerate a town centre site with a mix of uses including those which would support employment and tourism. </td> <td> It was considered that this option could, by allowing for major redevelopment sites, potentially lead to significant adverse impacts on the heritage features of the town centre. </td> </tr> </tbody> </table>	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option	Social Positive effect on social objectives – policy would be a catalyst to regenerating a town centre site with benefits for the wider town. Environmental Policy would provide environmental enhancements for a key site in the town centre. Adverse effects unlikely. Economic Positive effect. Policy would help regenerate site with a mix of uses including those which would support employment and tourism.	This option was accepted as the preferred approach as it was considered that it would provide a catalyst to regenerating this site and also provide environmental enhancements at the site. It was also supported by local stakeholders. This option was selected as the preferred approach at Update Report stage (2010) and no change in circumstances since then to merit changing this approach.	Alternative Option⁶⁰: Radical redevelopment of the site encompassing large development sites along the frontage Social Positive effect on Social Objectives – policy would be a catalyst to regenerating a town centre site with benefits for the wider town. Environmental Option would provide some environmental benefits but there is potential for significant adverse impacts on the heritage features of the town centre. Economic Positive effect. Option would help regenerate a town centre site with a mix of uses including those which would support employment and tourism.	It was considered that this option could, by allowing for major redevelopment sites, potentially lead to significant adverse impacts on the heritage features of the town centre.
Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option						
Social Positive effect on social objectives – policy would be a catalyst to regenerating a town centre site with benefits for the wider town. Environmental Policy would provide environmental enhancements for a key site in the town centre. Adverse effects unlikely. Economic Positive effect. Policy would help regenerate site with a mix of uses including those which would support employment and tourism.	This option was accepted as the preferred approach as it was considered that it would provide a catalyst to regenerating this site and also provide environmental enhancements at the site. It was also supported by local stakeholders. This option was selected as the preferred approach at Update Report stage (2010) and no change in circumstances since then to merit changing this approach.						
Alternative Option⁶⁰: Radical redevelopment of the site encompassing large development sites along the frontage Social Positive effect on Social Objectives – policy would be a catalyst to regenerating a town centre site with benefits for the wider town. Environmental Option would provide some environmental benefits but there is potential for significant adverse impacts on the heritage features of the town centre. Economic Positive effect. Option would help regenerate a town centre site with a mix of uses including those which would support employment and tourism.	It was considered that this option could, by allowing for major redevelopment sites, potentially lead to significant adverse impacts on the heritage features of the town centre.						
Other factors	Site owner engagement: No – site in disparate ownership Positive response to allocation?: No particular response but support for allocation amongst local stakeholders Contingency position if site not delivered: Further engagement with site owners						

⁵⁹ See 2012 SA main report

⁶⁰ See 2012 detailed SA

Policy PR4	Land south of Horns Lane	
Policy Development	Issues and Options IF3	Justification
	<ul style="list-style-type: none"> Town Centre Site PR5 (South of Horns Lane) Options: Mixed-use focusing on retail, with car parking and some residential. 	<ul style="list-style-type: none"> See IF3 Town Centre Uses Background Paper (p9)
	Preferred Options IF4	Justification
	<ul style="list-style-type: none"> Site highlighted on p74 as a retail-led mixed-use site with parking and residential uses, with appropriate relocation of the fire station to be required. 	<ul style="list-style-type: none"> To support and protect the vitality and viability of the town centre by providing for this site development opportunity.
	Update Consultation 2009	Justification for change
<ul style="list-style-type: none"> No change although site no longer referred to as 'South of Horns Lane' – area of site the same 	<ul style="list-style-type: none"> n/a 	
Update Report 2010 - none		
2011 consultation draft	Justification for change	
<ul style="list-style-type: none"> Policy PR4 allocated site for small-scale mixed-use development – suitable uses listed as retail, residential, community facilities, business, hotel, leisure development and car parking. List of development requirements set out. Policy renamed 'Land south of Horns Lane' and covered a slightly smaller site area to exclude houses at the back of the site. 	<ul style="list-style-type: none"> To reflect the ability of comprehensive redevelopment of this prominent site to deliver significant visual amenity benefits and to add to the vitality and viability of the town centre. Site area adjusted to remove private residences. 	
2012 Proposed Submission Document	Justification	
<ul style="list-style-type: none"> Policy PR4 takes forward policy with no changes. 	<ul style="list-style-type: none"> General support for policy in consultation. 	
Consultation responses	<p>IF3 2005: (8 comments received) Support for the redevelopment of this site and it considered by some to enhance the vitality and viability of the town centre. However, some concern over the loss of open space and the impact it may have on the character of the town and objection from Budgen's to inclusion of their site in allocation and questioning need in retail terms for the allocation.</p> <p>IF4 2007: (2 comments received)</p> <ul style="list-style-type: none"> Concerns regarding Water Supply Capability in relation to this site. Specifically, the network in this area is unlikely to be able to support the demand anticipated from this development No comments other than fire station is on the site <p>Update Consultation 2009 (1 comment received)</p> <ul style="list-style-type: none"> Response seeking further clarification on the future of this site. 	

	<p>Update Report 2010 – N/a</p> <p>2011 consultation draft: (3 comments received)</p> <ul style="list-style-type: none"> Support for principle of policy but Thames Water expressed concerns over the proposed flow and the capacity of the connecting sewers. 	
<p>SUSTAINABILITY APPRAISAL</p> <p>Options selected for appraisal: Three options appraised, covering the reasonable alternative uses (retail, residential/business) and a mix of uses.</p>		
Options appraised⁶¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁶²: Small-scale mixed-use development	<p>Social By providing new development on a town centre site, policy is likely to deliver positive effects on social objectives, particularly if scheme contains an element of residential.</p> <p>Environmental Given the location of the site within a town centre, the re-use of the site is likely to have positive effects on environmental objectives.</p> <p>Economic Overall, the policy is likely to have a neutral to positive impact on the economic objectives given the retention of the retail element on site and potential to encourage tourism.</p>	<p>This option was accepted as it was considered that it would represent an appropriate mix of uses in sustainable town centre site, subject to requirements on relocating existing uses.</p> <p>This option was selected as the preferred approach at Preferred Options stage (2007) and no change in circumstances since then to merit changing this approach.</p>
Alternative Option 1: Retail use only	<p>Social Option is unlikely to have any effect on social objectives, particularly given that would not include any residential element.</p> <p>Environmental Given the location of the site within a town centre, the re-use of the site is likely to have positive effects on environmental objectives.</p> <p>Economic Overall, the option is likely to have a neutral to positive impact on the economic objectives given the potential to retain or increase retail provision on the site.</p>	<p>Whilst this option had the potential to provide improved retail facilities, it was not considered to have the same level of benefits as the above option.</p>
Alternative Option 2: Residential/business	<p>Social By providing new development on a town centre site, option is likely to deliver positive effects on social objectives, particularly if scheme contains an element of residential.</p>	<p>Whilst this option had the potential to provide new housing and businesses, it was not considered appropriate to allocate this site, which is partially in the primary shopping area, for non-retail uses.</p>

⁶¹ See 2012 SA main report

⁶² See 2012 detailed SA

	<p>Environmental Given the location of the site within a town centre, the re-use of the site is likely to have positive effects on environmental objectives.</p> <p>Economic Overall, the option is likely to have a positive impact on the economic objectives given the potential to increase jobs on site, particularly higher skilled positions, and the potential to encourage tourism.</p>	
Other factors	<p>Site owner engagement: Yes – partly owned by Council; partly by the Fire Service Positive response to allocation?: General support for greater flexibility in allocation Contingency position if site not delivered: Further engagement with other site owners but small site so no impact on strategy.</p>	

Development Management Policies

DM1 Transport Requirements of Development Sites		
Policy Development	Issues and Options IF3 Issues set out in terms of links between land use and transport	Justification
	Preferred Options IF4 N/a	Justification
	Update Consultation 2009 n/a	Justification
	Update Report 2010 New policy in 2010 co-written by WDC and BCC. Sets out requirements of new development in relation to transport requirements Definition of high quality, fully accessible, attractive public transport service included.	Justification Policy introduced to remove repetition of common elements/requirements in site specific policies. To comply with GOSE response
	2011 consultation draft Wording of policy refined in relation to travel plans, travel choices, design of development for non-car modes of transport. Level of development policy aimed at changed	Based on discussion with County Council clarifying scope and detail of policy Threshold of developments that it would apply to was changed to make delivery of public transport requirements more realistic and to allow for different impacts/demands between types of development
	Proposed Submission Document 2012 Removed reference to Real Time Passenger Information Removed reference to Smarter Choices In part 2b) minimise changed to mitigate	To simplify policy and make more flexible in terms of requirements and programmes to influence travel behaviour, and reflect implementation of CIL In relation to consultation response and to make more policy more measurable.
Consultation responses	IF3 2005 (N/a) IF4 2007 (N/a) Update Consultation 2009 (1 response received) GOSE made a representation in relation to including a policy on provision of public transport facilities within new development. Update Report 2010 – (11 responses received) Overall support for the objectives and principles of the policy, although further clarification and justification for the thresholds stated was required. Some concerns were expressed over the implications of such a policy on viability and whether a 'blanket approach' was the most appropriate approach, or whether the policy should be seen as a starting point, with each site and development considered on its own merits. 2011 Consultation Draft – (8 responses received) Overall support for policy with comments in relation to viability, provision of cycling facilities, thresholds at which policy applies and determination of level of	

	section 106 contributions.	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options appraised, encompassing an approach with framework of transport requirements and one without this framework.		
Options appraised⁶³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁶⁴: Policy with menu of transport requirements of development sites	<p>Social Positive impact on social objectives relating to provision of safe cycle and pedestrian routes in new developments and the potential these offer to encourage people to improve health through exercise.</p> <p>Environmental Positive impact on environmental objectives due to focus of policy on achieving sustainable transport.</p> <p>Economic Positive impact on economic objectives</p>	<p>This option was accepted as it was supported by highway authority and other consultation responses, and also was considered to augment and supplement Core Strategy Policy 20 (as well as Core Strategy Policies 16 and 21). It was considered that the approach would enable appropriate transport requirements to be secured without specifying the detail of these in each individual policy.</p> <p>This option was selected as the preferred approach at Update Report stage (2010) when it was co-written with the highway authority, and no subsequent change in circumstances to justify changing this approach, other than modifications to the detailed wording of the policy.</p>
Alternative Option: No policy	<p>Social Option would have no direct effect on social objectives.</p> <p>Environmental Negative impact due to not being able to require measures that contribute towards sustainable travel behaviour.</p> <p>Economic Option would have negative impact on economic objectives.</p>	<p>This option was rejected as it was considered that it would not be supported by the highway authority and would not deliver the requirements set out in Core Strategy Policy 20. Also not supported by the outcome of the SA or in consultation responses.</p>
Other factors	The supporting text specifies level of service required for a high quality, fully accessible, attractive public transport service	

⁶³ See 2012 SA main report

⁶⁴ See 2011 detailed SA

DM2 Transport Improvement Lines		
Policy Development	Issues and Options IF3 2005 Ongoing protection of improvement lines identified	Justification Prevent development that would jeopardise implementation of schemes
	Preferred Options IF4 2007 Policy A14 sets out approach to safeguard and identify on the proposals map Reference made to area specific proposals in relevant sections of document	Justification (if different) Enable community to identify what is proposed in their area
	Update Consultation 2009 No update to policy included List of schemes identified and topic paper produced	Justification No changes proposed to approach Enable community to identify what is proposed in their area Identifies Junction and Route Improvements as part of strategy
	Update Report 2010 No update to policy included Updated improvement line review document issued Revised list of schemes produced including High Wycombe Town Centre Masterplan related schemes	Justification No changes proposed to approach Enable community to identify what is proposed in their area Identifies detailed development control measures to promote sustainable development including the protection of improvement lines to protect future transport links. Protection of improvement lines result from County Council improvement lines and reviews of them, or from new plan proposals (eg Masterplan).
	2011 consultation draft Policy redrafted Improvement lines and junctions identified on maps	Justification To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach Enable community to identify what is proposed in their area
	Proposed Submission Document 2012 No change	
Consultation responses	IF3 2005 (No responses received) IF4 2007 (5 responses received) Fails to set out proposals for meaningful transport infrastructure Unclear how the transport network alterations are to be funded. Support removal of Regional Coachway from the AONB and its inclusion as part of MU19. Support the inclusion/improvement of a walking and cycling network. Some dedicated cycle paths around Hazlemere would be appreciated. Improvement line of the A4010: Care needs to be taken over this with respect to the parts that are located within the Chilterns AONB and the parts that are not within the AONB, but which affect its setting Update Consultation 2009 (N/a) Update Report 2010 – (6 responses received) Reponses received in relation to: Chapel Lane/West Wycombe Road	

	<p>London Road/Hatters Lane Marlow Bottom Road Marlow</p> <p>There is a need for realistic reviews of proposals involving the public The Bourne End/High Wycombe railway line should be protected for strategic transport needs and not seen as a local asset. 2011 consultation draft (5 responses received) (1 objection, 2 supports and 2 comments) Lack of evidence to support HWTC Masterplan Vision and Portlands Link Road</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: One option selected to encompass the approach to protecting transport improvement lines. As transport improvement lines are designated by the highway authority and these lines need protecting to enable implementation of strategy and schemes, this was considered to be the only reasonable alternative.</p>		
Options appraised⁶⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁶⁶ – Policy approach to protecting transport improvement lines, with these listed in the appendices</p>	<p>Social Positive impact on social objectives relating to provision of safe cycle and pedestrian routes in new developments and the potential these offer to encourage people to improve health through exercise.</p> <p>Environmental Positive impact on environmental objectives due to focus of policy on achieving sustainable transport</p> <p>Economic Positive impact on economic objectives</p>	<p>This option accepted as it was in compliance with the approach of the highway authority in designating and protecting transport improvement lines. Approach is in compliance with the national policy (NPPF para 41, which states that local planning authorities should identify and protect, where there is robust evidence, sites and routes which would be critical in developing infrastructure to widen transport choice).</p> <p>This option selected as the preferred approach at Preferred Options stage (2007) and, with the exception of minor wording changes, no new circumstances since then to warrant changing this approach.</p>
<p>Alternative Option: No alternative tested as Transport Strategy identifies that routes and junctions need safeguarding to enable implementation. Assessment of which schemes should be safeguarded subject to a separate consultation process by the County Council.</p>	n/a	n/a
Other factors	This policy identifies proposed improvement lines, the process of consulting on the extent and detail of any improvement line is the responsibility of the County Council and will need to be dealt with when the County Council consults on improvement lines.	

⁶⁵ See 2011 SA main report

⁶⁶ See 2011 detailed SA

DM3 Former Bourne End to High Wycombe Railway Line		
Policy Development	Issues and Options IF3 2005 n/a	Justification
	Preferred Options IF4 2007 Included in Transport Improvement Lines policy	Justification No separate policy
	Update Consultation 2009 Different options identified for the proposed safeguarding of line	Justification To define end use and amount of land required to be safeguarded
	Update Report 2010 Preferred option identified Continue safeguarding a 5m corridor as a walking and cycling route	Justification No current justification for safeguarding for light/heavy rail use. Wording would still safeguard route for any longer term investment decisions that could deliver public transport in the longer term utilise it in shorter term for walking/cycling, Supporting background paper provides detail.
	2011 consultation draft Policy drafted for preferred option	Justification To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach
	Proposed Submission Document 2012 Addition of proposed role for the former railway line Addition of cross references to Green Infrastructure Policy	Justification To provide clarity on the purpose of the policy Highlight additional role of route
Consultation responses	IF3 2005 (No responses received) IF4 2007 (No responses received) Update Consultation 2009 (31 responses received) Overall support for the protection of the railway alignment but split in opinion amongst respondents as to the transport link to be created (heavy rail; public transport corridor (e.g. light rail) or walking & cycling route). The creation of a walking & cycling route, at least in the short term, was supported. Update Report 2010 – (13 responses received) There was general support for the option for the protection of the route with some respondents requesting that a wider route be protected in case of future public transport use and for enhanced protection of adjacent natural habitats. 2011 consultation draft – (16 responses received) 2 objects, 7 comments and 7 supports) Overall support for policy but comments that insufficient land is safeguarded to allow reinstatement of rail use and policy	
SUSTAINABILITY APPRAISAL Options selected for appraisal: Four options appraised, encompassing varying degrees of protection of the corridor for transport use. from no protection for future transport reuse, to protection as a walk/cycle route, protection for light rail use and protection for heavy rail use.		

Options appraised ⁶⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁶⁸ : Walking and cycle route	<p>Social Option would have a positive impact on achieving social objectives due to increasing potential access to facilities</p> <p>Environmental Option would have positive impact on achieving environmental objectives due to providing a sustainable transport link, being a part of the green infrastructure network and increasing access to the countryside</p> <p>Economic Option would have no impact on economic objectives.</p>	<p>This option was accepted as it was considered to be supported by the evidence base (the High Wycombe to Bourne End Railway Line Background Paper) in terms of being deliverable and support received from consultation responses.</p> <p>This option was selected as the preferred approach at Update Report stage (2010) following evidence base indicating that the route should be protected for this purpose. No subsequent changes of circumstances to justify altering this approach.</p>
Alternative Option 1 – Protect the rail line for future heavy rail use	<p>Social The creation of a public transport corridor will greatly improve access to services and facilities for residents in this area, and therefore option would have significant positive effects on social objectives once implemented.</p> <p>Environmental Limited negative impacts of the re-instatement of the line would be outweighed by the wider benefits of providing a new public transport link.</p> <p>Economic Overall, the option would have positive effects on economic objectives.</p>	<p>This option was rejected because, whilst it would deliver benefits and was positive in terms of the SA outcome, the evidence base suggested that the preferred option should be to protect the route for a walking and cycle route rather than for heavy rail use.</p>
Alternative Option 2 – Protect the rail line for future guided public transport use e.g. light rail/ultra light rail use	<p>Social The creation of a public transport corridor will greatly improve access to services and facilities for residents in this area.</p> <p>Environmental Impact of provision of infrastructure would be negative against environmental objectives but provision of sustainable modes of transport would be positive. Overall neutral impact.</p> <p>Economic Overall positive impact on economic objectives.</p>	<p>This option was rejected because, whilst it would deliver benefits and was positive in terms of the SA outcome, the evidence base suggested that the preferred option should be to protect the route for a walking and cycle route rather than for light or ultra-light rail use.</p>
Alternative Option 3 – Cease to protect the former railway	<p>Social Would allow opportunity for residential development but would not have</p>	<p>This option was rejected because it was not supported by the SA outcome, the evidence base or the consultation responses. It was considered that this</p>

⁶⁷ See 2011 SA main report

⁶⁸ See 2011 detailed SA

alignment for any potential transport reuse	<p>positive impact on other social objectives.</p> <p>Environmental Overall neutral impact on environmental objectives.</p> <p>Economic Overall negative impact on economic objectives.</p>	option would not optimise a key opportunity to effect modal shift away from the private car.
Other factors	Supporting evidence identified no reasonable prospect of a public transport use coming forward for the use of this route	

DM4 Scattered Employment Sites		
Policy Development	<p>Issues and Options IF3 -2005 Seeks to resist the loss of employment generating uses from small business sites Acceptable uses include employment generating uses rather than just 'B' uses and there is flexibility to include community uses but not residential uses (as in general business areas) Sites not been subject to Employment Land Review (ELR) protected for employment use unless it can be demonstrated the site is no longer viable for employment generating uses, suggested criteria may include: Strategic accessibility Transport/Highways Capacity Compatibility with surrounding uses Occupier environment Marketability/Affordability Number of sites identified as being suitable for alternative uses following ELR</p>	<p>Justification Small employment sites play an important role in providing affordable premises for existing, new and expanding small businesses and start ups. Thus in many cases they provide local employment for local people creating sustainable working patterns. Clear definition of the criteria will reduce some of the uncertainty and arguments over the interpretation This approach in line with the revisions to PPG3</p>
	<p>Preferred Options IF4 - 2007 2 policies: Scattered Business Sites (A3) Allows B1, B2 and B8 uses as well as leisure uses, small scale retail (subject to sequential test) and community uses Residential uses not allowed Specifies change to residential only permitted as a result of identification in a future DPD. Identifies site threshold 0.1 ha urban, 1ha rural. Scattered Business Sites with potential for change (A4)</p>	<p>Justification for change Adopts approach identified in 2005 setting out a preferred option Identifies site suitable for other uses including residential based upon ELR and designation of sites as badly sited users in local plan</p>
	<p>Update Consultation 2009 Criteria added to the policy to identify conditions when a scattered site could be redeveloped for residential use including marketing. Removal of requirement for identification of a site in a DPD to be redeveloped for non- employment generating uses Removal of site size criteria Option regarding different approach to town centre office sites included in consultation</p>	<p>Justification for change Previous approach too inflexible, with no potential to adapt to changing circumstances, introduction of criteria provides clarity in terms of requirements - in response to comments received. Included by mistake as this was criteria used for ELR work and not for classification of what is or is not a scattered site To assess whether there is support for greater protection of town centre sites by being excluded from this policy approach</p>
	<p>Update Report 2010 – no changes proposed</p>	

	<p>Draft for Consultation 2011 Policy re-drafted, but overall approach remained unchanged</p>	<p>Justification To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach No differentiation in terms of town centres to retain flexibility</p>
	<p>Proposed Submission Document 2012 Minor change made to policy in relation to circumstances allowing redevelopment for residential uses</p>	<p>Justification for change To make policy clearer in application No inclusion of viability and details relating to marketing as current market conditions would result in potential significant loss of land as indicated by CIL background work.</p>
<p>Consultation responses</p>	<p>IF3 2005 (2 responses received) Suggested that small sites should be redeveloped for residential uses and employment areas should be retained within communities</p> <p>IF4 2007 (4 responses received)</p> <p>Policy should be combined with General Business Area Policy, with the differences relating to residential development (para 2.14) clarified in the supporting text. More employment sites should be allocated for housing. The circumstances under which alternative uses would be considered is unduly restrictive, supporting text should be reworded to allow for more discretion and flexibility in the consideration of change. The market is not for new small units, but for cheap and cheerful re-uses/conversions. Para 2.12 is correct that existing scattered rural sites already provide this type of small unit.</p> <p>Update Consultation 2009 (23 responses)</p> <p>Overall support for change to policy Mixed response to different approach to town centre offices More detail required in relation to size threshold, time period for marketing, and reasonable price Contrary to PPS6 Residential should be acceptable Previous approach better</p> <p>Update Report 2010 – N/a (No responses received)</p> <p>2011 consultation draft (10 responses) Mix of support and objections, objections concerned with requirement to market sites when vacant, no assessment of viability included and questioning basis for assessing other employment generating uses before residential uses acceptable</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised to test different levels of flexibility for uses, with one option being an approach of retaining sites in business use and allowing other employment-generating or main town centre uses, and residential subject to meeting certain tests; and the other option taking a more flexible approach to the range of uses and the tests required to justify them.</p>		

Options appraised ⁶⁹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁷⁰ - Retain in business use, allow community facilities, small scale retail, residential (subject to meeting tests)</p>	<p>Social Positive effect on social objectives due to the potential to deliver new homes and community facilities</p> <p>Environmental Overall positive effect on environmental objectives due to redevelopment of previously developed land</p> <p>Economic Overall negative effect on objectives due to potential loss of employment land</p>	<p>This option was accepted as it was considered to be supported by the evidence base (the Economy Study), which states whilst providing flexibility for changes where justified; and marketing requirements add clarity to the approach.</p> <p>This option was selected as the preferred approach at Update Consultation stage (2009) although the wider economic context has shaped further evolution to the wording of the policy.</p>
<p>Alternative Option – More flexible approach - allow other uses without requiring marketing or demonstrating site no longer suitable for employment uses</p>	<p>Social Overall positive due to allowing redevelopment for residential use</p> <p>Environmental Overall positive effect on environmental objectives due to scattered sites being previously developed land and redevelopments being required to meet new sustainability standards.</p> <p>Economic Overall negative effect on economic objectives due to likely loss of employment land and feeding into emerging imbalance in labour supply and demand</p>	<p>This option was rejected because it was considered that it could lead to the loss of employment land and contribute to an imbalance in labour supply and demand in the District.</p>
<p>Other factors</p>		

⁶⁹ See 2011 SA main report

⁷⁰ See 2011 detailed SA

Policy DM5	Mixed Use Development	
Policy Development	<p>Issues and Options IF3 -2005</p> <p>Identifies role of mixed use sites and potential sites that could be allocated as sites Includes: reference to use of planning agreements, use of site specific requirements as development principles reference to Council involvement in delivery</p>	Justification
	<p>Preferred Options IF4 - 2007 Draft policy identifying specific sites as mixed use sites, referring to development principles, delivery mechanisms, comprehensiveness.</p>	<p>Justification Supports draft CS policy approach providing land for business Delivery of commercial elements of schemes and comprehensive redevelopment of sites.</p>
	<p>Update Consultation 2009 No changes proposed to policy</p>	Justification
	<p>Update Report 2010 No changes proposed to policy</p>	Justification
	<p>Draft for Consultation 2011 Policy not included in draft document</p>	<p>Justification Policy included in Position Statement due to links to mixed use allocations removed from the Plan and incorporated in Position Statement.</p>
	<p>Proposed Submission Document 2012 Policy re-introduced and –slightly amended</p>	<p>Justification To embed in policy requirement to deliver commercial elements of mixed use proposals and deliver, contributes towards delivering the economic benefits of sustainability objectives. Re-introduced of policy in a form that does not link it directly to just allocations due to removal of most mixed use allocations from Plan when scope of plan changed in 2011.</p>
Consultation responses	<p>IF3 2005 (3 responses received)</p> <p>2 in relation to specific sites (De La Rue, High Wycombe) and West's Yard, Saunderton) 1 stating not enough consideration given to the role of mixed uses sites</p> <p>IF4 2007 (11 responses received)</p> <p>Concerns were raised about the delivery of mixed use sites and especially the delivery of the employment element of mixed use sites, comprehensiveness, ability of regeneration of employment sites to meet business needs, requirements to meet development principles, deliverability agreements and potential to delay housing delay. 2 additional sites suggested Abbey Barn South (High Wycombe) and Thames Industrial Estate (Marlow)</p> <p>Update Consultation 2009 (6 responses received)</p>	

	<p>Additional sites proposed as mixed use Wye Industrial Site (High Wycombe) Ruskin Works (Desborough) Sites in Princes Risborough if allocated should be mixed use (3) Support for mixed use on Portlands (Marlow)</p> <p>Update Report 2010 – (no responses received) Draft for Consultation 2011 – (no responses received)</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options selected to reflect approach of requiring development requirements to ensure mixed-use schemes are delivered as such (and particularly to ensure delivery of employment elements of schemes and that comprehensive approach is taken); and an approach which does not contain these requirements (i.e. a 'no policy' approach).</p>		
Options appraised⁷¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁷²: Option specifying site-specific requirements to be met; comprehensive approach delivered; and delivery of B uses secured through legal agreement.</p>	<p>Social General and non-locational nature of the policy makes it difficult to identify specific effects, and the precise effect of policy is likely to depend upon site-specific issues and requirements in individual site policies.</p> <p>Environmental Policy itself has largely neutral or uncertain effects; precise nature of effects are likely to be dependent on site-specific issues. Small positive effect likely due to the requirement for comprehensive development having a positive effect on the potential for reducing the need to travel.</p> <p>Economic Policy approach likely to have a positive effect on economic objectives as it provides a framework for ensuring the delivery of the business component of mixed-use schemes where relevant.</p>	<p>This option was accepted as it was considered that it was necessary to reflect the aspiration of Core Strategy Policy CS11 and to snare the deliver of the wider objectives of mixed-use sites, in a piecemeal rather than fragmented fashion. Approach supports the economic elements of sustainability objectives.</p> <p>This option was selected as the preferred approach at Proposed Submission stage (2012) and no subsequent changes in circumstances to merit altering this approach.</p>
<p>Alternative Option: No policy</p>	<p>Social General and non-locational nature of the policy makes it difficult to identify specific effects, although a 'no policy' approach is likely to undermine the ability for other site-specific policies to seek particular requirements from developments where appropriate and necessary in planning terms.</p> <p>Environmental General and non-locational nature of the policy makes it difficult to identify specific effects, although a 'no policy' approach is likely to undermine the ability for other site-specific policies to seek particular requirements from developments where appropriate and necessary in planning terms. Lack of</p>	<p>This option was rejected as it was considered that it would not ensure the benefits of mixed-use schemes as set out above.</p>

⁷¹ See 2011 SA main report

⁷² See 2011 detailed SA

	<p>requirement for comprehensiveness in development likely to undermine opportunities to reduce the need to travel.</p> <p>Economic No policy' approach would undermine ability to ensure provision of employment elements of mixed-use schemes where relevant.</p>	
Other factors	<p>Deliverability of the employment generating aspects of mixed use scheme is important in ensuring economic contribution and to ensure that where there is a loss of employment land this is offset by regeneration for new employment generating opportunities.</p>	

Policy DM6 Policy Development	Town Centre Boundaries Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). • Question asked as to whether designations remain or do they need to be altered. • Question asked as to whether Desborough Road should be designated as a secondary shopping frontage. 	Justification <ul style="list-style-type: none"> • No changes to Local Plan boundaries suggested at this stage.
	Preferred Options IF4 <ul style="list-style-type: none"> • Maps accompanying Policy A9 set out extent of town centre boundaries for High Wycombe, Marlow and Princes Risborough. • All three town centre boundaries follow the boundaries in the Adopted Local Plan, apart from High Wycombe where Wycombe General Hospital and the block between Westbourne Street and Desborough Avenue are excluded. 	Justification <ul style="list-style-type: none"> • Based on Local Plan apart from tighter boundary in High Wycombe, where the exclusion of the hospital and the western block was proposed to reflect that they are not technically main town centre uses.
	Update Consultation 2009 <ul style="list-style-type: none"> • Maps accompanying Policy B5 set out extent of town centre boundary for High Wycombe, Marlow and Princes Risborough. • Boundary for High Wycombe town centre reinstated Wycombe General Hospital and the block between Westbourne Street and Desborough Avenue (although in the latter case a small area of predominantly residential use on West End Road was maintained outside the Town Centre Boundary). 	Justification for change <ul style="list-style-type: none"> • Hospital reincluded in the Town Centre Boundary for High Wycombe – major community use and attractor of people considered to be appropriate for inclusion in town centre boundary; also to reflect future redevelopment opportunities in this area. • Western block reincluded in the Town Centre Boundary for High Wycombe – to reflect the fact that part of the area formed part of proposed expanded secondary shopping frontage (following a recommendation in the 2004 Retail and Town Centre Uses Study) and to reflect redevelopment opportunities on part of area. • Guildmaster Court and southern side of West End Road still excluded from Town Centre Boundary in High Wycombe to reflect fact that they are residential. • Changes supported by the SA and received broad support in consultation responses.
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> • Maps accompanying Policy DSA5 set out the extent of the town centre boundaries for High Wycombe, Marlow and Princes Risborough. 	Justification for change <ul style="list-style-type: none"> • N/a

	<ul style="list-style-type: none"> No change from 2009 Document. 	
	<p>2012 Proposed Submission Document</p> <ul style="list-style-type: none"> No change to extent of town centre boundaries. Wording of policy (Policy DM6) adjusted to clarify that main town centre uses need to satisfy policy tests when proposed outside the town centre boundary, but that retail proposals need to do this when proposed outside the primary shopping area boundary. 	<p>Justification for change</p> <ul style="list-style-type: none"> Town Centre Boundaries considered to be appropriate. To clarify how the policy will be implemented and comply with national policy approach – responding to comments received suggesting such an approach.
Consultation responses	<p>IF3 2005 (no comments received on policy)</p> <p>IF4 2007 (1 comment received)</p> <ul style="list-style-type: none"> Support policies to encourage mixed use development within the town centre <p>Update Consultation 2009: (12 comments received)</p> <ul style="list-style-type: none"> General support for approach proposed. Issues raised include the need to integrate Eden and Desborough Road with the rest of the town centre and the need to clarify whether 'edge of centre' sites fall between the Primary Shopping Area and the town centre boundary shown on Map 14, or whether 'edge' of centre sites fall outside of the town centre boundary completely <p>Update Report 2010: n/a</p> <p>2011 consultation draft: (7 comments)</p> <ul style="list-style-type: none"> Extent of town centre supported although comment expressed opposing extension of High Wycombe town centre boundary from earlier draft – other comments include on map drafting error - key in Map 6 is the problem and that thought should be given to allow for residential accommodation in the town centre areas. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised both contained policy approach in line with national policy on town centres. However one option appraised a tighter town centre boundary in High Wycombe (excluding the hospital and western area) than the other (which included these areas). No reasonable alternatives considered to be available in terms of overall policy approach.</p>		
Options appraised ⁷³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁷⁴: Town Centre Boundary in High Wycombe to include Wycombe General Hospital and extending westwards to Desborough Avenue – exclusion of southern</p>	<p>Social Policy would encourage the development of further appropriate town centre uses (as defined in national planning policy) in a wide range of locations in the town centre, assisting the regeneration of those – and adjacent – communities.</p>	<p>This option was accepted as it was considered to represent an appropriate area of each town centre and set out a clear framework for uses proposed inside and out of these boundaries. This option was selected as the preferred approach at Update Consultation stage (2009) and no change in circumstances since then to merit changing the approach.</p>

⁷³ See 2012 SA main report

⁷⁴ See 2012 detailed SA

<p>side of West End Road and Guildmaster Court on Desborough Road; maintenance of existing Local Plan boundaries for Marlow and Princes Risborough. Within these boundaries, main town centre uses acceptable in principle; outside it, main town centre uses only permitted if they satisfy national policy, including the sequential and impact tests. Retail schemes to be subject to this test if they fall outside the primary shopping area boundary.</p>	<p>Environmental No direct negative impacts and policy would encourage the re-use of previously developed land.</p> <p>Economic Policy could have a positive impact by creating a framework to enable a wide range of developments to come forward which would assist the local economy.</p>	
<p>Alternative Option: Tighter Town Centre Boundary in High Wycombe to exclude hospital and western block.</p>	<p>Social Option would encourage the development of further appropriate town centre uses (as defined in national planning policy) in the currently-defined town centre. However it would not spread these benefits to the adjacent areas as under the above option, and therefore would not have the added benefit of assisting the regeneration of those – and adjacent – communities.</p> <p>Environmental No direct negative impacts and option could continue current regime of allowing for appropriate and intrinsically sustainable developments in the currently defined town centres.</p> <p>Economic Option would continue current framework of allowing for developments in central locations which would assist the local economy. However no further benefit to economic objectives beyond currently existing policies.</p>	<p>Whilst policy approach was the same and boundaries the same for Marlow and Princes Risborough, it was felt that the exclusion of the hospital in the High Wycombe boundary would exclude what was a major community use and major attractor of people; exclusion of western areas would not reflect the fact that they were now being included as part of the town centre secondary shopping frontage.</p> <p>This option had been selected as the preferred approach at Preferred Options stage (2007) but was superseded by the above option in 2009 following appraisal of the option.</p>
<p>Other factors</p>	<p>The National Planning Policy Framework (NPPF), whilst retaining the principles of the town centre approach from previous national policy, omits some detail on how to apply the boundaries – therefore it was considered useful to specify in the policy how it will be implemented for different uses for the purposes of clarity.</p>	

Policy DM7	The Primary Shopping Areas	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (pages 8-9): Para 1.10 explains that these designations already exist in the Adopted Local Plan, so they are not repeated in the maps in this document). • Question asked as to whether designations remain or do they need to be altered. • Question asked as to whether Desborough Road should be designated as a secondary shopping frontage. 	Justification <ul style="list-style-type: none"> • No changes to Local Plan boundaries
	Preferred Options IF4 <ul style="list-style-type: none"> • Maps accompanying Policy A10 set out extent of primary shopping areas for High Wycombe, Marlow and Princes Risborough. • All three town centre primary shopping areas (PSAs) follow the boundaries in the Adopted Local Plan, apart from: <ul style="list-style-type: none"> i) the exclusion of the Swan Theatre and car park from the High Wycombe PSA; ii) the exclusion of depot adjacent to Liston Court, Methodist Church on Klondyke and block on southern side of Chapel Street between secondary shopping frontage and junction with Liston Road from the PSA in Marlow; and iii) the exclusion of the Duke Street/New Road roundabout from the PSA in Princes Risborough. 	Justification <ul style="list-style-type: none"> • Wording of policy considered to be in line with national policy guidance on the role of Primary Shopping Areas, in PPS6 followed by PPS4. • All changes put forward to reflect nature of uses and compliance with national policy definition of primary shopping area and align boundaries more closely with the designated shopping frontages.
	Update Consultation 2009 <ul style="list-style-type: none"> • Maps accompanying Policy B6 set out extent of primary shopping areas for High Wycombe, Marlow and Princes Risborough. • No change from Preferred Options document. 	Justification for change <ul style="list-style-type: none"> • n/a
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> • Maps accompanying Policy DSA6 set out the extent of the town centre boundaries for High Wycombe, Marlow and Princes Risborough. • Only change to boundaries from 2007 and 2009 documents was reinclusion of block on southern side of Chapel Street in Marlow between secondary shopping frontage and the junction with Liston Road. 	Justification for change <ul style="list-style-type: none"> • No major changes due – support for overall approach in consultation • Minor change in Marlow reverted to Local Plan PSA and reflected nature of uses in block, including recently opened Waitrose basket store.

	<p>2012 Proposed Submission Document</p> <ul style="list-style-type: none"> No change to the extent of the primary shopping areas Extra text added to Policy DM7 to clarify that retail proposals outside the primary shopping area will need to satisfy the national planning policy tests. 	<p>Justification for change</p> <ul style="list-style-type: none"> No change to extent of primary shopping areas – overall support for approach in consultation To clarify how the policy will be implemented and comply with national policy approach.
Consultation responses	<p>IF3 2005 (No comments received) IF4 20071 comment calling for the role of retail outside town centre, and specifically John Lewis, to be recognised.</p> <p>Update Consultation 2009: 2 comments Support for proposed shopping areas</p> <p>Update Report 2010:</p> <p>2011 consultation draft: 3 comments Overall support – comments included about the degree to which a greater proportion of residential accommodation should be permitted in parts of the town centre and whether point (a) is sufficient or whether it could include something in terms of design.</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options appraised for the degree of flexibility permitted for retail and other uses, both of which provided for an appropriate scale of facilities; a further option appraised allowing for larger-scale uses.</p>		
Options appraised⁷⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁷⁶ – Retail and all other main town centre uses acceptable in principle. Development to be of an appropriate scale and not impact on other centres.</p>	<p>Social Policy would continue to focus retail and other town centre uses in specific areas to maintain vitality, viability and accessibility.</p> <p>Environmental Policy would consolidate retail and other town centre uses in the primary shopping areas where they are most accessible by sustainable modes of transport and be of a scale that complements the existing centre. It will therefore have significant positive effects on environmental objectives.</p> <p>Economic Policy promotes retail and other uses which can have a positive impact on the economy within existing town centre shopping areas</p>	<p>This option was accepted as the preferred approach as it was considered to most appropriately reflect national policy in terms of the range of uses considered to be acceptable in principle in primary shopping areas. It was also considered that a caveat on developments being of an appropriate scale would protect against schemes which could have a significant adverse impact on the vitality and viability of these or other town centres. This option was selected as the preferred approach at Preferred Options stage (2007) and no change of circumstances since then to merit changing this approach.</p>
<p>Alternative Option 1: More flexible approach – larger-scale formats acceptable.</p>	<p>Social Although there may be benefits from a wider range of town centre uses in primary shopping areas there could be adverse impacts in terms of vitality and</p>	<p>It was considered that this approach could risk allowing developments which, by their scale, could have a significant adverse impact on the vitality and viability of these and/or other centres.</p>

⁷⁵ See 2012 SA main report

⁷⁶ See 2012 detailed SA

	<p>effects on other centres.</p> <p>Environmental Policy option will consolidate retail and other uses in the town centres where they are most accessible by sustainable modes of transport, but could lead to developments of a scale and character that do not complement the existing centre and which could have a harmful impact on the historic environment. Therefore overall effects on environmental objectives likely to be neutral.</p> <p>Economic Option could improve vitality of parts of a town centre but could have adverse impacts elsewhere.</p>	
Alternative Option 2: More restrictive approach – only retail uses acceptable	<p>Social Policy option would restrict opportunities for other town centre uses important to the vitality of centres. It would therefore be likely to have negative effects on social objectives.</p> <p>Environmental Although policy option provides for retail development in sustainable locations, it could drive non-retail community uses to less sustainable locations. Therefore it could result in negative impacts on environmental objectives.</p> <p>Economic Option promotes retail uses which can have a positive impact on the economy within the existing town centres but restricting other uses could undermine their vitality and viability. Therefore likely to result in negative effects on economic objectives.</p>	It was considered that this option would represent an unduly restrictive approach to the range of uses appropriate in primary shopping areas.
Other factors	<p>Area of Eden and new Sainsbury's development in High Wycombe already included in the PSA in the Adopted Local Plan. In Marlow, impact of proposal for the Waitrose basket store at Chapel House as explained above.</p> <p>The National Planning Policy Framework (NPPF), whilst retaining the principles of the town centre approach from previous national policy, omits some detail such as on the scale of retail uses. Therefore it was considered to include reference to such issues in the policy for the purposes of clarity.</p>	

Policy DM8	District Centres	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> • Section 3 – Town Centres (p8-9): District Centres not specifically mentioned but general questions and issues posed about Town Centre and Primary Shopping Area boundaries. • Question posed as to whether Desborough Road should be designated as a secondary shopping frontage (it was previously a Local District Centre under the Local Plan). • Background Paper: Sets out the shopping centre hierarchy as recommended by the 2004 Retail and Town Centre Uses Study – sets Hazlemere, Bourne End and Flackwell Heath as District Centres; Desborough Road to be part of High Wycombe Sub-Regional Town Centre and Wooburn Green as a Local Centre). 	Justification <ul style="list-style-type: none"> • Local Plan boundaries in place. • See IF3 Town Centre Uses Background Paper (p6-7). • Proposed exclusion of Wooburn Green and Desborough Road as District Centres followed the recommendations of the 2004 Retail and Town Centre Uses Study (paras 9.13-9.14 of the report).
	Preferred Options IF4 <ul style="list-style-type: none"> • Policy A13 set out approach to allow uses of an appropriate scale and character for that centre; not allow development involving the change of use from a shop to non-shop use where this would result in more than 2 non-shop uses in any 5 consecutive original uses; and ensure all development provides a shop frontage. 	Justification <ul style="list-style-type: none"> • Flexibility for allowing a certain degree of non-shop uses in line with the definition of District Centres outlined in national policy (PPS6, followed by PPS4). • SA supported an element of flexibility for the mix of uses in District Centres.
	Update Consultation 2009 <ul style="list-style-type: none"> • Policy B7 - wording the same but slight alteration of boundaries to include Swains Lane shopping parade in Flackwell Heath; Parade Court site in Bourne End; and exclude the former Cedars pub in Hazlemere. • Maps 17 (a, b and c) outlined proposed boundaries. 	Justification for change <ul style="list-style-type: none"> • Flackwell Heath: boundary change to reflect extent of shopping areas in the village. • Bourne End: boundary change to reflect mixed-use draft allocation which had been put forward in 2007 document. • Hazlemere: boundary change to reflect redevelopment of former Cedars pub for residential use and therefore not appropriate for inclusion in District Centre boundary.
	Update Report 2010 - none	
	2011 consultation draft <ul style="list-style-type: none"> • Policy DSA7 slight change – changes of use based on percentage 	Justification for change <ul style="list-style-type: none"> • To enable policy to apply to the proportion of units across the District

	<p>approach. Effectively the same ratios of non-A1 permitted in Bourne End and Flackwell Heath but measured across the centre rather than in rows of 5 units. A stricter percentage target for Hazlemere.</p>	<p>Centre as a whole as it was considered this would be the key impact on vitality and viability of the centre. A stricter limit on non-A1 uses proposed for Hazlemere to reflect low quantum of vacant units here.</p> <ul style="list-style-type: none"> Centre boundaries from 2009 document maintained following supportive comments in consultation.
	<p>2012 Proposed Submission Document</p> <ul style="list-style-type: none"> Wording of Policy DM8 adjusted to express percentage-based approach in positive terms (i.e. the Council will allow certain changes of use) Minimum percentages adjusted and now include a built-in allowance for A3 uses. Wording of policy clarifies that applicants will need to provide the up-to-date use class survey evidence that their proposal complies with minimum percentages; and clarifies that changes will be restricted to particular use class, notwithstanding the provisions of the use classes order. 	<p>Justification for change</p> <ul style="list-style-type: none"> To reflect the role of non-A1 uses in centres, particularly the role of A3 uses, in maintaining vitality and viability and customer attractiveness – see Town Centre Retail and Frontage Policies Background Paper Update for further details. To clarify how the policy will be implemented.
<p>Consultation responses</p>	<p>IF3 2005 (No. of responses received) n/a</p> <p>IF4 2007 (No. of responses received) n/a</p> <p>Update Consultation 2009: 4 comments</p> <ul style="list-style-type: none"> Mixed views on proposed change to Bourne End District Centre boundary. <p>Update Report 2010:</p> <p>2011 consultation draft: 2 comments</p> <ul style="list-style-type: none"> Support for policy although one comment calling for greater flexibility required in relation to the Parade Court site, in order to allow for residential development on frontages. 	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Options selected to cover differing degrees of flexibility for changes of use; also options selected based on proportions of different uses indicated to be acceptable across different District Centres.</p>		
<p>Options appraised⁷⁷</p>	<p>Summary of the outcome of the Sustainability Appraisal</p>	<p>Reasons for accepting/rejecting option</p>
<p>Preferred Option: Percentage target of frontage lengths in non-A1/A3 use – to be specified for each District Centre but some</p>	<p>Social: Option would enable the development of appropriate uses for the district centres including an appropriate proportion of retail developments, A3 and other supporting non-retail uses, as well as new homes where criteria in policy</p>	<p>This option was selected as the preferred approach as it was considered that it would enable an appropriate proportion for retail developments, A2 and other supporting non-retail uses, which would assist in maintaining the vitality and viability of District Centres. The addition of the acceptability of residential in</p>

⁷⁷ See 2012 SA main report

<p>scope for non-A1/A3 use in each District Centre. Except where site-specific policies state otherwise, residential development acceptable on upper floors and on ground floors where this would involve no loss of ground floor frontage.</p>	<p>are met. This would assist in maintaining the vitality and viability of the district centres.</p> <p>Environmental: Option would consolidate retail, A3 uses and other supporting main town centre uses in the District Centres where they are most accessible by sustainable modes of transport and be of a scale that is appropriate for their functions and position in the Town Centre Hierarchy. It would therefore have significant positive effects on environmental objectives.</p> <p>Economic: Option could have a positive impact by creating the framework to enable a wider range of developments to come forward which would assist the local economy.</p>	<p>certain circumstances was considered appropriate to reflect government and local policy supporting town centre living provided certain criteria are met. This was selected as the preferred approach via a Further Change following submission, following further consideration of the proposal to add this residential option into the approach.</p>
<p>Alternative Option 1⁷⁸ – Percentage target of frontage lengths in non-A1/A3 use – to be specified for each District Centre but some scope for non-A1/A3 use in each District Centre</p>	<p>Social Policy would enable the development of appropriate uses for the District Centres including an appropriate proportion of retail developments, A3 and other supporting non-retail uses. This would assist in maintaining the vitality and viability of the District Centres.</p> <p>Environmental Policy would consolidate retail, A3 uses and other supporting main town centre uses in the District Centres where they are most accessible by sustainable modes of transport and be of a scale that is appropriate for their functions and position in the Town Centre Hierarchy. It would therefore have significant positive effects on environmental objectives.</p> <p>Economic Policy could have a positive impact by creating the framework to enable a wider range of developments to come forward which would assist the local economy.</p>	<p>This option was selected as the preferred approach as it was considered that it would enable an appropriate proportion for retail developments, A2 and other supporting non-retail uses, which would assist in maintaining the vitality and viability of District Centres.</p> <p>This option had been selected as the preferred approach at Proposed Submission stage (2012) to reflect the ongoing uncertain outlook for the retail industry and to reflect the wide role which District Centres have. It was subject to a further change during following submission (see above).</p>
<p>Alternative Option 2: Percentage target of frontage lengths in non-A1 use – to be specified for each District Centre but some scope for non-A1 use in each District Centre</p>	<p>Social Option would enable the development of appropriate uses for the district centres including an appropriate proportion of retail developments and supporting non-retail uses. This would assist in maintaining the vitality and viability of the district centres.</p> <p>Environmental Option would consolidate retail and other town centre uses in the District Centres where they are most accessible by sustainable modes of transport and be of a scale that is appropriate for their functions and position in the</p>	<p>Whilst this option provided for flexibility and responsive approaches across the District Centres, it was considered that the important role of A3 uses in District Centres should also be recognised.</p> <p>This option had been selected as the preferred approach at Consultation Draft stage (2011) but was superseded by the above option in 2012 for the reasons explained.</p>

⁷⁸ See 2012 detailed SA

	<p>Town Centre Hierarchy. It would therefore have significant positive effects on environmental objectives.</p> <p>Economic Option could have a positive impact by creating the framework to enable a wider range of developments to come forward which would assist the local economy.</p>	
<p>Alternative Option 3: Greater flexibility for changes of use from A1.</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility, but loss of retail frontage could undermine vitality and viability</p> <p>Environmental Policy option will consolidate retail and other town centre uses in existing developed areas where they are most accessible by sustainable modes of transport.</p> <p>Economic Loss of retail development within the district centres could risk undermining their viability and therefore have negative effects on economic objectives.</p>	<p>Whilst this option provided greater flexibility in the frontage, it was considered that a more dynamic and responsive approach was needed which recognised the importance of A3 uses in some of the District Centres.</p>
<p>Alternative Option 4: No loss of A1 permitted.</p>	<p>Social Policy option continues to focus retail development in specific areas to maintain vitality and accessibility, but failure to cater adequately for other services could undermine these objectives</p> <p>Environmental Policy option will consolidate retail uses in existing developed areas where they are most accessible by sustainable modes of transport but could divert other town centre uses to less sustainable locations</p> <p>Economic Policy option promotes retail uses which can have a positive impact on the economy within the existing District Centres but restricting other uses could undermine their vitality and viability.</p>	<p>It was considered that this option would represent an unduly restrictive approach in District Centres.</p>
<p>Other factors</p>	<p>Planning decisions support the approach in the policy in each of the centres.</p>	

Policy DM9	Thresholds for the Assessment of Schemes for Town Centre Impact	
Policy Development	Issues and Options IF3 <ul style="list-style-type: none"> n/a 	Justification <ul style="list-style-type: none">
	Preferred Options IF4 <ul style="list-style-type: none"> n/a 	Justification <ul style="list-style-type: none">
	Update Consultation 2009 <ul style="list-style-type: none"> n/a 	Justification for change <ul style="list-style-type: none">
	Update Report 2010 <ul style="list-style-type: none"> Page 33-34 of document set out options for local thresholds, encompassing a range of approaches – preferred option in the document was for a lower District-wide threshold of 200m2. 	Justification <ul style="list-style-type: none"> Options floated following introduction of PPS4, which set a national threshold of 2,500m2 above which retail and leisure schemes were to be subject to impact assessment; and stated that LPAs should consider setting local thresholds in development plan documents.
	2011 consultation draft <ul style="list-style-type: none"> Instead of progressing with former preferred option of a lower District-wide threshold, Policy DSA8 sets out a tiered approach to thresholds where retail and leisure schemes would require impact assessment; thresholds are for assessment of High Wycombe; other town centres; 	Justification for change <ul style="list-style-type: none"> Thresholds proposed due to the modest quantum of capacity identified for additional retail floorspace in 2009 Retail and Town Centre Uses Study Update. Thresholds based on role of centres and likely appropriate scale of

	District Centres; Local Centres; and other centres outside the District.	development, above which schemes to be tested for impact on the respective centre. – roles as set out in the Adopted Core Strategy. <ul style="list-style-type: none"> Former preferred option not progressed partly due to strong objections received in consultation.
	2012 Proposed Submission Document <ul style="list-style-type: none"> Policy DM9 unchanged apart from extra bullet point at the end of the policy requiring an assessment of impact for any application which it is deemed has the potential to have a significant adverse impact on any of the centres in the district. 	Justification for change <ul style="list-style-type: none"> Council is satisfied that the thresholds are justified and proportionate. Last bullet point inserted to cover any proposals which do not fall within the thresholds, e.g. applications to modify conditions which may not encompass an increase in floorspace but which nonetheless have the potential for significant impacts.
Consultation responses	IF3 2005 (No. of responses received) n/a IF4 2007 (No. of responses received) n/a Update Consultation 2009 (No. of responses received) n/a Update Report 2010: (5 comments received) <ul style="list-style-type: none"> Mixed responses including some support for preferred option of a tiered approach but some opposition to lower threshold as not being justified. 2011 consultation draft: 4 comments <ul style="list-style-type: none"> Mixed response to policy, with some nontown centre interests expressing concern over lower threshold being overly prescriptive but town centre interests supporting approach as being based on the limited capacity projections for retail floorspace up to 2016. 	
SUSTAINABILITY APPRAISAL Options selected for appraisal: Four options appraised reflecting different levels of threshold considered to be reasonable. One of these options encompassed a tiered approach with different levels depending on the centre affected.		
Options appraised⁷⁹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁸⁰: Tiered thresholds for impact on different types of centre in the District.	Social Policy would ensure that developments in out-of-centre locations which could have the potential to have a significant adverse impact on designated centres are subject to a robust test to assess their impacts on such centres. Under this policy, this policy approach would function over an appropriate balance of developments. The policy would therefore assist in maintaining the vitality and viability of these centres. Environmental Policy likely to assist in ensuring that proposals for development in out-of-centre locations are thoroughly appraised for their impacts where appropriate.	This option was selected as the preferred approach as it was considered that it would be the most dynamic, responsive and robust way of ensuring that developments which could have the potential to have a significant adverse impact on centres would be subject to an assessment for this impact, whilst not representing an undue burden on developments which would be unlikely to have such a significant adverse impact. It was considered that the approach would have regard to (a) the future scope for retail floorspace in the District and (b) the varying roles of the different town centres in the Town Centre Hierarchy. This option was selected as the preferred approach at Consultation Draft stage (2011) following consultation responses, and no circumstances since

⁷⁹ See 2012 SA main report

⁸⁰ See 2012 detailed SA

	<p>Economic Policy likely to create barriers for businesses who wish to locate in out-of-centre locations. However it is likely to help provide appropriate protection for designated centres, ensuring that they maintain vitality and viability.</p>	then to merit changing this approach.
<p>Alternative Option 1: Retain the national threshold in PPS4 of 2,500m2.</p>	<p>Social Option would ensure that developments in out-of-centre locations which could have the potential to have a significant adverse impact on designated centres are subject to a robust test to assess their impacts on such centres. – however medium-sized proposals would not be subject to such a check. The option would therefore only provide some degree of assistance in maintaining the vitality and viability of these centres.</p> <p>Environmental Option only likely to assist in ensuring that large proposals for development built in out-of-centre locations are thoroughly appraised for their impacts.</p> <p>Economic Option likely to create barriers for businesses who wish to locate large schemes in out-of-centre locations. However it is likely to help provide some degree of protection for designated centres, ensuring that they maintain vitality and viability.</p>	Whilst this option represents the national default threshold, it was considered that this option would be inappropriate as it could have the potential to allow for schemes which would have a significant adverse impact on designated centres. This analysis was suggested by the Council's retail consultants and set out in the Town Centre and Retail Frontages Background Paper.
<p>Alternative Option 2: Adopt a higher threshold – in the range of 3,000-5,000m2.</p>	<p>Social Option would provide little check against large developments in out-of-centre locations which could have the potential to have a significant adverse impact on designated centres. The option would therefore provide little assistance in maintaining the vitality and viability of these centres, and could risk allowing developments which ultimately damage vitality and viability.</p> <p>Environmental Option unlikely to assist in ensuring that developments built in out-of-centre locations are appraised for their impacts.</p> <p>Economic Option reduces barriers for businesses, but also loosens the degree of policy protection for designated centres, meaning that it risks harming their vitality and viability.</p>	It was considered that this option would be inappropriate as it could have the potential to allow for schemes which would have a significant adverse impact on designated centres
<p>Alternative Option 3: Adopt a lower threshold across the District (of 200m2).</p>	<p>Social Option would ensure that developments in out-of-centre locations which could have the potential to have a significant adverse impact on designated centres</p>	Whilst this would ensure that all medium-sized and large schemes would be subject to an impact assessment, it was considered that such a low threshold could represent an undue burden on businesses in situations in the larger

	<p>are subject to a robust test to assess their impacts on such centres.</p> <p>Environmental Option likely to assist in ensuring that most proposals for development in out-of-centre locations are thoroughly appraised for their impacts.</p> <p>Economic Option likely to create barriers for businesses who wish to locate in out-of-centre locations. Even relatively small-scale businesses would be faced with more onerous policy requirements.</p>	<p>town centres where smaller schemes above this threshold would be very unlikely to have a significant adverse impact on the respective centres. This options had been selected as the preferred approach at Update Report stage (2010) but was superseded by the Preferred Option in 2011 for the reasons set out in this table, and following consultation responses.</p>
Other factors	<p>NPPF maintained overall approach but included offices in the range of developments which should be subject to this approach. However, WDC has excluded offices from policy as (a) there is a substantially different methodology for forecasting employment floorspace compared with that for retail and leisure, and (b) there had been no consultation on including offices in the thresholds.</p>	

Policy DM10	Green Networks and Infrastructure	
Policy Development	Issues and Options IF3 -2005 n/a	Justification
	Preferred Options IF4 - 2007	Justification
	Update Consultation 2009 First draft of policy (B9) Existing GI network and opportunities for new areas identified Policy seeks to protect retain and enhance and link new green space and links with existing	Justification Publication of countywide strategy published, identified opportunity areas in WDC area. More detailed GI network identified in background paper around Wycombe and Marlow in areas most subject to development pressure identified
	Update Report 2010 No change	Justification
	Draft for Consultation 2011 (DSA 9) Addition of threshold – “one dwelling or more” - triggering contributions towards GI network from new development Addition of Biodiversity Opportunity areas to policy (formerly included in B12 Local Designations)	Justification To enable improvements to made to the GI network through CIL To reflect synergy between opportunity areas identified by different source documents and enable delivery The historic environment is one of the themes used to identify GI areas so no need to identify specifically in policy
	Proposed Submission Document 2012 (DM9)Threshold in part 2 of policy changed “to all development”, addition of “where appropriate “ and clearly set out what is being supported by contributions Addition of the role reserved locations and GI to the policy	Reflect consultation response not to limit contributions to residential development and allow for the fact not all development will contribute if, for example subject to a zero CIL charge. To clearly identify elements of the GI that will be supported To ensure that developments on reserve sites incorporate GI and links that presently exist on site The policy does not set out to protect historic assets and it is not appropriate to include in this policy – other existing development plan policies do this. Landscape is a key theme used in identifying GI, AONB designation is too broad brush at local level to assist in defining the network and is defined in separate existing development plan policy.
Consultation responses	IF3 2005 n/a IF4 2007 n/a Update Consultation 2009 (15 responses received)	

	<p>Overall support for introduction of policy A single GI policy suggested incorporating green space and open space Suggested biodiversity should be priority role Policy should be changed so not limited to development falling within GI should be mapped on proposals map Criticised for lack of inclusion of heritage assets</p> <p>Update Report 2010 – no comments received</p> <p>Draft for Consultation 2011 - (11 responses received) Overall support for policy Policy should apply to all development Policy should include historical environment Only include Regional BOA's AONB should be a specific element</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options selected to encompass the possible approaches to this issue, one covering an approach of protecting – and requiring development to contribute to – green networks; and one not encompassing such an approach (i.e. a 'no policy' option).</p>		
Options appraised⁸¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁸²: Policy giving protection to Green Networks and requiring development to contribute towards improvement of networks, including on Reserve Locations for Future Development where relevant.</p>	<p>Social Overall positive effect on social objectives due to promoting, enhancing and increasing green infrastructure network, and associated social benefits.</p> <p>Environmental Overall policy has a positive impact upon environmental objectives through improving linkages and quality of the green infrastructure network.</p> <p>Economic The policy is unlikely to have a significant direct impact upon economic objectives</p>	<p>This option was accepted as it was considered to be supported by the evidence base (the County Council's Green Infrastructure Strategy and the District's Green Networks and Infrastructure Background Paper) and the outcome of the SA. Consultation responses also generally supported this approach, and it was considered that it would enable improvements to be made to the GI network.</p> <p>This option was selected as the preferred approach at Update Consultation stage (2009) when the policy was first drafted. The detailed wording of the mechanisms of the policy has been adjusted but the overall approach has remained the same since then.</p>
<p>Alternative Option – No policy</p>	<p>Social Overall neutral effect on social objectives.</p> <p>Environmental Overall negative impact on environmental objectives due to loss of opportunities to enhance and create links in network.</p> <p>Economic</p>	<p>This option was rejected as it was considered not to be supported by the evidence base, outcome of the SA or consultation responses in that it would not optimise opportunities to enhance green infrastructure and create new links in the green network.</p>

⁸¹ See 2011 SA main report

⁸² See 2011 detailed SA

	Lack of this policy is unlikely to have a significant direct impact upon economic objectives.	
Other factors	Green infrastructure as a concept is an important approach that embraces biodiversity, recreation, access to the countryside and a range of cultural assets. A policy that seeks to enhance and provide more is an important part of realising this at a local level.	

DM11 Green Spaces		
Policy Development	Issues and Options IF3 n/a - although related background paper considered main issues and options for site allocations document to take forward.	Justification
	Preferred Options 2007 IF4 Policy (A18) for protection of green space Green spaces identified on map Coverage greater than in 2004 adopted local plan Applies to spaces to in rural settlements and washed over by the greenbelt or which do not have a settlement boundary Emphasis on connection between new and existing spaces for non vehicular and wildlife movement	Justification To protect important green spaces based on new open space audit
	Update Consultation 2009 Policy (B10) changed to remove connections element Additional green spaces identified and minor boundary revisions Challenge sites retained as green spaces	Justification Incorporated into new policy for green infrastructure New overarching green infrastructure policy introduced in response to comments As a result of public consultation in 2007 and work on open space framework Land at Fieldhead Gardens - site is part of the green infrastructure network in Bourne End Marlow Football Club – no certainty that club will re-locate The Paddock – site is part of green infrastructure network and has a role to play in linking between reserved site immediately to north and existing network to the south
	Update Report 2010 Additional green spaces identified and minor boundary revisions	Justification As a result of work on open spaces framework/audit Draft open space framework published Site at Hawks Hill/Kiln Lane no longer proposed to be a proposed green space as a result of decisions made on planning applications for the site. Hawks Hill, Heavens Lea Bourne End – no change made to proposed designation as no change in circumstances since site designated in previous local plans. Area bounded by Marlow Road & Little Marlow Road (A4155), Broke Farmston Place and Britannia P.H. – transport strategy does not support provision of park and ride at this location No revision to policy published, only changes to boundaries.
	Draft for Consultation 2011 No change to policy (DSA9)	Justification

	Supporting text added	<p>Addressing consultation responses clarifying main factors that result in a site being identified as green space.</p> <p>Suggested area in Kingswood not designated due to not fulfilling criteria for designation Land between Kingswood Road and The Thicket- no justification for differentiating between this plot of land from larger woodland area. Heavens Lea, Hawks Hill, Bourne End – see above Terriers House, Amersham Road – see The Paddock above</p>
Consultation responses	<p>IF3 2005 (No responses received)</p> <p>IF4 2007 (16 responses received) General support for the green space policy Suggestions that policy should include references to biodiversity, improvement, enhancement, and management of green spaces</p> <p>Designation of 3 sites objected to:</p> <p>Land at Fieldhead Gardens, Bourne End Marlow Football Club, Oaktree Road The Paddock, NE of Terriers House, 201 Amersham Road</p> <p>Update Consultation 2009 (15 responses received)</p> <p>Need for clearer definition of the terms use, specifically green space and open space Policies B9, B10 and B14 should be combined to an overarching GI policy Need to ensure consistency of policy working to avoid conflict between B9 and B10 Support designation of Cadmore End Cricket Ground and Grassy Lane and Kiln Lane as green space Area near Marlow Rd / Little Marlow Road should not be designated as green space but as Park & Ride</p> <p>Designation of 3 sites objected to:</p> <p>Hawks Hill/Kiln Lane, Bourne End – no designation Hawks Hill, Heavens Lea Bourne End -no designation Area bounded by Marlow Road & Little Marlow Road (A4155), Broke Furnston Place and Britannia P.H. should be a park and ride site .</p> <p>Update Report 2010 – (2 responses received)</p> <p>Support for the maintenance and enhancement of green space as a high priority. Green infrastructure should be an integral part of sustainable communities. Suggestion of the benefits of green roofs.</p> <p>Update Consultation 2011 - (77 responses) 68 supporting the allocation of green space on land between Kingswood Road and The Thicket. 1 suggesting an additional green space designation for an area of local woodland off Bartons Road in Kingswood Area 4 objections:</p>	

	<p>2 land between Kingswood Road and The Thicket. 1 Heavens Lea, Hawks Hill, Bourne End 1 Terriers House, Amersham Road</p> <p>5 comments</p> <p>No definition of what is a 'reasonable distance', thus it could be open to interpretation. Fragmentation The test for exceptional circumstances should be very high. Reasonable distance for replacement provision should be no more than a short walk. However a definition should be provided to clarify whether playing fields (public, private and education) are included within this in line with chapter 15 of PPG17.</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options selected to encompass the possible approaches to this issue, one covering an approach of identifying and protecting green spaces; and one not encompassing such protection (i.e. a 'no policy' option). Appraising an option with different designation criteria not considered appropriate but these were still subject to consultation as part of plan preparation. SA of individual sites not appropriate as this relates to assessment against the policy criteria rather than the wider SA objectives. Not appropriate to undertake SA of a process issue – ie whether there should be a comprehensive review of green spaces or not.</p>		
Options appraised⁸³	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁸⁴: Policy identifying and giving protection to Green Spaces, based on green space designation criteria set out.</p>	<p>Social Overall positive effect on social objectives due to protecting spaces that have potential to contribute towards achieving access, community welfare and health objectives</p> <p>Environmental The policy has a positive impact upon environmental objectives by avoiding loss of natural settings/landscapes and retaining open space and green infrastructure.</p> <p>Economic The policy is unlikely to have a significant direct impact upon the objectives, although maintaining open spaces may have a positive effect on tourism.</p>	<p>This option was accepted as it was considered to be supported by the evidence base (the Open Spaces Audit), the outcome of the SA and general responses to the consultation. The fundamental approach encompassed within the option was selected as the preferred approach at Preferred Options stage (2007). Since then there have been adjustments to the wording of the policy and some of the sites subject to the policy, but not to the fundamental approach.</p>
<p>Alternative Option: No protection for Green Spaces</p>	<p>Social Overall neutral effect on social objectives due to increased opportunities for development for housing or community facilities, but reduced opportunities for recreation and community identity</p> <p>Environmental Overall negative impact due to impact on biodiversity, landscape and loss of green spaces outweighing benefits of developments meeting policy requirements and accessibility of sites.</p>	<p>This option was rejected as it was not supported by the evidence base or the outcome of the SA. It would result in unacceptable environmental impacts in terms of potential loss of green space.</p>

⁸³ See 2011 SA main report

⁸⁴ See 2011 detailed SA

	<p>Economic Although development of open spaces may provide opportunities for employment-generating development it may have a negative effect on outdoor recreation and tourism.</p>	
Other factors	<p>The Council has chosen to retain this policy despite the introduction of a new designation in the NPPF for "Local Green Space" as overall there is widespread support for the Council's policy and it achieves a number of the objectives set out in the NPPF in relation to open space. Local Green Space designation in NPPF has a narrower application than this policy/designation.</p>	

Policy DM12	Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance	
Policy Development	Issues and Options IF3 2005 N/a	Justification
	Preferred Options IF4 2007 No policy proposed	Justification Proposed to include in a Development Management DPD
	Update Consultation 2009 Two policies included in update document to protect Sites and Species of National and International Importance (B11) and Local and Regional Importance (B12), all of which were identified on a map base. Policy aims to maintain, and enhance, restore or add to biodiversity and geological conservation interests.	Justification for change In accordance with PPS9 which included the requirement that LDF's should: indicate the location of designated sites of importance for biodiversity and geodiversity To distinguish between local and nationally important sites Policy approach informed by the Biodiversity Designations Background Paper 2009 and in with Core Strategy Policy CS17 Environmental assets. Considered a priority to bring forward a policy now rather than in Development Management DPD, particularly to ensure that local designations were identified and protected through the Plan.
	Update Report 2010 Additional nature conservation sites identified	Justification New sites included newly designated Local Wildlife Sites and updated information provided by Buckinghamshire County Council on Biodiversity Action Plan Priority Habitats.
	Draft for Consultation 2011 Policies B11 and B12 combined Includes a distinction within the policy of the different approach to local and nationally important sites Biodiversity Opportunity Areas included in a Green Networks and Infrastructure policy	Justification Due to the similar nature of these policies and remove duplication The approach of combining the policies was agreed with Natural England. Wording reflects Natural England guidance for protected species and the thrust of the Natural Environment White Paper, the new biodiversity strategy for England "Biodiversity 2020 : A strategy for England's wildlife and ecosystem services" and the draft National Planning Policy Framework. In response to consultation responses and to reflect the different nature and policy objectives for these areas.
	Proposed Submission Document 2012 Minor word changes	Justification To make policy more positive, reflect consultation responses
Consultation responses	IF3 2005 Some site specific comments made with regard to nature conservation IF4 2007 Comment made on the policies in general welcome the focus on green Infrastructure but recommend more emphasis on biodiversity provision in line with PPS9. Also some site specific comments relating to biodiversity. . Update Consultation 2009 (9 responses)	

	<p>Support for policy approach Suggest inclusion of veteran trees Consultee comments that BOAs did not sit comfortably within policies mainly dealing with constraints as they are an opportunity not a constraint Concern that policy says no development on BNS's or LWS's etc which are not designated but are normally privately owned. Therefore this should be taken out and referred to NE and DEFRA guidance to avoid confusion. More distinction needed between local & national sites. Needs rewording as there is a lack of statutory guidance to back up this policy.</p> <p>Update Report 2010 (5 responses) Support for policy Support for inclusion of up to date information Support for combination of 2 policies and inclusion of new policy covering Biodiversity Opportunity Areas</p> <p>Draft for Consultation 2011 (7 responses) Generally supportive Should refer to 'conserving and enhancing' rather than 'protection and enhancement' - will ensure that policy complies with national legislation. Suggested extra wording for para 3. Some contradiction and potential confusion about the status of Biological Notification Sites, chiefly arising from the decision not to map them. Proposed options to remedy this. Suggested rewording to bring the policy in line with national Planning Policy Statement 9 Para 6.25 should acknowledge that until the Local Wildlife Site identification process is completed, all Biological Notification Sites should be afforded the same level of protection as Local Wildlife Sites in line with the requirements of PPS9. Recommend that bullet points in para 6.28 are refocused to bring paragraph in line with Policy DSA11;</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: One option selected, encompassing a criteria-based approach to conserving and enhancing sites, habitats and species of biodiversity and geodiversity importance, as it was considered the only reasonable alternative to implement the requirement in national policy for local authorities to set such policies.</p>		
<p>Options appraised⁸⁵</p>	<p>Summary of the outcome of the Sustainability Appraisal</p>	<p>Reasons for accepting/rejecting option</p>
<p>Preferred Option⁸⁶:</p>	<p>Social The policy will be promoting the conservation and enhancement of sites and habitats many of which are used by the community. These areas bring benefits to health, well-being and community cohesion.</p> <p>Environmental This policy has a positive impact on environmental objectives by conserving biodiversity resources, natural settings/landscapes and retaining open space and green infrastructure.</p> <p>Economic Protection and enhancement of nature conservation areas may have a</p>	<p>This option was selected as it was considered to be supported by the outcome of the SA and to be in compliance with Core Strategy Policy CS17 and NPPF para 113 on setting policies to conserve and enhance sites of biodiversity and geodiversity importance.</p>

⁸⁵ See 2011 SA main report

⁸⁶ See 2011 detailed SA

	positive effect on tourism, e.g. Chiltern beech woods and by helping attract businesses to the area.	
No alternative policy as policy is a requirement in national policy	n/a	n/a
Other factors		

Policy DM13	Biodiversity in Development	
Policy Development	Issues and Options IF3 Focus on identification of sites for development	Justification
	Preferred Options IF4 No policy proposed	Justification Proposed to include in a Development Management DPD
	Update Consultation 2009 Policy on Biodiversity in Development (B13) drafted seeking a gain as well developments to be designed to protect, manage, enhance and extend existing biodiversity areas or features as well as requiring ecological surveys and reports.	Justification for change In accordance with PPS9 which included the requirement that LDF's should: promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of the development aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. Policy acknowledges significant biodiversity resources exist outside designated and special sites, and that opportunities exist through development to retain and also enhance biodiversity on a site.
	Update Report 2010 No changes proposed to policy	Justification
	2011 consultation draft Policy DSA 12 wording and supporting text refined	Justification Wording changes made to reflect changes to internal Development Management procedures with regard to biodiversity and consultation responses Note: separate guidance (outside of Plan) provided on application provided in response to comments.
	Proposed Submission Document 2012 Removal of requirement for net gain from policy and addition of conserving	Justification To bring in line with National Policy – PPS9 and reflect consultation responses
Consultation responses	<p>IF3 2005 Some site specific comments made with regard to nature conservation</p> <p>IF4 2007 Comment made on the policies in general welcome the focus on green Infrastructure but recommend more emphasis on biodiversity provision in line with PPS9. Also some site specific comments relating to biodiversity.</p> <p>Update Consultation 2009 (10 responses) Support for policy Include consideration of ecosystem services and the opportunity to offset the effects of climate change in the policy wording To ensure the policy is robustly and effectively applied, it needs to be accompanied by explicit guidance material for both applicants and Development Control Officers</p> <p>Update Report 2010 n/a</p> <p>2011 consultation draft (6 responses received)</p>	

	Overall supportive of policy Addition of conserving to the list of actions Should happen on the edges of all large new developments	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options selected, encompassing potential approaches to maximising biodiversity in development; one option requiring development to maximise requirements where an interest is identified; an alternative option not requiring development to maximise such biodiversity interest.		
Options appraised⁸⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁸⁸: Development required to maximise biodiversity; requirements for ecological surveys where biodiversity interest identified.	<p>Social The policy promotes the retention and creation of biodiversity rich open spaces and improvements to the management of those spaces, thus potentially improving health and providing a better quality of environment for local residents.</p> <p>Environmental This policy has a positive impact on environmental objectives by avoiding loss of habitats and the creation of new ones. As a consequence there will be positive impacts on issues such as biodiversity, landscape, open spaces, flooding etc.</p> <p>Economic Conservation and enhancement of biodiversity in developments may have a positive effect on tourism and attractiveness of an area to business.</p>	This option was accepted as it was supported by national planning policy, consultation responses and the outcome of the SA. This option was selected as the preferred approach at Update Consultation stage (2009) and, other than minor wording changes, no subsequent changes in circumstances to merit altering this overall approach.
Alternative Option 1 - Less onerous approach – development not required to maximise biodiversity	<p>Social The policy is unlikely to have a significant positive impact on the objectives – maintenance of existing position only.</p> <p>Environmental Option has a positive impact on environmental objectives by avoiding loss of existing habitats but may not necessarily involve the creation of new ones.</p> <p>Economic Conservation of features of importance for biodiversity on development sites may have a positive effect on tourism and attractiveness of an area to business.</p>	This option was rejected as it was considered not to confer the benefits in terms of sustainability objectives which the preferred option would entail, in terms of taking opportunities to maximise biodiversity in development, and not to be supported by consultation responses or national policy.
Other factors		

⁸⁷ See 2011 SA main report

⁸⁸ See 2011 detailed SA

Policy DM14	Protection and Enhancement of River and Stream Corridors	
Policy Development	Issues and Options IF3 N/a	Justification
	Preferred Options IF4 N/a	Justification
	Update Consultation 2009 No policy	Justification River and stream corridors were included in B13 as an example of important habitat. Also covered by several site specific policies eg High Wycombe Town Centre, Baker Street, Swan Frontage, Policy D2 Delivering new open space and river corridor improvements
	Update Report 2010 n/a	Justification
	2011 consultation draft New policy "Protection and enhancement of river and stream corridors"	Justification In response to discussions with the Environment Agency and in relation to saved policy L5, which is considered to be good practice and used frequently, Policy jointly drafted with the EA Modelled on local plan policy this option offers more protection and encourages the re-instatement of culverted sections of the River Wye.
	Proposed Submission Document 2012 Minor redrafting Addition of requirement for long term management plan in 10m buffer	Justification To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach To ensure buffer is maintained Policy applied to all rivers/watercourses
Consultation responses	IF3 2005 n/a IF4 2007 . n/a Update Consultation 2009 Consultees generally supportive of enhancing the River Wye through High Wycombe Update Report 2010 Consultees supportive of river corridor enhancements and deculverting of the River Wye through High Wycombe 2011 consultation draft (11 responses) Overall support Comments on the whole relate to the River Wye Policy should be applied to the development adjacent to River Thames in Little Marlow Parish. Buffer width should be a minimum.	

SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Three options selected, encompassing possible degrees of protection for river and stream corridors; one option selected to exclude deculverting requirements.		
Options appraised⁸⁹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁹⁰: protection for watercourses and associated corridors; opportunities for deculverting to be actively pursued; 10m buffer required with landscape and ecological management plan for this buffer.	<p>Social The policy promotes the retention, improvement and creation of river corridors which have the potential to deliver benefits to health and well-being, and provide a better quality of environment for local communities.</p> <p>Environmental This policy has a positive impact on environmental objectives by providing benefits to the physical river environment, wildlife associated with watercourses and their corridors, landscape and townscape character, and water cycle processes.</p> <p>Economic Conservation and enhancement of river corridors may have a positive effect on the attractiveness of areas to businesses.</p>	<p>This option was accepted as it was supported by the Environment Agency, and was considered to be in compliance with Core Strategy Policy CS17 and supported by the outcome of the SA process in terms of providing protection for these vital elements of the green infrastructure in the District. Requirement for active pursuit of deculverting opportunities considered to be in compliance with the wider objectives of the town, especially in High Wycombe town centre. This option was selected as the preferred approach at Consultation Draft stage (2011), when the policy was first drafted. Apart from minor and detailed wording changes, no further changes in circumstances to merit altering this approach.</p>
Alternative Option 1 - Less protection for corridor (Less onerous requirements from developers/more flexible protection for the river corridor in part 1 of policy)	<p>Social If adverse impacts on the functions of a river corridor are not avoided, there are less likely to be positive effects on social objectives.</p> <p>Environmental If adverse impacts on the functions of a river corridor are not avoided, there are unlikely to be positive effects on environmental objectives.</p> <p>Economic If adverse impacts on the functions of a river corridor are not avoided, there are unlikely to be positive effects on economic objectives.</p>	<p>This option was rejected as it was not considered to be in compliance with Core Strategy Policy CS17 or the views of the Environment Agency. Not supported by the outcome of the SA.</p>
Alternative Option 2 – Alternative policy excluding deculverting requirements of policy.	<p>Social The policy promotes the retention, improvement and creation of river corridors which have the potential to deliver benefits to health and well-being, and provide a better quality of environment for local communities. The potential overall effects of this option as compared to the preferred option will be reduced, particularly in the town centre, if opportunities for deculverting are not actively pursued.</p>	<p>This option was rejected as it was not considered to maximise the opportunities for an approach which would support the wider objectives of the plan, especially in relation to town centre regeneration.</p>

⁸⁹ See 2011 SA main report

⁹⁰ See 2011 detailed SA

	<p>Environmental This policy has a positive impact on environmental objectives by providing benefits to the physical river environment, wildlife associated with watercourses and their corridors, landscape and townscape character, and water cycle processes. The potential overall effects of the option will be reduced particularly in the High Wycombe town centre if opportunities for deculverting are not actively pursued.</p> <p>Economic Conservation and enhancement of river corridors may have a positive effect on the attractiveness of areas to businesses.</p>	
Other factors		

Policy DM15 Open Space in New Development		
Policy Development	<p>Issues and Options IF3 Focus on identifying existing and new sites for open space and any changes to boundaries Number of open spaces identified in relation to HWTC Masterplan Related background paper highlighted open space deficiency issues.</p>	<p>Justification To meet open space deficiency needs Part of improvements identified for the town centre</p>
	<p>Preferred Options IF4 Policy (A19) for Areas of Open Space Deficiency proposed Identifies main areas suffering deficient in open space and range of solutions</p>	<p>Justification Based on results of Open Space Audit Embed in policy requirement to alleviate deficiency</p>
	<p>Update Consultation 2009 Policy (B14) expanded to include open space requirements in new developments Includes thresholds, requires on-site provision, major developments and standards. Identifies 2 options for local standards Locally based 7.76 ha/1000 population District wide minimum 4 ha/1000 population Areas of deficiency still identified , but not focus of policy Questions asked in relation to priorities and thresholds.</p>	<p>Justification As a result of audits of open space and sports facilities, consultations on open space standard setting and a draft sports facility strategy</p>
	<p>Update Report 2010 Preferred option for standards of provision identified – District-wide minimum standard based on a strategic – local split 4.71 ha/1000 population Deficiency areas removed from policy</p>	<p>Justification To create a clear and simple approach to open space provision that provides certainty whilst at the same time taking account of the locality. Flexibility built in to how provision is made (on site/developer contribution) in light of comments received. To be dealt with in the Open Space Framework or as part of site specific developments/policies</p>
	<p>Draft for Consultation 2011 Standards modified to 4.45 ha/1000 population Thresholds retained but will apply to all development once Community Infrastructure Levy is introduced Inclusion of reqt. for strategic sites to meet all needs onsite</p>	<p>Justification Due to finalising the open spaces framework To allow for the proposed adoption of CIL in 2012. To ensure major development meets own needs and does not put additional pressure on existing facilities or exacerbates deficiencies</p>
	<p>Proposed Submission Document 2012 Policy re-organised</p>	<p>Justification To add clarity in terms of standards for open space and requirements sought from different scales of development To accord with introduction of CIL</p>

<p>Consultation responses</p>	<p>IF 2005 - Comments in relation to proposals to remove Adams Park Stadium from the Green Belt, proposals for the Sports Centre site, or referred to local areas of deficiency</p> <p>IF4 2007 (8 responses received)-There was broad support for the open space deficiency policy, but concerns were raised about how deficiencies would be alleviated</p> <p>Update Consultation 2009 (22 responses received) Mixed responses in terms of support of standards Suggested to combine policies on open space, green space and green infrastructure Clear definitions of green space and open space required Requirements should be site specific Requirements of natural / semi-natural provision is inappropriate. There is overlap in categories so more clarity required. Both options represent significant increases in provision. Unrealistic to meet any of the standards, as it is already impossible to meet NPFA on-site. Realistically only larger sites can deliver, e.g. Gomm Valley</p> <p>Most important priority for open space improvement Support of greatest provision of open space for amenity and play Suggested priority is amenity space and outdoor play for youth and adults Need to increase open space provision in High Wycombe. Different types of character of open space may be required, e.g. communal gardens/farms or allotments Priority is provision of gardens and natural spaces in keeping with nature.</p> <p>Threshold level Support of provision thresholds – should refer to need of pooling of contributions from smaller sites Object to 2,500sqm threshold on grounds of insufficient evidence. Policy not flexible enough to meet changing requirements. Should have lower threshold for seeking contributions All developments should contribute - concerns about population increase through backland development</p> <p>Development thresholds for on-site open space provision Yes, threshold at the right level for on-site provision Threshold at wrong level. Should have lower threshold for on-site provision Concern that on-site provision threshold is too low, resulting in small open space with little benefit. Important that on-site thresholds are set out clearly and that on-site provision is based on locally defined standards, taking into consideration local provision and requirements</p> <p>Potential future opportunities areas Princes Risborough - Access improvements along A4010 and between long-distance trails Marlow - BCC has plans to upgrade footpaths between Spade Oak & Marlow. Further opportunities for improvements where BCC are landowner in parts</p> <p>Update Report 2010 (12 Responses Received) There was a split between respondents as to the level of standards for open space to be applied, with some respondents noting that detailed standards should not be included within the DSA itself but in other</p>
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	<p>supporting documents. Some comments related particularly to open space proposals for individual areas and sites.</p> <p>Draft for Consultation 2011 (8 Responses Received) Policy should ensure local and public open space area are not double counted Policy should be flexible so as not to deter schemes coming forward and allow for consideration of existing open space New standards should apply immediately and not wait for the CIL to be introduced</p>	
<p>SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options selected, encompassing potential approaches to securing open space in new development; either District-wide minimum standard or local standards tailored to local requirements. No further options were considered would be in compliance with national policy and Core Strategy policy CS19 so not considered to be reasonable.</p>		
Options appraised ⁹¹	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option: District-wide minimum standard	<p>Social The policy will be promoting an environment where great emphasis is placed upon the need for quality open spaces and landscapes that are conducive to improving health and providing a better quality of life for local residents.</p> <p>Environmental The policy seeks to avoid loss of natural settings/landscapes and retain open space and green infrastructure.</p> <p>Economic The policy is unlikely to have a significant direct impact upon the objectives.</p>	<p>This option was accepted as it was considered that approach was in line with the Core Strategy Policy CS19 (and Policy CS21), supported by the evidence base (The Open Space Framework) and was considered that these standards could be implemented without a burdensome requirement in terms of process or negotiation.</p> <p>This option was selected as the preferred approach at Update Report stage (2010) and, apart from modification of the detail of the standards, this has remained the preferred approach.</p>
Alternative Option: Local standards tailored to local requirements	<p>Social Overall significant positive effect social objectives as the option would promote an environment where great emphasis is placed upon the need for quality open spaces and landscapes that are conducive to improving health and providing a better quality of life for local residents.</p> <p>Environmental Option would have significant positive effects on environmental objectives.</p> <p>Economic The option is unlikely to have a significant direct impact upon economic objectives.</p>	<p>This option was rejected because, whilst it would confer benefits in terms of open space, it would not have the advantages of the preferred option in terms of clarity and not requiring further process of negotiation.</p>
Other factors	<p>Key consideration was to set standards that could be implemented without a burdensome requirement in terms of process or negotiation, the preferred option offers this when compared to the alternative.</p>	

⁹¹ See 2011 SA main report

Policy DM16	Planning for Flood Risk Management	
Policy Development	Issues and Options IF3 -2005 Issue raised of identifying flood zone 3 and a related policy for flood risk areas	Justification
	Preferred Options IF4 - 2007 Two policies proposed – (A20) Reducing flood risk and (A21) Flood zone exceptions test	Justification To reflect requirements set out in emerging Core Strategy and the need to sequentially assess sites that come forward
	Update Consultation 2009 Policies combined and setting out requirements to support sites not allocated in flood risk zones 2 and 3 Includes SFRA, sequential and exceptions test, FRA and construction methods and materials Refers to FZ being identified on proposals map	Justification Policy A20 duplicates policy CS18 of Core Strategy To reflect consultation responses
	Update Report 2010 No changes proposed	Justification
	Draft for Consultation 2011 Policy re-written Sets out circumstances in which applications for development in zones 2 and 3 will be permitted Sets out supporting information required for all applications in zones 2 and 3 and over 1 ha in size Supporting text sets out exceptions test Addition of consideration of non-fluvial types of flooding	Justification To include more positive wording in the policy reflecting a shift from a development control approach to a more positive development management approach In response to draft NPPF and risk of approach to flood risk weakening In response to consultation response from the EA
	Proposed Submission Document 2012 No change to policy, removal of exceptions test from supporting text	Final NPPF retains same approach to that set out in PPS25
Consultation responses	IF3 2005 (No responses received) IF4 2007 (No. of responses received) 3 Policy supported. Points of clarification raised in relation to the need for the Council to undertake a SFRA, the application the exceptions test, when and what would be required in a FRA and zones shown on maps. Update Consultation 2009 (2 responses received) Variety of proposed changes suggested and commentary on role of sequential test Update Report 2010 – (No responses received) Draft for Consultation 2011 - (4 responses received) Generally supportive Revised version of policy proposed to guard against a void being created when PPS25 is replaced by the NPPF.	

	Requirement in policy conflicts with policies HW1 and HW2 which encourage redevelopment of sites in the Desborough area, many of which are in Flood Zone 2. SA for DSA15 indicates only environmental benefits but respondent believes the policy has wider benefits too.	
SUSTAINABILITY APPRAISAL Options selected for appraisal: Two options selected to encompass an approach setting out various requirements relating to managing and reducing flood risk; and one which does not encompass these requirements (i.e. a 'no policy' option).		
Options appraised⁹²	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁹³: Requirements as set out in document for developments proposed in Flood Risk Zones 2 and 3 policy	<p>Social Reducing flood risk is unlikely to have a direct effect on social objectives.</p> <p>Environmental Policy would be likely to have significant positive effect on environmental objectives as measures to reduce flood risk will also provide opportunities to safeguard water quality.</p> <p>Economic Policy is unlikely to have a direct effect on economic objectives.</p>	<p>This option was accepted as it was considered to be in compliance with national policy (NPPF para 100, which sets out the overall approach and criteria to be used when considering development proposals in areas at risk of flooding), Core Strategy Policy CS18 and the responses of the Environment Agency.</p> <p>This option was selected as the preferred approach at Update Consultation stage (2009) when the single policy was drafted, although it was redrafted at Consultation Draft stage (2011).</p>
Alternative Option: No policy	<p>Social Absence of policy could risk allowing developments which cause harm to health and safety of the population.</p> <p>Environmental Option would be likely to have significant negative effect on environmental objectives due to the absence of a policy measure to reduce flood risk.</p> <p>Economic Option is unlikely to have a direct effect on economic objectives.</p>	<p>This option was rejected as it was considered that a 'no policy' option would not be in compliance with national policy, Core Strategy Policy CS18 or the response of the Environment Agency.</p>
Other factors		

⁹² See 2011 SA main report

⁹³ See 2011 detailed SA

Policy DM17	Carbon Reduction	
Policy Development	Issues and Options IF3 -2005 N/a	Justification
	Preferred Options IF4 – 2007 Policy on Sustainable Buildings (A22) Proposing reduction in carbon emissions and use of renewables in residential and commercial developments and use of recycled materials Requiring all development to be Code Level 3 of Code for Sustainable Homes (CSH) or BREEAM excellent. Requirement for 15% renewables Allow for adaptation to climate change in design	Justification To reflect requirements set out in emerging Core Strategy, to implement the Code for Sustainable Homes and emerging PPS on Climate Change
	Update Consultation 2009 Policy on Sustainable Construction (B16) Policy applies to 1 dwelling plus and >100 sq.m commercial development Addition of timescale for implementation of CSH Introduction of flexibility in policy allowing for site specific circumstances Reference to CHP as required by site specific policies	Justification In line with RSS policy NRM1 and adopted CS policy To make application of policy manageable and appropriate No evidence/justification as demonstrated by a number of inspectors reports on other authorities Core Strategies to support requiring implementation of CSH in advance of government timetable, but flagging up requirements in advance of changes in building regulations In response to consultation responses As supported by the energy feasibility study produced by the council assessing CHP on large sites
	Update Report 2010 Policy changed to focus on achieving carbon reduction with different requirements for small and large schemes	Justification Supported by evidence ⁹⁴ commissioned by the Council to assess viability of different levels of renewables that could be supported by new development and to link this to carbon reduction targets. Shift in emphasis more in line with government policy, changes to building regulations and introduction of the CSH Retain focus on carbon reduction and use of renewables
	Draft for Consultation 2011 Addition of an off-site contribution in circumstances where it is demonstrated it is not feasible or viable to provide on-site renewables.	Justification To ensure that in those circumstances new development contributes towards the carbon reduction Support Council's carbon reduction strategy
	Proposed Submission Document 2012 Deletion of reference to national requirements for reducing use of natural resources	Replicates CS policy CS18 and development will need to meet national requirements though other regulatory powers

⁹⁴ Evidence to Support Sustainable Construction Volume 1: Percentage Energy Requirement, The Blewburton Partnership, March 2010

	Single threshold requirement for carbon reduction Addition of references to SPD's for renewables and design	To simplify application of policy and achieve overall greater carbon reduction, supported by evidence To inform design of new development Proposed policy more in line with government requirements To reflect consultation responses
Consultation responses	<p>IF3 2005 n/a</p> <p>IF4 2007 (8 responses received) Overall support for policy Policy should refer to use of local and more sustainable building materials. Policy should account for viability and be assessed on a site-by-site basis. Document should include a statement of policy on wind turbines (residential and commercial) and their visual impact</p> <p>Update Consultation 2009 (13 responses received) Mixed response to policy challenging the need for it, potential negative impacts on development, no assessment of whether BREEAM excellent achievable. Policy should be flexible, set out definition of terms used in policy and flexibility should be removed,</p> <p>Update Report 2010 – (9 responses received) Overall support for policy, comments in relation to definition of terms Thresholds not justified, policy too narrow should also include higher standards for water efficiency in line with level 3 or 4 Code for Sustainable Homes and sustainable drainage</p> <p>Draft for Consultation 2011 - (8 responses received) Overall support for policy, policy should be based on current building regs and proposed future changes, higher threshold should be used for commercial developments due to reasons of viability, policy should also include higher standards for water efficiency in line with level 3 or 4 Code for Sustainable Homes and sustainable drainage.</p>	
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options selected, to test possible approaches to carbon reduction; one encompassing requirements for carbon reductions from developments and another one requiring a proportion of on-site renewables from specified developments. The latter approach reflects the approach in Policy NRM11 of the South East Plan (which is still extant at the time of writing).		
Options appraised⁹⁵	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
Preferred Option⁹⁶: Requirements for carbon reductions as set out in policy, applying to developments of 1 home or 100sq m (or greater).	<p>Social Positive effect on environmental objectives due to requirement applying to nearly all new residential and commercial development. Sustainable construction to the required standards will improve the quality of housing and minimising carbon emissions and use of fossil fuels may have positive effects on health.</p> <p>Environmental</p>	This option was accepted as it was supported by the evidence base on viability of such requirements (The Blewburton Partnership report), and considered to be in compliance with government policy. Approach is in compliance with national policy (NPPF para 96), which states that LPAs should expect new development to comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.

⁹⁵ See 2011 SA main report

⁹⁶ See 2011 detailed SA

	<p>An important focus of the policy is the reduction of carbon emissions and use of on-site renewable technology to generate energy as part of delivering that reduction. Along with the efficient use of resources this will have a positive effect on meeting environmental objectives.</p> <p>Economic The policy is unlikely to have a significant impact upon the objectives.</p>	<p>This option was selected as the preferred approach at Update Report stage (2010) and, other than detailed alterations, maintained as the preferred overall approach since.</p>
<p>Alternative Option: Approach based on former South East Plan Policy NRM11 – no carbon reduction target, 10% on-site renewables applies to 10 dwelling/1000 sq.m. plus</p>	<p>Social Overall positive effect on Social Objectives</p> <p>Environmental Option would have limited positive effects on environmental objectives.</p> <p>Economic Option is unlikely to have a significant effect upon economic objectives.</p>	<p>This option was rejected as it was considered to be more limited in terms of its potential benefits, than the option set out above, and in greater compliance with national policy on this issue.</p>
Other factors		

Policy DM18	Infrastructure and Delivery	
Policy Development	Issues and Options IF3 -2005 n/a	Justification
	Preferred Options IF4 - 2007 n/a	Justification
	Update Consultation 2009 Policy on viability drafted	Justification In response to viability becoming a more major issue for the development industry due to property market decline/recession issues
	Update Report 2010 Policy amended: To clearly state expectation of development proposals in relation to affordable housing and infrastructure To include an assessment by council of overall benefits of a proposal against a reduced level of affordable housing or infrastructure provision	Justification Mainly to make the policy more balanced in response to comments received in 2009. ie change from referring to need to demonstrate "overriding" reasons for permitting an unviable scheme to a balancing factors.
	Draft for Consultation 2011 Addition of cross reference to policy on carbon reduction	Justification To acknowledge potential viability impacts of carbon reduction policy and include in open book assessment requirement
	Proposed Submission Document 2012 Policy redrafted and merged with policy on Infrastructure and Delivery	Justification To simplify policy, take account of the introduction of CIL and in relation to the infrastructure policy to avoid duplication with Core Strategy Policy and reflect changes to the scope of the Plan in 2011 (eg in relation to the Infrastructure Delivery Plan)
Consultation responses	IF3 2005 (No. of responses received) n/a IF4 2007 (No. of responses received) n/a Update Consultation 2009 (26 responses received) Overall support of the approach suggested Update Report 2010 – (9 responses received) Mixed response to policy Comments made in relation to suitability of including a policy for short term circumstances in a document with long term aspirations, negative development industry comments on potential to prevent sites coming forward, requirement of viability information, infrastructure requirements. Draft for Consultation 2011 - (14 responses received) Mixed response to policy Support and Objections to the approach and requirements of demonstrating viability	•
SUSTAINABILITY APPRAISAL		
Options selected for appraisal: Two options selected, to test different approaches to infrastructure requirements; one encompassing requirements in line with the infrastructure delivery plan, with an approach to viability set out, and another requiring infrastructure to support individual developments only with no reference to the IDP.		

Options appraised ⁹⁷	Summary of the outcome of the Sustainability Appraisal	Reasons for accepting/rejecting option
<p>Preferred Option⁹⁸: Infrastructure requirements in line with Infrastructure Delivery Plan (IDP). Approach to viability set out.</p>	<p>Social Policy will have a positive effect on social objectives as it ensures the provision of infrastructure to support the needs of local communities.</p> <p>Environmental Policy has a positive effect on environmental objectives, as it promotes the provision of green infrastructure and sustainable transport modes to support new development.</p> <p>Social This policy has a limited positive impact in achieving economic objectives as the IDP identifies infrastructure that is required to support economic activity.</p>	<p>This option was accepted as it reflected the introduction of the Community Infrastructure Levy, and Infrastructure Delivery Plan, in the District. It was considered appropriate to incorporate an approach to viability to provide clarity on this issue in the current uncertain economic context.</p>
<p>Alternative Option : Infrastructure requirements to support individual developments only, and not the IDP.</p>	<p>Social This option has the potential to have limited positive benefits as development will have to provide sustainable transport opportunities and green infrastructure in line with policy. Limited benefit to the wider community.</p> <p>Environmental This option has very limited positive effect on environmental objectives, as development will be required to provide on-site infrastructure but there will be limited positive benefit to the wider environment.</p> <p>Economic This option will have a neutral effect on economic objectives as there will be limited benefits to the wider economy.</p>	<p>This option was rejected as it was not considered to be in compliance with the CIL regime introduced by the Council together with the wider approach to securing infrastructure set out in the Core Strategy.</p>
<p>Other factors</p>		

⁹⁷ See 2011 SA main report

⁹⁸ See 2011 detailed SA