

CHAPTER 4 – EMPLOYMENT

E1: NEW EMPLOYMENT GENERATING DEVELOPMENT IN THE DISTRICT

The Objections

0351/4	John Laing Property
0408/21	<i>Ercol Furniture Ltd</i>
0408/24	Ercol Furniture Ltd
0506/9	Bassetsbury Area Protection Group
0524/13	Thames Valley Chamber
0524/17	Thames Valley Chamber
0593/3	David L Davies
0608/13	G W Deeley Ltd
0608/15	<i>G W Deeley Ltd</i>
0799/1	Michael J Relf
0840/17	Marlow and District Chamber of Trade & Commerce
1186/7	Miss P Densham
1798/13	<i>Buckinghamshire County Council – Environmental Services Department</i>

PIC 4/1 Objections

0524/27	Thames Valley Chamber
0863/2	Clifford and Sylvia Mary Putnam

Summary of Objections

- (a) This is not a suitable development control policy.
- (b) Criterion (i) should be deleted. Suggests replacement wording based on High Wycombe town centre sites with good public transport.
- (c) Concern over implementation of criterion (iv) – no relocation site is allocated to Ercol.
- (d) Not enough opportunities for existing businesses to expand as new allocations are B1. Amend to help B2 and B8 employers.
- (e) Concern at imbalance between homes and jobs. Risk of more homes being occupied by the work-less.
- (f) Amend criterion (iv) to also refer to policies C7, C8 and C12.
- (g) This plan fails to implement Structure Plan policy that allows Local Plans to replace lost employment land.
- (h) The policy is unduly restrictive and would prohibit expansion of an existing identified business park. Add (v) 'where the expansion of an existing business park is not restrained by the policies in the plan'.
- (i) No mention is made of the need to replace the employment opportunities that have been lost in Marlow. Policy must be revised.
- (j) Provides for retention of too much employment land. Some could be reallocated for housing.
- (k) Concern over possible mis-interpretation of policy. Parts (ii) and (iii) do not appear to accord with policies E2 and E3 of the Structure Plan. Supporting text should be clarified.

(l) Objection to the rewording of E1 in PIC 4/1 as an unrealistic limitation on employment-generating development at Princes Risborough.

(m) Objection to the PIC 4/1 alterations to E1(iii) – where do such opportunities exist?

Inspector's Reasoning and conclusions

4.1.1 RPG9, setting out regional planning guidance for the South East, was published during the inquiry but after the Employment RTS where objections to policies E1-4 were discussed. A full note of the session is attached as Appendix 4.1. Within the broad policy thrust of encouraging a variety of employment, Policy RE8 for the western sector of the region requires positive strategies to be developed for areas where congestion or labour or land shortages are inhibiting growth. The Council argued that Wycombe District was becoming a 'hotspot' of the type identified in RGP9, although some areas of local deprivation remained. To varying degrees the objectors raise the issue of whether Policy E1 would provide for the correct balance between the supply and demand for employment land throughout the District over the next decade. Given the fluid nature of the local economy, with a switch from manufacturing to business and research activity, changing employment densities, site utilisation and commuting patterns, the impact of such land use policies on the number of jobs can be very hard to predict.

Employment land needs

4.1.2 The relatively low level of unemployment in the District (just over 1% at the time of the inquiry) is a good indicator of a strong local economy, and consequently a high demand for land and premises suitable for employment uses. Objectors at the RTS agreed that the High Wycombe area had seen a significant rise in rental levels for commercial property in recent years, although it was argued that there was some stagnation in the secondary industrial market. The evidence of vacant industrial and commercial property schedules produced by Verco's witness indicated a very considerable number of units under 1000 sq m in size, with few buildings larger than this threshold. The shortage of modern office buildings, now fetching rents significantly higher than traditionally found at this location on the fringe of the Thames Valley 'golden triangle', indicated a strong demand. The survey also revealed a shortage of vacant sites, which objectors particularly stressed in relation to arguments about need for business park, discussed below in section 4.2.

4.1.3 The Council's analysis of future labour supply within the District, taken from the Prism Report (CD/J/6), was not disputed. This indicated a significant fall in the projected number of economically active residents in Wycombe, from 89,200 in 1996 to 84,200 in 2011, principally due to an ageing population. In general terms therefore, the allocation of more employment land to provide more jobs could not be justified for local reasons. Policy RE5 of RPG9 leads towards the redevelopment of existing sites in accessible locations, wherever possible at more intensive levels of use, rather than development of new sites. In essence the Council has followed this approach.

4.1.4 The District is a net exporter of labour at present, although the Prism report indicates that commuting flows may be in balance by 2011. Whether the provision of more job opportunities in Wycombe District would reduce out-commuting is not clear cut. Existing information about commuting patterns is rather out of date. Much would depend on the nature of the jobs created in relation to the skills of the resident workforce. A considerable proportion of the new employment may be taken up by those living outside the District, for example along the M40 corridor to the north-west. Traffic congestion is acknowledged to be a serious problem in High Wycombe, which the provision of new employment sites, even if located close to public transport nodes and routes is unlikely to alleviate to any significant degree.

4.1.5 The Council also is confident that the District will continue to experience 'spaceless growth' in the local economy, through higher density of employment at existing sites. To the extent that this phenomenon has occurred over the last decade or so, it may well reflect the changing balance between manufacturing (which has declined) and office employment.

Need to protect manufacturing land

4.1.6 Although PPG3 refers to the need to consider employment land for new housing, the broad thrust of the policy guidance is aimed at those areas with very significant surpluses of vacant land. Paragraph 42 refers to land that cannot realistically be taken up and is a 'wasted resource'. This hardly applies to circumstances in Wycombe, where objectors acknowledge that there is a shortage of vacant sites. Both the PPG and the Good Practice Guide – Tapping the Potential refer to derelict urban land, not sites actively used for industry and business.

4.1.7 Policy RE10 of RPG9 specifically refers to manufacturing in the context of encouraging economic diversity and maintaining a balanced economy. Given the quite substantial losses of industrial land that occurred during the 1990s, identified in the Employment Topic Paper, I sympathise with the Council's caution about releasing further sites for other uses. This view is reinforced by the nature of the topography in High Wycombe itself, where large flat sites along the Wye valley floor are at a premium. I discuss this issue further in section 4.4.

Town centre employment

4.1.8 Structure Plan policy E1 clearly seeks to restrict substantial new employment growth in the District and unlimited approval for new Class B1 development, even in a town centre location close to public transport links, would be inappropriate. I consider that criterion i) could reasonably be used as a development control policy to prevent the significant overall expansion of employment land. In the same strategic policy context the unlimited expansion of existing employers in general industrial and warehouse businesses could not be justified. The Council refer to the promotion of a mixed use site at Stockwells Timber Yard. Similar considerations apply to the expansion of existing business parks, a sector which is discussed in more detail below.

4.1.9 However, as currently worded the policy could prevent new employment development, such as offices in High Wycombe town centre, on sites in some other previous use. From the Council's evidence, such an outcome was not intended, provided that safeguards concerning other planning objectives, for example retaining the vitality and viability of retail areas or protecting residential amenity, were applied. The Structure Plan refers to 'major employment areas', not infill schemes within the fabric of the town, which is expected to be the main focus of growth within Wycombe District. I therefore recommend adding another criterion to the policy allowing new employment generating development in the town centre, up to a floorspace limit identified by the Council/equivalent to the size of the existing buildings on any one site.

Rural employment

4.1.10 I see no need for the Plan to introduce a number of extra cross-references between employment and countryside policies. Although Policy C7 promotes farm diversification, new building is limited by criterion (vi) to extensions and would not encompass the type of major employment development implicit in Policy E1. Similar C8 deals with the re-use of existing rural buildings (possibly with minor extensions). Policy C12 also relates to small scale development.

4.1.11 I note that the County Council objected to the original policy on grounds that the Plan might have encouraged too much employment growth in unacceptable countryside locations. Structure Plan Policy E2 states that employment development adjoining the settlements beyond the green belt should be specified in local plans. I accept the Council's point that further employment land releases might upset the delicate balance between promoting and overheating the local economy. Apart from the planned redevelopment of the Princes Estate, there is no real need for new allocations at Princes Risborough, the only settlement of any size beyond the green belt not surrounded by the AONB (see also section 4.2). The Council has proposed a change to the policy to reflect these circumstances and the County Council has now conditionally withdrawn its objection

Marlow

4.1.12 Major employment allocations in the Marlow area would be contrary to Structure Plan Policy E1. The very low unemployment rate for the town indicates no special local circumstances that might weigh against strategic policy. From the Council's evidence, the loss of employment land in Marlow has been limited to the Brewery site and land at New Town Road. Redevelopment of existing premises at higher density, which broadly accords with government policy in principle, has taken place. This has helped to maintain the status quo in the town's employment market.

Other matters

4.1.13 The Ercol objection has largely been overtaken by events, namely the decision of the company to relocate to new premises currently under construction at Princes Risborough and the granting of planning permission for new housing on the High Wycombe site. I deal with the proposal for a business park at Summerleys Road in section 4.2 below.

4.1.14 I consider the Plan provides sufficient flexibility within defined employment areas to meet the needs of existing businesses for limited expansion. Major growth on new employment land would conflict with Structure Plan policy but there have been some opportunities for relocation in the past, notably the move of Ercol from High Wycombe to Princes Risborough. The redevelopment of the Princes Estate, in a relatively sustainable location close to the railway station, accords with the broad thrust of Structure Plan policy. Similarly, I consider the proposed change in the wording of the policy, restricting the scale of new employment development and its location to within the current settlement limits, correctly reflects the strategy of the current Structure Plan.

Conclusion

4.1.15 Taking into account all the written evidence and the conflicting views at the RTS, I agree with the Council that the plan provides roughly the right balance between protecting existing sites and the designation of new areas for general employment use. I deal with the specific issue of a new business park in section 4.2 below. However, I consider the Plan should provide additional flexibility to allow redevelopment of sustainable employment sites in High Wycombe town centre.

RECOMMENDATIONS

- E/1/1 Modify the Plan in accordance with PIC 4/1
- E/1/2 Modify criterion (i) of the policy to include reference to redevelopment of previously developed sites in High Wycombe town centre with good public transport accessibility, subject to a reasonable maximum floorspace limit to be identified by the Council.

E2: NEW BUSINESS PARKS

The Objections

0228/5	Thames Valley Chamber of Commerce & Industry – Wycombe & South Bucks Area
0851/6	B Mahaffey
0872/24	Government Office for the South East
0947/6	Kier Ventures Ltd
1414/18	Michael J Overall
1475/5	Mr D V Baker

PIC 4/2 Objections

0376/47	Axa Equity and law Life Assurance Society
0524/28	Thames Valley Chamber
1798/27	Buckinghamshire County Council Environmental Services Department
1935/10	Councillor Anthea Hardy

Summary of Objections

- (a) Not enough provision of new land for business parks/employment uses.
- (b) High Wycombe has overgrown – a reduction of business/commercial level would ease problems.
- (c) The scale and type of development at Abbey Barn is linked to the findings of the Handy Cross multi-modal study. Supporting text should make reference to this.
- (d) The policy is contrary to national, regional and Structure Plan policy in allocating sites for employment uses. The plan identifies sites which should not necessarily be allocated and fails to identify others that should.
- (e) Site allocations appear to be based on assumptions and forecasts which are inadequately developed, incomplete and/or flawed.
- (f) No account seems to have been taken of the additional traffic which will be generated by business parks.
- (g) Objections to the deletion of business parks in PIC 4/2. This is contrary to Serplan and does not provide adequate provision of additional employment land in the District.
- (h) Create a new village to the west of Wycombe which could accommodate housing and employment development.

Inspector's Reasoning and conclusions

4.2.1 National policy in PPG4 seeks to encourage new enterprise and investment through clear land use policies for industrial and commercial development. Wycombe District lies in the western sector of the South-East region, where over-stimulation of the local economy has created transport and environmental problems in the past. Policy RE5 of RPG9 re-iterates the need for new employment development to be located where it is accessible by environmentally friendly modes of transport, and encourages the re-use of developed land. Major new development is directed to the Thames Gateway, whereas in the western sector, positive strategies should be developed to deal with 'hotspots'. Although clusters of high value-added activities are encouraged, the guidance refers to science and new technology parks near universities or research facilities, which are not prevalent in the District. Policy E1 (c) of the Structure Plan refers to necessary employment re-structuring to secure a more diverse employment base, but only to the extent of replacing existing employment land lost to other uses. I consider there is no strong strategic policy direction in favour of providing a significant new Business Park in the High Wycombe urban area.

Local demand

4.2.2 Axa point to the Prism report (CD/J/6) findings that New Buckinghamshire has a concentration of knowledge-based businesses. The report shows High Wycombe as an area where the supply of floorspace in all sectors will not keep up with the projected demand from local businesses. The report concludes that unless these demands are not met by new land releases, the growth will be diverted elsewhere and the town's position as the hub of the New Bucks economy will be threatened.

4.2.3 As the Council point out, new businesses in information technology and related fields continue to be attracted to the District, such as Citrix (London Road) and Purple Software

(Corporation Street). This trend has been accompanied by 'spaceless growth', whereby significant increases in the number of jobs in the District have been achieved without granting permission for major new sites. Redevelopment of existing premises, and the shift away from manufacturing to service employment, have led to substantial increases in the amount of office floorspace. The Council's research indicates that there were 128,746 sq m of Class B1A development in the pipeline as of May 2001, representing a 20 year supply based on annual completion rates during the 1990s.

4.2.4 In quantitative terms, therefore, I consider there is limited need for a major new development of business floorspace at a time of substantial supply compared to past trends and low unemployment. To allocate a new business area could exacerbate current economic and environmental pressures.

4.2.5 Several objectors argued that there was a strong qualitative need for a Business Park, where similar enterprises could enjoy the benefits of synergy through clustering. The Council acknowledged this point at the publication of the Deposit Plan in December 1998, which included two Business Park allocations totalling 20 ha. One of these, the AXA-Sunlife site at Terriers has already been developed with new housing, following an appeal decision in 1999. The other, at Abbey Barn South, has been withdrawn (see Section 3.2). The only remaining Business Park allocation is at Beacon Heights, Stokenchurch, where it appears that an existing planning permission for a headquarters office building is about to be implemented.

4.2.6 I share some of the Council's concern that to meet a need for high quality business premises might in turn generate further economic activity, contrary to regional and county policy objectives. Nevertheless, continued re-structuring of the local economy would provide further protection against any future downturn, and could help to meet wider employment objectives.

4.2.7 Existing premises, such as those at Kingsmead and the Mercury Centre, have already attracted occupiers in high value businesses, including pharmaceuticals and computer software design. Other sites may provide some new development in similar Class B1 uses, for example 2 ha at Wycombe Marsh, as part of mixed developments at sustainable locations in accordance with the strong thrust of government policy. Other employment sites, such as Globeside at Marlow, Glory Mill and Compair, may be suitable for re-development with modern premises aimed at new technology businesses, in attractive locations not far from a variety of transport facilities. Developments of this scale and type might not match past expectations for new employment opportunities in the format of a greenfield campus-style Business Parks heavily dependent on car travel; nonetheless they may meet modern needs in a more sustainable manner.

4.2.8 On balance therefore, I support the Council's position that economic circumstances no longer justify the allocation of any free-standing Business Park allocations. However, there is a clear need for continued monitoring of economic data, as advised by the County Council, to ensure that the High Wycombe area in particular is able to carry on meeting the diverse employment needs of its residents.

Wycombe Airpark

4.2.9 Cllr Anthea Hardy put forward what she described as a bold proposal for a new business park as part of a new village covering a substantial area of land to the west of High Wycombe. She argued that the chosen site would be preferable to some of the safeguarded areas outside the green belt, emphasising the particular advantages of the site with regard to access, which could be obtained from a new junction on the M40. I deal with this concept more fully in Section 3.2 above.

4.2.10 The business park and manufacturing area would comprise much of the Airpark, the lease for which runs out in 2014. At present the land is effectively green belt, either in its own right or as a major developed site within it. The remainder of the land is green belt and AONB. Given my acceptance of the LPA's position that a new business park at a greenfield location is not needed within the life of the Plan, there is no justification on grounds of national need to

override national policy for both green belt and AONB in this instance. Such a major revision to green belt boundaries would have to be taken in a strategic policy context. Similarly, I have no technical evidence to support the concept of a major new junction on the M40 close to junction 4, where the motorway is within a relatively deep cutting.

RECOMMENDATIONS

- E/2/1 Modify the Plan in accordance with PIC 4/2

E2i: NEW BUSINESS PARKS - ABBEY BARN SOUTH
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The Objections

See Appendix 4A

PIC 4/2 Objections

1579/30	Oxford Land Limited
1739/3	Lord Carrington's Grandchildren's Settlement
2063/9	Wycombe Summit Ltd/Wycombe Option Ltd

Summary of Objections

- (a) Increase in congestion, noise, pollution and danger from traffic, especially to school children, particularly in Daws Hill Lane and Flackwell Heath. Will worsen traffic congestion at Handy Cross. Effect on narrow country lanes must be considered.
- (b) Premature to consider this site until a traffic impact assessment of the development of all four sites (Abbey Barn North, Abbey Barn South, Wycombe Marsh Sewage Treatment Works and Wycombe Marsh Paper Mill) has been carried out.
- (c) Site is poorly located for development;
 - fails to take account of brownfield alternatives (contrary to Government advice),
 - Poor access/existing infrastructure - too remote from M40 junctions 3 & 4, and lacks adequate public transport services to support it,
 - Contrary to policies T1 and T9,
- (d) Destruction of the landscape (including Green Belt and AONB designations), leading to amalgamation of Flackwell Heath and Daws Hill Lane. Site should be made a Local Landscape Area (LLA).
- (e) Loss of wildlife habitat.
- (f) Loss of high grade agricultural land.
- (g) Loss of footpaths and bridleways.
- (h) Water pollution and increased risk of flooding.
- (i) Adverse effect on local house prices.
- (j) Adverse effect on tourism.
- (k) Increased crime and unemployment.

- (l) Increased pressure on Local Authorities and services, including school places.
- (m) Lack of need for more housing, a hotel or business park and unacceptable mix of development.
- (n) Pressure to extend development in the future.
- (o) Impact on Wycombe Summit.
- (p) Alternative business parks/employment areas suggested:
 - Wycombe Marsh Paper Mill
 - Wycombe Marsh Sewage Treatment Works
 - Safeway site
 - Sainsbury site
 - Booker Hospital
 - Cressex
 - United States Air Force (USAF) base, Daws Hill
 - Rank Xerox, Marlow
 - Wycombe Air Park
- (q) Objections to the PIC 4/2 deletion of a business park at Abbey Barn South.

Inspector's Reasoning and conclusions

4.2.11 Following the proposed deletion of the mixed-use allocation for Abbey Barn South in the PICs, many of the objectors' concerns about the business park element have been met. For the reasons set out in detail in sections 3.2 and 4.2 above, I agree with the Council that the site should be retained as safeguarded land, without any indication of when it may come forward for development, or the intended land use(s).

4.2.12 I deal with the objection to the deletion of the business park element of the allocations in my general discussion above, and also in my report on the deletion of the housing element of the Deposit Plan allocation.

RECOMMENDATIONS

- E/2/2 Modify the Plan in accordance with PICs 3/4, 4/2 and M/1

E2ii: NEW BUSINESS PARKS - AXA SUNLIFE
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The Objections

See Appendix 4B

Summary of Objections

- (a) No justification for further business development in the town. No further development of any kind should be allowed on the site.
- (b) A business park should not be located in this Spacious Residential Zone – housing would be more appropriate, especially affordable housing for local needs.

- (c) Effect on conservation area, trees and wildlife.
- (d) Loss of community access to woodland.
- (e) Increase in volume of traffic, with associated noise, pollution, congestion and danger, especially on Amersham Road, Totteridge Lane and High Wycombe town centre. Question whether policy T1 can be met.
- (f) Isolated nature of this site makes it unsustainable, contrary to other policies in the Plan.
- (g) Office and business uses would be better located close to the motorway or in vacant premises elsewhere in High Wycombe.
- (h) Obtrusive skyline.
- (i) Lack of need for further business premises.

Inspector's Reasoning and conclusions

4.2.13 I note that shortly after the Plan was placed on a deposit, the residential redevelopment of the site was granted planning permission on appeal (CD F/3). This development has been carried out, thus meeting the objections to the allocation, which is now redundant. I see no need to discuss this issue further.

RECOMMENDATIONS

- E/2/3 Modify the Plan in accordance with PIC M/6

E2: NEW BUSINESS PARKS – COMPAIR, HIGH WYCOMBE (AS21)
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The Objections

0816/1 Invensys Plc

Summary of Objections

- (a) Policy fails to consider other business park allocations, such as Compair.

Inspector's Reasoning and conclusions

4.2.14 The objectors' case is that the site could be suitable for redevelopment with either employment uses, which could include a business park, or employment and residential and or retail uses. I deal with this more fully in section 3.4 above. In summary, the retention of the existing or another manufacturing use of the site would be desirable, most probably in new buildings to replace the current outdated premises. However, I consider the site would also be suitable for redevelopment with a new business park. Although I support the deletion of the allocation for a business park as part of a mixed-use development on a greenfield site at Abbey Barn South, I see no reason why the redevelopment of one type of employment use with another would lead to overheating in the local economy.

4.2.15 The site has very high density of buildings dating back at least to the 1950s, many of which rather unsightly and appear to have outlived their usefulness. The site is in a relatively sustainable position (certainly compared with Abbey Barn South) with opportunities to be very well served by public transport. It is reasonably close to the town centre with its range of facilities and the station is a short bus ride away. Although there are significant changes of level within the site, these could be used to create an attractive modern business environment, in combination with other improvements such as providing more landscaping on site and opening up the Hughenden Stream along the eastern boundary. However, both these possible

redevelopment scenarios could be achieved through application of Policy E4 as worded in the Plan. A site specific policy allocation for a business park would remove the flexibility to allow redevelopment for Class B2 employment use, as at present, which may be equally desirable.

RECOMMENDATIONS

- EM/2/4 No modification

E2: NEW BUSINESS PARKS - LANE END ROAD, SANDS

The Objections

0010/1 Banner Homes

Summary of Objections

- (a) The area of Safeguarded Land at Lane End Road should be designated as a business park or employment land.

Inspector's Reasoning and conclusions

4.2.16 The site lies within the AONB, a very high value landscape of national importance. The site comprises one side of a dry valley very characteristic of this part of the Chilterns. I consider the most important qualities of the site are its openness and its function of providing a clear break between Sunter's Wood and the western edge of the town. A business park would of necessity comprise substantial plot coverage of buildings and car parking, even if extensive landscaping were implemented with the scheme. A development of such essentially urban character would irrevocably change the landscape for the worse. I note from the inquiry appearance concerning the objection that the site should be allocated for housing that the difficulty of providing a suitable and safe access is likely to require the replacement of a substantial section of frontage hedgerow. This would have a further urbanising influence, involving substantial remodelling of the embankment on which the current hedge sits, increasing the visual impact of any development on the AONB in the short to medium term.

4.2.17 As I have commented elsewhere (in section 3.2) I consider the retention of land as safeguarded for future development despite its designation as AONB presents a serious policy dilemma which is difficult to resolve. In my view the adverse effect on the AONB landscape is a compelling objection to development of the site within this Plan period. The review of the Plan would need to address the wider issue of the future expansion of High Wycombe in the context of any review of green belt policy, evolving government guidance on transportation policy and sustainability and the strategic policy context at the time. In that event the Council would have to look again at the relative merits and disadvantages of all potential expansion areas, including this site.

4.2.18 I have already considered another objection regarding housing development on the site in section 3.2 of my report. The total area of the safeguarded land is just over 10 ha, at the minimum limit of viability for a single business park development with a variety of different units. I question whether the site can accommodate a business park development of sufficient size to meet modern marketing requirements and to provide the level of synergy between clustered new technology businesses sought by the Structure Plan and the final version of RPG9 in particular. I have dealt with arguments relating to the overall need for a new business park development at High Wycombe in section 4.2 above. While I share some of the objectors' misgivings about the concept of 'spaceless growth', certainly as far as employment prospects are concerned, I see no overwhelming need to provide for the expansion of existing local firms

on this particular site. I have taken into account the potential for other business development elsewhere, for example at Wycombe Marsh, and possible redevelopment of some other existing employment sites within the urban area of High Wycombe. In my view the level of development that could be accommodated on the site and the current local context of need would not be sufficient to justify relaxing the very strict test of national need outlined in PPG7.

4.2.19 The site falls within accessibility zone 5, on the edge of zone 4. Although it lies close to the second largest employment area in the town, I agree that it is relatively remote from main public transport routes. Satisfactory access could be provided from a new roundabout on Lane End Road, at some environmental cost.

4.2.20 Agricultural land quality is classified as a mixture of grades 3A, 3B and 4. A more accurate survey may be required if the allocation of the site were to be reconsidered in any Plan review. A significant amount of grade 3A land would be lost, which would be unfortunate, but may not of itself preclude designation of the site at a later date.

RECOMMENDATIONS

- E/2/5 No modification

E2: NEW BUSINESS PARKS – SUMMERLEYS FARM, PRINCES RISBOROUGH (AS133)
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The Objections

0863/1 Clifford and Sylvia Mary Putnam

Summary of Objections

(a) The site should be identified as a business park under policy E2.

Inspector's Reasoning and conclusions

4.2.21 I have dealt with the overall employment needs in the District in section 4.2, where I concluded that there was no overriding requirement for a new 'campus style' business park in High Wycombe. Princes Risborough is a smaller town which is not identified for any major employment growth in strategic policy, including Policy E1 of the Structure Plan or the policies in RPG9. Despite falling economic activity rates in the District as a whole, resulting from an ageing population, the labour supply in the town is likely to grow towards the end of the Plan period with the development of the Park Mill Farm site. On the basis that this goes ahead, a new allocation may fall within the scope of Structure Plan Policy E2, which allows for some employment growth at towns beyond the green belt, subject to local needs.

4.2.22 Some economic re-structuring is taking place through the redevelopment of the Princes Estate, which lies closer to the railway station. Although the town has its own identity and provides for some of its own employment needs, it remains an important dormitory area with very significant proportion of residents commuting out to work, primarily to London. The site has a total area of some 6.8ha, not all of which could be developed. It would be unrealistic to expect an area of this size to provide a range of modern premises occupied by a cluster of users who could benefit from significant interchanges of ideas and expertise as in other new technology parks.

4.2.23 At the inquiry appearance the objectors argued that the site would be suitable for a small unit development capable of supporting about 80 industrial and commercial jobs (compared with about 25 at present), not just in the new technology sector. The Council referred to 2 business start-up sites, but both were outside Princes Risborough and would not

meet any local demands for new jobs. However, part of the Princes Estate would be occupied by Ercol and there may be potential for redevelopment of other sites near the station, such as Hypnos or Whiteleaf Furniture. All three of these sites are more suitably located with regard to public transport accessibility and are more easily reached on foot or cycle from a wider area of the town. On balance therefore I consider that there is no strong case for the proposed allocation on grounds of local employment need.

4.2.24 The Council accepted that the agricultural quality of the land, Grade 3, would not be an over-riding constraint to development. The site is relatively well contained, especially to the east by the heavily planted railway embankment. Similarly, there is a strong hedgerow along the bridleway running alongside the south-western boundary. Although new development would be relatively inconspicuous in the wider landscape, the site is quite separate from the main developed area of the town, even after the Park Mill Farm development takes place. A new access would involve some loss of trees and further urbanise the rural character of Summerleys Lane. In summary, any future development would not relate very well to the pattern of building in the town and would...

4.2.25 The objectors accepted that the current access to the site was unacceptable for the level of development intended. The Council argued that the proposed new access point would be likely to require visibility splays of 4.5m by 215m, depending on vehicle speeds in Summerleys Lane. The objectors have argued in subsequent correspondence that the 85th percentile speeds measured along the road in August 2001 show that the design speed should be 70 km/h, requiring a 'y' distance of 120 metres. Even so these distances cannot be achieved at the access 3rd party land in both directions. The disruption of the hedge and land ownership difficulties are further disadvantages of the proposed allocation, particularly in the context of no strong defined need for the type of employment proposed.

4.2.26 There was some discussion at the hearing about the problems of traffic capacity in Summerleys Road under the two railway bridges between the site and the town centre and further away at Poppy Road. From the transport report prepared for the Princes Estate planning application, the measures proposed, including new traffic lights at the entrance to the estate and shuttle working through the bridges, would enable Summerleys Lane to continue operating at no more than 60% of its predicted capacity. Revised predictions for Poppy Road show that the ratio to flow capacity (rfc) of the junction with the A4010 would be at almost 100% by 2015, necessitating the installation of traffic lights. In practice the proposed allocation would make very little proportionate difference to traffic flows at this junction and I do not consider that this effect alone would be so severe as to prevent development of the objection site.

4.2.27 To achieve adequate accessibility by public transport, the allocation would have to be subject to a phasing policy restricting occupation of the development to a date after provision of the bus service for the Park Mill Farm housing development. Access to the station (about 2 km from the centre of the site) on foot is not ideal, given the distance and the narrow width of Summerleys Lane under the railway bridges. The relatively poor access at present to the station and town centre by cycle could be improved at some future date by a new link through the Princes Estate. However this would require a new bridge across the main railway lines, funding for which remains uncertain.

RECOMMENDATIONS

- E/2/6 No modification

E3: EXISTING BUSINESS PARKS

The Objections

0158/16 High Wycombe and Marlow Green Party
0595/15 Berks, Bucks & Oxon Wildlife Trust
1042/24 Mr J D Burnham
1042/25 Mr J D Burnham

Summary of Objections

- (a) The policy should list the sites and their locations.
- (b) Nature conservation interests should be protected.
- (c) Development should be expected to provide very high standards of building design as well as landscaping.

Inspector's Reasoning and conclusions

4.3.1 The intentions of the policy to safeguard the highest quality employment sites is consistent with national, regional and strategic policy, best expressed in policy RE9 of RPG9, which seeks to encourage high valued-added activities, in clusters where practical. The Council has accepted that the policy would be improved by listing the relevant business parks and indicating the need for high quality design, reflecting the government's commitment to improved standards in By Design, published in May 2000.

4.3.2 As far as I am aware, no nature conservation interests would be prejudiced by designating these parks, all of which exist have already been developed, except Beacon Heights, where planning permission has been granted (see below).

RECOMMENDATIONS

- E/3/1 Modify the Plan in accordance with PIC 4/3

E3: EXISTING BUSINESS PARKS – BEACON HEIGHTS, STOKENCHURCH

The Objections

0228/9 Thames Valley Chamber of Commerce & Industry (Wycombe & South Bucks)
0347/1 Tarmac Clayform Ltd

PIC 4/4 Objections

0347/3 Tarmac Clayform Ltd
0376/48 Axa Equity and Law Life Assurance Society Plc
21144/2 Mr M R Chadwick
2165/1 Mr & Mrs E R Butler
2406/1 Stokenchurch Parish Council

Summary of Objections

- (a) Site should be allowed to include B1(c) and B8 uses.
- (b) Site should include the dwellings fronting Ibstone Road and the triangle adjacent to the motorway slip road.
- (c) Objection to the exclusion of the triangle adjacent to the motorway in PIC 4/4.
- (d) Reference to Beacon Heights in PIC 4/4 should be deleted.
- (e) Objection in PIC 4/4 to the inclusion within the site of the dwellings on the road frontage.

Inspector's Reasoning and conclusions

4.3.3 The site lies within the AONB, to the south west of junction 5 of the M40. I note that the original development, permitted on appeal, was a high-quality office block, intended to be occupied as a company headquarters. From evidence heard at the employment RTS it seems clear that there is a need for good quality business premises at attractive locations in the District. The current owners of the site appear to be actively implementing a business park scheme and I see no need to change the allocation on economic grounds, despite the relatively poor accessibility by public transport. The site is viewed as part of an outlying limb separated from the main body of Stokenchurch by the motorway, but has a substantial length of boundary with the countryside to the west. I agree with the Council that a wider definition of suitable uses, including those within Classes B2 and B8, would be likely to make it much more difficult to assimilate new development in the AONB while still preserving its natural beauty.

4.3.4 The designation of the site as a BNS after the granting of permission for the office block, was clearly a significant discrepancy. In practice, this can only be reconciled by omitting to designate the land as a SINC under the new nature conservation procedures.

4.3.5 Inclusion of the residential area fronting Ibstone Road would create a much more logical boundary for the site, and ease its development. I appreciate the Council's desire to retain as much residential accommodation as possible, and that the previous owner of the site supported the proposed change requiring replacement dwelling provision within the extended site area. However, such an amendment may compromise the objective of creating a site with a more regular shape that could be more efficiently developed in terms of land take, layout and design. I consider these benefits would outweigh the loss of 4 dwellings, which would have a marginal impact on District-wide housing numbers and could be replaced elsewhere. In my view it would not be reasonable to compel existing residents who own their dwellings to move, but the planning merits of making the best use of the site for employment purposes would be significant advantage. These economic benefits may be a sufficient financial incentive to overcome the stated opposition to the allocation.

RECOMMENDATIONS

- E/3/2 Modify the plan by including the additional land shown on PIC4/4 within the business park allocation, but deleting the requirement in the explanatory text for replacement residential accommodation.

E4: EMPLOYMENT AREAS

The Objections

0379/42 Sport England
0408/23 Ercol Furniture Ltd

0524/14	Thames Valley Chamber
0608/14	G W Deeley Ltd
0669/2	B & Q Plc
0947/5	Kier Ventures Ltd
1338/5	Pimms Action Group
1780/5	Mr & Mrs A J Garner

Summary of Objections

- (a) Policy should be amended to allow for provision of sports and recreational facilities close to business and retail areas and to prevent loss of existing facilities.
- (b) Policy should clarify what is meant by 'employment generating uses', and prevent change of use to anything other than B1, B2 and B8 Use Classes.
- (c) E4 does not recognise the employment generating benefits of other land uses nor afford flexibility for other uses on employment land.
- (d) Difficult to justify retention of employment land when unemployment in the District is so low.

Inspector's Reasoning and conclusions

4.4.1 The Council responded to this group of objections by referring to Structure Plan Policy E5, which precludes re-use of employment sites outside Classes B1, B2 and B8 of the Use Classes Order. However, the Structure Plan policy has been framed to allow for some variation to accommodate local circumstances, provided that exceptions are put forward through the Local Plan process. While it would be possible therefore to depart from the restrictive wording of the Structure Plan policy, I consider the general state of the local economy does not justify such action. Although unemployment was low at the time of the inquiry, I have concluded in section 3.1 that continued losses of employment land on the same scale as those experienced during the 1990s could jeopardise the future health of local businesses. I see a real need to ensure that the best sites for general industry and warehousing, or larger scale Class B1 developments, are retained for existing local businesses or new firms seeking to locate in the area.

4.4.2 I see no need to vary the policy to meet part of the Sports Council objection suggesting the provision of recreational facilities as part of redevelopment of employment sites, since these could be accommodated as ancillary uses in the normal course of granting planning permission for new premises. Similarly the protection of existing important local facilities on large sites, which accords with the thrust of emerging guidance in the 2001 draft of PPG17, could be dealt with in the same way.

4.4.3 Some objectors seek flexibility to allow other uses such as car showrooms within employment areas, in the manner of the policy in the previously adopted Local Plan. I think this approach would weaken the broad thrust of the policy; which is endorsed in PPG4. Much of the employment land in High Wycombe. Indeed, I consider the wording should be tightened in the manner suggested by another objector to reflect more closely the clarity of the Structure Plan policy.

RECOMMENDATIONS

- E/4/1 Modify the policy to say:

'THE DEVELOPMENT OF LAND FOR EMPLOYMENT GENERATING USES WILL BE PERMITTED ON SITES IDENTIFIED AS EMPLOYMENT AREAS ON THE PROPOSALS MAP. ON SUCH SITES PLANNING PERMISSION WILL NOT BE GRANTED FOR USES FALLING OUTSIDE CLASSES B1, B2 AND B8 OF THE USE CLASSES ORDER 1987.'

E4: BUCKS FREE PRESS, GOMM ROAD, HIGH WYCOMBE

The Objections

0465/1 *Bucks Free Press*

PIC 4/5 Objections

0376/49 Axa Equity and Law Life Assurance Society Plc
0524/29 Thames Valley Chamber
1141/50 Beazer Strategic Land
2120/3 William Vere (Properties) Ltd

Summary of Objections

- (a) This site is not suitable for continued employment generating uses and should be reallocated for housing.
- (b) Objections to the proposed deletion of the site for employment uses in PIC 4/5 on the grounds that the site is suitable for continued employment use as offices. There is a shortage of available employment land, particularly in accessible locations.

Inspector's Reasoning and conclusions

4.4.4 The Bucks Free Press objection has been conditionally withdrawn following the allocation of the site for housing in accordance with PIC 4/5. I deal with the merits of the site for housing in section 3.2.

4.4.5 The objectors to the PIC argue that the site is suitable for continued employment use, despite some shortcomings. At the time of the inquiry, the site was occupied by the Bucks Free Press as a production office for a number of newspapers. Printing had ceased at the works several years previously, but the company planned to relocate the remaining part of the business to offices in High Wycombe. The latest planning permission for redevelopment for offices was granted in December 1999, indicating that the Council had no objection to continued employment use. The Council accepted the argument of Bucks Free Press that it would not be viable to implement this permission, principally because the rents likely to be obtained would not match those at other premises with higher visibility, such as Kingsmead Business Park, sited directly off London Road. This view was disputed at the inquiry by objectors to the PICs, whose valuation witness pointed to improved rent levels at the Peregrine Business Park, just beyond the railway line to the north. In general, evidence to the Employment RTS showed that demand for good quality office premises in High Wycombe at the time of the inquiry remained firm. I found the evidence of both valuers finely balanced. Although the site had had an extant planning permission for office development since 1990, the existing premises had been used by the Bucks Free Press since that time. To my mind it would be surprising if redevelopment of the site with Class B1 premises proved unviable at this location so close to the important commercial corridor of London Road.

4.4.6 The significant change in levels across the site presents some construction difficulties, but it would also provide opportunities for an interesting development without necessarily imposing undue extra costs. Although a Class B2 or B8 redevelopment is unrealistic, the site has potential for some form of Class B1 scheme. In my view therefore, the arguments about the viability of re-use for employment purposes are insufficient on their own to provide a clear cut reason in support of residential allocation.

4.4.7 Since then the employment land site to the south, has been redeveloped with affordable housing. Bucks Free Press have argued that the site is no longer suitable for employment, due to its proximity to these new dwellings. However, by definition a Class B1 use should be a suitable neighbour for housing and changing the allocation of the site could not be justified on this ground. Nonetheless, the premises are now the only commercial use on the east side of Gomm Road, and comprise a discrete block standing apart from the mixture of retail, industrial and commercial uses to the west. To the north the strong physical barrier of the railway line separates the site and the isolated Peregrine Business Park and open countryside of the Gomm valley.

4.4.8 In the absence of a common boundary with any other commercial premises, I consider the release of one more employment site could be justified. The loss of the site would not undermine the integrity of the area to the west of Gomm Road. In terms of the overall balance of competing uses, the 1.8 ha site is a relatively small part of the total remaining employment land. As I have indicated in my general discussion of employment demand and supply in section 4.1, I disagree with the objectors that there is a severe shortage of land for such uses. By contrast, I have concluded that the Plan has not identified enough housing land and previously developed land within the urban area, such as Bucks Free Press, would be high on a list of suitable sites. Following a period of significant losses of employment land which did not lead to a corresponding fall in employment, I think the Council's proposal to allow only modest further releases is the right approach.

RECOMMENDATIONS

- E/4/2 Modify the Plan in accordance with PIC 4/5

E4: EMPLOYMENT AREAS – COMPAIR, HIGH WYCOMBE
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The Objections

0816/2 Invensys Plc

Summary of Objections

- (a) Policy is too restrictive and inflexible with respect to allowing development other than employment generating uses.

Inspector's Reasoning and conclusions

4.4.9 The CompAir site extends to 6.5ha of land located to the west of mainly residential property fronting Hughenden Road. The site extends southwards from Hughenden Avenue for over 300m to Bellfield Road, opposite the Safeway store and car park. Much of the site is covered by a range of industrial buildings comprising the operational unit of CompAir Ltd, a subsidiary company of the objectors specialising in the manufacture of compressed air equipment. The western part of the site is an open car park, which is at a higher level than the buildings on the southern end of the site, with access from the adjoining small modern industrial estate to the north. The objectors seek policy amendments to Policy E4 and policies in the Town centre chapter of the Plan to enable the redevelopment of the site with a mix of uses, to be either employment generating uses or for employment generating uses with either residential and/or non-food retail uses. I deal here with the composite objections, including those concerned with retail strategy and the Town centre.

Employment policy

4.4.10 Much of the evidence concerning the need for employment land was covered in some detail at the Employment RTS, and I have dealt with these arguments at sections 3.1 and 3.2 above. In summary, the objectors argued that High Wycombe had the potential to continue and expand as a location for emerging businesses, for example in the information technology and financial services sectors, and that the role of manufacturing would continue to reduce in importance. Existing labour shortages within the District were likely to become more severe, and the current jobs provided by CompAir were incidental to the sustained health of the overheated local economy.

4.4.11 However, I agree with the Council's argument that there is a need to retain a range of employment sites. In this case the site is one of few located on the north side of the A40, following employment land losses such as G-Plan in recent years. The site is in an accessible position with good public transport, to the town centre (4 buses per hour along Hughenden Avenue). The site has a regular shape and its location of site towards the bottom of the valley means that changes in level are minimal compared with many other locations in the town. It would be suitable for the provision of a single unit or units big enough to accommodate a large company, if required. Give these advantages I find no reason to question that it would prove an attractive site for potential employers, given market conditions at the time of the inquiry. The loss of the site could lead to pressure for non-employment development on the adjoining De La Rue site to the north, which would be hard to resist. In that event the whole employment area would be seriously undermined, creating an imbalance between the north and south sides of town. This could have particularly adverse consequences for travel patterns and add to congestion in the town at rush hours, which is already severe. does slope to the south has the advantages of site was

4.4.12 At the time of the inquiry about 314 people were employed at the site, a significant reduction in the 2000 or so workers in the 1950s. The objectors' witness stated that there was some doubt over the future of the plant, because the air compressor group had been earmarked for sale. However, if the current operations can only be sustained on part of the site by housing and/or retail development on the remainder, I consider it would be preferable to allow the whole site to be redeveloped for employment use. The redevelopment for general manufacturing use or a business park at his location would clearly comply with government policy in PPG4 and PPG13 and Policy RE5 of RG9 in favour of employment uses in sustainable locations, and to encourage the intensification of use on existing sites.

Retail policy

4.4.13 I deal with a number of objections concerning the level and location of retail warehouse provision in Chapter 5 of my report. I concluded that the Plan proposals for such development at the Lilys Walk and Wycombe Marsh sites were soundly based and would meet the retail needs of High Wycombe for the duration of the Plan period. Although Wycombe Marsh is an out-of-centre site, it is located on a key public transport corridor and the proposals for mixed-use redevelopment, including retail, would have very substantial urban regeneration benefits. The objectors did not submit any evidence to indicate that more retail floorspace should be provided than the Council's projections.

4.4.14 The objectors argued that the site was 'edge-of-centre' in retail policy terms. They referred to an appeal decision in 1998 concerning the a retail warehouse proposal for the Tannery Road site, in comparison to which this objection site was mentioned favourably. As the inspector noted, it lies about 400m or so from the railway bridge that marks the start of the town centre. He did not agree that the site was a true edge-of-centre site in terms of the definition of PPG 6. As I found myself, the walk is neither direct nor particularly pleasant, because it involves crossing busy main roads, the Safeway car park and underneath the railway arches. These form a significant physical and psychological barrier, preventing any view of the site from the town centre. The CompAir site is further from the centre than the Safeway store, which does not appear to generate many pedestrian movements, especially to the primary shopping area, some 700m away.

4.4.15 In these circumstances I consider that the site is not sequentially preferable to the Lilys Walk site, which is at an edge-of-centre location. Both CompAir and Wycombe Marsh are out-of-centre sites the relative distances to the town centre mean little in terms of the sequential test and the advantages and constraints of both sites need to be compared. As well as regenerative benefits, the Wycombe Marsh site is near some other non-food retail outlets, including the proposals for the Citygrove site, providing the opportunity for linked trips. I consider these strong planning benefits outweigh any advantages of the closer position of CompAir to the town centre. This finding accords with the comparative retail site analysis carried out for the Council by Chestertons, which was done when Lilys Walk was not available for development.

Housing proposals

4.4.16 As developed land the site would accord with the sequential test for new residential development in PPG3. It lies within Zone 3 on the Public Transport Accessibility Map (Appendix 9 of the Plan). Apart from Safeway, a number of local shops are within easy walk and there are a variety of employment opportunities nearby. I have no doubt that other issues such as the provision of suitable safe access, dealing with contamination, integration with existing communities could be resolved satisfactorily. However, if part of the site were retained by CompAir the proximity of new housing to an existing general use is likely to prove a significant constraint on development. Much more fundamentally however, the need to retain good employment land is in my view an overriding planning objection to the allocation of part of the site for mixed-use including housing.

RECOMMENDATIONS

- E/4/3 No modification

E4: EMPLOYMENT AREAS – DE LA RUE, HIGH WYCOMBE

The Objections

0364/1 De La Rue Plc

Summary of Objections

(b) Policy is too restrictive and inflexible with respect to allowing development other than employment generating uses. Site should be deleted from E4 and promoted for comprehensive redevelopment.

Inspector's Reasoning and conclusions

4.4.17 De La Rue occupy an elongated site alongside the Hughenden stream to the south of Coates Lane, and also use a smaller area adjacent to Hughenden Manor on the opposite side of the road as a car park. The group of linked buildings on the main area of the site has been constructed at high density over many years. The company argues that the shape of the site hampers efficient manufacturing operation. Although the main industrial building contains particular fixed plant associated with the business of security printing, most of the structures are nearing the end of their useful life. Despite the good condition of more modern office buildings near the Coates Lane frontage, the company considers therefore that new premises are likely to be required before the end of the Plan period. I appreciate that some aspects of the current business, such as the need for security and a very clean printing environment, would prevent continued operation while refurbishment on site takes place. This could lead to relocation elsewhere, funded by redevelopment of the Coates Lane site. However, it is not the function of

the Local Plan process system to secure the highest value for any particular site on redevelopment to encourage an existing employer to remain in the High Wycombe urban area. In any event, if relatively large sites such as this were to be lost to employment, over time the potential for relocation would be lost.

4.4.18 The objector argues that the proposed employment allocation on the proposals Map, subject to Policy E4, would remove any flexibility in any proposals for the potential redevelopment of the site with other uses such as retail and/or residential. Within the High Wycombe urban area the Plan designates employment areas totalling 143 ha. As I discuss in section 4.1, I am in broad agreement with the Council's approach to the management of employment land. I have noted the significant losses of employment sites to other uses throughout the 1990s. Despite some evidence during the inquiry of overheating in the local economy, I consider there is a need to protect the best sites for general employment use to sustain a varied economic base in the District, and particularly in the largest employment area, High Wycombe.

4.4.19 In this case I accept that the objection site may be suitable for a mixed-use development, possibly incorporating residential use, as the objectors claim. The land adjoins an attractive area of parkland owned and managed by the National Trust and is surround by housing to the east and north-west. It also lies within accessibility zone 3, reasonably close to the town centre, but not within easy walking distance. However, these advantages also make it suitable for continued employment use, particularly with good quality, campus-style business buildings. Although I have identified a shortfall in housing provision, this could be met elsewhere. I can understand the Council's concern that if housing were agreed on part of the site, the employment identity of the site would be lost and the potentially higher residential value of the land would lead to pressure for further employment loss.

4.4.20 The same could not be said if the site were to be lost to employment. Together with the adjoining land to the south occupied by Compair, the site forms a locally important focus for industrial employment on the north side of High Wycombe. Although commuting patterns to employment uses are difficult to ascertain with surety, the Council's point that this area is the only source of industrial jobs on the north side of the town carries some weight. There are no other employment areas of similar size so close to the town centre, with all its facilities and public transport links. There is no evidence that continuation of the established industrial use next to housing areas has caused significant problems in the past. Although part residential development would secure an improvement in the appearance of the site, the same could also be expected of a new commercial development such as the business park mooted by the Council. The mixed use nature of the area as a whole may also be lost if substantial parts of the site were lost to retail and/or housing.

4.4.21 Although I accept the objectors' point that the Plan should allocate some more land for housing, provision can be made elsewhere, not at the expense of scarce good-quality employment land. The sustainability benefits of brownfield redevelopment would apply equally to the provision of modern employment premises as to new housing.

RECOMMENDATIONS

- E/4/4 No modification

E4: EMPLOYMENT AREAS – FORMER SEWAGE WORKS, MARLOW

The Objections

0840/50 Marlow and District Chamber of Trade & Commerce

Summary of Objections

(a) Suggest RT6 site and land adjoining it next to Marlow as a new employment area.

Inspector's Reasoning and conclusions

4.4.22 This objection has been overtaken by events, as a hotel is currently under construction at this site, in accordance with Policy RT12 of the adopted Wycombe District Local Plan. Other objections regarding a park and ride site and leisure uses are dealt with elsewhere in the report (see sections 7.17 and 12.19).

RECOMMENDATION

E/4/5 No modification

E4: LAND BETWEEN HUNTS HILL & LEFLAIVE CENTRE, NAPHILL (AS82)

The Objections

1695/5 Mr A Rush

Summary of Objections

(a) Site should be allocated for either residential or commercial development.

Inspector's Reasoning and conclusions

4.4.23 The objection site comprises a small parcel of paddock immediately west of the Le Flaive Business centre at Naphill, within the green belt and the AONB. The business centre was created by converting some former agricultural buildings into what the objector describes, with some justification, as a small industrial estate. The conversion scheme was allowed on appeal, reflecting government policy in PPGs 2 and 7 for the re-use of structurally sound buildings. This policy does not allow for the significant extension of existing buildings and seeks to retain a rural appearance to the land in which they are set. While this rustic character has been eroded by the conversion, there is no justification for removing the green belt designation of the adjoining land. Further building would increase the suburban nature of this part of the AONB, to its detriment, and would fail to preserve the natural beauty of the countryside, in conflict with the guidance in PPG7.

4.4.24 The green belt boundary follows a clearly defined hedgerow along the rear boundary of houses in Hunts Hill Lane, which, contrary to the objector's assertion, remains a defensible line on the ground. A change in the green belt boundary would allow more development to encroach into the countryside, contrary to one of the main objectives of the established policy. The conversion of the buildings since the last Local Plan inspector's report in no way changes the basic thrust of this policy.

4.4.25 Paragraph 68 of PPG3 advises that there may be occasion to review tightly-drawn green belt boundaries where to do so would be a more sustainable development option. However, those circumstances do not apply in his case, because there are other parcels of

safeguarded land around the High Wycombe urban area which lie outside the green belt. In any event this site lies within Accessibility Zone 5, some distance from a range of facilities, and cannot be considered a particularly sustainable option.

RECOMMENDATIONS

- E/4/6 No modification

E4: EMPLOYMENT AREAS – HYPNOS SITE, PRINCES RISBOROUGH (AS47)

The Objections

0580/1 Hypnos Ltd

Summary of Objections

- (a) This site is not suitable for continued employment generating uses.

Inspector's Reasoning and conclusions

4.4.26 The objectors argue that changing patterns of economic activity in the District justify some releases of employment land to make a positive contribution towards meeting housing requirements. They seek a mixed use redevelopment of the site incorporating Class B1 office and residential. In support, they refer to government guidance in 'Tapping the potential – Assessing Urban Capacity', which states that over-allocation of employment land is a wasted resource. However, as I discuss in section 4.1 above, I consider that Wycombe District is not in such a position of oversupply. Factors such as the switch from manufacturing to service employment and changes in employee density have resulted in continuing strong demand for labour, despite significant losses of employment land over the last decade. Nevertheless, I consider that further erosion of the land available to support local businesses could jeopardise the healthy local economy. The substantial drop in the level of manufacturing employment over the last 20 years, from roughly 40% to 20% of the workforce, has reduced the scope for what the Council calls 'spaceless growth'. I consider there is a real need to protect the best employment sites to maintain some diversity in the local economic base, in order to provide a variety of local employment opportunities. Although such a policy may have minimal effect on complex commuting patterns, it may help to stem the ever-increasing numbers and length of journeys to work.

4.4.27 The objection site is of particular importance, as together with the Whiteleaf Furniture site, which was vacant at the time of the inquiry, it forms one of just three focal points for employment in Princes Risborough. The development of the Princes Estate, to the south east of the railway line, replaces a long-established previous employer. The town is to experience a considerable housing expansion through the development of Park Mill Farm, and the loss (even partial) of an employment site would disrupt the balance of uses in the town. The site lies in a position highly accessible by public transport, next to the railway station, which is also the terminus for a number of bus routes.

4.4.28 The objectors consider a number of advantages would accrue if the site were to be redeveloped in the manner proposed. These include: better buildings and general environmental improvement; broader employment base locally; more housing near employment opportunities and public transport facilities; reduced traffic problems. I saw that the existing factory buildings are dated and ill suited to modern needs, having been constructed at a high density with little off street space for manoeuvring or parking delivery vehicles. Demolition of the utilitarian structures would undoubtedly improve the appearance of the locality, but this

could equally be achieved by a new employment development. At present the use of narrow streets and confined spaces within the site by large HGVs creates problems for other users, but these are likely to diminish on any redevelopment.

4.4.29 In conclusion therefore, I consider the objectors have put forward no strong arguments to outweigh the need to retain this useful employment site in a sustainable location in a town with little scope for more employment generating development within the urban area.

RECOMMENDATIONS

- E/4/7 No modification

E4: LAND OFF GOMM ROAD/TANNERY ROAD (AS86)

The Objections

1388/11 Ravenseft Industrial Estates Ltd

Summary of Objections

- (a) Objection to the blanket nature of this policy; exceptions should be permissible and appropriate criteria set out.

Inspector's Reasoning and conclusions

4.4.30 In dealing with objections to the general principle of this policy, I have concluded that there is a need to protect the best land for general industrial and commercial uses, in order to provide a broad employment base in the District. Although this site lies adjacent to two sites currently in retail use (B&Q and Halfords), it remains a good employment site in terms of accessibility to public transport along the London Road corridor. Despite the Gomm Place housing development and the residential allocation and granting of planning permission of Bucks Free Press on the opposite side of Gomm Road, its coherence as a single discrete employment area remains. To allow any erosion of the area would seriously undermine its employment function. I note that a previous Inspector concluded in an appeal decision that the removal of the industrial and warehouse buildings on the site would conflict with the objectives of Policy E3 of the Structure Plan.

4.4.31 As explained in section 5.2 of the report, any needs for further retail warehousing development have been catered for on other sites allocated in the Plan.

RECOMMENDATIONS

- E/4/8 No modification

E4: EMPLOYMENT AREAS – LANE END ROAD, SANDS

The Objections

0010/2 Banner Homes

Summary of Objections

- (a) The 4ha area of Safeguarded Land at Lane End Road, Sands should be designated as a business park or employment land.

Inspector's Reasoning and conclusions

4.4.32 I have dealt with the substance of this objection in section 4.2 above.

RECOMMENDATIONS

- E/4/9 No change

E4: EMPLOYMENT AREAS – WESSEX ROAD INDUSTRIAL ESTATE, BOURNE END

The Objections

0607/1 Glen House Estates

Summary of Objections

- (a) Land to the east of Wessex Road industrial area should be included as an employment area.

Inspector's Reasoning and conclusions

4.4.33 The Bourne End and Wooburn Green area has been successfully developed with new employment premises in recent years, such as the Mercury Centre and Bourne End business Centre. However, as I have already said, I see no real need for general expansion of employment in the District as a whole.

4.4.34 The proposed site would be a relatively small addition to the existing industrial estate at Bourne End. It would not meet the need for new growth in the high technology sector. In any event the site lies in the green belt, which is subject to the long established principle that its boundaries should not be changed except in very special circumstances. The land performs a valuable role in separating Bourne End from the Hawkes Hill/Harvest Hill area and the proposed allocation would encroach upon open countryside. Its development would undermine another of the main purposes of the green belt, that of encouraging urban regeneration by resisting pressure for 'greenfield' expansion.

RECOMMENDATIONS

- E/4/10 No modification

E6: BADLY SITED USERS

The Objections

0137/3 The High Wycombe Society
0179/1 Mr J Harding

Summary of Objections

- (a) Objection to the nine sites in High Wycombe, Hazlemere and Wycombe Marsh that are listed as Badly Sited Users. Nuisance may be as a result of mismanagement and enforcement would be preferable to closing the site down.
- (b) Objection to the identification of the three sites in Stokenchurch (n,o & p) as Badly Sited Users. Due to loss of employment in Stokenchurch in recent years, no further loss of employment land should be allowed.

Inspector's Reasoning and conclusions

4.6.1 The Proposals Maps identify a number of badly sited users, which the LPA would prefer to be the subject of redevelopment, rather than consolidation. The list of these sites has evolved following an initial selection process in the 1980s, taking into account the nature of the activities and past records of the incidence and type of complaints made to Environmental Health Officers or to the Planning Department. From inspection, all the sites appear close to residential property and I have no evidence to contradict the LPA's point that they cause significant problems. The Council also say that almost all these uses were established before 1947 and therefore do not need, or have, planning permission to continue.

4.6.2 Government policy in PPG1 and PPG4 and Policy RE4 of RPG9 supports mixed-use development patterns and the need to accommodate small businesses. This is tempered by other policies to protect the environment and to provide adequate living conditions for all residents. A balance has to be struck between these competing objectives, which this policy seeks to achieve, in combination with Policy E5 (permissive of employment development on other scattered employment sites). The policy does not therefore adopt a blanket approach, but with Policy E5 reaches a reasonable compromise by seeking to achieve the benefits of a more sustainable mix of uses while removing over time the problems created by the worst cases. I accept the Council's point that the review of all potential sites was carried out thoroughly in the 1980s and the list has been kept up to date with regard to redevelopment and logging of complaints. Even though the nuisance from such uses may be caused by bad management, in most instances they are immune from enforcement action and the only remedy for environmental problems is redevelopment.

4.6.3 The Council refer to a long history of complaints about the three sites in Stokenchurch, which is not contradicted by the objector. From external inspection, two lie very close to residential property, where considerable noise could be expected to continue causing disturbance to adjoining occupants. The third, at Park Lane, abuts gardens on 2¹/₂ sides, and is served by a narrow carriageway. For a settlement of its size, Stokenchurch is relatively well-provided with employment opportunities, to be supplemented by further development at Beacon Heights and Stockwells Yard.

RECOMMENDATIONS

- E/6/1 Modify the Plan in accordance with PIC4/7

E6: BADLY SITED USERS - HIGH HEAVENS (AS41)

The Objections

1279/6 Mr David Coe

Summary of Objections

- (a) The scrap car business adjacent to the former High Heavens Waste Disposal site should be designated as a Badly Sited User in the light of the closure and restoration of the waste disposal site to agriculture/forestry.

Inspector's Reasoning and conclusions

- 4.6.4 The site adjoining High Heavens has a certificate for lawful use as a vehicle scrapyards. The site lies in open countryside designated as green belt and AONB, some distance from the nearest residential property. It does not therefore create the same problems of noise disturbance as the other designated sites.
- 4.6.5 I accept the objector's point that the stacked cars create an unattractive appearance which significantly detracts from the natural beauty of the AONB. Despite the economic difficulties experienced by scrap operators to which he refers, the objector's suggested re-use as agriculture or forestry is unlikely to be viable, especially on a relatively small site. Any redevelopment for housing, on a site used for open storage without building cover, would conflict with green belt policy. The site may be unsuitable for any building due to the proximity of landfill gas, given the proximity of the electricity plant powered by such gas.
- 4.6.6 I note that no firm decision has been taken concerning any expansion of the existing waste transfer depot, which would have no impact on the re-use of the site for agriculture or forestry in any event.

RECOMMENDATIONS

- E/6/2 No modification

E6: BADLY SITED USERS - HOPKINS YARD, VALLEY ROAD, HUGHENDEN VALLEY

The Objections

0543/6 Richard Pushman

Summary of Objections

- (a) Site should be identified as a Badly Sited User.

Inspector's Reasoning and conclusions

4.6.7 Site provides the only source of non-service employment in the village. Some complaints about activities outside the building on the site, but not serious, according to the Council.

RECOMMENDATIONS

- E/6/3 No modification

E6: BADLY SITED USERS – REAR OF 16 MARLOW ROAD, STOKENCHURCH (AS103)

The Objections

0221/1 Mr B J Lawrence

Summary of Objections

(b) Site should be identified as a Badly Sited User.

Inspector's Reasoning and conclusions

4.6.8 The site was part of a larger area used as a timber merchants. Following grant of planning permission for housing, an application in 1993 for a certificate of lawful use as a builders yard was refused and subsequently dismissed on appeal. Any use of the site for business or employment generation would therefore require planning permission. It would not be necessary to designate the site as a badly sited user since enforcement action could be taken against any unauthorised use that created disturbance.

RECOMMENDATIONS

E/6/4 No change

E7: WYCOMBE MARSH PAPER MILL

The Objections

See Appendix 4C

PIC 4/8 Objections

See Appendix 4D

Summary of Objections

- (a) Policy does not make best use of the site; should include less employment allocation and greater residential provision.
- (b) An over-intensification of the area between Daws Hill and Flackwell Heath.
- (c) The site should be predominantly developed for business park/employment purposes rather than housing.
- (d) Concern about traffic generation from this site and its impact on local roads.
- (e) Premature to consider this site until a traffic impact assessment of the development of all four sites (Abbey Barn North, Abbey Barn South, Wycombe Marsh Sewage Treatment Works and Wycombe Marsh Paper Mill) has been carried out.
- (f) This is not a true brownfield site: it is not derelict but is in current use and not in need of 'recycling'.
- (g) Site should be reallocated under policy H2 for residential development.
- (h) Policy is contrary to national, regional and structure plan policy relating to suitable locations for retail warehouse development.

- (i) The site should be retained as a 'green lung'. Bucks Car Panels should be retained as it is important to the ecology of the area.
- (j) No justification has been made for the need for employment land on this site.
- (k) Site should provide at least 4ha of employment land.
- (l) Insufficient provision is made for the retail element of the scheme. The policy should allow for greater flexibility in terms of the other proposed uses.
- (m) Objection to the increased housing allocation in PIC 4/8.

Inspector's Reasoning and conclusions

4.7.1 I have dealt with other objections to the allocations at Wycombe Marsh extensively in section 3.5 above. I supported the principle of the mixed-use development of the site, which accords with the broad thrust of government policy to provide for a range of needs at a sustainable location close to good public transport, thus helping to reduce car travel. I am satisfied that the proposals set out in the Development Principles (Appendix 2 of the Plan) provide for adequate new infrastructure to address concerns about the capacity of the road network in the Eastern Sector of High Wycombe, and the London road corridor in particular.

4.7.2 As I have indicated in Section 4.1 and 4.2 above, I consider the Plan will safeguard roughly the correct amount of land to achieve the correct balance between meeting reasonable employment needs and preventing 'overheating' of the local economy. To increase the proportion of employment land would reduce the area of other uses, which are equally desirable. The inclusion of the Bucks Car Panels site would enable a comprehensive development of the modified site, as shown on PIC M/11, but is not essential. Any ecological features, for example along the river bank, could be retained as part of a landscaping scheme.

4.7.3 Retail issues are covered in Section 5 of the report. The area of land for retailing is justified by the need for enabling development to offset the costs of relocating the sewage works and the lack of any suitable edge-of-centre site.

RECOMMENDATIONS

- E/7/1 No change

E8: THE PRINCES ESTATE, PRINCES RISBOROUGH
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The Objections

0037/2	Mrs E MacFarlane
0080/2	Bernard Andrew Hill
0087/3	<i>Council for the Protection of Rural England</i>
0124/2	G A Davies
0158/17	High Wycombe and Marlow Green Party
0377/1	<i>Chiltern Railways</i>
0513/2	Mark Scales
520/2	R F H & E D M Martin
0528/2	David Liddington MP
0601/2	Gordon MacDonald
0632/2	Annette Martin
0647/2	Mrs Frances Dunn
0650/2	David Marshall Dunn

0791/2	<i>Dr A J MacFarlane</i>
0802/3	D L Morris
0836/3	S Baker
0929/4	<i>Paul Turner</i>
0933/2	Mr T B Skilbeck
0968/2	Mrs S J Rogers
1019/3	David Rhodes
1060/2	Hugh McGarel-Groves
1091/2	Jane McGarel Groves
1153/2	Mr & Mrs B Hunter
1187/2	Francis Gomme
1619/2	Hilda Kaye
1669/2	Mrs W P Marr
1669/3	Mrs W P Marr
1762/2	Roger Buntin
1779/5	Frederick Harrold
1808/2	Risborough Area Residents Association
1898/2	<i>Princes Risborough Area Heritage Society</i>
1922/2	Mr D G Marr
2025/2	Mr P Oates
2104/2	Miss A W Marr
2112/2	Susan Ann Hill

PIC 4/9 Objections

0408/31 Ercol Furniture Ltd

Summary of Objections

- (a) The site is not suitable purely for industrial use and should be a mixed development of industrial units and residential, particularly low cost housing for local needs.
- (b) Further commercial premises are unnecessary to meet local needs.
- (c) Concerns about extra traffic causing nuisance, danger and congestion and leading to further parking problems in the town at peak times.
- (d) An area of the Princes Estate, adjacent to the west side of the Railway Station, ought to be designated as a future station car park. A rail branch into the site should be a priority, although the cost of linking the Estate to the railway station should not fall on developers.
- (e) The site is better suited to housing rather than business development.
- (f) There are no specific policies relating to improvements to infrastructure around the Estate.
- (g) Policy lacks adequate information about specific detail of proposed development of the site.
- (h) Commercial development would be out of keeping with and detrimental to Horsenden Conservation Area.
- (i) The policy should make provision for small units on this site.

Inspector's Reasoning and conclusions

4.8.1 Following the granting of outline planning permission in 1999 for the redevelopment of the former Building Research Station with a mix of Class B1, B2 and B8 buildings up to a maximum of 28,512 sq m, many of the objections have been overtaken by events. The site has been purchased by Ercol, in order that the company can relocate from its factory in High Wycombe to a new building with a floorspace of 14,750 sq m, under construction in the Autumn

of 2001. The continued employment use of this land, located in a sustainable position close to the station, will provide a better balance between homes and jobs, particularly when Park Mill Farm is developed, and would help to minimise out-commuting from Princes Risborough.

4.8.2 I agree with the Council that the time when a mixed use development on the site, with housing on the part not occupied by Ercol, has passed. One of the principal reasons behind the firm's move from High Wycombe was to stop noise from factory operations disturbing nearby residents. To re-introduce the similar potential for incompatibility between Class B2 and residential uses would be poor planning. In the same vein, the potential traffic implications of the redevelopment would have been assessed in detail at planning application stage.

4.8.3 The only remaining function of the policy is to regulate proposals for the development of the rest of the site. One would not normally expect however matters such as infrastructure provision or detailed design to be covered by a local plan policy. The development scheme could include the extra car parking for the station and a new footbridge, if some variation in the approved planning proposal is put forward. The proposed change suggesting the new bridge does not specify the precise mechanism for funding the structure, which would be a matter for negotiation between the parties involved. I consider it is appropriate for the Plan to outline such key development principles, which have a realistic chance of implementation, in the interests of good planning. However, the wording of the policy could be construed to imply that the developer of the site should meet the costs of building the bridge in full, rather than facilitate its construction. I recommend modifications to the wording of the policy and the explanatory text to explain the Council's intention.

4.8.4 The objection in principle to industrial development on grounds of proximity to the Horsenden Conservation Area is one of those overtaken by events. I note the Council's comments about the effect of the permitted building on its surroundings. I consider the policy wording properly reflects national policy and would ensure that any changes to the approved scheme would protect conservation area interests adequately.

RECOMMENDATIONS

- E/8/1 Modify the plan in accordance with PIC 4/9
- E/8/2 Modify the last sentence of the policy to read:
'NEW DEVELOPMENT SHOULD BE IN ACCORDANCE WITH POLICY E4 AND SHOULD PROVIDE SATISFACTORY ACCESS AND PARKING ARRANGEMENTS IN ACCORDANCE WITH POLICY T1 AND APPENDIX 10 AND ALLOW FOR A PEDESTRIAN LINK TO PRINCES RISBOROUGH RAILWAY STATION.'

E9: STOCKWELLS TIMBER YARD, IBSTONE ROAD, STOKENCHURCH
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The Objections

0228/8	Thames Valley Chamber of Commerce & Industry – Wycombe & South Bucks Area
0432/2	Oxfordshire County Council
0712/2	South Oxfordshire District Council

Summary of Objections

- (a) Objection to the allocation of so much of the site to small B1 units.
- (b) Policy should be amended to make provision for a park and ride facility on part of the site.

Inspector's Reasoning and conclusions

4.9.1 National and regional policy in para 6 of PPG4 and RPG9 supports the Council's position that the Plan should provide for range of employment types, including small unit schemes necessary for the development of start-up businesses. I note that the Council has promoted an Enterprise Centre at the Cressex Business Park in High Wycombe, where there has been a successful take-up of small units on flexible leases, with shared support services. Demand for such units may be less strong at different location outside the main village envelope, with relatively poor accessibility to public transport services. However, the previous use of the site as a timber yard and its location adjacent to a business park proposal and close to junction 5 of the M40, together with the shortage of new potential employment sites in the District generally, weigh in favour of the allocation. The policy would allow a range of units for different uses to be built, including a minimum of 60% floorspace for Class B2 and/or B8 uses. If this objection site is to be developed independently of the adjoining business park proposal, I expect the Plan allocations to allow a good mix of employment uses. I consider therefore on balance that the designation of a site for development of similar-sized premises, or 'second stage' follow up units, would be a worthwhile element in the Council's employment strategy.

4.9.2 I deal with the objection that the site (or part of it) should be reserved as a park and ride location in section 7.17 below. I consider the potential of the site for employment use outweighs the very doubtful potential of the site as a park and ride location (see section 7.17.5).

RECOMMENDATIONS

- E/9/1 No change

E10: HOME WORKING

The Objections

1688/3 Matthew Homes Ltd

Summary of Objections

- (a) Policy fails to make provision for the creation of purpose designed developments for homeworking. Suggest land at Smoky Row, Great Kimble be so allocated.

Inspector's Reasoning and conclusions

4.10.1 The objectors argue that the site would be a suitable location for a new residential development with provision for homeworking. I deal with the merits of the housing proposal in section 3.2. Policy E10 is intended to reflect a positive attitude to working at home, in line with the broad thrust of government guidance in PPG1, but to allow reasonable safeguards to be applied to protect residential amenity. This complies with the advice in PPG4, which does not advocate the development of new home/work units in unsustainable countryside locations like the objection site. I agree with the Council that to amend the policy to allow a more relaxed approach to new dwellings designed for occupation by those working from home would undermine the key objective of seeking a sustainable pattern of housing and employment development. The objectors' proposals could be applied to countless other rural sites throughout the District, to the detriment of the physical environment and both national and

strategic transportation objectives.

RECOMMENDATIONS

- E/10/1 No modification

POLICY OMISSION

The Objections

0840/18 Marlow and District Chamber of Trade & Commerce

Summary of Objections

- (a) New mixed employment generating sites must be identified in and around Marlow, and an appropriate policy included.
- (b) There are no policies regarding employment generation, its mix and balance for Marlow.

Inspector's Reasoning and conclusions

4.11.1 The general strategic context for employment policy set out in the Structure Plan identifies the High Wycombe urban area as a location for some employment development to secure necessary economic restructuring. Policy E5 states that new sites for employment generating development will not be allowed other than in accordance with other policies; these do not allow for growth at Marlow. RPG9, which reiterates government policy to make the best use of urban land, does not alter this basic position.

4.11.2 The Council point to evidence of vacant commercial property in the Marlow area as evidence of a lack of need for the type of sites proposed. Vacancies at any one time may be untypical of a long-term picture and there is no evidence of sites remaining undeveloped for long periods. However, while the balance of employment in the town may have changed, reflecting national trends, the low level of unemployment is indicative of a generally thriving local economy. To allocate new employment sites outside the town would conflict with national policy for the green belt and AONB, and the established sub-regional strategy.

RECOMMENDATIONS

- E/11/1 No modification