



The Planning
Inspectorate

Report to Wycombe District Council

by **Paul Crysell BSc MSc MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE WYCOMBE DELIVERY AND SITE

ALLOCATIONS PLAN

Document submitted for examination on 21 September 2012

Examination hearings held between 18 and 20 December 2012

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Abbreviations Used in this Report

CIL	Community Infrastructure Levy
CS	Core Strategy
DSA	Delivery and Site Allocations Plan
GI	Green Infrastructure
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
RBWM	Royal Borough of Windsor and Maidenhead
RS	Regional Strategy (The South East Plan)
RLFD	Reserve Location for Future Development
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SPD	Supplementary Planning Document
SSL	Sainsbury's Supermarkets Limited
SUDS	Sustainable Urban Drainage Systems
TIL	Transport Improvement Lines
WDC	Wycombe District Council
2004 Act	The Planning & Compulsory Purchase Act 2004 (as amended)

Non-Technical Summary

This report concludes that the Wycombe Delivery and Site Allocations Plan is an appropriate basis for the planning of the District to 2026 providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. Most of the modifications were proposed by the LPA and I have recommended their inclusion after consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

- Further recognition of the potential impact of changes to the road network in High Wycombe town centre clarifying the need for flexibility and on-going assessment during the implementation process;
- Additional recognition of historic assets and opportunities to improve the environment in High Wycombe;
- Increased flexibility in the use of specific sites;
- Clarification of policies affecting Desborough, Marlow and Princes Risborough;
- Inclusion of a new policy in favour of sustainable development;
- Alterations to development management policies in response to local issues and the need for consistency with the NPPF.

Introduction

1. This report contains my assessment of the Wycombe Delivery and Site Allocations Plan (DSA) [CD0.1] in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (2004 Act). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan (LP) should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted DSA (September 2012) which is the same as the document published for consultation in June 2012.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted¹ [CD7.5].
4. The main modifications are set out in the Appendix to this report and have been subject to public consultation and, where necessary, Sustainability Appraisal (SA). I have taken the consultation responses into account in writing this report.

Assessment of the Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. This came into force on 6 April 2012, the Regulations² setting out those bodies that are required to comply with the duty.
6. The Council was aware that some prescribed bodies had not been consulted for the purposes of plan-making under the previous LP regulations³. It sought to address this in relation to both the emerging plan⁴ and the Proposed Pre-Submission DSA, the responses received being set out in its Soundness and Legal Compliance Self-Assessment document [CD1.4].
7. The purpose of the DSA is to identify opportunities to strengthen the town centres in Marlow, Princes Risborough and High Wycombe while protecting and enhancing those attributes which contribute to their character. The proposals are not intended to alter the role of the centres or affect the retail hierarchy. Matters appertaining to wider strategic issues are to be addressed in a review of the Core Strategy [CD5.2.1] which will replace, as appropriate,

¹ Letter to Inspector regarding Main Modifications, October 2012 [CD7.5]

² Town and Country Planning (Local Planning)(England) Regulations 2012 [CD5.0.3]

³ Town and Country Planning (Local Development)(England) Regulations 2004 as amended

⁴ Draft Delivery and Site Allocations Document for Town Centres and Managing Development [CD4.7.1]

'saved' elements of the Wycombe District Local Plan [CD5.2.3].

8. One of the main purposes of the DSA is to support modifications to the road network in High Wycombe town centre, the Council having examined the feasibility of doing so in conjunction with Buckinghamshire County Council. As part of this process, the Highways Agency has been made aware of the proposals so that it has been able to consider their impact on the strategic highway network.
9. The Council has participated in regular liaison meetings with Buckinghamshire districts and has consulted other relevant bodies. The Royal Borough of Windsor and Maidenhead has concerns regarding the effectiveness of policy DM6 which I address later in this report. So far as it has been necessary to engage with other bodies, I am satisfied that the Council has complied with the 'Duty to Cooperate'.

Assessment of Soundness

10. The DSA is relatively modest in scope although this does not remove the need for the Plan to reflect the wider policy framework of the CS or comply with the National Planning Policy Framework (NPPF) [CD5.0.1]. Since the examination hearings the Government has revoked the South East Plan [CD5.1.1]. This took effect on 25 March 2013 and, subject to the retention of policy NRM6 relating to the Thames Basin Heaths Special Protection Areas, it means the Regional Strategy (RS) is no longer part of the development plan. No representations were received to suggest that the revocation of the RS had any implications for the soundness of the DSA.
11. The NPPF replaces previous Planning Policy Statements and Guidance Notes but was introduced when the DSA was well advanced. Nevertheless, the Council has had regard to it, its Self Assessment of Soundness appraising each policy for consistency with the NPPF. Representors have suggested the DSA fails to comply with parts of the NPPF but there is no evidence to show the Council has ignored it. Subject to the consideration of specific issues, I am satisfied the Plan has been positively prepared and is generally in compliance with the NPPF.
12. The Council has been prepared to engage with respondents in order to address deficiencies in the Plan. Prior to the opening of the hearings it published a number of changes it has recommended should be made, largely in response to matters raised by respondents. In some cases it has been able to reach an agreed position on previously disputed matters culminating in formal Statements of Common Ground.
13. At the close of the hearings I asked the Council to consolidate all such changes into a single document. This document⁵ [CD7.17] forms the source of the main modifications I have recommended are made to the Plan. These were published by the Council between 8 March and 19 April 2013 and I have taken the responses into account.

⁵ Proposed Main Modifications to the Delivery and Site Allocations Plan [CD7.17]

Main Issues

14. Taking account of the representations, written evidence and the discussions that took place at the examination hearings I have identified three main issues upon which the soundness of the Plan depends.

Issue 1 – Whether the vision and objectives of the DSA are consistent with the Wycombe Core Strategy and National Planning Policy Guidance.

15. The Wycombe Core Strategy (CS) was adopted by the Council in July 2008. It sets out a spatial strategy for the District which focuses most development on High Wycombe and less on Marlow, Princes Risborough and the rural areas. A number of generic policies for development management purposes are included in a separate section of the DSA.
16. The original intention was for the DSA to allocate land to complement the strategy established in the CS and RS. This was altered when the government announced its intention to revoke the RS and the Council decided to undertake its own assessment of housing needs before setting targets in a CS Review. This will also look at employment land provision and complete work on outstanding development management policies.
17. Plan production has also been influenced by the findings of the Inspector conducting the examination into the CS [CD5.2.2]. He concluded there was insufficient evidence to justify CS proposals for changes to the road network in High Wycombe and any work should be taken forward in a subsequent plan.
18. Although changes to the planning system now envisage the preparation of a single local plan instead of a series of documents, the Council confirmed its replacement CS/LP would sit alongside the DSA to form the new LP for the District. These documents will be supplemented by other guidance, where appropriate, to inform and explain its approach on specific matters. The detail and the timing of document preparation can be found in the latest iteration of the Council's Local Development Scheme (LDS) [CD7.4].
19. The DSA seeks to improve the attractiveness of High Wycombe town centre for residents, workers and visitors. Plan policies are directed at measures to support the local economy, improve the public realm and the cohesiveness of the town centre, including those parts marginalised by the road system. Proposals to address the shortage of open space in the Desborough area are a separate measure intended to improve the local environment.
20. Marlow has a vibrant town centre where there are opportunities to make better use of sites, reinforce its attractiveness and improve the local offer. Similar considerations apply at Princes Risborough where it is possible to make changes over the plan period to help maintain the vitality and viability of the town centre.
21. Development Management policies encourage more sustainable forms of transport, support for businesses, the enhancement of green spaces and circulation routes. The Council considers it is important to include these in the Plan prior to reviewing other 'saved' policies which have been carried forward from its previous LP.

22. References in the DSA imply it has the same end date as the CS (2026). Apart from a solitary reference (paragraph 6.121) this is not made clear. While it has no bearing on the soundness of the Plan it would be sensible if the Council were to include a more overt reference to the plan period. This could be done as an Additional Modification.
23. Generally, the proposals in the DSA accord with the Council's vision and objective for each town and illustrate the manner in which individual sites can be used. A number of these are also critical to the successful delivery of wider objectives and I am satisfied that the policy initiatives in the DSA are consistent with the strategic direction of the CS and the roles envisaged for the three towns.

Issue 2 – Whether the Council's objectives for the town centres of High Wycombe, Marlow and Princes Risborough provide for the positive planning of these settlements.

High Wycombe

Background

24. The Council's proposals for High Wycombe are ambitious and are founded on the shared vision of the District and County Councils to improve the environment in the town centre. The impetus for this would come from comprehensive changes which are planned to the road network directing more traffic around rather than through the centre. This would allow improvements to create a more pleasant and attractive environment and help to maintain the vitality and viability of the town centre.
25. The proposals for this area were one of four Key Areas of Change identified in policy 6 of the Council's submitted CS. The examining Inspector acknowledged that re-routing traffic around the town centre was an 'entirely supportable objective' but felt there was insufficient evidence to show this could be delivered⁶. In deleting this element, he recognised that the Council's Site Allocation Plan offered the best means of carrying forward any revised proposals.
26. The District and County Councils have since commissioned a series of studies into the changes proposed to the central area of High Wycombe⁷. These examine the impact of the road proposals and are intended to show the changes are realistic and deliverable. The likely effect of traffic movements has been modelled and the costs of essential infrastructure assessed together with funding mechanisms and the phasing arrangements for implementing the proposals.
27. The evidence suggests the road network no longer needs to provide for some of the traffic for which it was designed. Strategic east-west movements are catered for by the M40 motorway while traffic surveys in 2010 confirmed that through traffic is responsible for about 20% only of movements through the urban area.
28. Even so, High Wycombe continues to experience congestion at peak periods,

⁶ CD5.2.2, paragraphs 3.16 – 3.27

⁷ CD3.10.3 – 3.10.25

particularly on the northern and southern approaches to the town centre. While the Highways Agency has reservations about the impact of queuing traffic on the A404 (Marlow Hill), it appears to be content to work with the local authorities to minimise any adverse effects.

29. The changes in traffic movements mean that previously important parts of the road network, such as the Abbey Way junction and flyover, are no longer needed to alleviate congestion so that much of the rationale for the current road network has disappeared. Yet parts of the town centre remain isolated because roads give priority to traffic at the expense of pedestrian movement.

Highway proposals

30. The objective of the two councils is to create a more pleasant and pedestrian friendly environment for shoppers and other users of the town centre by removing extraneous traffic. In this respect, the proposals reflect the challenge set in the NPPF for plans to be both positive and aspirational in responding to future needs. The Council's vision has for the most part been uncontested although a few respondents doubt whether the changes are justified.
31. Together with land acquisition, funding is one of the main risks to delivery while doubts have also been expressed about the effectiveness of the revised road system. The Council has sought to assuage such concerns by undertaking a range of modelling work but this has been criticised by a major retailer who says it has not fully evaluated Saturday traffic movements nor considered how revisions to the road system will affect vehicular access to parts of the town centre.
32. The High Wycombe Town Centre Masterplan Background Paper [CD2.2] summarises how the proposals for the central area have emerged as a response to constraints and opportunities. These are consistent with the principles set out in policy CS3 of the Core Strategy. The Council has examined options and ways in which a revised network might be delivered as well as the likely consequences of the changes. This includes some limited Saturday scenarios to allow comparisons between 'Do-nothing' and the preferred option ('Masterplan').
33. The modelling shows there is little difference between the 'Masterplan' proposals and the 'Do-nothing' scenario. It is also clear the former will not resolve some issues, particularly the congestion affecting journey times on the Amersham to Marlow Hill route (north-south). Consequently, the effectiveness of the changes to different parts of the road system is of concern to a number of respondents, including Sainsbury's Supermarkets Ltd (SSL). Among other matters, SSL says that revised access arrangements in the vicinity of its town centre store would result in a loss of trade.
34. Discussions between the parties led to the submission of a Statement of Common Ground [CD7.10] which clarified a number of issues. The Council is satisfied that its modelling work demonstrates the road network would perform within anticipated parameters, including the gyratory system in the vicinity of the Sainsbury's store. Nevertheless, it concedes that further detailed work will be necessary prior to implementing these changes. I agree that Appendix B should be modified to acknowledge that changes to the road junction may be required and that this work should be carried out in

consultation with relevant stakeholders (MM1).

35. More generally, SSL believe the evidence base fails to fully assess the effect of the Masterplan proposals and that residual and cumulative impacts resulting from the changes will be more significant than those anticipated by the Council. For this reason it recommends a Town Centre Transport Strategy is undertaken to demonstrate that traffic approaching the town can be satisfactorily accommodated, whether by modal shift or other means.
36. I am not convinced a further study is merited or will forestall problems associated with the revised routing arrangements. Maintaining traffic flows in the town centre is also dependent upon overcoming deficiencies in other parts of the highway network which are not central to the objectives of the DSA. Changes to the road system will increase journey times on some routes, as the modelling predicts, but the evidence suggests they are likely to be modest. Ultimately, these changes have to be balanced against the benefits which will accrue from a more relaxed and attractive environment in the town centre.
37. The Council and the Highway Authority agree the effectiveness of the revised road system will need to be monitored and, if necessary, revisions taken forward in a future DSA/LP Review. This is reflected in both the High Wycombe Town Centre Masterplan Background Paper, paragraph 5.14 [CD2.2] and the County Council's Local Transport Plan 3⁸ [CD3.2.13]. The potential consequences of the changes to the highway network are also carried through into policy HWTC3, identifying the need for effective traffic management, maintaining access to the town centre without unacceptably compromising movement around it.
38. More generally, I consider the range of design and assessment work carried out on behalf of the Council is commensurate and proportionate to explain and justify the proposals included in the DSA⁹. In this respect, the evidence base addresses the concerns raised by the CS Inspector and the representations in relation to the highway proposals for High Wycombe do not lead me to conclude the Plan is unsound.

Deliverability

39. The Council has committed funding from its capital programme towards the first phase of development (2013/14 – 2016/17). It also relies on County Council support, CIL and S106 Agreements and receipts from redeveloped sites. A number of other funding sources will also be investigated including the Regional Growth Fund, the LEP through the 'Growing Places Fund' and Tax Incremental Funding. Supplementary support may also be possible via Heritage Lottery Funding.
40. Funding cannot be guaranteed but the Council is reasonably confident it will be able to meet the anticipated costs of phase 2 works after 2018 providing they do not increase. Were they to do so it could affect the speed of implementation. However, funding problems are largely associated with a single location rather than several sites which would be more likely to jeopardise the scheme.

⁸ Summarised in paragraph 5.15 [CD2.2]

⁹ See for instance, core documents CD3.10.4 – 3.10.19

41. The Council's objectives for High Wycombe town centre are ambitious yet consistent with the improvements envisaged in policy CS3 of the CS. The Council accepts it will have to respond to changing circumstances and may need to revise parts of the scheme as implementation takes place. In view of the scale of the project I do not consider its approach is unreasonable or one which suggests the DSA is unsound.

Policy provision

42. Policies HWTC1 – 6 are referred to by the Council as 'thematic' policies applicable to all proposals in the town centre. Reaction to these policies was generally muted although the Environment Agency and English Heritage have sought changes to policy HWTC2 (Town Centre Environment) to address omissions and ensure consistency with other parts of the DSA and the NPPF (**MM2**).
43. Policy HWTC3 outlines the objectives behind changes to the road system. The Council accepts these will need to be viable and that reference should be made to this. Nevertheless, viability will be a difficult issue to resolve. For instance, some respondents believe the intention to downgrade the Abbey Way Flyover to a single carriageway will create bottlenecks at key points and could hinder business activities but modifying its role is central to restricting vehicular movements across the town centre.
44. The County Council (as Highway Authority) now intends to designate Transport Improvement Lines (TILs) as soon as the DSA is adopted. This demonstrates the Council's and the County Council's commitment to secure the road links needed to implement the revised road network. I therefore endorse the modifications proposed to both policies HWTC3 and DM2 to reflect the emphasis on progressing TIL designation (**MM3** and **MM16**).
45. Policies HWTC7 – 21 mostly focus on sites associated with changes to the road network which are also locations capable of augmenting town centre activities and enhancing the environment. Where appropriate, the Council has responded positively to allay concerns by recommending modest but important changes to clarify uses and identify the constraints affecting some sites (**MM4 – MM9**).
46. The District Council and Royal Mail currently occupy land (HWTC8) which will continue to be used for commercial purposes but has longer-term (post 2018) potential to attract new town centre uses able to benefit from its location close to the cultural area centred on the Swan Theatre. The Royal Mail has no plans to relocate its sorting office and is concerned its activities could be curtailed should adjacent areas be redeveloped. Safeguards are in place for it to remain, however, unless an acceptable alternative location can be provided. I am satisfied this accords with the principles set out in the NPPF, avoiding impediments to economic growth but encouraging flexibility and positively promoting opportunities to accommodate future business needs.
47. Making better use of a site in Duke Street (HWTC9) has the support of the owner although the Council's proposal to maintain employment floorspace is neither necessary nor desirable in his opinion because of poor access and surplus office capacity elsewhere in the town. The Council explained there was continuing demand for high quality office space which would support its economic objectives, as confirmed in the SA assessment of the site [CD1.7].

The site is favourably located close to the town's railway station and, subject to a minor correction to the supporting text (paragraph 3.67), I find there are no substantive reasons for modifying the policy.

48. There is significant scope for improving the area occupied by the Fire Station, Royal British Legion and Liberal Club (HWTC10). This is a peripheral but prominent location on the edge of the central area where changes could complement existing cultural and educational activities. Advantages could also follow from re-modelling the road junction to reduce the prominence of the Abbey Way Flyover.
49. I agree with the Council that more could be accomplished if the existing uses were to move although the High Wycombe Society was concerned that tall buildings, as depicted in the DSA (figures 5 and 6) would be unacceptable. I understand its misgivings but I do not consider they are well-founded. The drawings are indicative while high quality design solutions, including public spaces, are pre-requisites if policy objectives are to be satisfied.
50. I appreciate why the Fire Authority would want to remain in its current location fronting the Abbey Way Flyover but the Council has been looking to relocate it. The former has sought assurances to safeguard its position rather than be faced with unexpected costs. The Council is well aware of the issues and I endorse its modification to protect the Fire Authority's interests (**MM4**).
51. The historic features in High Wycombe town centre help to give the town its identity and are attributes which should be retained and wherever possible enhanced. This objective is formalised in policy HWTC1 but the Council has agreed with English Heritage that further wording would reinforce its position. I support these changes (**MM5**).
52. As explained in the text to policy HWTC12 the opening of the Eden Centre in 2008 led to a loss of trade at a smaller centre in the Frogmoor area of the town (Chilterns Shopping Centre). The Council is keen to broaden the appeal of this older centre by allowing mixed-use development. For this reason it accepts residential uses at ground as well as upper floor levels would be beneficial providing it did not result in a loss of retail frontage. Encouraging new uses is a sensible and pragmatic step, in my opinion, to invigorate and rejuvenate what is a tired and unappealing part of the town centre (**MM6**).
53. Sites designated as HWTC13 (Lily's Walk) and HWTC14 (Buckingham House and Castle House) are adjacent to each other and are crucial to the delivery of the new road network. Both sites are within easy walking distance of the main shopping area and are well positioned to support town centre uses and residential development. Subject to modifications proposed by the Council to address concerns raised by respondents, I endorse the Council's objectives for both sites (**MM7**).
54. Removing extraneous traffic from the town centre would make it possible to transform the area occupied by the Oxford Road roundabout (HWTC16). Redesigning this to capitalise on the space offers opportunities to significantly enhance the public realm and improve connectivity to other parts of the town centre. Measures to de-culvert parts of the River Wye would also accord with the provisions of policy DM14 and the aims of the Environment Agency.

55. Land at Baker Street (HWTC18) has been investigated by the Council as a potential site for a replacement fire station although the Fire Service is uncertain whether this would meet its operational needs. It has reservations because the noise and disturbance caused by its activities could jeopardise the mixed employment and residential uses the Council also contemplates as possible uses for the site. Retaining the flexibility to explore different uses is sensible but changes are necessary to address the concerns which have been raised in representations (**MM8**).
56. According to the Council there is scope to make better use of land on Oxford Road (Rapid House) to provide modern office floorspace in conjunction with other uses. Paragraph 3.138 recognises that Rapid House could be developed in isolation but makes no reference to highway arrangements. Modifications are therefore proposed to policy HWTC19 requiring that site access must not interfere with the revised road network (**MM9**). While supporting these I regard the inclusion of a reference to opportunities for de-culverting the River Wye, sought by the Environment Agency, to be inappropriate because the river does not flow through the site.

Desborough

57. The Desborough area to the west of High Wycombe town centre is a densely developed part of the town with a range and mix of land uses. This gives it a distinctly different character which contrasts markedly with surrounding areas. The DSA refers to it as an area of deprivation in relation to crime and the environment with a serious deficiency of open space¹⁰ [CD3.4.9].
58. Policy HW1 provides a framework for securing visual and environmental improvements following from the principles for the area set out in policy CS4.1 of the CS. Key objectives are to provide better links to the town centre and areas of open space. Opportunities exist to capitalise on its industrial heritage by re-using existing buildings and encouraging redevelopment options while retaining the broad mix of uses which contribute to the area's character.
59. Policy HW2 seeks to address open space deficiencies by promoting residential use alongside the River Wye to encourage redevelopment. Providing schemes comply with specific criteria it is hoped a series of informal open spaces can be created to provide a riverside corridor. Broad support for these policies is tempered by criticism that they fail to provide the flexibility needed to deliver the Council's objectives. In particular, policy HW2 imposes an unrealistic expectation for open space on smaller sites where viability considerations are paramount.
60. I share the concerns of those parties who consider the Council's target of securing 50% of redeveloped sites for open space purposes to be unrealistic. Many of the sites are small and are likely to require remediation works. Owners of employment sites would be further burdened by criteria expected to provide on-going employment uses proportionate to their size.
61. Such requirements are excessive and difficult to rationalise with the NPPF. The latter encourages plans to be aspirational but also realistic (paragraph

¹⁰ Wycombe Open Space Framework [CD3.4.9]

154), have regard to viability and delivery (173) and not impose a risk to implementation (174). Minor changes initially suggested by the Council would fail, in my view, to offset the draconian requirements of the policy. Further modifications are required to provide a better basis for securing the improvements in the Desborough area the Council wishes to see. Some parties believe the Council's objectives remain impractical but I am satisfied the Council appreciates the need for a more flexible approach if the policy is to have a meaningful impact (**MM10**).

Marlow

62. One of the purposes of the DSA is to retain the vibrancy and economic health of Marlow town centre and ensure its historic core is protected. The latter is a designated conservation area¹¹ where English Heritage is advocating more attention is given to protecting areas identified for change.
63. Policies MR1 and MR2 identify primary and secondary shopping frontages to regulate uses permitted in these locations. These are similar to ones previously pursued by the Council in its LP [CD5.2.3] and follow the approach taken in other town centres in accordance with the rationale provided in a background paper on Town Centre and Retail Frontages [CD2.1].
64. Policy MR1 seeks to retain a minimum percentage of A1 uses¹² in primary shopping areas yet supports a more flexible approach allowing some A3 use. Exceptions to this would be considered if development would preserve or secure improvements to a listed building. Where secondary frontages are involved a less restrictive approach is advocated allowing other A class uses.
65. The Marlow Society believes this change of emphasis will lead to the demise of independent retailers with shops replaced by snack bars, cafes and restaurants. I agree too much flexibility could have unintended consequences but the proximity of the town to the River Thames and the Chiltern Hills mean it attracts many visitors. The reservations of the Marlow Society should be seen in this context and the Council's engagement with local stakeholders and the absence of objections from traders in the town. There is no evidence to show these policies would detract from the balance of services and facilities or harm the local economy.
66. Similarly I see no reason to propose changes to the boundary of the Primary Shopping Area (PSA) even though an office building at 18 Oxford Road is excluded from this area despite being next to it. The Council explained the site did not fall within a defined shopping frontage. I was told a proposal for retail use would not necessarily be refused but subject to existing policies for edge of centre sites.
67. Part of Riley Road (MR3) is allocated for mixed-use development with the focus primarily on retail use. A new Sainsbury's store opened here in 2011 and further development is possible, according to the Council. The allocation drew little criticism but some respondents felt the architectural merits of the area had been adversely affected and better access from Oxford Road and West Street was needed. It was suggested that more attention should be

¹¹ Marlow Conservation Area

¹² The Town and Country Planning (Use Classes Order) 1987 (as amended)

given to the Riley Road Development Brief although this already forms part of the policy criteria explaining the Council's aspirations for the area. I am not persuaded it is necessary to alter the policy.

68. Policy MR4 covers an area of under-used land to the south and rear of West Street to be used primarily for housing purposes (Portlands). This was endorsed by the Inspector examining the previous LP [CD5.2.4] who felt that housing would be less likely to have an adverse effect on the historic character of this part of the Marlow Conservation Area than major retail uses.
69. Consequently, the Council has pursued other objectives including the provision of rear access to premises on West Street and High Street and new, small scale town centre uses. Respondents have been especially divided on the merits of a link road between West Street and Pound Lane. The latter has been a long-standing ambition of the District and County Councils although the County Council no longer supports it or wishes to safeguard the road line. Nevertheless, the Marlow Society and others believe the road is essential to relieve congestion in the High Street.
70. Reducing or removing traffic from the High Street would significantly improve the centre of the town making for a more pleasant shopping environment. However, I am not convinced this would compensate for the urbanising effect the proposed road link would have on the tranquil environment to the west of the High Street. In my view it would seriously detract from the character and appearance of the Conservation Area and affect the living conditions of nearby residents. A new road junction would also reduce the capacity of the West Street car park where, the County Council now says, there is insufficient land for this purpose.
71. I therefore consider the disadvantages of a new link outweigh its benefits. Instead the changes to policy MR4 put forward by the Council limit the multi-functional role previously expected of this site but recognise it could still be used more effectively. The changes also incorporate an addition sought by English Heritage to ensure development conserves or enhances the conservation area character of the town centre.
72. The modification would reflect the aims for the town set out in policy CS5 of the CS to conserve its historic environment (CS17) and raise standards of design (CS19). Together with 'saved' policies in the LP the Council's stance also accords with the emphasis on conservation and design found in the NPPF (**MM11**).
73. Policy MR5 proposes using the Liston Road car park for residential purposes providing there is no net loss of parking space. The Council admits its objectives for this site cannot be guaranteed as parking is severely limited in the town centre. A scheme would also need to have regard to the impact on the Marlow Conservation Area and ensure the living conditions of neighbouring residents and the amenity of other users were safeguarded.
74. I consider it will be difficult for the Council to fully realise its ambitions for this site but this should not prejudice attempts to use it more effectively. As with change proposed to policy MR4, I agree with English Heritage that policy MR5 needs to highlight the importance of securing development which responds positively to the qualities of the Conservation Area following the principles in

'saved' policy HE 6 of the LP (MM12).

Princes Risborough

75. Policy CS10 of the CS places Princes Risborough in the second tier of the retail hierarchy providing services for its immediate area and rural catchment. The Council's projections¹³ [CD3.3.3] show there is little need for additional comparison or convenience shopping floorspace before 2021. Instead its strategy focuses on improving the character, quality and environment of the town centre by promoting small-scale mixed uses in two specific areas and allowing more flexibility in the range of permitted uses while continuing to safeguard shop units in primary shopping frontages.
76. As in other centres the Council intends to permit a wider range of uses through its policies for primary (PR1) and secondary (PR2) shopping frontages. More emphasis will be given to retaining a reasonable proportion (at least 50%) of A1 uses in primary shopping frontages in contrast to the full range of A use classes allowed in secondary frontages.
77. While broadly supportive of this approach, the Risborough Area Partnership is concerned that there is insufficient flexibility to accommodate change over the lifetime of the Plan or allow discretion for local circumstances. I do not agree because too much flexibility would undermine the retail role of town centres as expressed in policy CS10 of the CS. This restricts Princes Risborough to serving its rural catchment, avoiding any expansion of its service function which could draw trade from other towns or more distant locations.
78. The Council views an area between the High Street and New Road as having the potential for mixed-use development (policy PR3). Introducing pedestrian links and exploiting opportunities for development commensurate with the scale of existing uses could overcome the physical barrier between New Road and the heart of the town centre.
79. This would improve the retail environment in Princes Risborough adding to the vibrancy of the town centre and enhancing the Conservation Area¹⁴. English Heritage supports the Council's approach although multiple land ownership may hinder delivery. For this reason some respondents have questioned whether the policy is effective and the Council admits work will only take place incrementally over a number of years.
80. The difficulties of implementation and the complex pattern of land uses are not reasons in my view for rejecting the Council's vision for the town centre or changing its policy. In coming to this conclusion, I have had regard to representations made on behalf of Harbour Castle Ltd. which has promoted residential development outside the town centre. New housing would help to support the changes in the town centre by increasing the catchment population but residential allocations are being pursued through the Council's LP review and are not a matter which is before me.
81. A smaller site to the south of Horns Lane (PR4) but adjacent to the town centre is similarly identified by the Council for small-scale mixed use development. A range of uses are contemplated to improve its appearance

¹³ Retail and Town Centres Study [CD3.3.3]

¹⁴ Princes Risborough Conservation Area

and allow for more effective integration with the central area although multiple land ownerships pose similar problems as the adjacent site (PR3). It has been suggested a design brief could help to resolve ownership issues and provide a framework for future development. There is nothing to prevent this from happening were it seen as a useful tool, particularly as change is anticipated well into the plan period.

82. The Buckinghamshire and Milton Keynes Fire Authority is concerned that redevelopment of land off Horns Lane would compromise the operations of the fire station which occupies part of the site. The Fire Authority made no valid representation to the DSA and I am not convinced the Council's proposals place it in the invidious position it suggests.
83. Criterion 2c of policy PR4 requires any redevelopment of the Horns Lane site to provide for the satisfactory relocation of the fire station. There is no explicit reference to the funding of a new station but this does not invalidate the policy. Despite this, and to ensure consistency with proposals for the Fire Service in High Wycombe (see **MM4**), the Council is proposing to clarify those factors pertinent to relocating the fire station in Princes Risborough (**MM13**).

Issue 3 – Whether development management policies are appropriate to the needs of the District and consistent with the NPPF.

84. Development management policies promote sustainable development, support the economy and the local environment and include measures to offset the effects of climate change. Sustainability is a core theme which permeates the NPPF. The Council therefore intends to include a policy making it clear that proposals which accord with sustainability principles will be approved wherever possible. In view of the importance attached to this issue I consider it should be treated as a main modification (**MM14**).
85. Policy DM1 supplements policies CS16 and CS20 of the CS and sets out criteria that will be taken into account when assessing the traffic-related impact of major developments. I do not accept that measures to encourage more sustainable transport choices are at odds with the NPPF or that the policy includes an inappropriate reference to Department of Transport guidance because it is intended to apply to major schemes. I consider the policy represents a valid attempt to respond to forecasts that traffic will increase by 20% if there is no concerted effort to address growth¹⁵ [CD3.2.4].
86. Despite this, the John Lewis Partnership suggests that proposals to increase bus penetration should only be considered where a need can be demonstrated, to avoid undermining the viability of schemes. The latter is a crucial factor in the development process, as acknowledged in paragraph 173 of the NPPF and reflected by the Council in policy DM18 on infrastructure provision. Even so, I find it difficult to see why this justifies the premature discounting of sustainable transport initiatives. I consider the measures set out in policy DM1 represent reasonable ways to influence travel choices and should be retained.
87. In responding to concerns the Council has recommended changes acknowledging that it may not be possible to integrate all transport measures

¹⁵ Technical Note Wycombe LDF TN1 – Individual Site Tests [CD3.2.4]

into every development. This has been welcomed and reflects the sentiments expressed in paragraph 6.3 of the supporting text **(MM15)**.

88. Policy DM3 identifies the line of the former Bourne End to High Wycombe railway as a walking and cycling route although the High Wycombe Society felt it was a lost opportunity to reinstate the railway. I do not doubt a rail link would be a sustainable transport alternative to the A404 (the main north-south road route) which, as I saw, experiences considerable congestion at peak periods.
89. Sections of the former railway line have been built on or incorporated into gardens meaning some re-alignment of the route might be necessary. Much of it remains intact but the County Council says the costs of reinstating the railway are prohibitive and that there is no commercial interest in doing so. Ultra light tram systems or buses have been mooted as alternative options in appeal decisions¹⁶ but have also failed to attract interest. In the absence of supporting evidence to the contrary, I find it difficult to justify the retention of the route other than as a footpath/cycle link.
90. Scattered business sites (DM4) are an important part of the District's employment portfolio making up about 40% of employment land provision in urban areas, according to the Wycombe Economy Study [CD3.1.2]. These sites are a source of local jobs and start-up opportunities which contribute to the economy of the District as identified in policy CS11 of the CS (Land for Business).
91. The Council accepts that traditional 'B Class' uses may no longer be appropriate on all sites and intends to adopt a more flexible approach allowing employment generating sui generis uses and community facilities. Providing it could be shown that a site no longer has employment potential, a residential use could be acceptable although one respondent felt this would be an impediment to the relocation of existing businesses.
92. Relocation costs will be crucial when deciding if it is feasible to move; a residential valuation will make this more likely. However, retaining small sites for employment purposes should be supported. The policy does not preclude residential uses if other uses are no longer practicable. No changes are necessary to policy DM4.
93. The Council is supportive of residential uses in town centres providing this does not compromise their primary function as retail locations. It has clarified its position to ensure policy DM8 accords with the Core Strategy¹⁷ [CD5.2.1] and is consistent with the NPPF (paragraph 23) which recognises that residential uses can contribute to the vitality of town centres **(MM17)**.
94. An impact assessment will be required for retail and leisure schemes outside designated centres to satisfy criteria in policy DM9. This sets a limit of 1,000m² of gross floorspace as the threshold for High Wycombe. Lower levels are proposed for other centres including 500m² for Marlow and Princes Risborough. This complies with NPPF requirements (paragraph 26) although the chosen thresholds elicited a mixed response.

¹⁶ APP/K0425/A/08/2073840 & APP/K0425/06/2032592

¹⁷ See paragraph 4.48 of CD 5.2.1

95. Supporting evidence for threshold levels merely updates an earlier report¹⁸ [CD3.3.1] according to one respondent and was prepared in different economic circumstances. Criticism has also been directed at the threshold for High Wycombe because it is seen by some parties as overly restrictive. Others argue it represents a reasonable balance in meeting business needs while protecting established centres.
96. The objective for the Council is to maintain market share in order that its town centres can compete with out-of-centre locations and 'on-line' retailing. Projections confirm there is little need for additional retail floorspace before 2016 while vacancy rates in High Wycombe exceed 16% and are close to 10% in Princes Risborough. I agree with the Council that adopting the default threshold in the NPPF (2,500m²) would run the risk of compromising prospects for its town and district centres. For this reason the more cautious approach advocated by policy DM9 is justified.
97. The Royal Borough of Windsor and Maidenhead (RBWM) supports policy DM9 but believes policy DM6 (Town Centre Boundaries) is unsound because of an inadequate link to the evidence base. I do not accept the DSA is flawed in this respect because there is a clear association between these policies and the information in the High Wycombe Retail Strategy [CD3.3.6].
98. It also suggests that the impact of proposals on centres outside Wycombe District should form part of the Council's retail assessment. Policy DM9 requires assessments to be undertaken for schemes outside designated centres, including edge-of-centre sites and centres outside the District in order to show they would not harm the vitality and viability of these locations.
99. I am therefore satisfied the Council's approach is consistent with sustainability principles and the objectives of the NPPF. Nevertheless, the inclusion of a reference in the Plan to the High Wycombe Retail Strategy and recognition there are sites in High Wycombe capable of accommodating additional town centre needs would clarify the Council's position (**MM18**). However, these changes relate to policy HWTC4 rather than policy DM6 as originally indicated.
100. Planning for Green Infrastructure (GI) at county level is set out in Buckinghamshire's Green Infrastructure Strategy [CD3.4.7]. This is carried through into policy CS17 of the CS and further detail is provided in the DSA with objectives for the development of a Green Infrastructure Network set out in policy DM10. As explained in the Council's Background Paper ¹⁹[CD2.3] an important aspect of GI is its multi-functionality. A network of green spaces is a resource for local residents and visitors providing, among other things, recreational opportunities and contributing to the conservation of the natural environment.
101. The purpose of policy DM10 is to protect and enhance the GI network if sites meet at least two of five criteria. This is consistent with the advice in paragraph 114 of the NPPF requiring local planning authorities to be positive and proactive in managing GI networks.

¹⁸ Retail and Town Centres Study [CD3.3.1]

¹⁹ Green Networks and Infrastructure Background Paper [CD2.3]

102. A number of Opportunity Areas have been identified in and around Wycombe where there is potential to link existing areas although the identification of sites is seen by some as being too restrictive. The Council explained it was not its intention that the designation of land for GI purposes should be an impediment to development. This includes Reserve Locations for Future Development (RLFD) and smaller pockets of land as at Portlands, Marlow which were brought to my attention. However, this does not apply to land adjacent to Gordons Builders Merchants which is a designated Green Space and one the Council is keen to protect (see paragraph 107 below).
103. Policy CS8 of the CS identified land at Abbey Barn South as a RLFD. Berkeley Strategic which has an interest in this site is concerned the DSA now includes the whole of the site in the Green Infrastructure notation (Map 16). Previous versions of the DSA had focused on a 'woodland ride' to meet open space requirements which Berkeley found acceptable.
104. Berkeley accepts the proposal to modify criterion 4 of policy DM10 acknowledges the possibility of an overlap between the GI network and a RLFD but is concerned by the inconsistency between the CS and DSA. My reading of CS8 and DM10 and more specifically the GI notation shown on Map 16 does not lead me to the same conclusion. Policy CS8 explains that RLFD are sites which may be brought forward to meet development needs at some future point, not necessarily during the plan period. It points out there are constraints on the developable area at Abbey Barn South and that future allocation of the site, if needed, will be taken forward through a Site Allocations plan. As mentioned previously (see paragraph 16 above), housing provision will now be made through a LP review.
105. The site remains as a RLFD until such time as it is brought forward for development. Designating a wider area for GI allows for other parts of the site to be used to meet the policy requirements so that options other than the 'woodland ride' could be considered and could prove mutually beneficial. It also seems to me that it would not be in the Council's interests to severely restrict the housing potential of the site if it is to satisfy future needs and minimise the impact of development on the Green Belt and other sensitive locations. I am therefore not persuaded it is necessary to modify the policy as suggested by Berkeley Strategic.
106. Following discussions during the hearings the Council is proposing further changes to the supporting text to explain the distinction between the role of DM10 and associated policies (DM11 – DM15). A number of adjustments/ corrections have also been recommended to the accompanying maps (**MM19**).
107. Policy DM11 (Green Spaces) seeks to protect designated green spaces. The NPPF recognises that open spaces can make an important contribution to health and well-being but says policies should be based on a robust and up-to-date assessment of needs. The Council's evidence base contains a number of studies it has undertaken since 2005 to inform both its policy and development management processes. This includes the Wycombe Open Space Framework [CD3.4.9] which I was told is an evolving document providing a common information base for the provision and planning of open space.

108. Representations were made to the designation of three sites as Green Spaces where there is no right of access although paragraph 6.73 confirms this does not compromise the designation of these areas. Their importance depends on other factors. Thus the smallest of the three sites has been part of a tree belt in a residential area which the Council considers still has landscape value and contributes to biodiversity interests²⁰. I see no reason to disagree.
109. The open space designation of another site²¹ has not been directly challenged although the owners have proposed an alternative boundary to allow for residential use of part of the site. No provision is made in the DSA for housing. Subject to any need to do so in a revised LP, I see no justification for reducing a large area of attractive and semi-natural woodland.
110. The owner of the third site²² commissioned a detailed appraisal of the land which is close to the eastern extremity of Bourne End. The topography and peripheral hedgerow cover makes it difficult to fully appreciate the extent of the site which the appraisal suggests has limited value for wildlife. Nevertheless, some idea of the open character of this land can be gained in glimpses from the lane on its eastern boundary.
111. The site has no role in meeting open space needs for sport or recreation as set out in paragraphs 73 and 74 of the NPPF but has been designated as a Green Space in local plans since 1995. Objections to the designation in the 2004 version of the LP were rejected by the Inspector conducting the LP examination because of the contribution he found it made to the surrounding rural area. However, the owner continues to dispute this and contends its designation is neither justified nor has its value been reviewed as referred to in policy CS17 of the CS.
112. The Council has undertaken a series of studies on open space provision founded on the approach advocated in previous national guidance (PPG17)²³. This work is becoming increasingly dated and predates the NPPF, including the concept of Local Green Spaces referred to in paragraphs 76 and 77. Nevertheless, it argues that its original Open Space Study [CD3.4.1] and subsequent Open Space Framework [CD3.4.9] are still valid and there has been no significant change at Heavens Lea since 2003. The owner disagrees and says nearby development has changed its character in recent years.
113. The site is adjacent to the Green Belt and an Area of Attractive Landscape as designated in the LP (saved policy L2) and has a semi-rural character as referred to in paragraph 8.65 of the LP. In my view the changes which have taken place in the vicinity reinforce rather than detract from the role of this site as a Green Space because of its inherent landscape value which is one of the defining factors in paragraph 6.72 of the supporting text to policy DM11.
114. I consider the designation should be retained until a review of this and similar sites (ideally in the Council's replacement LP) is undertaken to ensure future planning policies on Green Spaces adequately reflect the principles in the NPPF in promoting healthy communities.

²⁰ Land North of 52a Telford Way, High Wycombe

²¹ Land adjacent to 2 Copse Hill Cottages, High Wycombe

²² Land at Heavens Lea, Hedsor and Hawks Hill

²³ Planning Policy Guidance 17, *Outdoor Sport and Recreation* (PPG17)

115. I have also considered the representation made to the SA regarding policy DM11. The Council has examined the alternatives of protecting or dispensing with the protection of green spaces. This ignores the option of reviewing green space designations but I do not regard this as relevant to the SA process whose purpose is to assess the social, economic and environmental consequences of policy designations. I accept the policy is likely to compromise the economic contribution of sites designated as Green Spaces but this has to be balanced against the corresponding social and environment benefits as set out in the SA [CD1.7].
116. It has been suggested that combining policies DM10, DM11 and DM12 would overcome the confusion that arises from each policy having specific but different objectives. I do not agree. Policy DM10 sets out the overall approach to the GI network while policy DM11 deals solely with the protection of Green Spaces. Both of these policies are in turn easily distinguishable from policy DM12 which explains how designated biodiversity and geodiversity interests will be safeguarded.
117. There is a greater likelihood, in my view, that combining the policies would reduce their effectiveness and give rise to more rather than less confusion. Furthermore the remit of policy DM12 extends beyond the geographical coverage of the GI network. A separate policy for biodiversity and geodiversity also ensures the distinction between the hierarchy of sites is made clear. This requires a change to the wording of DM12 so that the importance of international and nationally designated sites is recognised (**MM20**). The policy would then provide a better basis for understanding the Council's approach to different sites, reflecting the objectives of paragraph 113 of the NPPF.
118. The Environment Agency seeks changes to strengthen policy DM14 on river and stream corridors. I am not convinced these are necessary as there are references elsewhere in the Plan supporting, for instance, opportunities for de-culverting of watercourses or improving biodiversity. Additional text is proposed, however, to highlight the importance of avoiding impediments to the movement of fish along watercourses (**MM21**).
119. The provision of open space is covered by policy DM15. The Council relies on a number of studies including, most recently, its Open Spaces Framework [CD3.4.9] to assess needs and justify the standards required in new developments. The High Wycombe Society was generally supportive of this approach but said it found open space was often directed to sensitive locations or ones which were difficult to reach. It saw merit in aggregating funds from small and medium development to provide common and readily accessible off-site strategic open space. For larger sites strategic open space should be provided on or at least very close to the new site.
120. The criticisms made by the High Wycombe Society seem to reflect the difficulties associated with finding suitable land for open space rather than any inherent deficiency in the policy. The latter is intended to deliver both strategic and local open space in appropriate locations commensurate with the scale of the development with funding mechanisms in place as part of the Council's CIL charging schedule. I consider there is no basis for modifying the policy.

121. Changes proposed to policy DM16 would address some of the earlier concerns of the Environment Agency in relation to flood risk. However, it objects to revisions proposed to Sustainable Urban Drainage Systems (SUDS) because of fears that developers would use this to circumvent drainage requirements. I do not regard it as unreasonable, however, to acknowledge that SUDS may not be suitable in every case. In other respects I find the revised policy represents a more comprehensive approach to dealing with flood risk, improving its clarity and ensuring consistency with the NPPF (**MM22**).
122. The need to manage water resources more effectively and offset demand because of climate change and development pressures should also be acknowledged, according to the Environment Agency. A further criterion to be inserted into policy DM17 would require that new homes met appropriate water efficiency standards equivalent to levels 3 and 4 of the Code for Sustainable Homes (**MM23**).

Other Matters

123. An Infrastructure Delivery Plan (IDP) has been developed in conjunction with service providers to ensure requirements are identified commensurate with the development envisaged. The IDP is an evolving document and forms part of the evidence base to support the Council's CIL. This will be the principal means by which the Council will fund infrastructure works although it is intended to continue using planning obligations to support specific needs.
124. A monitoring framework is included in the DSA for area specific policies showing targets, timescales and delivery mechanisms. The association between District-wide development management policies and relevant policy provisions in the CS are identified, the latter providing the relevant indicators and targets for monitoring purposes. In combination, the CS and DSA show how the effectiveness of the policy base will be assessed.
125. As previously mentioned, viability is a factor to be taken into account. This is made clear in policy DM18 and accords with the position adopted in the NPPF. Nevertheless, the High Wycombe Society believes the 'test' of viability should be set very high to include a claw back clause in agreements which would become operative once the economy improves. I consider it would be inappropriate to impose unreasonable and excessive requirements on developers. Nevertheless, 'claw back' clauses have been incorporated into the Council's Developer Contributions Supplementary Planning Document [CD5.3.4] and its draft replacement [CD 5.3.6] which expects mechanisms to be put in place to capture any uplift following improvements in market conditions.
126. Views expressed by Network Rail in responding to the main modifications highlighted the impact of development on level crossings. Neither this nor comments made in relation to planning obligations and CIL contributions were matters it chose to identify in representations to the submitted DSA. Consequently, I have not taken these comments into account although the Council may wish to consider both matters when undertaking its LP review.
127. The Council is proposing a number of changes are made to maps and figures in the DSA. These are intended to augment information in relation to watercourses and a specific road junction improvement (**MM24**). Finally, I

have made a small number of textual changes to the main modifications where the wording was unclear. These do not alter the substance or intent of the modifications.

Conclusions

128. I have identified and endorse the modifications the Council has recommended should be made to the DSA in response to the representations and my consideration of the Plan. The Main Modifications are set out in detail in the Appendix to this report. Providing these are made I am satisfied the DSA is consistent with the aims and objectives of the Wycombe Core Strategy and national planning policy contained in the NPPF. I appreciate that some parties continue to have reservations about the likely effectiveness and validity of parts of the Plan but I do not consider it is fundamentally flawed or incapable of delivery. The proposed changes to the road system in High Wycombe will be challenging for the Council to implement but they demonstrate the Council's commitment to plan positively for its residents and business community.

129. I find the DSA satisfies the tests of soundness and provides a positive basis for future development in the District.

Assessment of Legal Compliance

My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Delivery and Site Allocations Plan is identified within the approved LDS October 2012 which sets out an expected adoption date of July 2013. The Plan's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in October 2006 (updated December 2012) and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations HRA has been carried out and is adequate.
National Policy	The Delivery and Site Allocations Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Delivery and Site Allocations Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

- 1. The Wycombe Delivery and Site Allocations Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.**
- 2. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix to this report the Wycombe Delivery and Site Allocations Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

P R Crysell

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications to Wycombe Delivery and Site Allocations Plan

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and **bold** for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD.

Ref.	Page	Policy/ Paragraph	Main Modification to Wycombe Delivery and Site Allocations Plan
MM1	P79	Appendix B High Wycombe Town Centre Masterplan Highway Changes	<p><i>Amend Reference A as follows:</i></p> <ol style="list-style-type: none"> 1) Reconfiguration of highway Premier Way, between Archway and Bellfield Road, to provide westbound only 2) Provision of new junction at junction of Premier Way and access into Sainsbury's (Dovecot) car park. The format of junction is to be confirmed following further highway design and assessment work and consultation with stakeholders. This could include a priority arrangement or signalised junction. 3) Junction & traffic management changes to implement a gyratory system at Bellfield Road / Parker Knoll Way / Glenisters Road / Archway / Premier Way <p><i>Amend Reference D as follows:</i></p> <p>(2) Provision of new signalised junction at junction of West Wycombe Road and Westbourne Street. At the approach from Westbourne Street an additional left turn lane is provided. The format of junction to be confirmed following further highway design and assessment work.</p> <p><i>Amend Reference O as follows:</i></p> <p>Abbey Way Flyover</p> <ol style="list-style-type: none"> (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 Cclosed 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.

Ref.	Page	Policy/ Paragraph	Main Modification to Wycombe Delivery and Site Allocations Plan
MM2	p12	HWTC2 Town Centre Environment	<p><i>Make following change to Clause 4</i></p> <p>All development within the town centre should preserve conserve or enhance the town centre townscape. Development proposals should give consideration to:.....”</p> <p><i>Make the following change to Clause 5</i></p> <p>Development proposals which are located within the inner Source Protection Zones (SPZ4) for the Pann Mill Public Water Abstraction (Principal Aquifer in the New Pit Chalk) should be designed to ensure no impact on the function of the inner Source Protection Zones</p> <p><i>Include new paragraph within supporting text (between paras. 3.22 and 3.23)</i></p> <p>Para. 3.23 High Wycombe’s history and the historic environment are an important element of the town’s identity and are valued by residents and visitors alike. The High Wycombe conservation area was first designated in 1970 and covers the medieval core, including Frogmoor and the eastern part of the town centre, including the historic pastures of the Rye. Within the town centre there are over 80 listed or locally listed buildings, including the Grade I listed Guildhall and All Saints Parish Church and the Scheduled Ancient Monument of St. John’s Hospital. All development proposals within the town centre should conserve and enhance the town centre townscape. In particular development proposals within the conservation area and/or which would impact on the fabric and/or the setting of a listed building must have regard to the heritage policies within the Development Plan and additional guidance set out within the conservation area appraisal.</p> <p><i>Make the following change to paragraphs 3.26 and 3.27:</i></p> <p>3.26 The following town centre sites are located within the inner Source Protection Zones (SPZ4) for the Pann Mill Public Water Abstraction (Principal Aquifer in the New Pit Chalk):</p> <ul style="list-style-type: none"> • HWTC7 Easton Street • HWTC8 Council Offices and Royal Mail Sorting Office • HWTC9 Land off Duke Street • HWTC10 Swan Frontage • HWTC11 Wycombe General Hospital • HWTC12 Chilterns Shopping Centre & Frogmoor East • HWTC13 Lily’s Walk (Former Gas Works Site) • HWTC16 Oxford Road Roundabout

Ref.	Page	Policy/ Paragraph	Main Modification to Wycombe Delivery and Site Allocations Plan
			<p>3.27 In discussion with the Environment Agency development proposals within the Source Protection Zones SPZs4 need to be designed to allow for:</p> <ul style="list-style-type: none"> • the potential to encounter shallow groundwater and the restriction on the use of soakaways • avoiding direct discharge of hazardous substances to groundwater • the potential for historic contamination to be encountered during development • the restrictions on deep penetrative foundation methods if contamination is encountered.
MM3	p14	HWTC3 Movement, Connections and Access	<p><i>Make following change to Clause 2(v)</i></p> <p>“is cost-effective and viable to construct and maintain”</p> <p><i>Make following change to Paragraph 3.36 (p.17)</i></p> <p>“...Transport Improvement Lines are declared by Buckinghamshire County Council as the highway authority and the proposals maps show the indicative location or route of the proposed Transport Improvement Lines (see policy DM2 Transport Improvement Lines for further information). It is anticipated that the highway authority will proceed with the formal designation of Transport Improvement Lines once this plan is approved, in consultation with the Council and relevant stakeholders.”</p>
MM4	p24	HWTC10 Swan Frontage	<p><i>Add new policy clause [between 3 and 4]</i></p> <p>“If the fire station remains in situ:</p> <ol style="list-style-type: none"> 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 <ol style="list-style-type: none"> 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 <p><i>Amend existing clause 4</i></p> <p>“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</p>

Ref.	Page	Policy/ Paragraph	Main Modification to Wycombe Delivery and Site Allocations Plan
			<p>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."</p> <p><i>Insert new paragraph into supporting text between paragraphs 3.72 and 3.73</i></p> <p>"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."</p> <p><i>Amend paragraph 3.73 as follows:</i></p> <p>"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.</p> <p><i>[Create new paragraph]</i> - 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."</p>
MM5	p.6	Para. 3.3	<p><i>Make following change to Para 3.3</i></p> <p>"...attractive wooded setting to the town. The town centre is rich in history and the historic environment enhances the quality of the environment and sense of place within the town. Key features of the historic town centre include.....</p>
	p28	Para 3.81 – 3.85	<p><i>Include new paragraph within supporting text (between paras. 3.82 and 3.83)</i></p> <p>These two areas fall within the High Wycombe</p>

Ref.	Page	Policy/ Paragraph	Main Modification to Wycombe Delivery and Site Allocations Plan
			<p>conservation area and contain a number of significant heritage assets, including the Grade I listed Guildhall and All Saints Parish Church. Development proposals within these areas should conserve and enhance the historic environment and the heritage assets within it. In particular development proposals within these areas must have consideration of the requirements of the heritage policies within the Development Plan and additional guidance set out within the conservation area appraisal.</p>
MM6	p29	HWTC12 Chilterns Shopping Centre and Frogmoor East	<p><i>Make following change to part (3)</i></p> <p>Development proposals for this site should maintain an active frontage, and acceptable land uses are:</p> <ul style="list-style-type: none"> • Retail • Restaurants • Hotels • Pubs • Commercial leisure <p>Residential is acceptable on upper floors and on the ground floor where this does not lead to the loss of ground floor retail frontages.</p>
MM7	p30	HWTC13 Lily's Walk (Former Gas Works Site)	<p><i>Make following change to Clause 5</i></p> <p>"If a full link road is highway improvements / infrastructure are required to mitigate development on this site, then the link road these must be designed and provided for in a way which is consistent with the delivery of the strategic town centre vision, and in particular meets the requirements of Policy HWTC3."</p> <p><i>Make following change to Paragraph 3.103</i></p> <p>"There is currently an historic Transport Improvement Line....The proposed TIL to be designated on this site is shown within the supporting technical evidence. It is anticipated that the highway authority will proceed with the formal revision of the Transport Improvement Line on this site once this plan is approved, in consultation with the Council and relevant stakeholders."</p> <p><i>Make following change to Paragraph 3.104</i></p> <p>"If the development proposals for the site require the implementation of all or part of the link road highway improvements / infrastructure to make the development acceptable in planning terms, the design and provision of the highway infrastructure is these works are required to support and not prejudice the implementation of the wider strategic vision for the town centre, including the provision</p>

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			of an alternative cross-town route.”
MM8	p36	HWTC18 Baker Street	<p><i>Make following change to part (3)</i></p> <p>If a new road linking Westbourne Street and West Wycombe Road is required highway improvements/infrastructure are required to mitigate development on this site, then the link road these must be designed and provided for in a way which also contributes to is consistent with the delivery of the strategic town centre vision, and in particular meets the requirements of Policy HWTC3.</p> <p><i>Amend paragraph 3.131 as follows:</i></p> <p>“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.</p> <p><i>Make following change to para. 3.135</i></p> <p>If development proposals for the site require the implementation of a link between Westbourne Street and West Wycombe Road of highway improvements/infrastructure to make the development acceptable in planning terms, the design and provision of the highway infrastructure is these works are required to support and not prejudice, the implementation of the wider strategic vision for the town centre, including the provision of an alternative cross-town route.</p>
MM9	p37	HWTC19 Rapid House	<p><i>Make following change to part (3)</i></p> <p>If a new road linking Westbourne Street and West Wycombe Road is necessary highway improvements/infrastructure are required to mitigate development on this site, then the link road these must be designed and provided for in a way which also contributes to is consistent with the delivery of the strategic town centre vision, and in particular meets the requirements of Policy HWTC3.</p>

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			<p><i>Make following change to para. 3.141</i></p> <p>If development proposals for the site require the implementation of a link between Westbourne Street and West Wycombe Road highway improvements /infrastructure to make the development acceptable in planning terms, the design and provision of the highway infrastructure these works are required to support and not prejudice, the implementation of the wider strategic vision for the town centre, including the provision of an alternative cross-town route.</p>
MM10	p41	HW2	<p><i>Delete existing policy HW2 and supporting text (paras. 3.151 – 3.158) and replace with the following policy and supporting text..</i></p> <p>HW2 Delivering Regeneration, New Open Space and River Corridor Improvements in Desborough</p> <p>1. Regeneration of employment areas adjacent to the River Wye between Desborough Avenue and Desborough Park Road for residential or mixed residential and employment generating uses will be permitted subject to the following:</p> <ul style="list-style-type: none"> a. Provision of high quality local open space on site which: <ul style="list-style-type: none"> i. is significantly in excess of the local element of the open space standard set out in policy DM15 unless it can be demonstrated that this would not be viable including regard being had for future maintenance; and; ii. adjoins the River Wye (where practical), is useable and allows full public access; and; iii. is designed in a way to enable integration with open space provision made within developments that may come forward on adjacent sites. b. Where a site: <ul style="list-style-type: none"> i. is 0.5 ha and above provision of employment generating development on-site in proportion to the size of the site. ii. contains an existing business, the Council will encourage retention of the business within the District or where possible on-site. <p>2. Development proposals should seek to conserve and enhance the biodiversity, landscape and recreational value of the River Wye and its corridor through good design in line with policy DM14.</p>

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			<p>This policy applies to the land adjacent to the River Wye, between Desborough Avenue and Desborough Park Road, as it runs through the Desborough area.</p> <p>Desborough is a diverse area that has traditionally played a key role in accommodating a range of businesses, but some of the existing buildings are now outdated and no longer meet modern business needs. Desborough still has a role to play in meeting these needs but it is also in need of regeneration to improve the area. Desborough is also severely deficient in open space²⁴, lacking a range of open space facilities. There are insufficient informal open spaces such as semi-natural green spaces and green corridors as a result of the dense development pattern of the area. In addition, some open spaces don't meet their full potential, e.g. outdoor sports use at Desborough Recreation Ground could be intensified.</p> <p>Possible options for improvement of the area as identified by the Open Spaces Framework include improving the quality of and public access to the River Wye with the aim of creating a continuous corridor. The river is a key environmental asset of the area that could significantly contribute to creating a high-quality environment. Regeneration of sites along the river offers an opportunity to provide new housing, new jobs and, of particular importance in the Desborough area, new areas of open space.</p> <p>This policy seeks to deliver these improvements through allowing the redevelopment of sites along the River Wye to create a network of informal open spaces that open up stretches of the River Wye, improve public access to the river, and which improve biodiversity. It is important that the design of development sites ensures that the open spaces are integrated into the existing urban fabric so that they are accessible and visible from the surrounding area and not isolated by the new development.</p> <p>The main opportunities for regeneration are the existing employment areas located adjacent to the River Wye and the Council wishes to see these areas redeveloped for residential and mixed use residential and employment generating schemes, providing good quality housing and, on sites of 0.5 ha and above, an element of new employment generating development. This could take the form of live work units, studios, small workshops and offices, subject to the location</p>

²⁴ WDC Open Spaces Framework, 2010

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			<p>and design of a scheme as well as other employment generating uses as identified in policy DM4. The amount of employment generating development required will be determined on a site by site basis, but as a guide an area in the region of 25% will be sought by the Council. The exact proportion will be subject to whether a meaningful amount of floor space is proposed, the viability and feasibility of a proposal, as well as the degree to which wider benefits are delivered through the scheme, notably the provision of open space and enhancement of the River Wye corridor. On smaller sites that accommodate an existing business the Council will endeavour to retain that business elsewhere within the District or where possible on-site. Viability issues will need to be assessed against policy DM18 and have regard to other supporting guidance on viability in the Planning Obligations SPD or any subsequent guidance.</p> <p>In assessing development proposals the Council will seek to strike a balance between achieving tangible regeneration benefits for Desborough, including critically the provision of significant new open space, and where appropriate the provision of employment generating development, whilst still delivering development. The Council will support proposals where land in more than one ownership can be assembled to deliver a meaningful area of open space.</p> <p>Employment areas that are covered by this policy are not subject to policy DM4 for Scattered Business Sites or existing Local Plan employment sites policy E3 (or any similar policy in a subsequent local plan), provided the requirements of Policy HW2 are satisfied in any redevelopment proposals.</p>
MM11	p46	MR4 Portlands and Policies Map 2	<p><i>Make following changes to part (1)</i></p> <p>Development proposals should:</p> <ol style="list-style-type: none"> a) Be consistent with Conserve or enhance the townscape and Conservation Area character of the town centre; b) Maximise accessibility to and through the site for pedestrians and cyclists; c) Provide for the main vehicular access to the development Be accessed from the south of the site; d) Provide for the delivery of the northern section of the link road between West Street and Pound Lane, consistent with townscape character, should it be required for future use by general through-traffic in order to alleviate congestion on the High Street and support alternative bus routing e) Extinguish existing vehicular access to High Street

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			<p>(except for emergency vehicles);</p> <p>f) Retain Portlands Alley;</p> <p>g) Secure rear servicing to frontage premises on High Street and West Street;</p> <p>h) Retain 24 hours pedestrian/cycle access to High Street, West Street, Pound Lane including the retention of Portlands Alley as a quality pedestrian link; and;</p> <p>i) Retain mature trees where possible</p> <p><i>Map 2 - Site boundary for MR4 Portlands redrawn as consequential change in light of above changes to policy MR4</i></p>
MM12	p47	MR5 Liston Road Car Park	<p><i>Make the following changes to Clause (b)</i></p> <p>b) a design and layout which is sensitive to that conserves or enhances the Marlow Conservation Area and safeguards the amenity of surrounding occupiers /users/ residents.</p>
MM13	p52	PR4 Land south of Horns Lane	<p><i>Make following change to Clause 2:</i></p> <p>“Redevelopment should:</p> <p>(c) Enable the satisfactory relocation of the fire station and public toilets</p> <p><i>Add in new policy clause</i></p> <p>(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.”</p> <p><i>Add new paragraph after para 5.15 within supporting text</i></p> <p>“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.”</p>
MM14	p.53	New policy Insert before existing policy DM1	<p><i>Insert policy before DM1</i></p>

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			<p>Presumption in favour of sustainable development</p> <p>1. Planning applications that accord with the policies in this Local Plan (other Local Plan documents and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>2. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p style="padding-left: 40px;">a) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p style="padding-left: 40px;">b) Specific policies in that Framework indicate that development should be restricted.</p> <p><i>Insert the following as supporting text</i></p> <p>The National Planning Policy Framework requires that Local Plans should be based upon and reflects the presumption in favour of sustainable development (para. 15).</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p>
MM15	p53	Policy DM1	<p><i>Additional text to be added to parts (1) and (2) of the policy:</i></p> <p>1. All developments that require the submission of a Transport Assessment, in line with Appendix B of the DfT Guidance on Transport Assessment (March 2007), or any replacement to this guidance, or as required by the Highway Authority, should provide, wherever possible:.....</p> <p>2. Design of development should allow for, where feasible:</p>
MM16	p55	DM2 Transport Improvement	<p><i>Make following change to Paragraph 6.19 (p.55)</i></p>

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		Lines	<p>“...The final stage of the review of improvement lines involves the County Council formally designating the new improvement lines outlined in Appendix B. The County Council intends to commence this process in 2013 once this plan is approved. It is anticipated that the highway authority will proceed with the formal designation of Transport Improvement Lines once this plan is approved, in consultation with the Council and relevant stakeholders.”</p>
MM17	p60	DM8 District Centres	<p><i>Make following change to part (2)</i></p> <p>2. All development should ensure an active shop frontage at ground floor level to maintain and enhance the vitality and viability of the centre.</p> <p>2. Except where site-specific policies state otherwise, residential development is acceptable in District Centres on upper floors and on ground floors where this would involve no loss of active ground floor frontage.</p>
MM18	p18	HWTC4 Economy	<p><i>Make following addition at the end of paragraph 3.41</i></p> <p>This plan identifies a number of sites which will help deliver this extra floorspace as well as providing for investment in the town centre¹.</p> <p><i>Make following changes to the final sentence of paragraph 3.42:</i></p> <p>Policies HWTC5-6 set out the Council’s approach to retail development existing shopping frontages within the town centre, and policies HWTC7-21 outline individual site policies and allocations.</p> <p>¹ High Wycombe Retail Strategy Report (NLP for WDC, 2012)</p>
MM19	p62	DM10	<p><i>Make the following changes to Parts 1 and 4 of the policy and paragraphs 6.59 and 6.60 of the supporting text:</i></p> <p>1. All development should retain, protect and enhance The Green Infrastructure Network will be conserved and enhanced, paying special attention to the conservation and enhancement of biodiversity, recreation and non-motorised access.</p> <p>4. Where Reserve Locations for Future Development (as identified in the Core Strategy or any subsequent Local Plan) overlap with the Green Infrastructure Network, any future development on those sites should be designed to provide strong and continuous links to the surrounding parts of the identified network.</p>

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			<p>Introduction</p> <p>6.59 “Green Infrastructure provides a vital life-support system, encompassing a network of green spaces, access routes, landscapes and natural and historic elements that intersperse and connect Buckinghamshire’s urban and rural settlements with each other and the surrounding countryside. Operating at all spatial scales it enables a holistic overview of the natural and historic environment, acknowledging its multi-functional benefits for economy, wildlife and health and well being of local people and communities”.²⁵</p> <p>6.60 The National Planning Policy Framework indicates that planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The policy framework for green infrastructure as set out in Policies DM10 – DM15 of this Plan seeks to do this. Policy DM10 provides the overarching approach seeking to conserve and enhance the Green Infrastructure Network, in line with the NPPF, ensuring that new development contributes positively towards it. Policies DM11 and DM12 aim to protect key green infrastructure assets, namely identified greenspaces and sites, habitats and species of biodiversity and geodiversity importance respectively, whilst policy DM14 addresses the protection and enhancement of rivers and streams and their associated corridors. Policies DM13 and DM15 seek to ensure that the issue of biodiversity and open space in new development is properly addressed, including the creation of new open space and new areas or features of biodiversity interest.</p> <p>Identification of the Green Infrastructure Network</p> <p>6.610 At a sub regional/county scale, provision of Green Infrastructure (GI) is being addressed by the Buckinghamshire Green Infrastructure Consortium (of which WDC is a member). In April 2009, the Consortium published a Green Infrastructure Strategy for Buckinghamshire.²⁶ This identifies several opportunities within Wycombe District in two Priority Action Areas.</p> <p><i>Maps re-scaled to ensure adequate overlaps between</i></p>

25 Buckinghamshire Green Infrastructure Strategy (April 2009)

26 Green Infrastructure Strategy for Buckinghamshire (2009)

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		<p>Maps 11 - 19</p> <p>Map 12 Widmer End / Great Kingshill</p> <p>Map 13 Downley / Desborough</p> <p>Map14 Micklefield and Totteridge</p> <p>Map 15 Cressex</p> <p>Map16 Loudwater</p> <p>Map 17 Wooburn Green</p> <p>Map 18 Bourne End</p> <p>Map 19 Marlow</p>	<p><i>each map, to ensure that affected green spaces, green infrastructure and transport improvement lines are shown in their entirety.</i></p> <p><i>Show HW to BE railway line across all maps</i> <i>Add northern section of Hughenden Spine Road to map13</i></p> <p><i>Add link between Queens Road and Princes Gate to map 14</i></p> <p><i>Map reproduced to show</i></p> <p><i>i. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10</i></p> <p><i>Map reproduced to show</i></p> <p><i>ii. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10;</i> <i>iii. The extent of the Desborough area referred to by policy HW1</i> <i>iv. The Green Street School site HW3</i></p> <p><i>Map reproduced to show</i></p> <p><i>i. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10</i></p> <p><i>Map reproduced to show</i></p> <p><i>i. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10</i></p> <p><i>Map reproduced to show</i></p> <p><i>i. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10</i></p> <p><i>Map reproduced to show</i></p> <p><i>i. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10</i></p> <p><i>Map reproduced to show</i></p> <p><i>i. Green Infrastructure Network and Corridor Opportunity Areas, as referred to by policy DM10</i></p>
MM20	p66	DM12 Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance	<p><i>Add additional clause to policy</i></p> <p>1. The highest level of protection will be given to sites and species of international and national importance, development affecting them will not normally be permitted.</p> <p><i>Make following change to Clause 1</i></p> <p>2. Development proposals which would harm directly or indirectly other designated sites of nature conservation or</p>

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			<p>geological interest or protected species including those shown on the proposals map will only be permitted where it has been demonstrated that:</p> <ol style="list-style-type: none"> a. there is no suitable alternative site for the proposed development, and b. the impact can be mitigated or compensated to achieve a net overall gain in biodiversity or geodiversity, and c. it has been clearly demonstrated that the benefits of the development outweigh the harm to the biodiversity or geological conservation interests. <p>2. The highest level of protection will be given to sites and species of international and national importance. For these sites, their role within the wider natural environment and wider national network of sites will be considered.</p>
MM21	p69	DM14 Protection & Enhancement of River & Stream Corridors	<p><i>Add the following text to paragraph 6.94</i></p> <p>“Where barriers to fish movement are present in a watercourse adjacent to development proposals, the design should include measures to allow for the natural movement of fish within the watercourse.</p> <p>Further guidance is available in the River Wye Advice note which also contains principles that can also be applied to other watercourses.”</p>
MM22	p72	DM16 Planning for Flood Risk Management	<p><i>Make the following changes to Parts 1 and 2 of the policy and to the supporting text.</i></p> <p>(1b) That the requirements of the exceptions test as set out in national policy have been met.</p> <p>In such circumstances the requirements of 2a) to 2d) below will also need to be fulfilled.</p> <p>(2) Applications on allocated sites greater than 1ha and or that are in Flood Risk Zones 2 or 3 will need to be supported by:</p> <ol style="list-style-type: none"> a) A flood risk assessment which demonstrates that the most appropriate layout of development on site in terms of flood risk has been applied; and b) Demonstration that a sequential approach has been taken within the site, directing the most vulnerable uses to the areas of lowest flood risk; and c) Demonstration that resilient and resistant construction methods for managing residual risk and delivering an overall reduction in flood risk have been assessed; and d) The provision of space for flood water storage

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			<p>through the use of open space or areas above ground (where appropriate).</p> <ul style="list-style-type: none"> e) Demonstration that flood risk is not increased elsewhere and where possible reduced, and f) Demonstration that all forms of flooding are taken into account including groundwater and surface water flooding, and g) Demonstration that Sustainable Urban Drainage Systems (SUDS) are incorporated, where feasible. <p><i>Insert new paragraph between paragraphs 6.108 and 6.109</i></p> <p>6.109 The Council will expect all developments to include sustainable drainage measures in the form of Sustainable Urban Drainage Systems (SUDS). There may be site specific circumstances where this is not possible due to reasons of contamination, and this will need to be set out in the FRA. Further guidance on SUDS can be found in the FRA guidance note on the Environment Agency website.</p> <p>6.109 This policy does not apply to applications for a change of use or extensions that are less than 250m².</p>
MM23	p73	DM17 Carbon Reduction	<p><i>Make the following change to the Policy name – “Carbon Reduction and Water Efficiency”</i></p> <p><i>Add new clause 5 to policy</i> (5) New developments shall be designed to a water efficiency standard for new homes of 105 litres/head/day (l/h/d), equivalent to levels 3 and 4 for water, within the Code for Sustainable Homes and setting a water efficiency standard for new non-household development, such as BREEAM (BRE Environmental Assessment Method) ‘Excellent’ with a maximum number of ‘water credits’.</p> <p><i>Add new paragraph 6.119</i> “Setting water efficiency standards for both residential and commercial developments will contribute towards a sustainable use of water resources by reducing demand.”</p>
MM24		Figure 2 Map 16	<p><i>Amend Figure 2 to show the route of the culverted section of the River Wye.</i></p> <p><i>Add to Map 16 junction improvement at Micklefield Road / London Road.</i></p>

Ref.	Page	Policy/ Paragraph	Main Modification to Wycombe Delivery and Site Allocations Plan
		Map 1 and 13	<i>Amend Maps 1 and 13 to show the culverted section of the River Wye and Hughenden Stream.</i>