

CHAPTER 14 - APPENDICES

APPENDIX 1: RESIDENTIAL DESIGN GUIDANCE

The Objections

0173/13	W J Whitehead
0572/8	Fairview New Homes PLC
0817/34	Croudace Ltd
1042/3	Mr J D Burnham
1584/46	The Marlow Group
1935/7	Cllr Anthea Hardy

PIC A1/1 Objections

2124/1	Crime Prevention Design Adviser, Thames Valley Police
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PIC A1/2 Objections

0579/37	Michael Lambert
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Summary of Objections

- (a) Car free housing does not go far enough; a presumption of car-free housing is needed with exemptions for disabled.
- (b) Status of Appendix 1 requires clarification. It should not be part of the Local Plan, if it is to perform the role of Supplementary Planning Guidance.
- (c) Appendix objected to in principle.
- (d) Safeguards with enforcement measures must be included to guard against displaced parking from car free development.
- (e) The guidelines relating to development on slopes are superfluous; too generalised and simplistic.
- (f) There is a lack of understanding of the design process in relation to sky lines.
- (g) In relation to 'materials' the use of local materials (e.g. flint) does not transform mediocre design to good design.
- (h) Landscaping should not be treated as a reserved matter. The value of landscape design should be emphasised. Guidelines should legislate against the nuisance to neighbours that the planting of inappropriate species can cause.
- (i) No mention is made of solar energy.
- (j) Reference to 'rules' too prescriptive; should refer to 'guidelines'.
- (k) Garaging formats do not need to dominate elevations.
- (l) Calls for narrow spans ignores the wide spans of barns.
- (m) Design guidelines have houses, not apartments in mind.
- (n) Instruction to break large buildings into small component parts is misleading.
- (o) Suggest references to 'form follows function'.

- (p) Note that design guides are notoriously hard to write. A good architect may defy all the previous rules and produce good design, whilst a developer may adhere rigidly to the best rules and produce a bad one.
- (q) The Police Architectural Liaison Office is now termed the Crime Prevention Design Adviser.
- (r) Guidance should be redrafted to identify the areas where special care and respect of existing densities should be afforded.

Inspector's Reasoning and Conclusions

14.1.1 Appendix 1 to the Local Plan was drafted in accordance with the advice of PPG1 but before the issue of PPG3 (in its revised form) and the publication of 'By Design: Better Places to Live' (DTLR 2001). The contents of the Residential Design Guidance was extensively revised to take account of the latter publication, to the extent of changing the title to 'Residential Design Criteria'. Sections 3-5 of the Appendix are now proposed for deletion in recognition of the parallel proposal to discard Policies H14-16. The proposed changes appear broadly in accord with the published advice. PPG1 in particular (Annex A) gives wide discretion to LPAs to prepare and adopt design guidance policies and publications. This is very much for LPAs to resolve; there is a clear advantage in integrating design policies with local plans but there is also the drawback of keeping such advice up to date. In the present case, the LPA have chosen to set out general design principles in Chapter 2 of the Local Plan. These are elaborated in Appendices 1 and 4. The LPA relies on the advice of the 'Chilterns Building Design Guide' (1999) specifically within the AONB (see L1). This means that responsible intending developers may have access to key local design guidance within two concise documents that have been subject to an appropriate degree of public scrutiny.

14.1.2 As in the case of Policies L1, L8 and L10, the above objections are varied and will be mainly dealt with in turn, using the key lower case letters:

- (a+d) Car-free housing is quite likely to figure increasingly in high-density inner urban areas but it is not likely to loom very large within the totality of general residential development within the currency of the Local Plan. Apart from anything else, its establishment generally calls for the prior existence of controlled parking on-street and this, at present, is within the ambit of transport, rather than development plans. Implementation is therefore likely to be very restricted. Guidance is nevertheless set out in (new) Section 6 of Appendix 1 (as proposed for alteration and hence endorsed).
- (b-c) The status of Appendix 1 is quite clear. It is an integral part of the Local Plan, adopted under normal procedures, albeit that the guidance is relegated to the Appendices for the sake of editorial and user convenience. It is not unduly prescriptive in content and merely points to some unfortunate design solutions in past development and encourages their avoidance in future by the example of acceptable forms and having regard to specific design criteria (see also later comments).
- (e-f) There is a clear need to signal the adverse effects of intrusive or incongruous residential development in those many parts of Wycombe District which are steeply sloping or are visually prominent. The advice contained in Appendix 1 merely elaborates Policy G8 with particular reference to residential development. Without being too rigid or prescriptive, it is difficult to see how to advise designers to approach the varied problems of slope and skyline. It is most important to note that Policy G6 design statements may well be required in sensitive situations such as these.
- (g) Appendix 1 quite reasonably advises the use of local materials as being harmonious in relation to the local landscape. The point is also usefully made in the 'Chilterns Guide' (Chapter 3) where a slightly more rigid aesthetic code is laid down, as no doubt befits development in the AONB. Elsewhere in this report (see HE9) the use of traditional materials is regarded as an acceptable option but not to the exclusion of all others.

- (h) Landscaping is defined as a 'reserved matter' by legislation. This fact does not imply subordinate status, merely that LPAs may consider the merits of development in principle. In certain cases, particularly where landscape design is of the essence of a proposal, LPAs may require such additional details, including structural and screening planting schemes, to be shown. This may be sought under the recommended terms of Policy G4(1)(b). Whereas the terms of planning permissions may require the planting of suitable species, at present there is no form of preventative control over anti-social planting.
- (i) The question of solar energy cannot easily be dealt with in this Appendix. It is at once too basic and too detailed a matter for such treatment. To the extent that a development plan can steer building forms and layouts, this is touched on in Policy G23 and supporting text. There it is noted that the LPA intend to issue a Guidance Note on Sustainable Design. This is to be commended. It will presumably cover details of active and passive solar energy collection, optimum orientation and forms of residential building and other more detailed matters of design and construction.
- (j) Any reference to 'rules' is now proposed for deletion and is accordingly endorsed.
- (k-p) These detailed criticisms of the Design Guidance were considered during the appearance at the Inquiry of Cllr Hardy and will be dealt with under that heading.
- (q) The official title of the Police Crime Prevention Design Adviser is proposed for substitution in Section 3 of the Appendix.
- (r) The obvious intention of the Local Plan is that the Design Guidance should apply district-wide; within the Chilterns AONB the relevant SPG will be taken into account. With the proposed demise of Policies H14-16 there is no longer justification for area-specific guidance and Sections 4 and 5 of Appendix 1 are proposed for deletion.

14.1.3 Councillor Hardy's was the only objection to be heard by way of an appearance at the Inquiry. She raised a fundamental critique of Appendix 1 in particular and of design guidance in general. In essence, she considers such guidance to be irrelevant to the limited design skills of unqualified applicants and their agents and to be irksome and inhibiting to architects and other properly qualified professionals. This is not an uncommon view and has been expressed many times during the past 20-30 years, especially following the publication of the 'Essex Design Guide' in 1976. This criticism is misplaced, not only because of official support for such local design guidance but because its preparation and publication is intended as a safety net rather than as a straitjacket. LPAs find themselves in a position where they are often obliged to accept planning applications through the agency of largely or entirely unqualified designers. This may be regrettable but the purpose of design guidance is to ensure that proposals avoid the more extreme environmental blunders of the past. The whole tenor of the Local Plan provisions is that design quality should be 'equal to or better than' the Appendix benchmarking.

14.1.4 It is readily apparent, on reading and hearing the various objections that some, if not most, objectors have studied Appendix 1 in isolation. This is wrong because, as will be seen from the above references, it merely fills out the policy content of Chapter 2 in particular. The LPA may accordingly wish to insert suitable right-hand marginal cross-references to the main body of the Written Statement. In effect, the Appendix usefully expands and illustrates the policy content of the Local Plan. Since its function is as a complement to the Plan's other provisions, it is entirely appropriate that it appears within the same set of covers. If it were to be issued as a separate document (ie as SPG) there would be a danger of the substantive content of the Local Plan being ignored. A further technical modification of Appendix 1 (upon which no formal recommendation is made) is the question of numbering and referencing its sections, headings and subheadings. It is unwise to rely on un-numbered and bullet-pointed paragraphs in the event that Appendix 1 provisions may need to be referred to in decisions.

14.1.5 In relation to Cllr Hardy's detailed points of criticism, the following conclusions have been reached and possible detailed modifications recommended (the references made are to the various parts of Appendix 1 as proposed for alteration, numbered as informally recommended above):

- 1.1 Topography: *Modify* to read 'Most of Wycombe District is within the dry valley portion of the Chilterns AONB' and 'Traditionally, development was confined to the valley floors but more recent development has taken place on valley sides, hilltops, plateaux and other prominent locations'.
- 1.2 Roofscape (nb this word does not appear in the dictionary and it is therefore suggested that the words 'Roof Shapes and Profiles' be used instead (see also G8)): *Modify* by the omission of the marginal illustration which shows a roof arrangement which is functionally unwise although traditional in form.
- 1.3 Development on Slopes: *Modify* by the insertion of 'Advantage may be taken of the design opportunities given by sloping sites, such as the use of split levels and creation of partly underground storage accommodation'.
- 1.4 Skylines: *Modify* to read 'Since Wycombe is a hilly district, important hilltop locations should be protected from intrusive development. Where residential development is acceptable in relation to Policy G8, the following design considerations need to be taken into account:
 - (a) the extent, height and roof profiles of new residential building.
 - (b) The prominence and distant visibility of new housing.
 - (c) The need for woodland planting and preservation in the area of development.'
- 1.5 Building Materials: *Modify* to read 'Traditional buildings in the Chilterns were of locally available materials such as flint, clay and hardwood. New buildings should reflect this tradition by the use of good quality and locally appropriate materials that may however include non-traditional items or innovative forms of architectural expression.'
- 3.1 Highway Standards and Layout: *Modify* by reference to the relevant requirements of Policies T1, T5, T7, T9 and T15 as well as the Bucks CC Highways Design Guide.
- 3.2 Community Safety: *Modify* by reference to the relevant requirements of Policy G25.
- 3.5 Achieving Privacy: The guidance (as proposed for change) does not imply the universal adoption of 1 or 2-storey housing; the point of Cllr Hardy's objection to it.
- 3.9 Quantity and Quality of Open Space Accessible to the Public: *Modify* by the exclusion of the right-hand marginal illustration which adds nothing substantial to the design guidance.
- 3.12 Garaging Formats: *Modify* sub-heading to read 'Car Parking and Garaging' and include 'Parked cars and garages should be unobtrusively located and suitably landscaped or screened where possible'. Delete last sentence ending 'the elevation of the dwelling is further eroded'.
- 3.13(2) *Modify* bullet point (a) to read 'Parking spaces allocated for residential use should be within view or under the surveillance of the dwellings they serve'.
- 3.13(2) Bullet point (d) does not need modification. The use of underground or low level car parking may run counter to Policies G20 and G21 and would be of very limited general application for other reasons, including those of security and cost.
- 7.1-3 Design Guidelines for the Countryside: *Modify* by reference to Policies L1, L2 and L3 as well as Policies GB5, GB6 and the Chilterns Buildings Design Guide.

14.1.6 Generally speaking, many of the relevant objections have been accommodated by the changes proposed in PICs A1/1 and A1/2. To a large extent, these changes are endorsed but the Appendix should also be modified as recommended in the light of Cllr Hardy's helpful and very detailed comments (see above). However, it is not clear what purpose is served by changing the title of the Appendix from 'Residential Design Guidance' to 'Residential Design Criteria'. It is true that both PPG1 and PPG3 studiously (and perhaps needlessly) avoid the use of the phrase 'design guidance'. They adopt slightly wordy phrases such as 'good practice guidance on the layout and design of new development' (PPG3 paragraph 64). This seems to be a distinction without a difference. The use of the title 'Residential Design Guidance' is accordingly recommended simply because that is what the Appendix in fact contains, as well as more detailed design criteria for the assessment of individual planning applications.

RECOMMENDATIONS

- AP01/1 Modify Appendix 1 in accordance with PICs A1/1 and A1/2 but retain the title 'Residential Design Guidance'.
- AP01/2 Further Modify Appendix 1 in accordance with paragraph 14.1.5 above.

APPENDIX 2: DEVELOPMENT PRINCIPLES

The Objections

0376/26	Axa Equity and Law Life Assurance Society PLC
0379/33	Sport England
0507/3	P W Eldridge Esq

Summary of Objections

- (a) Object to the failure to have development principles listed for Gomm Valley; propose such a list including railway station and park and ride site, 600 homes and business park.
- (b) NPFA guidelines for open space and play provision are minimum guidelines; wording should reflect that these are minimum recommended standards.
- (c) No mention is made on each of the housing sites as to the amount of land that will be required to be laid out as formal pitches.
- (d) No assessment made of the need for new community facilities, including the need for new sports facilities generated by the development proposed.
- (e) It should be made explicit that the list of requirements is based on preliminary investigations and is for guidance purposes only.

Inspector's Reasoning and Conclusions

14.2.1 Gomm Valley's identification as a Policy L2 LLA is the subject of an earlier unfavourable recommendation (LN02.5/1) and its continued exclusion from Appendix 2 is appropriate. NPFA guidelines for open space and play provision are broadly reflected in Appendix 7 but their use as minima would be inappropriate in the light of most recent PPG17 advice. The LPA in any event now wish to insert their own area-specific and variable space standards in the form of a Technical Note (see reference to Appendix 7 in RT0). Since space standards and additional provision are to be the subject of local determination and case by case examination, it is not necessary to qualify their eventual adoption as being tentative or only as guidelines.

RECOMMENDATION

- AP02/1 No modification

APPENDIX 2: DEVELOPMENT PRINCIPLES - ABBEY BARN NORTH

The Objections

1009/5 Mr J E Pickering

PIC A2/1 Objections

0376/59 Axa Equity & Law Life Assurance PLC
1071/13 Persimmon Homes (TV) Ltd
1579/35 Oxford Land Limited

PIC A2/16 Objections

1579/37 Oxford Land Limited

Summary of Objections

- (a) A buffer of trees should be retained between Abbey Barn Lane and any development on Abbey Barn North.
- (b) In relation to PIC A2/1, propose that it is deleted.
- (c) Development principles will not be achieved, unless a greater number of units is allocated in order to assist in funding of proposals, particularly transport.
- (d) Text under 'transport' should contain explicit reference to state that highway solutions must not prejudice the future development of Abbey Barn South; delete reference to Abbey Barn South as 'area of safeguarded land'.

Inspector's Reasoning and conclusions

14.2.2 Section 3.2.1 of the report recommends against Abbey Barn North as a housing allocation. Although the points made by objections (a) (b) (c) are valid, they have been overtaken by events.

RECOMMENDATIONS

- AP02/2 Delete the development principles for Abbey Barn North

APPENDIX 2: DEVELOPMENT PRINCIPLES - ABBEY BARN SOUTH

The Objections

0081/4 Mr D A Laidlaw

0174/5	<i>R Vitty, B A Vitty</i>
0217/3	Mr A A Van Der Pant
0220/4	John Oldcorn
0242/3	<i>Mr & Mrs P J Hitchcock</i>
0243/3	<i>Mr & Mrs P H Lisle</i>
0250/3	Robin Plumridge
0261/4	<i>Mr John C Harris</i>
0273/4	Mr & Mrs J E Rouse
0427/2	<i>Rambler's Association Wycombe District Group</i>
0438/3	Mr A D Dickson
0668/4	John Roseblade
1058/3	<i>G A Hunt</i>
1064/3	<i>Mrs B Hunt</i>
1075/10	<i>Little Marlow Parish Council</i>
1124/2	R E Carter
1328/3	Philip J Price
1364/4	Mr W H Thatcher
1394/3	Mr Stephen Paul Ross
1414/7	Michael J Overall
1441/7	Mr J W Johnson
1523/5	K R Burroughs
1579/10	<i>Oxford Land Limited</i>
1579/12	Oxford Land Limited
1741/3	Mr R I & Mrs C E Caqrey
1763/3	Montague E Seymour
1828/3	Mr A S Mann

PIC A2/2 Objections

1579/22	Oxford Land Limited
1579/34	Oxford Land Limited
1739/13	Lord Carrington's Grandchildren's Settlement
2063/19	Wycombe Summit Ltd/Wycombe Option Ltd

Summary of Objections

- (a) Road infrastructure will not support development, without major road construction; Abbey Barn Lane is inadequate; junction improvements will be impossible to achieve.
- (b) Widening of Daws Hill Lane is unacceptable; which will be inevitable with junction improvements at Marlow Hill.
- (c) A relief road between Abbey Barn Lane and Junction 4 is required.
- (d) Proposed footpath along Heath End Road will be unpleasant for pedestrians because of traffic fumes.
- (e) No mention is made of increased educational provision.
- (f) Traffic calming should take place in Flackwell Heath, before the development is implemented; traffic should not be allowed to turn left down Winchbottom Lane.
- (g) No reference is made to the two footpaths through the site.
- (h) Object to the proposal for a range of accommodation types. Affordable housing should be located close to public transport.
- (i) Detailed transport improvements are too prescriptive.

- (j) Development should not be restricted to the open farmland; this is an inefficient use of land. Business Park could be related to the woodland ride.
- (k) 30% affordable housing is too onerous; housing mix must reflect the need to promote a successful business park as part of a high quality scheme.
- (l) Not appropriate to identify off-site highways works in the development principles.
- (m) In response to PIC A2/2, object to the deletion of the site as an allocation and the consequent deletion of the development principles; site should be reinstated. Principle of development has been established; site is required to meet development needs; development would support significant improvements to public transport, leisure and local economy.
- (n) Development Principles should be reinstated, but without reference to an hotel. Emphasis should be on provision of a high quality business park.

Inspector's Reasoning and conclusions

14.2.3 Section 3.2.1 of the report recommends approval of the PIC deleting the mixed-use allocation at Abbey Barn South. It follows that the objections to the detailed implementation of any proposals, many of which have been conditionally withdrawn, have been met by this change to the Plan. The substance of the objections to PIC A2/2 has been covered by my comments in section 3.2.1.

RECOMMENDATIONS

- AP02/3 Modify the Plan in accordance with PICA2/2

APPENDIX 2: DEVELOPMENT PRINCIPLES – ASHWELLS

The Objections

0103/5	Mr & Mrs R Zeraschi
0208/2	Graydon Karlson
0376/9	Axa Equity and Law Life Assurance Society PLC
0427/4	Ramblers' Association Wycombe District Group
1113/4	Mr Antony Mumford
1207/4	Residents' Action Group on Gomm Valley
1338/7	Pimms Action Group
1907/4	D A Wheatley

PIC A2/3 Objections

0376/60	Axa Equity and Law Life Assurance Society PLC
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Summary of Objections

- (a) Development Principles should recognise that improvements to the Cock Lane railway bridge and the A40 junction will be required.
- (b) Access arrangements are unsatisfactory and would place additional pressure on Cock Lane; two access points mentioned are not favoured by Buckinghamshire County Council.

- (c) Affordable housing on site will prove unsustainable, due to distance to town, public transport, facilities and services.
- (d) Site should come forward in a more comprehensive development at Gomm Valley and not in isolation. There could be benefits of a new local distributor road, relieving pressure on the north end of Cock Lane. The wider measures identified in Appendix 2 can not be achieved unless a larger scheme is brought forward.
- (e) No mention is made of the existence of a public footpath along the southern boundary of the site; path should be visually screened from any development.
- (f) Question how 'public access for pedestrians and cycle links' is going to be maintained in practice.
- (g) In response to PIC A2/3, support deletion of principles, but propose that they should be incorporated into a wider Gomm Valley area.

Inspector's Reasoning and conclusions

14.2.4 Similar comments apply to this site as to Abbey Barn South and other housing allocations deleted by various PICs. Section 3.2.1 of the report recommends approval of the PIC deleting the allocation at Ashwells and the objections to the detailed implementation of any proposals have therefore been met by this change to the Plan. The substance of objections (d) and (g) to PIC A/2/3 has been covered by my comments in section 3.2.1 and my recommendation against any allocation of the whole of the Gomm Valley for mixed-use development.

RECOMMENDATIONS

- AP02/4 Modify the Plan in accordance with PICA2/3

APPENDIX 2: DEVELOPMENT PRINCIPLES – COPPERFIELDS

The Objections

1320/5	Banner Homes
1736/2	A T Potrykus

PIC A2/4 Objections

0867/8	West Wycombe Parish Council
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Summary of Objections

- (a) Unduly onerous requirements in respect of affordable housing, wildlife, landscape, open space and play provision, education and community.
- (b) In response to PIC A2/4, object as the existing development has a character of its own which can not cope with additional traffic; access is extremely difficult. Question why the emergency access has been removed from Chapel Lane. Existing problems turning right onto West Wycombe Road.

Inspector's Reasoning and conclusions

14.2.5 All these objections have been overtaken by events, in that the site has been deleted from the Plan following the granting of outline planning permission for residential development on a slightly smaller site area than originally proposed in the Plan. This PIC is supported in section 3.2.1 and no further comment on detailed matters is necessary in the Local Plan context.

RECOMMENDATIONS

- AP02/5 Modify the Plan in accordance with PIC A2/26

APPENDIX 2: DEVELOPMENT PRINCIPLES - ERCOL
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The Objections

0408/9 Ercol Furniture Ltd

PIC 2/5 Objections

0408/34 Ercol Furniture Ltd

PIC A2/17 Objections

0376/86 Axa Equity and Law Life Assurance Society PLC
0408/44 Ercol Furniture Ltd

Summary of Objections

- (a) Reference to 1ha of open space should be preceded by 'approximately' to allow for flexibility.
- (b) Object to requirement for 30% affordable housing as this imposes a rigid quota without recourse to Policy H11 'Affordable Housing', namely that affordable housing will be sought subject to site-specific characteristics and market condition, and will be negotiated.
- (c) Concern with specific references to highway network.
- (d) Seek reference to phased withdrawal from site, in order to maintain production capacity during redevelopment.
- (e) In response to PIC A2/5, object to the words 'at least'
- (f) In response to PIC A2/17 object to the capacity of site as being 200, as this is a significant overestimate of the reasonable capacity of the site.
- (g) Reference to educational contributions should take into account the extensive capital receipts that the Local Education Authority will obtain from residential allocation of four school sites during Plan period.

- (h) Object to statement 'contributions to local school provision off-site'; a plan indicating deficiency areas should be produced as part of Local Plan to enable matter to be considered.

Inspector's Reasoning and conclusions

14.2.6 Section 3.2.1 of the report deals with objections to the principle of allocating the site for housing, which is recommended for retention. Many of the matters raised here have been overtaken by events, in that the site has been granted planning permission for 265 units subject to a Section 106 planning obligation. I recommend a change to the anticipated housing numbers for the site in Table H2(i) to reflect this likely dwelling total. I note that the scheme allows for an appropriate amount of open space, reflecting the increase in housing numbers. The permission includes a 20% affordable housing requirement if Ercol relocate within the District, as the company is by moving to new premises at Princes Risborough. However, it is appropriate that the Development Principles are consistent with the wording of Policy H11, which is addressed by the inclusion of 'at least' in PIC A2/5. The other detailed concerns including highway layout, are considered in section 3.2.1.

RECOMMENDATIONS

- AP02/6 Modify the Plan in accordance with PICA2/5 and A2/17

APPENDIX 2: DEVELOPMENT PRINCIPLES - GARRATTS WAY

PIC A2/6 Objections

0379/65 *Sport England*

Summary of Objections

- (a) Object to retention of only an informal recreational open space; inconsistent with findings of Playing Pitch Strategy, which concluded no further playing fields should be lost.

Inspector's Reasoning and conclusions

14.2.7 Section 3.2.1 of the report deals with objections to the principle of allocating the site for housing, which is recommended for retention. The only matter raised here has been conditionally withdrawn, following clarification of the package of measures to deal with sports pitch provision as explained there, which is supported with regard to all the proposed school site allocations.

RECOMMENDATIONS

- AP02/7 Modify the Plan in accordance with PICs A2/6, A2/18 and A2/27

APPENDIX 2: DEVELOPMENT PRINCIPLES – PIMMS CLOSE

The Objections

0376/61	Axa Equity and Law Life Assurance Society PLC
0922/8	Mrs Monica Stevens
1078/5	G J Stevens
113/5	Mr Anthony Mumford
1907/5	DA Wheatley

Summary of Objections

- (a) Deletion of Pimms Close supported, but site should be incorporated into wider Gomm Valley area.
- (b) Development principles should refer to education provision.
- (c) Development principles for infrastructure improvements are not viable. Site is unrealistic.
- (d) Development principles do not recognise that development would require improvements to Cock Lane railway bridge, Cock Lane and Gomm Road junctions and A40 junction.

Inspector's Reasoning and conclusions

14.2.8 Similar comments apply to this site as to Ashwells and other housing allocations deleted by various PICs. Section 3.2.1 of the report recommends approval of the PIC deleting the allocation at Pimms Grove and the objections to the detailed implementation of any proposals have therefore been met by this change to the Plan. The substance of objection (a) has been covered by my comments in section 3.2.1 and my recommendation against any allocation of the whole of the Gomm Valley for mixed-use development.

RECOMMENDATIONS

- AP02/8 Modify the Plan in accordance with PIC A2/7

APPENDIX 2: DEVELOPMENT PRINCIPLES - WYCOMBE MARSH

The Objections

0547/3	Mr & Mrs Beckford
0547/5	Mr & Mrs Beckford
0678/8	Thames Water Property Division
0872/32	Government Office for the South East
1007/3	Citygrove Leisure PLC & Thames Water PLC
1646/8	John Dalton

PIC A2/8 Objections

0376/62	Axa Equity and Law Life Assurance Society PLC
0571/29	Laing Homes Ltd

1739/14	Lord Carrington's Grandchildren's Settlement
2063/20	Wycombe Summit Ltd / Wycombe Option Ltd
2124/2	Crime Prevention Adviser, Thames Valley Police
2136/8	Thames Water (Property Division)

PIC A2/19 Objections

0376/90 Axa Equity and Law Life Assurance Society PLC

Summary of Objections

- (a) Principles should refer to existing features being retained; substantial tree belt along southern boundary, and make clear that the informal open space should be along both river corridors.
- (b) Principles are not set out for non-residential use of the site.
- (c) 30% affordable housing figure is too prescriptive. Amount of affordable housing should not prejudice the realisation of other planning objectives
- (d) Educational and community provision should be fairly and reasonably related to the development.
- (e) There should be no reference to allotments.
- (f) Concern over the scale of the Local Distributor Road and its possible impact on local traffic circulation. This may warrant special mention in the Local Transport Plan.
- (g) Principles fail to mention retail warehousing.
- (h) Concern over enforcement of requirement to maintain flow in the River Wye.

In response to PIC A2/8:

- (i) Employment allocation should be increased from 2ha to 4ha; alternatively, existing area should be retained (5ha).
- (j) An EIA is required.
- (k) There is a need to take account of the Secretary of State's Code of Practice on Conservation, Access and Recreation, the Environment Agencies LEAP and the River Wye Study.
- (l) The deletion of allotment green space is inconsistent with Policy RT18 'Allotments'.
- (m) Object to enlargement of site; inclusion of the Bucks Car Panel generates the prospect of the termination of an employment use.
- (n) Development principles fail to demonstrate that the site is capable of accommodation 400 dwellings in a satisfactory manner.
- (o) Details of the appropriate type and level of health care provision are best dealt with at the planning application stage.
- (p) Delete reference to an hotel.
- (q) The word 'segregated' has been added to the transport section; segregation can often cause fear of crime / increased crime and a reduced level of use. Delete word.
- (r) Object to increased provision of open space. Council should seek to maximise the site's development potential; greater flexibility should be applied to normal NPFA standards.
- (s) All road improvements and contributions to public transport should be fairly and reasonably related to the sites redevelopment and identified at the planning application stage.

- (t) Object as there are inconsistencies between the transport requirements of Appendix 11 and this change.
- (u) In response to PIC A2/19, propose that site capacity should be 350 dwellings, to reflect greater proportion of the site being allocated for employment use.

Inspector's Reasoning and conclusions

14.2.9 I have dealt in detail with the allocation of this key site for mixed-use development in sections 3.5, 5.2 and 12.6 above, which generally cover the points raised here. Matters such as the protection and enhancement of existing natural features incorporating adequate open space for residents, provision of affordable housing to meet the requirements of Policy H11, and the inclusion of some, not all, allotments are all endorsed. I consider the balance of a wide range of uses to be appropriate, including the retail warehouse and hotel elements and the amount of employment land and the number of dwellings. The Development Principles allow for the assessment of school provision at planning application stage, but do not require such provision. Similar principles apply to community provision. I have no evidence that satisfactory regulation of the returned flow to the River Wye would not be achieved through existing legislation.

14.2.10 I find no inconsistency between Appendices 2 and 11 with regard to transport requirements. In the context of a site of this size, I consider the elements in the Appendix reasonably relate to a major development and its likely traffic impacts. The measures proposed would have a marginal effect on traffic congestion overall, but would ensure that the scheme improved conditions along London Road through the distributor road through the site, which would be provided by the developer not through the LTP. The segregation of cyclists from motorists is generally welcomed on safety grounds, subject to good design of routes and proper lighting.

RECOMMENDATIONS

- AP02/9 Modify the Plan in accordance with PICs A2/8 and A1 1/2

APPENDIX 2: DEVELOPMENT PRINCIPLES - GREAT MARLOW SCHOOL
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The Objections

0654/2 *Marlow Bottom Residents Association*
0840/26 Marlow and District Chamber of Trade & Commerce

Summary of Objections

- (a) Object to development principles; site is currently used as a recreational area; development would not protect existing recreational and leisure facilities. Local open space deficiency would be further compounded. Traffic increase would exacerbate existing roar and parking problems; junction proposals are already required and are subject to County Council funding.
- (b) Development principles are misleading; suggest removal of wording 'improves the quality and enhances the character of the living environment' as development will remove open space and close a green gap.
- (c) Contradiction of 'the site is in an open space deficiency area' and 'an open space visual corridor should be retained' should be resolved.

- (d) Infrastructure requirements should be ascertained and costed. There is no town shuttle bus now, so question how additional buses can be provided.

Inspector's Reasoning and conclusions

14.2.11 I have dealt in detail with this site in section 3.2.2 above, where I concluded that there were good planning reasons to re-instate the allocation. My comments covered the open space issues raised in these objections, including the potential overall improvement of playing pitch provision through a new all weather pitch at the school. Subject to satisfactory design, incorporating a visual corridor suggested in the original Development Principles, I consider that the allocation need have no unduly adverse effect on the quality of the surrounding environment.

RECOMMENDATIONS

- AP02/10 Re-instate the Development Principles for the site

APPENDIX 2: DEVELOPMENT PRINCIPLES - PORTLANDS

The Objections

0158/14 High Wycombe and Marlow Green Party
0872/33 Government Office for the South East

PIC A2/11 Objections

2137/6 Waitrose

Summary of Objections

- (a) Lost car parking places should not be replaced; public transport should be encouraged by reducing parking in Marlow.
- (b) Concern over nature of Link Road; minor changes in congested network can have a significant impact on congestion and delays across the network.
- (c) In response to PIC A2/11, object to the Housing Mix, as it is considered to be contrary to Circular 6/98 and made without justification.
- (d) Pedestrian / cycle access to High Street and the station may not be desirable in all cases.
- (e) Proposed Link Road will be required to cross the existing Portlands Alley, and this needs to be recognised in the development principles.
- (f) The statement that 'contributions toward the outcome of the Marlow Parking and Transportation Study will be sought' is contrary to the approach advocated in Circular 1/97.

Inspector's Reasoning and conclusions

14.2.12 The housing proposal was endorsed in sections 3.2.2 and 6.17 above, which dealt in detail with this site, including discussing matters such as parking and contributions to transport provision. I consider that there are good planning reasons to support the provision of affordable housing in accordance with Policy H11 of the plan in this sustainable town centre location. The PICCs take into account objection (e) concerning the link road, which would be

appropriate in scale and function to this part of the town centre. I find no objection to providing pedestrian and cycle access to the High Street to aid environmentally friendly transport modes in an historic centre.

RECOMMENDATIONS

- AP02/11 Modify the Plan in accordance with PIC A2/11

APPENDIX 2: DEVELOPMENT PRINCIPLES – PARK MILL / OAK TREE FARM
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The Objections

0345/3	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0427/1	Ramblers' Association Wycombe District Group
0678/1	Thames Water Property Division
0802/7	D L Morris
0869/2	Barry George Whelan
0936/1	Mr and Mrs T J Phillips
1071/2	Persimmon Homes (TV) Ltd
1205/16	Princes Risborough Town Council
1294/3	Environmental Records Officer, Bucks County Museum
1400/2	Risborough Christian Fellowship
1738/1	Christopher Brookes Oliver

PIC A2/10 Objections

0087/6	Council for the Protection of Rural England
0345/16	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0571/30	Laing Homes Ltd
0678/11	Thames Water Property Division
0929/6	Paul Turner
1071/14	Persimmon Homes (TV) Ltd
1200/44	English Nature
1205/18	Princes Risborough Town Council

PIC A2/20 Objections

1071/20	Persimmon Homes (TV) Ltd
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Summary of Objections

- (a) Propose change of wording in order to accord with Circular 1/97, so that requirements are 'fairly and reasonably related in scale and kind to the proposed development'. The word 'required' with regard to Housing Mix, should be replaced by 'sought, subject to the physical circumstances of the site and the prevailing and anticipated market conditions'
- (b) 'Comprehensive development' should be replaced with 'co-ordinated land use strategy'.
- (c) Delete word 'strategic' which prefixes Community Woodland.
- (d) There is disparity concerning the area of open space required.

- (e) Propose additional wording to Education and Community paragraph; 'subject to such contributions being demonstrated by the Local Education Authority at the time of outline planning permission to be reasonable and necessary.
- (f) Clarification is sought regarding 'community facilities'.
- (g) Transport paragraph (third sentence) should be amended to read 'widening of flare on Longwick Road approach to Tesco roundabout. Delete sentences four to seven and replace with 'funding towards the reasonable provision of improved pedestrian and cycle linkages between Princes Risborough Town Centre and railway station.' Eighth sentence; replace 'Summerleys Road/bus gate' with 'Mill Lane/bus gate'.
- (h) Housing Mix paragraph is not sufficiently detailed to ensure that the Council will be able to control the type of dwelling to meet local need; propose amendment to wording. Proportion of smaller homes should reflect percentage of smaller households in the District.
- (i) Would like to secure a guarantee with reference to the day centre and youth club. Provision for a place of worship should be made on site.
- (j) The provision of alternative footpath routes (e.g. the main footpath between Princes Risborough and Longwick and the circular walk around the town) must be a pre-requisite to development. Existing bridleway west of the railway line would be extended to the B4-09 near Londwick railway bridge to provide an alternative route to Longwick. A footpath across the railway line would be better located over Wades Fields than into Mount Way.
- (k) The detailed nature of transport matters is too prescriptive.
- (l) A developer contribution should be secured for a new bus service linking the development with the town and railway station.
- (m) Provision of a community woodland is excessive.
- (n) The SINC Longwick Bog is omitted from the Development Principles.
- (o) Under 'Site Specific'; change wording of last sentence to 'Thames Water indicated that it supports the development of the site and the preferred option for sewage treatment is currently being reviewed'.

In relation to PIC A2/10:

- (p) Propose that under 'Site Specific'; change wording of last sentence to read 'in the context of this new development Thames Water aims to transfer the sewage flows for treatment elsewhere once it becomes economic to do so.'
- (q) Suggest that the site has capacity to accommodate more than 300 dwellings and Appendix 2 should be amended to reflect this.
- (r) Reference to Oak Tree Farm in title is misleading and development principles no longer relate to it.
- (s) Proposed development is not viable and few if any of the proposed objectives will be realised; list of benefits is almost identical to previously development of 650 houses. Site is not large enough to support a development of this nature, particularly if a strategic landscape belt is to be provided.
- (t) Delete reference to sewage works; there are alternative ways of dealing with this requirement. Text should state that the use of a new greenfield site for this purpose is not intended. Object to deletion of any identification of the proposed site for relocation; the full implications of the relocation need to be assessed with the Local Plan process.
- (u) Seek clarification as to what is proposed in place of the community woodland. Inadequate information available to assess proposal. Object to lack of a boundary feature with Oak Tree Farm, as this would deter subsequent development.

- (v) Hydrology of Longwick Bog must be carefully evaluated prior to any major planing along its boundary.
- (w) Delete reference to bridge to Wades Park; there is insufficient justification for two crossings in close proximity; a sub-way would provide a better solution.
- (x) Object to pathway from Wades Park due to loss of open space and encroachment onto the play area that would result. Any additional path should be constructed to link with path 41 which passes over the railway line.
- (y) The proposed access arrangements do not comply with Highway Authority standards not the advice in DB32.
- (z) In response to PIC A2/20, object, as the proposed future intentions of the sewage facility are uncertain and will affect the net residential area of the site. The site should provide additional open space to meet the identified shortfall in Princes Risborough. Education, Community and Sports facilities should be provided on site.

Inspector's Reasoning and conclusions

14.2.13 The housing allocations at Park Mill Farm and Oak Tree Farm are considered in detail in section 3.2.2. Many of the objections concerning Oak Tree Farm have been met by the deletion of the site, which is endorsed.

14.2.14 As noted previously in Chapter 3, I consider the Development Principles requirements with regard to affordable housing meet the reasonable requirements of C 6/98 and Policy H11. The Council has revised the expected number of dwellings to accord with density guidelines in PPG3. There is no firm evidence to suggest that development at the revised figures would not be viable. Further requirements concerning the provision of educational and community facilities are not prescriptive and reflect the guidance in C1/95; more detailed requirements would not meet the tests of the circular.

14.2.15 The transport requirements for the allocation, including main and emergency access requirements, the provision of a bus link to Summerleys Road, off site highway improvements at the Tesco Longwick Road roundabout, and public transport improvements are dealt with fully in 3.2.2. The Development Principles are set out in a level of detail appropriate for a Local Plan. The revised wording allowing for the provision of a second crossing of the railway in an unspecified form is also endorsed. A similar comment applies to the text relating to possible relocation of the sewage works, which needs to provide some flexibility to account for different potential ways of dealing with this aspect of the development.

RECOMMENDATIONS

- AP02/12 Modify the Plan in accordance with PIC A2/10

APPENDIX 2: DEVELOPMENT PRINCIPLES - BUCKS FREE PRESS

PIC A2/12 Objections

0376/63 Axa Equity and Law Life Assurance
0571/31 Laing Homes Ltd

Summary of Objections

- (a) Principles should be deleted, as object to the loss of employment land in principle.
- (b) Substantial part of the site is woodland of amenity value that merits a TPO; due to topography, vegetation, loss of habitats and proximity to railway line (noise renders development inappropriate); dwelling capacity it significantly less than 80 dwellings.

Inspector's Reasoning and conclusions

14.2.16 These objections concern matters of principle of allocation that are dealt with fully in section 3.2.3.

RECOMMENDATIONS

- AP02/13 Modify the Plan in accordance with PIC A2/12

APPENDIX 2: DEVELOPMENT PRINCIPLES - DOWNLEY MIDDLE SCHOOL / TURNERS FIELD
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PIC A2/13 Objections

See Appendix 14A

PIC A2/23 Objections

0579/34 Michael Lambert

Summary of Objections

- (a) Green Space should be retained in entirety.
- (b) Object to loss of playing fields.
- (c) Inadequate open space replacement; development should be restricted to footprint of building.
- (d) Concept of central open space 'village green' fails; no need for formal play area; open space should be retained for both active and passive recreation. Seek similar solution to that offered at Heights First School i.e. transferral of green space from school playing field to the adjoining green field (Turners Field).
- (e) Principles do not mention character of village, conservation area or green links. Existing hedgerows and trees should be retained.
- (f) Concern over ownership and maintenance of existing boundary fence.
- (g) No consultation has taken place over the use of the old school building for community purposes.
- (h) Need to ensure that some of the financial benefits of the scheme are kept locally to mitigate the effects on the village of increased traffic and parking problems.
- (i) Road improvements proposed should be avoided, as existing tight corners and streets act as a restraint on speed and traffic.
- (j) Close reference should be made to the Downley Village Design Statement.

- (k) Principles should be amended to ensure that dwellings will appeal to a range of potential purchases (e.g. starter, family and retirement homes).
- (l) In response to PIC A2/23, object to the reference to 'contribution to school places' when school site is being developed. No assessment has been made of changes in supply and demand for school places as a result of school demolition and new build.

Inspector's Reasoning and conclusions

14.2.17 The broad thrust of most of these objections concern matters of principle of allocation that are dealt with fully in section 3.2.3, which recommends in favour of the replacement allocation. These matters include open space loss and provision, and local character.

14.2.18 Given the layout of the roads serving the site, I consider the modest road improvements identified would secure highway safety without leading to unacceptable increases in traffic speed.

14.2.19 The objector raises no objection in principle to the use of the Victorian school building for community use. Other matters, such as fence maintenance, retention of land sale proceeds fall outside the remit of this Local Plan report. As previously mentioned, the statement about possible contribution towards provision of school places is not prescriptive and therefore unobjectionable.

RECOMMENDATIONS

- AP02/14 Modify the Plan in accordance with PICs A2/13, A2/23, and A2/28

APPENDIX 2: DEVELOPMENT PRINCIPLES – HEIGHTS COUNTY FIRST SCHOOL
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PIC A2/14 Objections

See Appendix 14B

PIC A2/24 Objections

0376/89 Axa Equity and Law Life Assurance Society PLC

Summary of Objections

- (a) Green Space should be retained. Development should be restricted to footprint of building. Green Space proposed falls short of that necessary and will lead to a diminution in amenities.
- (b) Object to loss of playing fields.
- (c) Object to benefits being taken from this site toward an 'unknown community facility' or non-local traffic and parking restraint measures. Need to ensure financial benefits of scheme are kept locally.
- (d) Close reference should be made to Downley Village Design Statement.
- (e) Concern that proposals for Green Space may attract teenagers and subsequent trouble, affecting the quality of life for residents.

- (f) Object to toddler play area on site, as it would detract from beauty of the area and duck pond.
- (g) Principles should ensure that dwellings will appeal to a range of potential purchasers (starter, family and retirement homes).
- (h) Green fields, spaces, trees and hedgerows should not be disturbed in new development.
- (i) Path to Green Leys is unnecessary. Path may be underused and become dangerous to use, causing crime and annoyance to adjacent properties.
- (j) In response to PIC A2/24, object to the capacity of site and propose that it should be 20 dwellings to reflect the need to retain the existing Green Space on the site.

Inspector's Reasoning and conclusions

14.2.20 The objections to the principle of allocation concerning matters such as the loss of open space, new provision of open space, housing density and character are dealt with fully in section 3.2.3, which recommends in favour of the replacement allocation. The development principles require the protection of existing natural features, and the provision of a toddlers' play area would not be seriously out of character with the surrounding suburban area.

14.2.21 Properly designed and lit pedestrian links to surrounding streets should be beneficial to all residents and need not be the cause of concerns about safety and disturbance if proper surveillance can be achieved.

RECOMMENDATIONS

- AP02/15 Modify the Plan in accordance with PICs A2/14, A2/24 and A2/29

APPENDIX 2: DEVELOPMENT PRINCIPLES – TERRIERS FIRST SCHOOL
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PIC A2/15 Objections

0376/66	Axa Equity and Law Life Assurance PLC
0379/71	Sport England
0534	Laing Homes Ltd
0579/20	Michael Lambert
0839/25	Grange Action Group
1579/23	Oxford Lane Limited
2115/1	Michael J Hickman
2139/1	Nigel Roy Smith
2409/5	N A Smith

PIC A2/25 Objections

0376/88	Axa Equity and Law Life Assurance PLC
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Summary of Objections

- (a) Object to capacity of site; this should be reduced to protect green space. Existing green space capable of providing significant amenity; currently 0.55ha, whilst development principles indicate that it would be reduced to 0.36ha.

- (b) Open land (car park and recycling facility) and existing service road should be retained and landscaped.
- (c) Object to loss of playing fields.
- (d) Inclusion of flats in prominent corner building would maintain housing numbers whilst protecting green space.
- (e) Object to development principles for wildlife, landscape and open space; higher dwelling numbers would result in better brownfield land utilisation and wildlife, landscape and open space should more appropriately be considered on Terriers Farm site.
- (f) Council has not demonstrated suitability of the site.
- (g) Object to proposal to link housing estate to Gerald's Road with a public footpath or emergency access; experience has shown that this will lead to increase vandalism, verbal abuse and aggravation. Security and privacy of existing residents will be threatened.
- (h) Affordable housing should be located on the west side of the site.
- (i) Development should consist of a community for the elderly.
- (j) Development should include a condition to preserve the existing trees / shrubs on the site and preservation of wildlife.
- (k) Existing pathway alongside back of Freemantle Road should be deleted and there should be no access to Freemantle Road.

Inspector's Reasoning and conclusions

14.2.22 The objections to the principle of allocation concerning matters such as the loss of open space, new provision of open space, housing density and character are dealt with fully in section 3.2.3, which recommends in favour of the replacement allocation. Although a corner building in the form of a block of flats may be an appropriate design solution for the site, there may be other possibilities and such level of detail is not required in a Local Plan. Again, prescribing exactly where affordable housing should be located is unnecessarily detailed.

14.2.23 Properly designed and lit pedestrian links to surrounding streets should be beneficial to all residents and need not be the cause of concerns about safety and disturbance if proper surveillance can be achieved

RECOMMENDATIONS

- AP02/15 Modify the Plan in accordance with PICs A2/15, A2/25 and A2/30

APPENDIX 3: DEVELOPMENT BRIEFING

The Objections

1071/3 Persimmon Homes (TV) Ltd
1294/6 *Environmental Records Officer, Bucks County Museum*

Summary of Objections

- (a) Local Plan should set out a time scale for the preparation of Briefs and their implementation; a Brief could then take on the status of Supplementary Planning Guidance.

- (b) Correct 'Sites of Interest for Nature Conservation' to 'Sites of Importance for Nature Conservation'. Include Special Areas of Conservation and Special Protection Areas after Areas of Attractive Landscape.

Inspector's Reasoning and Conclusions

14.3.1 Development briefs are the subject of district-wide Policy G5 which is the subject of PIC A3/2 as well as substantial recommended modification (GD05/1-4). As, when and where such briefs are prepared and adopted for individual sites or areas, they will indeed have SPG status. It is not at all appropriate to have a programme for brief preparation and for their detailed implementation. The reason is that PPG3 envisages certain broad alternative approaches to LPA site release (eg criteria-based, ranking-based and period-based (see 'Planning to Deliver': July 2001)). Planning brief preparation essentially depends on the imminent or likely release of land and not vice versa. The detailed nature conservation terminology has been the subject of PIC A3/1 which is endorsed as factually correct.

RECOMMENDATION

- AP03/1 Modify Appendix 3 in accordance with PIC A3/1.

APPENDIX 7: PUBLIC OPEN SPACE, OUTDOOR SPORT, CHILDREN'S PLAY SPACE

The Objections

0379/27 Sport England
0379/35 Sport England
0572/9 Fairview New Homes PLC

PIC A7/1 Objections

0408/35 Ercol Furniture Ltd

Summary of Objections

- (a) Status of Appendix requires clarification. It should not be part of the Local Plan if it is to perform the role of Supplementary Planning Guidance.
- (b) Appendix fails to specify type of facilities which might be included within each type of public open space identified.
- (c) NPFA standards are minimum recommended guidelines and this should be acknowledged in the text.
- (d) A detailed assessment of playing pitches in the District is required.
- (e) It should be made clear whether the proposed standard for outdoor sport is in addition to that for public open space as outlined.
- (f) Appendix should incorporate provision for built sports and recreation facilities in association with new residential development, in addition to outdoor sports and open space. Alternatively, it should be made clear that appendix only relates to outdoor facilities.

- (g) In response to PIC A7/1, propose that plans showing deficiency areas should be produced as part of the Local Plan.

Inspector's Reasoning and Conclusions

14.7.1 The function of the various Appendices is to set out the more detailed information which is the subject of the various Policies or Proposals of the Local Plan. An example already cited is the Residential Design Guidance. For user and editorial convenience, it is as well that such detail is part of the Plan. If it were relegated as SPG, there is a danger that it would be read out of context. It would also not enjoy the same status nor could it be as easily cited in development control and allied decisions. By the same token, specific details of open space adequacy or deficiency are to be included in Appendices 7 and 8 (see RT0-4). Such appended detail, deriving mainly from the 2002 'Local Cultural Strategy', will enable development control decisions to be more reliably defended when Chapter 12 Policies are at issue. It is not the function of the Appendices to go down to the level of individual development sites or proposals. That is the function of Appendices 2 and 3 (Development Principles and Development Briefing).

14.7.2 The effect of PIC A7/1 would be to introduce a summary of open space and leisure facilities deficiencies in Appendix 7. This is in line with PPG17 advice and provision may differ from previous NPFA norms. Playing pitch retention or incremental provision will be secured by reference to the various adopted Policies of the Local Plan. Local auditing of such provision will be published in 2002 and presumably be thereafter monitored in accordance with PPG17 advice and supplementary future guidance (eg 'Good Practice Guides'). The LPA state that their overall future standards for open space generally will include playing field provision. It is important to note that only open land uses (ie not buildings) will be the subject of Appendix 7. It is understood that detailed mapping of open space deficiency will be shown in the form of SPG. This will presumably be based on the above 2002 Strategy; in any case it would not be helpful or convenient to show such detailed and transient information on the Proposals Map or Insets.

RECOMMENDATION

- AP07/1 Modify Appendix 7 in accordance with PIC A7/1.

APPENDIX 8: DEFICIENCIES OF PROVISION IN OPEN SPACE

The Objections

0379/34 Sport England

Summary of Objections

- (a) Appendix 7 and 8 are confusing and unhelpful.
- (b) Appendix should be amended to identify the type of open space deficiency in each instance (whether District, Sub-District, Neighbourhood, Local or Small Local).
- (c) Appendix should be extended to include areas suffering from a deficiency in outdoor pitches in light of the playing pitch review.

Inspector's Reasoning and Conclusions

14.8.1 It is earlier proposed that Appendices 7 and 8 be amalgamated and possibly extended by the inclusion of a Technical Note on Open Space Provision and Deficiency (see RT00/2). The form of this revised Appendix will be for the LPA to devise but the

suggestion that it be hierarchical in format has much to commend it. This would make it easier to bring to bear on specific development control decisions. No doubt the LPA will give consideration to the illustration of the new Appendix 7 by means of suitably sized and scaled maps or diagrams. This has been done with advantage in Appendix 9. It appears to be a useful alternative to the inclusion of deficiency information on the Proposals Map. On the other hand, if monitoring and consequential updating suggest the need for frequent revision, such data may better be included in the 2002 Strategy publication, already referred to.

RECOMMENDATION

- AP08/1 Modify Appendices 7 and 8 in accordance with earlier recommendation RT00/2.

APPENDIX 9: PUBLIC TRANSPORT ACCESSIBILITY MAP

The Objections

0817/35 Croudace Ltd

Summary of Objections

- (a) It would be useful to complement the map with time contours showing areas of the District that are 10, 20 and 30 minutes away from public transport services. Whilst the map identifies the population support that exists for public transport services, it does not identify areas that are most accessible.

Inspector's Reasoning and Conclusions

14.9.1 The Appendix 9 Public Accessibility Map appears closely to follow the former DoE and DTp advice as set out in 'Development Plans: Good Practice Guide' (1992) and 'PPG13: Guide to Better Practice' (1995). The Map shows five accessibility zones in Wycombe District for the purposes (among others) of locating key land use activity and of determining appropriate parking standards. Such considerations might arise in the context of Policies T1, T3, T4 and T9 when development control decisions have to be made or justified. It is not immediately obvious why 10 minute time contours with respect to scheduled public transport would assist this process. Accessibility is a composite function of nodality, frequency of service and population distribution. Time contours merely serve to indicate travel distance by specified mode to the nearest public transport point, regardless of level of service; a largely irrelevant measure of accessibility.

RECOMMENDATION

- AP09/1 No modification

APPENDIX 10: PARKING STANDARDS

The Objections

0339/5 Slough Estates PLC
0351/3 John Laing Property
0509/7 Lattice Property (Formerly BG Property)
0840/7 Marlow and District Chamber of Trade & Commerce
0872/34 Government Office for the South East

PIC A10/1 Objections

0424/3	Marks & Spencer PLC
1739/16	Lord Carrington's Grandchildren's Settlement
2063/22	Wycombe Summit Ltd / Wycombe Option Ltd
2137/7	Waitrose

PIC A10/2 Objections

1798/32	Buckinghamshire County Council - Environmental Services Dept
2124/8	Crime Prevention Design Adviser, Thames Valley Police

Summary of Objections

- (a) Non-residential car parking standards are too low. Recommend that parking standard for B1 and B2 development in Accessibility Zone 1 is amended to 1 space per 50.
- (b) Change in level of Accessibility Zones 1 and 2 is nowhere near as great as the change in parking standards would suggest. To ensure that town centre sites are brought forward for development, the difference in standard should be reduced.
- (c) For non-residential parking in Zone 1, there is a strong case for allowing only operational parking, given the high quality public transport links in existence and an existing supply of public parking spaces.
- (d) Using 'accessibility' as a determinant of zones is not sufficiently robust. Accessibility can alter rapidly. The Regional Transportation Strategy in revised RPG9 is likely to adopt a different approach, concentrating on land use characteristics and land use types, in a zone matrix.
- (e) Standards will reduce effectiveness in encouraging town centre development.
- (f) Commuted car-parking policy is inconsistent and does not comply with Government guidance. Proposals are a 'blanket' formulation which do not give sufficient regard to specific circumstances. Needs to be clear that contributions will be in accordance with Circular 1/97.
- (g) Following the reporting of the 'Marlow Traffic Survey', the plan relating to Marlow and transport should be redrafted to take into account the results of the survey. Clear plans showing accessibility zones for each major centre should be attached.

In response to PIC A10/1

- (h) Concern at reference to commuted payments; paragraphs 2.3 and 5.1 are contrary to latest Government thinking; PPG13 makes it clear that these are no longer appropriate. Reference should be deleted.
- (i) PIC seeking commuted payments to implement the strategy of P&R is unreasonable and unjustified and should be deleted.

In response to PIC A10/2

- (j) Holding objection, pending submission of further comments; changes have significant implications for the Highways Authority and Wycombe Transportation Strategy.
- (k) Concern that reduced number of parking spaces will put pressure on drivers, creating higher car crime as people park further from where they can see their cars; likely parking on pavements and disputes between motorists and residents as to who should park where. A more flexible approach and practical standard is required.

Inspector's Reasoning and Conclusions

14.10.1 The variable imposition of on-site parking standards reflect current government advice to integrate land use and transport planning and also to restrain the use of motor vehicles for optional purposes. The content of Appendix 10 merely reflects the priorities of Policy T1 (as modified by PICs 7/2 and 7/19). Town centre redevelopment need not be inhibited by such planning standards and policies. The reason is that the Local Plan appears to be following overall planning guidance as set out in PPGs 6 and 13. Moreover, the proposed levels of maximum parking provision are not inconsistent with either PPG13 (Annex D) or the directly relevant advice of RPG9 (Policy T3). In the case of the latter, there is evidence that the LPA has consulted adjoining authorities and no objections seem to have been received from that quarter in this particular context.

14.10.2 The latest relevant advice on parking policy is set out in PPG13 (paragraph 51). This does not advise LPAs against the imposition of commuted sums for parking. Indeed, it advises the use of shared parking, particularly in town centres. It is difficult to see how such a policy could be implemented without some form of commuted payment. At the same time, it would be inadvisable to embargo all but operational parking in Zone 1 (High Wycombe Town Centre) since the PPG advises caution in prescribing differential standards as between town centres and the periphery. In the case of High Wycombe at least, there is the prospect of some transference of parking capacity from centre to periphery under Policy T17 P+R proposals. This will be done only after monitoring has shown that this is an appropriate course of action and there would seem to be no C1/97 policy objection to it.

14.10.3 The differential between Zone 1 and Zone 2 employment parking standards would be reduced as a result of PIC A10/1, which is endorsed as being broadly in line with PPG13 advice. The use of the Appendix 9 Accessibility Zones to vary the levels of maximum on-site parking provision is logical and is wholly consistent with the advice of the PPG13 Good Practice Guide (see 3.11-12 etc). No doubt the standards will be kept under review and altered if necessary at the stage of Local Plan Review. The smaller urban centres, such as Marlow, are within the Zone 3-4 band and it is doubtful whether they should be re-zoned in view of their low-density catchment characteristics. In any event, the extent of redevelopment within the smaller centres is likely to be limited on account of their extensive conservation area status. No doubt the extent of parking within redevelopment sites will reflect their future function and existing parking capacity (eg Policies M4 and M5).

14.10.4 The holding objection to the PIC A10/2 alterations (June 2000) predates the publication of PPG13 (Annex D) in March 2001. The PIC contains marginally adjusted standards for residential parking in Zone 2, for disabled parking at places of employment and retailing in all zones. These changes seem unexceptionable and are endorsed. The fear that any reduction in parking provision will inevitably lead to car crime, physical violence and other forms of anti-social behaviour may well be exaggerated. These are all matters for law enforcement and road traffic regulation and do not directly concern land use planning. To the extent that they do, they may well be addressed for development control purposes by Policies G25 and T19 of the Local Plan.

RECOMMENDATION

- AP10/1 Modify Appendix 10 in accordance with PICs A10/1 and A10/2.

APPENDIX 11: ROAD SCHEMES AND TRANSPORT IMPROVEMENTS

The Objections

0345/2 Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell

	Partnerships Ltd
0374/5	The Countryside Agency
0367/13	Highways Agency
0509/5	Lattice Property (Formerly BG Property)
0678/7	Thames Water Property Division
1426/9	Mrs Pauline Bushell
1516/7	Mrs M Mason
1577/1	J Platt
1579/17	Oxford Land Limited

PIC A11/2 Objections

0345/17	Bryant Homes Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/67	Axa Equity & Law Life Assurance Society PLC
0408/36	Ercol Furniture Ltd
0840/67	Marlow and District Chamber of Trade & Commerce
1679/8	Mr & Mrs Brant, Kingsmead Road Caring Residents
2136/9	Thames Water (Property Division)

PIC A11/3 Objections

1739/15	Lord Carrington's Grandchildren's Settlement
2063/21	Wycombe Summit Ltd / Wycombe Option Ltd
2133/4	Mrs Patricia Price

Summary of Objections

- (a) M40-A404 Junction; improvement should be deleted; there is no scheme to improve the junction in the targeted programme of improvements in the recent White Paper 'A new deal for Trunk Roads in England'.
- (b) A404/ Hazlemere Diversion; object to line of diversion which is shown to run through safeguarded land in the AONB. No justification to build new roads into or through the AONB. Route should be deleted as the Proposals Map does not designate a preferred route and link it to the A404; the diversion conflicts with Government guidance and emerging SERPLAN policies; it will cause increase in noise and pollution; destroy green fields; conflict with local plan policies and guidance for the Chilterns AONB.
- (c) Desborough Road to Queen Alexandra Road Scheme; should be deleted. The reservation has been required for many years, but little or no progress has been made in implementing it, there is no justification for it and the reservation line has a significant impact on the Lily's Walk site.
- (d) Propose new scheme: mini roundabout at junction of Oxford Road into West Street in Marlow.
- (e) Propose new scheme: junction and park and ride improvements to the east of the Marlow bypass.

In response to PIC A11/2:

- (f) Wycombe Marsh; object to new local distributor road between London Road and Kingsmead Road as no detailed highway /transport study has been carried out. Reference to access points and link road is onerous and unreasonably related to sites development.
- (g) Wycombe Marsh; reference to additional highway improvements away from the immediate locality of the site is contrary to draft PPG13 which requires that the nature and scope of

contributions towards transport improvements be indicated. All road improvements and contributions to public transport and infrastructure should be fairly and reasonably related to the site's redevelopment and identified at the planning application stage by way of a detailed traffic and transportation impact assessment. Inconsistency between Appendix 2 and Appendix 11 of the Plan.

- (h) Wycombe Marsh; object to new road entering site from Junction of Abbey Barn Lane and Kingsmead Road, and cutting through green space.
- (i) Ercol; reference to the Ercol site transport requirements should be amended to 'contributions towards local highway improvements subject to their need being confirmed by a detailed traffic impact assessment and reconciled with Circular 1/97'.
- (j) Abbey Barn South; not appropriate to identify specific road schemes and transport improvements in relation to particular development sites; this can only be done following a detailed transport study. Requirement for a new local distributor road should be deleted; provision has not been justified.
- (k) Park Mill Farm; object to new pedestrian route; words 'a bridge to Wades Park' should be deleted. Point (10) should read 'widening of flare on Longwick Road approach to Tesco roundabout'. Points (11-12) should be deleted and replaced as a single entry as 'funding towards the provision of improved pedestrian and cycle linkages between the site and Princes Risborough Town Centre and railway station'. Point (13) should read 'funding towards the provision of a new shuttle bus service connecting with Summerleys Road and Longwick Road, including a new bus gate on Mill Lane'.
- (l) In response to PIC A11/3, object to the deletion of the M40-A404 junction scheme, as it is understood that money was secured from Central Government for these improvements. Proposed major works would have been of benefit; they should be reinstated.

Inspector's Reasoning and Conclusions

14.11.1 The purpose of Appendix 11 is merely to summarise the extent and agencies of road schemes and transport improvements that are mentioned elsewhere in the Local Plan. To the extent that various objections have been made to these, notwithstanding that they are dealt with elsewhere in this Report, they are addressed under their lower case references as below:

- (a) The design of the M40-A404 intersection is again under review and its possible improvement may now appropriately be shown on the Proposals Map.
- (b) The A404 Hazlemere Diversion is elsewhere recommended for deletion from the Plan.
- (c) The Desborough Road Scheme is proposed by the Bucks CC and should be included.
- (d) The Oxford Street-West Street junction improvement in Marlow is too minor a scheme for inclusion in the Local Plan and does not anyway figure in the Local Transport Plan.
- (e) The P+R proposals next to the Marlow Bypass (A404) (see T17(5)) is not recommended for inclusion and would be subject to (modified) Policy T17 if programmed in future.
- (f-h) Wycombe Marsh transport improvements are comprehensively covered elsewhere in this report and will be the subject of detailed negotiations and planning permission in due course.
- (i) Ercol Site is the subject of a resolution to grant planning permission subject to a s106 agreement.
- (j) Abbey Barn Site is recommended for deletion as an allocation.
- (k) The revised Development Principles as for Park Mill Farm allocation set out in PICs A2/10 and A2/20 deal with these points in principle, although the level of detail proposed by objectors is inappropriate for a Local Plan. The revised wording allowing for the provision of a second crossing of the railway in an unspecified form is also endorsed.

(l) see (a) above.

RECOMMENDATION

- AP11/1 Modify Appendix 11 in accordance with PICs A11/1, A11/2 and A11/3.

APPENDIX 12: AREAS OF ATTRACTIVE LANDSCAPE AND LOCAL LANDSCAPE AREAS

The Objections

0039/4 Michael and Janice M Jose

PIC A12/1 Objections

0376/68 Axa Equity and Law Life Assurance Society PLC
0571/35 Laing Homes Ltd

Summary of Objections

- (a) Gomm Valley should be included in the list of LLAs.
- (b) In response to PIC A12/1, object to the inclusion of Gomm Valley.
- (c) In response to PIC A12/1, object to the failure of description to adequately reflect character of Gomm Valley and its local landscape significance which totally justifies its designation as a Local Landscape Area.

Inspector's Reasoning and Conclusions

14.12.1 In the light of the earlier recommendation to allocate the Gomm Valley as an ASL, it would not be expedient to designate the area as LLA in accordance with PIC10/6.

RECOMMENDATION

- AP14/1 No modification.

APPENDIX 13: SITES OF SPECIAL SCIENTIFIC INTEREST+LOCAL NATURE RESERVES

The Objections

0483/7 *Wooburn Parish Council*
1193/13 *Environment Agency*
1193/23 *Environment Agency*
1200/30 *English Nature*
1294/7 Environmental Records Officer, Bucks County Museum
1646/3 *John Dalton*

PIC A13/1 Objections

0376/58 Axa Equity and Law Life Assurance Society PLC

Summary of Objections

- (a) Should be titled 'Sites of Nature Conservation Interest'; grid references should be attributed to the sites. Reference should be made to the fact that the Environmental Records Centre holds information and is available for reference.
- (b) Correct spelling of Buttlers Hangings and Moorend Common.
- (c) 'Brush Hill' Princes Risborough appears to be missing from the list of LNR's.
- (d) The Warren Nature Reserve should be shown on the Proposals Map as a Local Nature Reserve.
- (e) In response to PIC A13/1, propose that the Plan should set out the criteria that the Council use to assess the effect of a planning application on each SINC and BNS, particularly in the case of SINC's which have no statutory force.

Inspector's Reasoning and Conclusions

14.13.1 The objections which refer to minor errors and omissions are accommodated by PIC A13/1 and are endorsed as matters of fact. The Local Plan sets out an overall policy and detailed criteria for development affecting all grades of nature conservation areas in Policies L8a and L9a, these modifications being earlier endorsed (see L8-L10). Policy L9a (1-2) lays down the broad criteria for assessing development proposals. Chapter 10 of this Report also sets out a suitable format for the information contained in Appendix 13. This would include a Proposals Map reference, the name of the conservation site, its precise status, its National Grid Reference (NGR) and its overall area. This supplementary data and cross referencing as between Written Statement and Proposals Map has earlier been noted as of particular assistance to future users of the Local Plan.

RECOMMENDATIONS

- AP13/1 Modify Appendix 13 and the Proposals Map in accordance with PIC A13/1, M/19, M/20 and Recommendation LN08/6.

APPENDIX 14: CONSERVATION AREAS + PARKS AND GARDENS

The Objections

0768/4 Mrs J I Ricketts

Summary of Objections

- (a) Ashwells should be listed as an area of special historical interest.

Inspector's Reasoning and Conclusions

14.14.1 It is not the function of the Local Plan to secure the designation of conservation areas; merely to record the fact and extent of their designation. Since the Berghers Hill Conservation Area has been altered in extent by a very minor deletion, it would be appropriate to show this on the Proposals Map. This is on the understanding that the necessary statutory formalities, including notification and advertisement, have been completed. Similarly, the various alterations and extensions to the registered Parks and Gardens of Special Historic Interest, notified by the Historic Buildings and Monuments Commission on 10 August 2001), may appropriately appear on the Proposals Map. As

with other notations, the LPA may think it useful to indicate the NGRs of the various locations in the Appendix.

RECOMMENDATION

- AP14/1 Modify Appendix 14 and the Proposals Map in accordance with PICs A14/1, M/54-59 and M/62.

APPENDIX 15: SCHEDULED ANCIENT MONUMENTS

The Objections

0867/2 West Wycombe Parish Council
0867/7 West Wycombe Parish Council

Summary of Objections

- (a) West Wycombe Hill has never been referred to as Church Hill; it should be referred to as 'West Wycombe Hill'. Question why English Heritage should dictate this.

Inspector's Reasoning and Conclusions

14.15.1 The reference to Church Hill follows the name given on designation of the Scheduled Ancient Monument by the Historic Buildings and Monuments Commission. The LPA intend by PIC A15/1 to insert its more familiar name 'West Wycombe Hill' in parenthesis in deference to West Wycombe PC and this addition is endorsed. Also proposed are the additions to Appendix 15 and the Proposals Map of new Scheduled Ancient Monuments. As with other notations, the LPA may think it useful to indicate the NGRs of the various locations in the Appendix.

RECOMMENDATION

- AP15/1 Modify Appendix 15 in accordance with PICs A15/1, A15/2, A15/3 and M/60-61.