



**Wycombe Delivery and Site Allocations Plan
Consultation on Proposed Main Modifications
March 2013
Representation Form**

Representations must be submitted to Wycombe District Council by **4.45pm on Friday 19th April 2013.**

Representations can be submitted by:

- Email to
- Post to: Planning Policy Team
Wycombe District Council

Please note: Comments can only be submitted in relation to the Proposed Main Modifications and not in relation to the other parts of the DSA Plan that have already been subject to public consultation and have been fully considered during the examination and where no further changes are proposed.

PART A

1. Personal Details

** If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Email Address

2. Agent's Details (if applicable)

Mr

Michael

Fearn

1. Personal DetailsTelephone
Number**2. Agent's Details (if applicable)****3. Client Details**

If you are representing a client or specific site interest, please fill in the details below.

Site Interest	
Client's Name	
Client's Address	
Telephone Number	
Email Address	

4. Do you wish to be notified of future stages of the Delivery and Site Allocations Plan, including publication of the Inspector's Report and Adoption?

Yes

No

5. Data Protection and Freedom of Information

Copies of all representations will be submitted to the Planning Inspector, Paul Crysell, who has been appointed to examine the Delivery and Site Allocations Plan. By completing and submitting a response to the Council you are giving your consent to the processing of personal data by Wycombe District Council. You are also accepting that any information received by us, including personal data, may be put into the public domain, including on the Council's website.

PART B – Please copy and use a separate sheet for each representation

Name or Organisation:

Hambridge Limited

1. To which Main Modification does this representation relate? (please put MM reference number)

MM10

2. Please use this box to set out your comments on the proposed Main Modification. Please set out clearly if you support or disagree with the proposed Main Modification and the reasons supporting your position. If appropriate, please set out what further change(s) you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

According to paragraph 7 of the NPPF *“there are three dimensions to sustainable development: economic, social and environmental”*. These dimensions give rise to the need for the planning system to perform a number of roles”. Economic growth should be supported, the supply of housing land increased and the natural environment protected and enhanced. However, whilst *“Local Plans should be aspirational”* they must also be *“realistic”* (paragraph 154). The NPPF requires the use of flexible policies *“to allow a rapid response to changes in economic circumstances”* (paragraph 21 and elsewhere).

The urgent need for regeneration in the Desborough area is clearly recognised by the Council in the wording of new Policy HW2. In order to assist in opening up the River Wye and regenerating its banks the scope of acceptable alternative uses is to be widened (provided that the various criteria of new Policy HW2 are met) to include *“residential or mixed residential and employment generating uses”*. Crucially the terms of Policy E3 (or any similar policy subsequently adopted) will no longer apply to the sites with a riparian boundary between Desborough Avenue and Desborough Park Road.

This is encouraging as far as it goes, but to achieve lasting and real regeneration of Desborough’s industrial areas the scope of the policy requires extending. Hambridge’s own site (known as the Abercromby Industrial Estate, AIE, on Abercromby Road) shares many of the attributes of the industrial sites adjoining the River Wye, but is removed from the river by a short stretch of land within the ownership of another party.

Like many other parts of Desborough, the AIE also requires redevelopment, as the existing buildings have reached the end of their useful lives, no longer meet occupiers’ requirements and are gradually falling vacant. However, without the ability to secure higher value uses (particularly residential) it is unlikely that most forms of redevelopment will be economic. The result will be further stagnation and decay.

Were the small piece of land between the River and the AIE also to be within Hambridge’s control then the new Policy HW2 would also relate to this site as well. As it is, alone the piece of land outside Hambridge’s control is too small in extent and too isolated/enclosed for it to deliver useful development (either residential or *“integrated”* open space) under the terms of HW2. If the Council is serious in promoting regeneration in Desborough the scope of the policy’s geographic application must be widened, to include relevant areas not immediately adjacent to the River.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

Signature:



Date:

17/04/2013



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MM20

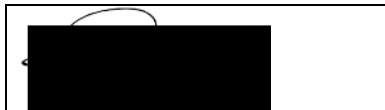
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The first part of the proposed additional criterion to Policy DM12 that *“the highest level of protection will be given to sites and species of international and national importance”* is unnecessary, as it adds nothing to the NPPF. The second part of the additional criterion which reads *“development affecting them will not normally be permitted”* goes way beyond the NPPF. Overall the NPPF is a positive document and it recognises that there will sometimes be cases where development has to be accepted even upon statutorily protected sites (paragraph 118).

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

Signature:

A rectangular box containing a solid black redaction mark, obscuring the signature.

Date:

17/04/2013