

**Delivery and Site Allocations Plan
Examination
Supporting Document**



CD7.12

**Statement of Common Ground between
Buckinghamshire and Milton Keynes Fire
Authority and Wycombe District Council**

Part 1 – Princes Risborough

Statement of Common Ground
between
Wycombe District Council
and
Buckinghamshire & Milton Keynes Fire Authority

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**Prepared in advance of the Hearings of the
Public Examination of the
Delivery and Site Allocations Plan
for Town Centres and Managing Development**

December 2012

Introduction

- 1.1. This Statement of Common Ground has been prepared by Wycombe District Council (“the Council”) in conjunction with Buckinghamshire and Milton Keynes Fire Authority (“BMKFA”).
- 1.2. The purpose of this statement is to set out the proposed changes to the Delivery and Site Allocations Plan Proposed Submission Document (published June 2012) agreed between the Council and BMKFA in relation to policy PR4 Land south of Horns Lane (Princes Risborough).
- 1.3. These changes are put forward for the consideration of the Inspector during the examination on the Delivery and Site Allocations Plan.
- 1.4. Discussion is on-going between the Council and BMKFA regarding the proposals for High Wycombe, including policies HWTC10 Swan Frontage and HWTC18 Baker Street. The conclusions of these discussions will be set out in Part 2 of this statement.

2. Context

The Delivery and Site Allocations Plan

- 2.1. The Delivery and Site Allocations Plan (DSA) includes site specific proposals for the three town centres in Wycombe district, including the High Wycombe town centre masterplan and proposals for Marlow and Princes Risborough town centres. It also includes a series of key policies to manage development across the District to secure more sustainable development in the future.
- 2.2. Preparatory work and public consultation on the DSA began in 2004 alongside the preparation of the Council's Core Strategy, which was adopted in July 2008. The DSA has been subject to a number of further rounds of public consultation in 2007, 2009, 2010 and 2011.¹
- 2.3. The Proposed Submission version of the DSA was published on Friday 1st June 2012. The deadline for comments to be submitted to the Council on the proposed plan was Friday 20th July 2012. In total 49 responses were received.²
- 2.4. The DSA was submitted to the Planning Inspectorate on Friday 21st September 2012. The DSA will now be subject to examination by a Planning Inspector, with public hearings to be held in December 2012.

Engagement with BMKFA on the Delivery and Site Allocations Plan

- 2.5. The Council has engaged with BMKFA on the development of the DSA Plan, and in particular on the development of the proposals for High Wycombe town centre. This has included meetings between officers of BMKFA and the Council.
- 2.6. A response was submitted by BMKFA on the proposed submission Plan in July 2012 (reference DSA12/002) regarding the proposals affecting High Wycombe fire station. This did not include comments on policy PR4 Land at Horns Lane. No response was made in relation to Princes Risborough for the reasons set out in paragraphs 3-7 of BMKFA's statement on Matter 4. BMKFA also submitted additional Statements to the Inspector on Matter 4 and Matter 6 (Q1 and Q10).
- 2.7. A meeting was held between the Council and a representative of BMKFA on Thursday 29th November 2012 to discuss BMKFA's position in relation to the DSA Plan. A further meeting was held on Wednesday 12th December 2012 to discuss the issues raised in BMKFA's statements.
- 2.8. The issues raised in the statements and the discussions at the meeting on 12th December inform the proposed changes set out in this statement.

¹ See the following Core Documents – CD4.4.1 & CD4.4.5 (2007); CD4.5.1 & CD4.5.4 (2009); CD4.6.1 & CD4.6.4 (2010); CD4.7.1 & CD4.7.5 (2011)

² See Core Documents CD1.14 and CD1.15

3. Proposed Further Changes

Where changes to the policies and supporting text is proposed, proposed additional text is highlighted in **bold italic** and text proposed to be deleted is shown as ~~struck through~~.

Policy PR4 Land south of Horns Lane

3.1 BMKFA set out its position in relation to Policy PR4 Land south of Horns Lane in its Statement on Matter 4.

3.2 Following discussions between the Council and BMKFA the following changes to the policy wording and supporting text are proposed:

Clause 2

“Redevelopment should:

(c) Enable the satisfactory relocation of the ~~fire station and public toilets~~

New policy clause

(3) If development proposals for all or part of the site require the relocation of the fire station, scheme promoters will be required to identify and enable provision of an alternative site before redevelopment commences. The fire station will only be relocated from the site if a suitable alternative site is identified which fulfils the requirements of Buckinghamshire Fire and Rescue Service, as assessed by Buckinghamshire and Milton Keynes Fire Authority. Any alternative site and station facility must be provided before the existing fire station is relocated.”

Supporting text – add new paragraph after para 5.15

“Any new site which is promoted as an alternative site for the fire station must meet the requirements of Buckinghamshire and Milton Keynes Fire Authority and will be subject to relevant public consultation on the acceptability of the relocation proposals.”

Further change proposed by BMKFA

3.3 BMKFA consider that it is necessary to include within the new paragraph additional text as follows:

“...must meet the requirements of Buckinghamshire and Milton Keynes Fire Authority (***including financial suitability***) and will be...”

3.4 BMKFA think clarifying that “requirements” includes financial suitability removes an element of ambiguity, and since it is accepted that this is implicit within the policy, there can be no harm in stating it explicitly.

3.5 The Council does not think it necessary to include specific reference to “financial suitability” within the supporting text as it is implicit within “requirements” and does not assist in increasing the effectiveness of the policy.

4. Other Issues

Funding of relocation

BMKFA's position

- 4.1 At paragraphs 21-24 of the Matter 6 statement and at paragraph 20 of the Matter 4 statement, BMKFA express concern that it should not be required to bear any cost of re-location of any fire station and that this commitment should be stated within policy.
- 4.2 BMKFA notes that the Plan makes no assumption that it will be required to fund any relocation (in whole or part) nor does it address the question of the funding of relocating Princes Risborough station. The High Wycombe town centre masterplan background paper (CD2.2) identifies that the cost of relocating High Wycombe station is likely to be £5.1 million (paragraph 8.2). As BMKFA has agreed and set its Medium Term Financial Plan ("MTFP"), which makes no provision for construction or relocation of a new station in High Wycombe or Princes Risborough, any reliance on funding from BMKFA in the future would be un-deliverable and render the plan unsound. As such, in order to be sound, BMKFA believes that the plan should clarify that it will not have to bear any of the costs of re-location.

The Council's position

- 4.3 It is the Council's position that it is not, at this time, appropriate to include a commitment within either site policy or supporting text that the provision of a new station will be at no cost to BMKFA. The relocation of the fire station(s) is anticipated take place in the longer-term and it is not possible at this stage to specify how a re-location would be funded. However, it should be noted that no assumptions have been made either within the Plan or the supporting evidence that all or part of the funding for the re-location for either High Wycombe or Princes Risborough fire stations will be expected from BMKFA and there is no requirement to this effect.
- 4.4 It is the Council's understanding that BMKFA's existing Medium Term Financial Plan covers the period 2012/13 – 2015/16. The timing box for Policy PR4 (p.52 of the Plan) indicates that the anticipated timing of development for the site is 2018 onwards. The potential future relocation of High Wycombe fire station is identified as happening as part of Phase 2 of the masterplan (2018 onwards) as set out in paragraphs 7.22 -7.24 of the background paper (CD2.2). The relocation of both fire stations is anticipated therefore to be beyond the timescales of BMKFA's Medium Term Financial Plan. Therefore the Council does not believe that it is necessary to make any further changes to the Plan in relation to funding the relocation of either fire station in order to make the Plan sound.