

**The Marlow
Society**



**The Marlow Society - Registered Charity
No. 262803
Protecting our Environment and
Heritage in Bisham, Great Marlow, Little
Marlow, Marlow Bottom, Marlow Town
and Medmenham.**

*A member of the Association of
North Thames Amenity Societies* **ANTAS**

18 April 2013

WDC Planning Policy Team,

Dear Sir,

WYCOMBE DEVELOPMENT FRAMEWORK - DELIVERY AND SITE ALLOCATIONS PLAN -
PROPOSED SUBMISION DOCUMENT [JUNE 2012]

Please find attached the submission of the Marlow Society to the consultation on its proposed main modifications. This submission has also been submitted by e mail.

I have been unable to find a link to the official response form mentioned on the WDC weekly planning bulletin of 10 Apr 13.

Yours faithfully,

Martin Blunkell

Chairman

The Marlow Society

WYCOMBE DEVELOPMENT FRAMEWORK - DELIVERY AND SITE ALLOCATIONS PLAN -
PROPOSED SUBMISSION DOCUMENT [JUNE 2012]

Reference:

A. TR8120685/MF/LR/001 DATED 12 July 2012

B. Unreferenced litter from CBRE dated 20 July 2012

The Marlow Society submitted comments on the draft Wycombe Development Framework - Delivery and Site Allocations Plan [DSP] in 2011 and then on the 2012 version. Both documents included under reference MM11:

"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."

Former Chairman of the WDC Planning and Development Committee and District Councillor, Derek Done, has written to the Society and has stated "This policy had been developed following one of the most comprehensive processes, involving widespread consultation, I have ever been involved with either as a Wycombe District Councillor or a private individual. "

There can be no doubt that the long standing and established WDC/BCC positions on the link road was for its retention in the Plan. The overriding WDC and community consideration was to safeguard the future provision of a vehicular link between West Street and Pound Lane as probably the only option, without major disruption or pedestrianisation, for relieving any future build-up of pedestrian and vehicular congestion in the High Street. The High Street is the principal asset that underpins the vibrancy of the town and helps support the future vision of the town as a significant tourism destination.

Having submitted its comments to the Inspector in 2012 the Marlow Society understood that the plan, as written, by the WDC would be presented to the Inspector along with the submitted comments. Changes were made to the Plan by the WDC after the deadline for the submission of public comments which deleted the reference to a link road. These were not advised to the Society and it was a last minute decision which allowed representations to be made to the Inspector at his public hearing on this issue.

There was clearly no desire expressed by the people of Marlow for the Link Road's deletion as evidenced by the absence of relevant submissions to the Inspector. In the absence of any properly designed plans for a link road, other than the general alignment shown in the extant Portlands Design Brief, it was impossible to be for or against such a road for implementation in the short term. It was clearly understood that when planning permission for the development of the Portlands site was submitted that the design of a link road would be considered on its merits. Clearly, its size and shape and, most importantly, its junction with West St would then be discussed and a decision would be determined by the democratic planning process. Should the WDC Planning

Committee determine that the balance of the argument was against the construction of a link road then the people of Marlow would have had an opportunity to state their case and a balanced decision would have been reached.

In contrast the John Lewis Partnership, at Reference A, submitted a letter from Glanville Consultants to the Inspector which states:

"From my investigations to date and in particular my discussion with Graham Smith, there appears to be no technical assessment that has been carried out available to determine either the need for a link road or whether there are the means to deliver it. Its layout seems to be based on no more than hand drawn sketches. Nevertheless, it is identified within the draft Wycombe District Improvement Line Review document dated June 2012 (CD2.7) as being proposed for retention and safeguarding, together with schemes that are being retained pending more detailed review."

Although the District Council currently has this on their wish list to alleviate congestion on the High Street, advice from the County Council is that they could not sustain an argument for a link road as its junction with West Street would need to be signalised or a roundabout provided. Neither of these options is viable due to the physical constraints of highway land available. The County Council would accept vehicular access via Malthouse Way subject to installation of double-yellow lines to prevent on-street parking and widening of Portlands Alley to around 3m. An access to the site from West Street for emergency vehicles only might also be required but this would need to be considered further."

Glanville's advice that "there appears to be no technical assessment that has been carried out" must be contrasted with the comments of former Councillor Done on the comprehensive process and public consultation that led to the policy in the first place. The second paragraph reproduced above quotes "advice from the County Council". Note that this advice is highly qualified by consideration of "the physical constraints of highway land available" only, which in itself seems to contrast with the more supportive advice given in previous years. Moreover, this recent advice has not been substantiated by the responsible authority, Highways for Bucks, in a manner that was open for public discussion and also justified this very significant departure from previous long held BCC advice. It is clearly a short term view, not a strategic policy.

It is abundantly clear that the WDC had retained the link road in its longstanding plans and that its change of mind was instigated solely by the submission by the John Lewis Partnership [JLP] at Reference B. The reasons for the WDC's policy change are not known. JLP has argued that because the link road has been part of the Marlow Local Plan for over 20 years but has not been built it should be deleted in the absence of any robust evidence of need, viability of deliverability. This ignores the critical point that whole basis of argument for the link road was for strategic safeguarding purposes. Quite apart from that, the road has not been planned because the JLP sat on the Portlands site for many years seeking permission to build retail premises. JLP has offered no positive plan to the people of Marlow for the development of the Portlands site with and without a link road.

The 1999 Halcrow study of traffic and parking in Marlow showed the likely impact of the forecast increase in traffic would have on Marlow in the absence of countermeasures. Its predictions have been proven correct because no such measures have been undertaken. The current WDC and MTC strategies and visions envisage Marlow as a growing town that is increasingly dependent for its commercial viability on visitors and tourism. Recent changes, especially to the High Street, point strongly to this conclusion. Their irresistible increase in traffic calls for positive action on long term transport strategy. A link road through Portlands may not be an answer but in some form it might well be a partial solution. We do not know because Bucks CC has failed conspicuously to develop a strategy. Until it does so it is premature to remove the route of a link road from the DSP. Such an action is unsound.

It should also be noted that JLP will benefit from the removal of the previous requirement to provide rear servicing to West Street and the High Street and no longer to have to accommodate car parking spaces lost from the West Street car park within Portlands. In these circumstances, it seems an act of greediness to pre-empt for commercial short term gain a long and widely considered need to retain a simple safeguarding provision aimed at ensuring the long term sustainability of the vitality, safety and attractiveness of Marlow's High Street to visitors.

If the balance of opinion is that it would be best for the short term access into Portlands to be provided from Pound Lane it would be profligate not to safeguard a route from Portlands into the West Street car park for potential use in the longer term as traffic patterns will surely change to put more strain on the Town's finite resources. The Marlow Society urges the Councils and the Inspector to secure this through the final stages of the DSA process.