

**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 2 – High Wycombe

Resources & Business
Transformation

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Date: 19 December 2012

Dear Sarah

**WYCOMBE DELIVERY AND SITE ALLOCATIONS DPD
STATEMENTS OF COMMON GROUND - CD 7.12**


Thank you for sending the agreed final Statements of Common Ground for Princes Risborough (CD 7.12 – Part 1) and High Wycombe (CD 7.12 – Part 2) by email on 18th December 2012.

I can confirm on behalf of Buckinghamshire and Milton Keynes Fire Authority ("BMKFA") that the Statements of Common Ground represent the final agreed position between BMKFA and Wycombe District Council.

I can also confirm that the agreed wording in relation to highways at paragraph 3.4 and 3.5 of CD7.12 – Part 2 resolves the concerns raised in relation to the soundness of this aspect of policy HWTC10 at paragraphs 28-31 of BMKFA's submission dated 30th November 2012.

Subject to the further changes proposed by BMKFA at paragraphs 3.6, 3.11 and 3.15 of CD7.12 – Part 2, and at paragraphs 3.3 and 4.2 of CD7.12 Part 1 being agreed, BMKFA can also confirm that all of its concerns regarding the soundness of policies PR4, HWTC10 and HWTC18 have been resolved.

Yours sincerely,



 **Fiona Bull**
Solicitor



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

Part 2 – High Wycombe

**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

1. 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 the proposals for High Wycombe town centre, including policies HWTC10 Swan Frontage and HWTC18 Baker Street..
- 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. The position of the Council and BMKFA regarding policy PR4 Land at Horns Lane is set out in Part 1 of this SoCG.

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). 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 HWTC10 Swan Frontage and Appendix B

3.1 BMKFA set out its position in relation to Policy HWTC10 Swan Frontage in paragraphs 18 – 24 of its Statement on Matter 6, including suggesting some alternative wording to the policy and supporting text.

3.2 At paragraphs 28-30 of the Matter 6 statement BMKFA express concern that “the evidence base to the Plan does not adequately demonstrate that the highway changes will not negatively impact upon BFRS’ ability to deliver an effective service.”

3.3 BMKFA is concerned that the de-duelling on the Abbey Way flyover and any associated “reduced priority” networking may impede responding staff travelling to the station, or response times. In an emergency situation any increase in journey times (even one that is not “significantly negative”) would compromise BMKFA’s ability to meet its response targets. Further, BMKFA have a number of concerns about the proposed highways design changes in the immediate vicinity of the station, and that these might impact on access/egress to the station.

3.4 Following discussions between the Council and BMKFA, the following changes to the policy and supporting text are proposed which address the concerns of BMKFA:

New policy clause [between 3 and 4]

“If the fire station remains in situ:

(a) Development proposals and/or highway works must ensure unrestricted north and southbound vehicular egress from the Fire Station onto Abbey Way flyover, and

(b) Highway works must ensure that

i. southbound vehicular access into the fire station from Abbey Way flyover is maintained;

ii. northbound vehicular access is provided before any reconfiguration of the Oxford Road roundabout commences

Insert new paragraph into supporting text between paragraphs 3.72 and 3.73

“In order to ensure unrestricted access/egress under clause 4 it is important that the forecourt area and current southbound lane to the front of the fire station are not used in any which compromises such access/egress.”

3.5 The decision on the use of the closed section of Abbey Way flyover in the longer-term is not being taken at this time and will be subject to further detailed design work before a formal decision will be taken. However for the sake of clarity it is agreed to propose the following amendment to **Appendix B:**

Abbey Way Flyover

- (1) De-dualling of Abbey Way flyover for single lane operation in each direction (using current west-bound lanes)
- (2) **Subject to further design work, the potential uses of the closed section of carriageway (east-bound lanes) could include potentially used for bus priority routes, emergency vehicle access and/or environmental improvements.**
- (3) **BMKFA is to be consulted upon any proposed potential use of the closed section of carriageway.**

Change to existing clause 4

“If development proposals for all or part of the site require the relocation of existing users, 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.**”

Para. 3.73

“Redevelopment in this location is likely to require the relocation of existing uses. In order to achieve high quality development it is the Council’s objective to relocate the fire station to an alternative site within the town. **However, the fire station will only be moved if a suitable alternative site can be found.** The Council is in discussion with the fire service to identify the operational needs of the fire service and **will continue to work with the fire service to identify a suitable alternative site** and a number of potential sites are being reviewed by the Council and the fire service. **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.**”

[Create new paragraph] - It may also be desirable that the existing Royal British Legion and Liberal club are relocated to allow for the comprehensive redevelopment of this site. However it may be possible to bring forward development proposals which retain one, two or all of these uses on site if it can be demonstrated that proposals can still deliver the high quality and comprehensive development required.”

Further change proposed by BMKFA

3.6 BMKFA consider that it is necessary to include within paragraph 3.73 additional text as follows:

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

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

3.8 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.

Policy HWTC18 Baker Street

3.9 BMKFA set out its position in relation to Policy HWTC18 Baker Street in paragraphs 10 – 15 of its Statement on Matter 6.

3.10 Following discussions between the Council and BMKFA the following change to the supporting text is proposed which addresses the concerns of BMKFA:

Para. 3.131

~~“Through discussions regarding ***This site may offer*** the potential to ***accommodate the*** relocation of the fire station from HWTC10 Swan Frontage, the Council and the fire service have identified this site as a potential option for an alternative site for the fire station once the new Westbourne Street Link road has been constructed. ***In considering its suitability the site must meet the requirements of Buckinghamshire and Milton Keynes Fire Authority and will be subject to relevant public consultation on the acceptability of any relocation proposals.*** Further testing work will be required to ensure that the site meets the operational needs of the fire service. Development proposals for this site should demonstrate consideration of the potential re-location of the fire station on this site within their design.~~

Further change proposed by BMKFA

3.11 BMKFA consider that it is necessary to include within paragraph 3.73 additional text as follows:

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

- 3.12 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.
- 3.13 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

3.14 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.

3.15 BMKFA recognises that the Background Paper makes no assumption that it will be required to fund any relocation (in whole or part). However, the same paper identifies that the cost of relocating the Station is likely to be £5.1 million (paragraph 8.2), and that there is a gap of £6.07 million in the funding of phase 2 of the masterplan, which includes the relocation of the Station (Table 14). 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, 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

3.16 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. The position in relation to the funding of any relocation of High Wycombe fire station is set out in paragraphs 6.3-6.9 of the High Wycombe Town Centre Masterplan Background Paper (CD2.2).

3.17 It is the Council's understanding that BMKFA's existing Medium Term Financial Plan covers the period 2012/13 – 2015/16. Chapter 7 of CD2.2 *High Wycombe Town Centre Masterplan Background Paper* sets out the indicative phasing of the proposals for High Wycombe town centre. The priority for phase 1 (2013-2018) is the delivery of the alternative route and public realm improvements within the town centre. The Council has focused on identifying the necessary funding for Phase 1 as set out in Chapter 8 of CD2.2 and in the Council's statement submitted on Matter 6 – Issue 1. 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 and is therefore 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.