

WDC/6

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



MATTER 6 – HIGH WYCOMBE TOWN CENTRE

November 2012

Matter 6 – High Wycombe Town Centre

Introduction

This statement has been prepared jointly by Wycombe District Council and Buckinghamshire County Council. It represents the joint view of the two authorities in response to the questions to be considered under this matter.

1. Are the policies and proposals in the DSA capable of delivering the vision the Council has for High Wycombe Town Centre?

- 1.1 The vision for High Wycombe town centre is ambitious, conserving and enhancing the town centre's strengths and protecting future opportunities for improvements. In line with the NPPF¹, the policies and proposals in the DSA set a positive policy framework for the town centre, promoting a competitive town centre environment and setting out policies for its management and growth over the plan period, which support its viability and vitality and allocates a range of sites to meet its development needs.
- 1.2 The Council, supported by the Highway Authority, has undertaken significant option testing and technical assessment work to ensure that the proposals are justified, effective and capable of being delivered². To implement these proposals, policies HWTC1-6 are strategic "thematic" policies (vision; environment; connections, movement and access; economy; and retail), which provide policy guidance for all development within the town centre. Policies HWTC7-21 ensure that individual sites contribute to the delivery of the vision through their land use, design and infrastructure and financial contributions, both in the immediate and longer-term.
- 1.3 Since the submission of the Plan, the Council has continued to identify and confirm funding for the town centre proposals. This has included Wycombe

¹ See paragraph 23 of the National Planning Policy Framework (NPPF)

² See CD1.10 Core Document List (documents CD3.10.1 – CD3.10.26)

District Council's Cabinet recommending the approval of £1.2 million from the Council's Capital Programme 2013/14 – 2016/17³ towards the town centre proposals and the adoption of the Council's Community Infrastructure Levy Charging Schedule⁴. This supports the Council's position that the proposals in the DSA are capable of delivering the vision for the town centre.

2. Concern has been expressed that the policies (HWTC1 & HWTC2) and illustrative diagrams (Fig 2 and Fig 3) do not provide sufficient detail or reflect the importance of open space, biodiversity interests or opportunities for de-culverting the River Wye. Should further references on these and other detailed matters be included in the DSA?

2.1 The NPPF requires that local authorities promote competitive town centres which reflect the individuality of town centres. The wooded valley setting, areas of open space such as The Rye and the River Wye all contribute to the unique setting of the town and are valued by residents and visitors alike⁵. It is the Council's position that the policies within the DSA Plan, including policies HWTC1, HWTC2 and DM14, appropriately address the issues of open space, biodiversity and opportunities for de-culverting the River Wye and set out a positive policy framework to conserve and enhance the environment of the town centre.

2.2 Policy HWTC1 includes objectives to "*protect and enhance where possible the historic townscape, environment and landscape setting of the town centre*" and to "*utilise the River Wye for place making through throughout the town centre...including increasing access to it and maintaining and enhancing its biodiversity value,*"⁶ reflecting the importance of natural environment within

³ WDC Cabinet recommended approval of the Council's Capital Programme 2013/14-2016/17 at their meeting on 5th November 2012. The recommendation will be considered by full Council at their meeting on 17th December 2012.

⁴ See CD7.3 Wycombe CIL Charging Schedule. The CIL rates set within the adopted Charging Schedule are the same as those used to calculate anticipated CIL contributions in CD2.2 High Wycombe Town Centre Masterplan: Background Paper in May 2012.

⁵ For example see response DSA12/025 High Wycombe Society

⁶ Policy HWTC1 Clause 2, parts (c) and (e)

the town centre⁷. Policy HWTC2 sets out the principles for the design of new development and the provision of improved existing and new public spaces, including the use of hard and soft landscaping and the recognition of the positive contribution of natural features to the character and quality of a place. It is the Council's position that within these strategic policies additional references to bio-diversity enhancement and wildlife are not required and they are adequately covered by the existing references to the town centre's environment⁸.

- 2.3 Requirements for visual and impact assessments will also ensure that the impacts of new development support the objectives for conserving and enhancing the townscape, and will include consideration of issues such as reflection⁹. At the time of writing, proposed changes to policy HWTC2 and supporting text regarding the Inner Source Protection Zones have been agreed in principle with the Environment Agency¹⁰.
- 2.4 To ensure the effectiveness of policies HWTC1, HWTC2 and DM14, with regards to maximising the place-making potential of the River Wye, both where it is currently visible (HWTC10 Swan Frontage) and future opportunities if they arise, the Council will propose a change to show the location of the River Wye and Hughenden Stream culverts on Policies Map 1 and the culverted section of the River Wye on Figure 2¹¹.
- 2.5 The DSA Plan also contains policies DM10, DM11 and DM12 which positively promote the protection and enhancement of open space and biodiversity across the district.

⁷ See CD3.10.1 A Vision for High Wycombe and response DSA12/025 High Wycombe Society

⁸ See response DSA12/035 Natural England

⁹ See response DSA12/025 High Wycombe Society

¹⁰ The Council is currently preparing a Statement of Common Ground with the Environment Agency which will address this issue.

¹¹ The Council is currently preparing a Statement of Common Ground with the Environment Agency which will address this issue.

3. Is there sufficient recognition of the historic environment in specific policies for High Wycombe Town Centre or in the development management section of the Plan?

- 3.1 The DSA Plan recognises the importance of the town centre's history and part 2(c) of Policy HWTC1 ensures that all development within the town centre contributes towards conserving and enhancing the historic townscape¹². Recognising concerns regarding the environmental quality of older parts of the town centre¹³, the Council's Public Realm Action Plan¹⁴ proposes improvements that could be made to the historic core, including Frogmoor, in the shorter term. Other initiatives such as the Business Improvement District and the Local Development Order¹⁵ will also assist in conserving and enhancing these areas of the town centre. In addition, much of the town centre is within the High Wycombe conservation area for which a detailed conservation area character appraisal and development management guidelines have been prepared.
- 3.2 Since the submission of the Plan, the Council has worked with English Heritage to ensure the DSA plans positively for the conservation and enhancement of the historic environment.¹⁶ A number of changes to the Plan are proposed to ensure that a positive framework, as required by the NPPF¹⁷, is in place¹⁸ and subsequently English Heritage have withdrawn their objection to the Plan.
- 3.3 Whilst recognising the importance of the historic environment, it is not within the scope of the Plan to include specific district-wide development

¹² The Council is proposing a change to Policy HWTC2 Clause 4 to reflect the terminology of the NPPF and comments from DSA12/016 English Heritage. See CD7.7 Further proposed pre-haring changes 22.11.12 – FC15

¹³ For example see responses DSA12/026 Gilbert; DSA12/038 Putnam; DSA12/039 Burnham

¹⁴ CD3.10.26 High Wycombe Town Centre Public Realm Action Plan

¹⁵ CD3.3.4 Local Development Order for White Hart Street of High Wycombe Town Centre

¹⁶ DSA12/016 English Heritage

¹⁷ See paragraph 126 of the NPPF

¹⁸ See CD7.8 Additional further proposed changes – 29.11.12 which sets out the changes agreed between the Council and English Heritage

management policies relating to heritage¹⁹. A more than adequate basis for conserving and enhancing heritage assets is provided through the application of the NPPF, Core Strategy policy CS17²⁰ and Chapter 11 – Heritage of the Local Plan²¹. Local development management policies on heritage will be reviewed as part of the preparation of the new Wycombe District Local Plan, in consultation with stakeholders including English Heritage²².

4. Significant alterations are proposed to the highway network in the town centre. Have the risks to delivery been fully identified and is there sufficient flexibility in the DSA to cope with changes which might arise?

- 4.1 The main risks associated with the delivery of the town centre proposals relate to funding availability, future traffic conditions and operation of the highway network and the acquisition of land.
- 4.2 Availability of funding continues to be a risk to delivery, in particular given the current economic climate and the long-term timescales of the project. Chapter 8 of CD2.2 High Wycombe Town Centre Masterplan Background Paper identifies the funding sources that may contribute to the delivery of the proposals and sets out a five year programme of delivery for Phase 1. Although the Council is confident that funding for the first five years of delivery has been identified and will be secured (see update to funding position given under Question 1), Chapter 8 also recognises that these funding sources are not guaranteed. If identified funding were not forthcoming then there may be scope to rebalance, with additional funding sought from alternative funding sources. Alternatively, the duration of Phase 1²³ could take place over a longer period.

¹⁹ The Council's Statement on Matter 1 explains more about the scope of the Plan

²⁰ CD5.2.1 Wycombe Adopted Core Strategy

²¹ CD5.2.3 Wycombe District Local Plan to 2011

²² See CD7.4 Wycombe Local Development Scheme

²³ See Chapter 7 of CD2.2 High Wycombe Town Centre Masterplan Background Paper

- 4.3 Significant work has been undertaken to assess the impact of the highway changes, and the proposals have been adapted as appropriate to mitigate risks to network performance identified through the assessment work²⁴. Using the assessment appraisal framework established²⁵, an on-going monitoring programme will be required to monitor the future performance of the highway network. This monitoring will inform the timing and implementation of subsequent stages of the proposals, with the potential to slow the pace of implementation if the network is not operating satisfactorily. On-going monitoring and a proposed phased approach to implementation will ensure that these changes are not implemented unless the highway network is considered to be operating satisfactorily.
- 4.4 Risks relating to land acquisition are addressed under question 6.
- 4.5 A key part of the Council's approach to managing risk is the phased implementation of the town centre proposals²⁶. This has had the effect of reducing the upfront financial exposure to – and commitment of – both the Council and the Highway Authority, and allows for further monitoring of the operation of the highway network as the changes are implemented. A flexible approach to phasing the works also allows both authorities to capitalise on delivery opportunities, including funding, as and when they arise. In addition, no short or medium term development opportunities are dependent on the implementation of the highway or public realm changes, and therefore if implementation was delayed this would not prejudice development proposals coming forward.

²⁴ Chapters 3 and 4 of CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report set out the audit trail of changes made to the highway proposals following rounds of assessment work. A specific example would be the development of the design for the gas works link road to mitigate risks to network operation and site development – see Section on Policy HWTC13 Lily's Walk (pp.32-38) of CD1.5 Overview and Audit Report

²⁵ See Chapter 5 of CD3.10.19 High Wycombe Town Centre Masterplan: Traffic Forecasting and Assessment Report

²⁶ See Chapter 7 of CD2.2 High Wycombe Town Centre Masterplan: Background Paper

4.6 As the proposals are implemented, the risks will be managed through a risk register administered by the town centre programme manager and monitored by the town centre programme board²⁷.

5. It is suggested the evidence base does not fully support or properly justifies the revised highway network. Are there deficiencies in the supporting documentation which could suggest the Plan is unsound?

5.1 It is the Council's position, supported by the Highway Authority, that the evidence base presented in support of the town centre proposals is comprehensive, positively prepared and justifies the revised highway network²⁸. The Council has taken on board the concerns raised by the Core Strategy Inspector²⁹ relating to the evidence base and has proceeded to revisit, challenge and refine the town centre proposals. The evidence base presented is the result of three years of further work, during which time the Council has worked closely with the County Council to develop an appraisal framework with which to assess the performance of the highway network changes, providing the Highway Authority with the robust evidence base necessary to support the proposals. In addition, the technical work has been carried out in partnership with a range of stakeholders in order to provide a regular opportunity for scrutiny of the emerging technical studies and assessments. The proposals have therefore been shaped by feedback from stakeholders at early stages in the process, and it is notable that those who have engaged regularly with the Council have had their previous concerns addressed and are no longer objecting to the soundness of the proposals.

5.2 The Council continues to work with representatives of Sainsbury's Supermarkets Ltd. who raised issues at the proposed submission stage with regards to the evidence base which justifies the Plan. At the time of writing, the Council is preparing a Statement of Common Ground with Sainsbury's,

²⁷ See Chapter 9 of CD2.2 High Wycombe Town Centre Masterplan: Background Paper

²⁸ In line with paragraph 182 of the NPPF

²⁹ CD5.2.2 Core Strategy Inspector's Report, paragraphs 3.20-3.27

within which the Council will respond to the detailed issues raised by Sainsbury's³⁰.

- 5.3 The evidence that justifies the proposals includes the assessment of a range of reasonable alternative highway network options for the town centre. Assessment work has included highway and urban design, transport modelling, environmental assessments, road safety and cost estimate and deliverability assessments³¹.
- 5.4 The technical evidence base that supports the revised highway network consists of a comprehensive and transparent package of documents that have been informed by a suite of transport models and assessment tools. Each of the transport modelling tools has been developed to industry-standard guidelines utilising recently collected data, and are accompanied by documentary evidence in the form of Local Model Validation Reports³². Detailed town centre modelling³³ has been undertaken in order to test the operational performance of the revised road network, based on a design approach consistent with the Manual for Streets approach³⁴. The results of all phases of modelling are consistent in terms of their conclusions about traffic growth and the overall performance of the highway network. The results of the assessments demonstrate collectively that the road network changes support the delivery of the town centre objectives, and that benefits can be achieved whilst maintaining an acceptable overall traffic performance that is similar to that of the existing highway network³⁵.

³⁰ See DSA12/023 Turley Associates on behalf of Sainsbury's Supermarkets Ltd.

³¹ See CD1.10 Core Document List (documents CD3.10.4 – CD3.10.25)

³² CD3.10.17 High Wycombe Town Centre Masterplan: Town Centre Micro-simulation Model – Local Model Validation Report

³³ CD3.10.19 High Wycombe Town Centre Masterplan: Traffic Forecasting and Assessment Report

³⁴ CD3.10.5 High Wycombe Town Centre Masterplan: Highway Design Report, CD3.10.10 High Wycombe Town Centre Masterplan: Quality Audit Review and paragraphs 5.17 – 5.24 of CD2.2 High Wycombe Town Centre Masterplan Background Paper

³⁵ See Chapter 5 of CD3.10.19 High Wycombe Town Centre Masterplan: Traffic Forecasting and Assessment Report and paragraphs 5.56 – 5.63 of CD2.2 High Wycombe Town Centre Masterplan Background Paper

6. There are crucial links in the proposed highway route around the town centre which appear vital to the delivery of the Plan. Given land ownership issues can these links be delivered?

- 6.1 The Council has undertaken significant technical assessment work to ensure the deliverability and acceptability of the proposed highway route. Land Registry searches of the town centre network have been undertaken and preliminary highway design work has identified the necessary land take requirements³⁶ and has subsequently informed the requirement for Transport Improvement Lines (TILs). The formal process of designating the TILs will be undertaken by the Highway Authority after the receipt of the Inspector's report, subject to the proposals being found sound³⁷. A cost allowance for the acquisition of land has been allowed within the budget profile³⁸.
- 6.2 Land is required from HWTC13 Lily's Walk and HWTC14 Buckingham House sites to deliver the Gas Works link road (linking Queen Alexandra Road and Desborough Road). There is an existing TIL on the western edge of HWTC13 Lily's Walk and the eastern edge of HWTC14 Buckingham House which the proposed design follows to a large extent, although some minor revisions to the TIL will be required³⁹. The Council has worked hard with GL Hearn on behalf of National Grid to develop an acceptable design for the link road, include an acceptable level of land take⁴⁰. The owners of HTWC14 have been consulted on the proposals, including the alignment of the new route which does not directly impact on the existing buildings on site, but they did not submit any comments on the proposed submission version of the DSA.
- 6.3 Policies HWTC13 and HWTC14 require any re-development proposals for the sites to provide the necessary land for the new link road. The extent of any

³⁶ See CD3.10.5 High Wycombe Town Centre Masterplan: Highway Design Report and Section 6 of CD1.12 Update note for the Inspector

³⁷ The designation of Transport Improvement Lines is addressed through the Council's statement on Matter 7 Transport.

³⁸ Chapter 6 of CD2.2 High Wycombe Town Centre Masterplan: Background Paper

³⁹ The extent of the revised TIL is shown in Appendix 4 of CD2.2 High Wycombe Town Centre Masterplan: Background Paper

⁴⁰ See CD7.6 Statement of Common Ground between WDC and GL Hearn on behalf of National Grid for the results of this negotiation.

highway works provided by either development will be determined through the development management process.⁴¹ If the construction of the link road is required before redevelopment proposals for either site come forward, the Council, in conjunction with the Highway Authority, will begin negotiations for the land required for the link road when appropriate. If necessary the Council's may use its Compulsory Purchase Orders power to acquire land. If highway works (including part or full provision of the link road) are not required to mitigate the re-development of either site the link road will be delivered in partnership by the Highway Authority and the Council.

- 6.4 The provision of the alternative route also requires the construction of the Westbourne Street link road, linking Westbourne Street to West Wycombe Road. This link road passes through the north-eastern section of HWTC18 Baker Street, which is currently a Council-owned surface car park with no buildings on it, and adjacent to HWTC19 Rapid House. It is proposed that Policy HWTC18 requires any redevelopment proposals for the site to provide the land necessary for the provision of the link road and any highway works to be consistent with the requirements of Policy HWTC3⁴². The delivery of this link road is therefore not dependent on the redevelopment of the Baker Street site and if the link road is not required to mitigate the redevelopment of HWTC18 it will be delivered in partnership by the Highway Authority and the Council. Objections raised by GL Hearn⁴³ have been addressed by the Council through a proposed change to Policy HWTC19⁴⁴.

⁴¹ Any highway works deemed necessary in line with Regulation 122 of the Community Infrastructure Regulations 2010 with regards to the redevelopment of HWTC13 and HWTC14 will be required to be provided in a way which is consistent with the strategic town centre vision and the requirements of Policy HWTC3. See CD7.6 Statement of Common Ground between WDC and GL Hearn on behalf of National Grid and FC17.

⁴² See CD7.2 Index of Further Changes – FC18

⁴³ DSA12/020 GL Hearn on behalf of Cockspur Property (General Partner) Limited

⁴⁴ CD7.2 Index of Further Changes – Ref. FC11

7. The modelling work suggests that the ‘gating’ effect of the key route capacities and junctions into the town centre means the Abbey Way Flyover and Archway operate below capacity. It is suggested that reducing their existing capacity would not ‘significantly negatively’ affect the future operational performance of the town centre – what is meant by ‘significantly’ in this context? (CD2.2, para. 5.63)

7.1 When constructed in the 1960s, Abbey Way Flyover performed a strategic function for longer distance east-west trips through the town centre. However, this function was removed by the later opening of the M40, and today the flyover itself does not form part of any strategic longer-distance journeys nor does it form part of the M40 diversion route⁴⁵. The flyover no longer serves the function for which it was originally intended and now, along with Archway, provides road link capacity well in excess of current traffic volumes. According to the information contained within TA79/99⁴⁶, both grade-separated dual carriageway routes operate at around a third of their theoretical link capacity. In practice, the Abbey Way flyover and Archway remain largely free flowing and the utilisation of the routes is constrained by the capacity and form of control at the adjacent junctions, and more generally by the layout of the wider town centre network. This means there is significant scope to reduce the capacity of these road links without affecting operational performance.

7.2 It is not the objective or stated purpose of the town centre proposals to address all actual or perceived traffic issues within the town, and in particular to address the current “gating” of traffic as it enters the town centre network. The “gating” effect is primarily a result of the historic evolution of the road network layout, which is in turn a result of environmental factors and constraints including topography and land use development patterns. As with all urban areas, there are a finite number of routes for north-south and east-west travel within the town and junctions must balance the priority given to a complex mix of strategic and local movements, alongside issues of pedestrian

⁴⁵ See Chapter 5 and Appendix 2 of CD2.2 High Wycombe Town Centre Masterplan Background Paper

⁴⁶ TA79/99 Traffic Capacity of Urban Roads (February 1999) from Volume 5, Section 1, Part 3 of Design Manual for Roads and Bridges

accessibility and the attractiveness of the town centre environment. Gating is an appropriate part of an overall approach to traffic management in the town centre consistent with the objectives of the Local Transport Plan⁴⁷. The approach ensures that queued traffic is stored in the most appropriate areas to limit the impact on more sensitive parts of the transport network and reduce the potential for mutually reinforcing traffic problems or “gridlock”. The “gating” effect in combination with the excess carriageway capacity within the town centre provides the opportunity to reconfigure the town centre road network as proposed in the Plan⁴⁸.

- 7.3 Using the appraisal process established for the town centre proposals⁴⁹, the evidence base concludes that the provision of the alternative route and the reduction in carriageway space on Abbey Way flyover and Archway does not “significantly negatively” affect the future operational performance of the highway network. “Significance” is defined in terms of the overall impact on journey time and speeds within the town centre. The impacts of the proposed highway changes are limited to changes in average journey times across the town centre of less than 20 seconds and changes in speed of less than 1mph overall⁵⁰. This decrease in speed should also be seen in the context of the lower speed environment within the town centre promoted by the Manual for Streets design concept.⁵¹
- 7.4 The Council recognises that against specific indicators the impact of the changes can be greater than against overall network performance. Concerns have been expressed with regards to the operation of the A404 north-south route, linking Amersham Hill to Marlow Hill, and the highway changes

⁴⁷ CD3.2.13 Local Transport Plan 3 Chapter 3 and Figure 3.2 The Plan Theme and Objectives. Also CD3.2.13a Local Transport Plan 3 – Local Area Strategy Extracts: High Wycombe and Chepping Wye Valley

⁴⁸ The Council's detailed response to the issue of “gating” raised by Sainsbury's will be set out in the Statement of Common Ground being prepared by the Council and Sainsbury's.

⁴⁹ See CD3.10.19 High Wycombe Town Centre Masterplan: Traffic Forecasting and Assessment Report, and CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report

⁵⁰ See Section 5.3 of CD3.10.19 High Wycombe Town Centre Masterplan: Traffic Forecasting and Assessment Report

⁵¹ See paragraphs 5.17-5.24 of CD2.2 High Wycombe Town Centre Masterplan Background Paper

proposed in the eastern part of the town centre⁵². In the PM peak Masterplan scenario, north-south journey times increase by almost two minutes when compared to the Do Minimum scenario⁵³. However, the Council and Highway Authority do not consider this impact to be of such a scale that it undermines the soundness of the town centre proposals and that it can be addressed through further detailed development and refinement of the signal strategy along this route to ensure the appropriate level of priority to serve the respective traffic demands and managed through a continual process of monitoring and phased implementation of highway changes.

- 7.5 It is the Council's position - supported by the Highway Authority - that the proposed highway changes do not constitute a "significantly negative" impact, particularly when considered in the context of the range of positive benefits that the Plan would deliver⁵⁴. The excess link capacity in the town centre is effectively redundant and this provides the opportunity to remove carriageway space, contributing towards the objectives and vision of the Plan.

8. What are the relative merits of either retaining the Abbey Way Flyover in its current form or reducing it to a single carriageway?

- 8.1 A number of respondents commented that Abbey Way flyover performs satisfactorily as a traffic route and that the Council should not be promoting any changes to the road network⁵⁵, However, since its construction, the flyover no longer performs its original function (see question 7) and the geography of the town centre has changed significantly, with a marked westward shift of economic focus and activity following the opening of the Eden Centre in 2009. Within this context and in line with early problem identification work⁵⁶ and in balancing a number of objectives for the town

⁵² DSA12/005 Keep; DSA12/025 High Wycombe Society

⁵³ See Section 5.4.10 of CD3.10.19 High Wycombe Town Centre Masterplan: Traffic Forecasting and Assessment Report

⁵⁴ See CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report

⁵⁵ For example see DSA12/015 Bond; DSA12/026 Gilbert; DSA12/038 Putnam

⁵⁶ CD3.10.1 A Vision for High Wycombe

centre⁵⁷, the Council's position is that that the flyover and the through-traffic which uses it represent a major barrier to the integration of the old and expanded town centre and this has a detrimental impact on visitor experience and the town's ability to expand and develop in an economically competitive way that realises its potential.

8.2 In line with paragraph 152 of the NPPF and in ensuring that the proposals are justified, CD3.10.3 sets out the option development and appraisal work the Council has undertaken to identify the most suitable option to propose for the town centre. Town centre objectives were developed in order to help shape and guide the proposals and a set of performance criteria and indicators were defined against which to measure the performance of the intervention⁵⁸. The Council developed and appraised a number of delivery scenarios, ranging from full implementation to a Do Nothing scenario⁵⁹.

8.3 Scenario C *Implementing & Protecting*⁶⁰ (which is the preferred option and the scenario that is proposed within the DSA Plan) performs well against the scheme objectives, and in particular against objectives related to movement, sense of place and provision of public space. This is because the provision of the alternative route and the reduction of Abbey Way flyover and reconfiguration of the junctions at either end enable a reduction in the number and impact of traffic movements in these locations, which in turn provides opportunities for increased public space provision.⁶¹ Highway works at Oxford Road roundabout also allow for the expansion of the Octagon Parade building (HWTC16). Although this scenario does not necessarily reduce the physical barrier of Abbey Way flyover, it does address the barrier caused by existing levels of traffic movements and the currently highway dominated design of the

⁵⁷ Paragraph 23 of the NPPF

⁵⁸ See Appendix 2 of CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report

⁵⁹ See Table 9 (p.53) of CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report. The results of this appraisal are set out in Chapter 4 (pp.55-61) and Appendix 4 of CD3.10.3 High Wycombe Town Centre Masterplan: Option Development and Appraisal Report.

⁶⁰ Scenario C includes the provision of the alternative route, reduction of Abbey Way flyover to single carriageway, and reconfiguration of junctions at Oxford Road roundabout and Swan Frontage

⁶¹ See Figures 4-9 of the DSA Plan and Appendix A of CD3.10.5 High Wycombe Town Centre Masterplan: Highway Design Report

junctions at either end. It allows for the delivery of improvements in line with the vision for the town centre whilst protecting future opportunities⁶². Scenario D *Do Minimum* and Scenario E *Do Nothing*⁶³ perform less well against the town centre objectives because the retention of existing highway capacity and junction configuration does not reduce traffic movements on the flyover. This in turn does not provide any opportunity to reconfigure the highway network at HWTC10 and HWTC16 to allow for the provision of public space improvements and development opportunities.

- 8.4 Respondent DSA12/038 questioned the Council's change of position regarding the full closure of the flyover and the justification for the provision of the alternative route if the flyover is to remain. As set out in Question 4, this approach is not a weakening of the Council's aspirations for the town centre but rather a pragmatic response to the risks of an ambitious delivery programme, both in relation to funding availability and traffic conditions.

9. Concern has been expressed about the loss of high value employment sites when an area becomes part of a residential scheme. What is the Council's stance in supporting existing businesses who believe the strategy displaces them?

- 9.1 The Council is not clear on where concern has been raised regarding the loss of high value employment sites and the displacement of existing businesses when an area becomes part of a residential scheme.
- 9.2 The policy for site HWTC8 (Council Offices and Royal Mail Sorting Office) could facilitate the relocation of existing operations (mainly the Council offices and/or Royal Mail sorting office) to alternative sites to enable the redevelopment of all or part of the site⁶⁴. The redevelopment of this site is a long-term aspiration and the policy states that development on the sorting

⁶² See paragraphs 7.4 – 7.8 of CD2.2 High Wycombe Town Centre Masterplan Background Paper

⁶³ Scenarios D and E see the retention of Abbey Way flyover as a dual carriageway, with the alternative route provided in the former scenario but not in the latter.

⁶⁴ Note that the Policy HWTC8 does not allocate the site for residential uses.

office site will only be acceptable if an alternative location is identified and deliverable. The Council does not think it necessary to include a new policy⁶⁵ to ensure that the existing operation of the sorting office is not affected by adjacent development as this would be addressed through the development management process when considering any proposals.

- 9.3 Longer-term redevelopment proposals for policy HWTC10 Swan Frontage could see the relocation of the some or all of the existing uses on the site, if appropriate alternative sites are identified and delivery mechanisms are in place. However the proposed highway and urban design changes do not preclude existing users remaining in situ if opportunities for relocation do not come forward. Clause 4 of Policy HWTC10 gives protection to these existing uses and development proposals on this site would not be allowed if they did not identify and enable the provision of an alternative site(s) before re-development commences. Additional changes, such as those proposed by the High Wycombe Society⁶⁶ are not considered necessary to make the policy more effective.

10. Are proposals for specific locations identified in policies HWTC7 – 21 appropriate for the location, deliverable and what contingencies exist in the event that circumstances warrant adjustments to the Plan?

- 10.1 The site specific proposals within the DSA Plan are appropriate for sites located with the town centre boundary, providing for a range of main town centre uses⁶⁷. In most circumstances, the policies represent a “flexing-up” of land uses allocated, reflecting their location and the role of these sites to meet the development needs of the town centre⁶⁸. The Council has engaged closely with landowners and stakeholders in developing the site specific policies, in particular for sites closely linked to the delivery of the wider town

⁶⁵ DSA12/029 BNP Paribas Real Estate for Royal Mail Group Limited

⁶⁶ DSA12/025 High Wycombe Society

⁶⁷ As defined in Annex 2: Glossary of the NPPF

⁶⁸ See paragraph 23 of the NPPF

centre vision, such as HWTC13 Lily's Walk⁶⁹. If circumstances arise that a site(s) does not come forward in line with its allocation, then alternative proposals could be considered through the development management process and/or the allocation could be reconsidered through the Local Plan process⁷⁰.

10.2 The Council is not proposing any change to the allocation of Policy HWTC9 Land off Duke Street⁷¹. The Council believes that this sustainable town centre location supports a mixed use allocation for the site⁷². Given its proximity to the railway station and the existence of B uses on the site, it is important that the level of current employment generating uses is retained on site. However the current layout of the site does not make efficient use of the land available and the Council recognises that a higher density mixed-use development would make more efficient use of the site. The Council consider that the supporting text should be amended to read “...*could see the creation of flats or **and** offices with...*” to ensure clarity that both residential and employment uses should be provided on the site.

10.3 Clause 2(b) of Policy HWTC10 requires good design in new development and in particular consideration of the important views of the Swan Theatre and All Saints Parish Church. No detailed design work has been undertaken at this stage (the building height shown in Figure 5 is purely indicative) and it would be inappropriate for the Council to dictate a height limit at this stage.⁷³ Policy HWTC10, in conjunction with HWTC2 and DM14, and supported by the River Wye Advice Note⁷⁴, provides guidance for the design of the public spaces in this location, including the enhancement of the River Wye. It is not felt

⁶⁹ See CD7.6 Statement of Common Ground between WDC and GL Hearn on behalf of National Grid

⁷⁰ Consideration of town centre allocations is outside the current scope of the new Wycombe District Local Plan (see CD7.4 Wycombe Local Development Scheme) and would require modification of the LDS. This is the less preferred course of action of the two identified.

⁷¹ DSA12/033 David Brown Associates

⁷² The Sustainability Appraisal of options for this site supports this position. Alternative Option 2 which did not include the requirement for no net loss of B use class floorspace scored lower against achieving economic objectives. See p.163-172 of CD1.7 Sustainability Appraisal of the Delivery and Site Allocations Plan.

⁷³ See comments from DSA12/025 High Wycombe Society

⁷⁴ CD3.4.10 River Wye Advice Note

necessary to include specific reference to access to nature, biodiversity and green space.⁷⁵

- 10.4 Objections relating to HWTC12 Chilterns Shopping Centre and National Grid's objections to HWTC13 Lily's Walk have been addressed through discussions between the Council and stakeholders⁷⁶. The Council does not accept that the proposed changes submitted by DPP on behalf of House of Fraser relating to sequential tests for edge-of-centre sites (HWTC13, HWTC14 and HWTC17) are necessary. These issues are addressed appropriately through policies DM6, DM7 and DM9, in compliance with the NPPF.
- 10.5 Opportunities for de-culverting the River Wye at HWTC16 have been identified in early feasibility work undertaken.⁷⁷ However, these opportunities become available when through traffic and the flyover ramps are removed from this location which is not proposed in the Plan. Therefore it would not be appropriate to include images from the *River Wye De-culverting Feasibility Appraisal*⁷⁸ as requested by the High Wycombe Society⁷⁹. Objections raised by the Environment Agency⁸⁰ relating to the future de-culverting of the River Wye at HWTC19 and HWTC20 will be addressed in the Statement of Common Ground being produced by the Council and the Environment Agency.
- 10.6 Policy HWTC17 Bridge Street will replace Policy HW2 Brook Street / Bridge Street of the adopted Wycombe District Local Plan (2004). Table 4 in Appendix G should be amended as follows to give clarity on this issue:

Policy – 2004 adopted plan	Justification / replaced by
☒ HW2 Brook Street / Bridge Street	HWTC17 Bridge Street

⁷⁵ See DSA12/035 Natural England

⁷⁶ For HWTC12 see CD7.2 Index of Further Changes – Ref. FC10 ; for HWTC13 see CD7.6 Statement of Common Ground between WDC and GL Hearn on behalf of National Grid

⁷⁷ CD3.10.25 River Wye De-culverting Feasibility Appraisal

⁷⁸ CD3.10.25 River Wye De-culverting Feasibility Appraisal

⁷⁹ DSA12/025 High Wycombe Society

⁸⁰ DSA12/042 Environment Agency. See also response to Question 2 within this statement.