

WDC/5

**Wycombe District Council's
Delivery and Site Allocations Plan
Examination Statement**



MATTER 5 – DESBOROUGH AREA

November 2012

Matter 5 – Desborough Area

1. Policy CS4.1 of the Wycombe Core Strategy identifies the Desborough Area as one of three ‘Key Areas for Change’. Have alternative options for this area been explored sufficiently?

1.1 The proposed role of policies HW1 and HW2 is to implement the objectives set out in policy CS4.1 of the Core Strategy. This policy identifies that development should contribute towards achieving the following:

- Sense of Place
- Integration
- Open Space
- The River Wye
- Economic and Social Regeneration
- Vista of West Wycombe Road

1.2 Policy HW1 is a more detailed policy aimed at identifying how these objectives should be met by new development. It would not be appropriate to test alternatives in the terms of what CS4.1 sets as objectives. The aim of HW1 has been to develop the policy further to assist in determining planning applications that come forward in the area.

1.3 Policy HW2 seeks to address what in the Council’s view is a critical issue: the provision of open space in the Desborough Area. Desborough is identified in the Open Spaces Framework report as being severely deficient in open space. To quote the report *“It scores significantly below local quantity standards and district average in all typologies with the exception of playgrounds. Many typologies are completely absent.”*¹

1.4 The area also lacks open spaces for informal use such as amenity spaces, semi-natural spaces or green corridors.

¹ CD 3.4.9a page 40

- 1.5 The Open Spaces Framework identifies the following options to improve the provision of open space in the area²:
- Increase amount of publicly accessible open space through the creation of an additional open space in the area
 - Create a high quality teen facility, e.g. at Green Street school
 - Create informal open space ideally along or in connection with the River Wye
 - Improve access to the River Wye, whilst at the same time maintaining and enhancing the biodiversity value of the River Wye – repairs to river banks at Desborough Recreation Ground
 - Intensify use of Desborough Recreation Ground for outdoor sports through the provision of changing rooms
 - Improve access to and quality of open spaces in the vicinity to improve existing open space capacity, in particular the Carrington Land (1748) and Tom Burts Hill (1741), but also Desborough Castle open space (1714).
- 1.6 Policy HW2 seeks to meet this deficiency by putting in place a criteria-based policy that would provide open space along the River Wye over time, whilst improving access to the river.
- 1.7 Policy HW3 seeks to deliver a mixed use development primarily focussed on the provision of a multi use games area aimed at teenagers.
- 1.8 Both of these policies also promote the regeneration of the area, especially HW2 as the majority of the industrial areas are located along the River Wye as it flows through Desborough and it is within these areas that redevelopment proposals are likely to come forward over the lifetime of the plan.
19. It is in relation to the location of the industrial areas alongside the River Wye that the Council tested the two options of either allowing redevelopment of employment land for mix of uses to provide open space or continuing

² CD 3.4.9a page 40

protection for existing employment uses, as set out in the adopted Local Plan policies E3 and E4³.

- 1.10 Representations made on behalf of Greenlife Properties (Ruskin Works) (see map 1) in respect of policies HW1 and HW2 state that the Council should have assessed a further option of allowing small sites to be redeveloped solely for housing. The argument put forward is that this would deliver more effective regeneration of the area, ensuring that historical buildings are conserved and enhanced. It is the Council's position that this option would not have achieved the objective of meeting the identified deficiency in open space which is the purpose of the Policy. Furthermore it is not in the scope of the DSA to allocate sites for housing outside of the identified town centres, whether the sites are large or small, and as such it would not have been appropriate to assess this option.
- 1.11 The Council's approach to policies for Desborough has evolved as the DSA has progressed⁴, moving from identifying site specific opportunities in previous documents to a more generic approach that introduces flexibility in terms of sites that are able to come forward to meet the objectives for the area. This followed careful consideration of representations received during the preparation process including dialogue with landowners.
- 1.12 The proposals for the DSA represent positive but flexible planning to address local issues. They are consistent with and help deliver aspects of the NPPF⁵ including the provision of high quality open space (para 69) including addressing deficiencies (para 73), assisting with delivering coherent ecological networks (para 109) as part of a green infrastructure network (para 113).

³ CD5.2.3

⁴ CD 1.5 page 60-66

⁵ CD 5.0.1

representors⁷ stated that the policy should focus on links to existing open space, challenged the amount of land required to create a river corridor and on the retention/ re-provision of employment land. They also said that the viability work that supports the policy is flawed in terms of some assumptions it makes and elements that were excluded.

- 2.3 The Council has reflected on these comments and proposes a number of changes to address these issues⁸. These changes aim to make the policy more flexible in terms of the amount of open space by making the 50% requirement an “approximate amount” to allow for site specific circumstances to be considered.
- 2.4 In addition to this, the requirement for new business provision has been changed to allow for the relocation of an existing business to another location within the district if, for viability reasons, it is not possible to include new provision on-site. However, as the Council wishes to see ongoing investment in the local economy, it has included a change that seeks a legal agreement to retain an existing business in the district. This requirement does not apply if the site is vacant.
- 2.5 Changes to the supporting text further elaborate upon this by changing how the Council will consider viability, identifying that the Council is willing to discuss viability and work produced to support proposals⁹, rather than depending wholly on the Council’s viability work on this issue¹⁰, which was undertaken to provide an indication of viability. The Council accepts that each site will differ and as such is open to discussion on this point at the application and particularly pre-application stages.
- 2.6 The changes also set out to be more flexible with regard to the requirement for a 10 m river corridor. This has been replaced by a cross-reference to policy DM14, which acknowledges that a 10 m buffer will not always be

⁷ FC19, CD7.7

⁸ FC19, CD7.7

⁹ See also the Council’s response to Question 2 of Matter 10 re viability

¹⁰ CD3.8.2, p28-31

achievable, especially where built development is already in the river corridor.¹¹

- 2.7 In the Council's view, these changes bring it more in line with the NPPF¹² in terms of viability and delivery (para. 173 and 174) and requirements to meet open space deficiencies (para 73). The changes introduce greater flexibility to the policy and, as such, will enable proposals to come forward that both make a contribution towards alleviating open space deficiencies and regeneration of the area.
- 2.8 Far from making it difficult to meet plan objectives, this policy helps deliver plan objectives, notably addressing open space deficiency in Core Strategy Policy CS4.1 but also CS3(6) in relation to ensuring local communities have access to a good range of local facilities. In addition, it also helps in delivering Core Strategy Outcomes, notably in relation to the outcome relating to community infrastructure being provided, improved and protected (which specifically refers to addressing open space deficiencies)¹³. A potential by-product of the policy, which is effectively a local "exceptions" policy to address a local issue, is the potential delivery of small amounts of additional housing. This then supports other plan objectives, albeit that this is at the expense of the loss of some employment land. The local application of this policy means that it would not significantly harm wider plan objectives but could make a significant difference locally.

¹¹ CD page 55, para 6.93

¹² CD5.0.1

¹³ See page 23 of the Core Strategy, CD5.2.1