

## CHAPTER 3 - HOUSING

### PARAGRAPH 3.03 - POLICY FRAMEWORK

#### PIC 3/21 Objections

0376/80	Axa Equity and Law Life Assurance Society PLC
379/72	Sport England
0579/28	Michael Lambert
1071/18	Persimmon Homes (TV) Ltd

#### Summary of Objections

- (a) Object to interpretation of PPG3. The use of 'Plan, Monitor and Manage' in the way stated, creates substantial uncertainty for developers. It is necessary that the planning system ensures new homes are provided in the right place, at the right time and in accordance with the adopted Structure Plan.
- (b) Object to definition of previously developed land; whilst sentiment of PPG3 is expressed in proposed wording, the housing allocations which flow from it are inconsistent. Allocations on school and other playing fields are directly contrary to PPG3.
- (c) Proposed amendments to take account of PPG3, are not borne out in Plan i.e. using brownfield before green field (e.g. Downley Middle/Turners Field site).
- (d) No reference is made to the development of housing in good public transport corridors.

#### Inspector's Reasoning and conclusions

- 3.0.1 The objection to the interpretation of PPG3 is dealt with fully in my report on the housing strategy under Policies H1 and H2. I consider that paragraph 3.03 of the Plan provides a reasonable short summary of the broad thrust of the PPG, in a neutral way.
- 3.0.2 Previously developed land is not defined specifically in this section; objectors' concerns about the interpretation of PPG3 with regard to specific sites (such as Downey Middle School) are dealt with separately below.
- 3.0.3 The Council's revised strategy clearly took into account the accessibility of the proposed sites by public transport (see for example PET committee reports CD/E/4,12).

#### RECOMMENDATIONS

- H/0/1 No modification

### CHAPTER OBJECTIVES

#### The Objections

0218/3	Airways Housing Society Ltd
0571/4	Laing Homes Ltd
0817/16	Croudace Ltd

### Summary of Objections

- (a) The objectives do not refer clearly and explicitly to the provision of affordable housing or an appropriate mix of tenures as a fundamental priority.
- (b) Objectives are confused as preceding text (para 3.05) displays a misunderstanding of Structure Plan policy. The Structure Plan does not adopt the same sequential approach. The objectives should not be determined save in the context of a comprehensive sustainability analysis as defined in the Structure Plan. Objectives are fundamentally misconceived. Translation of strategic policies into the District context is not consistent, nor does it optimise the achievement of sustainability aims.
- (c) Objective (ii) does not explain why the aim of maximising housing provision should be subjugated to respecting existing environmental protection policies. These should be reassessed.
- (d) Primary objective should be compliance with the Structure Plan requirements.

### Inspector's Reasoning and conclusions

- 3.0.4 The Council has suggested a change (PIC 3/1) to include a reference to affordable housing in 3.08 (iii). I agree that the amendment would provide a useful indication of the Plan's intention to meet a wide range of housing needs.
- 3.0.5 I deal with the wider issues of whether or not the Plan meets Structure Plan requirements, and their relationship to more recent government guidance, in my discussion of Policies H1 and H2 below. The objector's comments (571/4) about the differing emphasis between Structure Plan policy and government policy have to some extent been overtaken by the publication of PPG3 in March 2000 and the Council's subsequent substantial revisions to key housing policies. Many of the Council's committee reports (CD/E/1-15) show that the current proposed allocations were intended to meet sustainability policies of PPG3 with regard to the re-use of previously developed land and the concentration of new housing at High Wycombe and Princes Risborough. While the details of national and county policy may vary to some extent (as acknowledged below) one of the key purposes of the Plan is to meet the strategic requirement for new dwellings in the District. I consider that this important objective could usefully be added to paragraph 3.08.
- 3.0.6 The expectation that Wycombe District would meet only some 60% of its locally generated housing needs is a strong indication that the Structure Plan had taken into account the particular environmental constraints in large parts of the District. While some environmental policies subject to objections will be re-assessed as part of this report, recommendations about the overall strategic balance between housing needs and environmental protection are beyond my jurisdiction.

### RECOMMENDATIONS

- H/0/2 Modify paras 3.03 and 3.05 in accordance with PIC3/21
- H/0/3 Amend para 3.08 to include a new objective:
  - (i) *To provide 7,200 dwellings over the period 1991-2011 in compliance with the requirements of the Buckinghamshire Structure Plan.*

**POLICY H1: HOUSING DEVELOPMENT**

**The Objections**

0137/8	The High Wycombe Society
0158/8	High Wycombe and Marlow Green Party
0174/6	<i>R Vitty, B A Vitty</i>
0345/5	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/1	Axa Equity and Law Life Assurance Society PLC
0378/3	George Wimpey PLC
0378/11	George Wimpey PLC
0506/1	Bassetsbury Area Protection Group
0522/1	Redrow Homes (Southern) Ltd
0571/3	Laing Homes Ltd
0579/2	Michael Lambert
0709/5	Bryant Homes Technical Services Ltd
0808/5	Linden Homes South East Ltd
0817/18	Croudace Ltd
0829/5	Trevor Fazackerley
0831/3	Miss M B Messenger
0837/6	<i>Hazlemere Parish Council</i>
0839/6	<i>Grange Action Group</i>
0840/24	Marlow and District Chamber of Trade & Commerce
0922/14	House Builders Federation
0960/1	Mr & Mrs D Price
1001/1	Neil Richardson
1141/1	Beazer Strategic Land
1145/9	C Livesey
1166/4	Miss L Wootton
1260/38	The Marlow Society
1337/7	Gordon Hooper
1344/1	Mrs D K Burton
1414/15	Michael J Overall
1579/2	Oxford Land Limited
1688/2	Matthew Homes Ltd

**PIC 3/2 Objections**

0345/10	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/30	Axa Equity and Law Life Assurance Society PLC
0534/18	Thames Valley Chamber
0571/28	Laing Homes Ltd
0579/11	Michael Lambert
0817/41	Croudace Ltd
0840/55	Marlow and District Chamber of Trade & Commerce
0922/24	House Builders Federation
1071/8	Persimmon Homes (TV) Ltd
1141/39	Beazer Strategic Land
1218/20	R J Newell
1595/11	Berkeley Homes (Chiltern) Ltd
2120/1	William Vere (Properties) Ltd

1579/19 Oxford Land Limited

### **PIC 3/22 Objections**

0345/19	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/81	Axa Equity and Law Life Assurance Society PLC
0534/37	Thames Valley Chamber
0571/38	Laing Homes Ltd
0579/35	Michael Lambert
0817/47	Croudace Ltd
1071/19	Persimmon Homes (TV) Ltd
1141/55	Beazer Strategic Land
1579/38	Oxford Land Limited

### **Summary of Objections**

- (a) New dwelling figure is higher than necessary and ought to be reduced. No need for extra housing, as population is reducing. Clarification of the District's ability to accommodate housing is required. The 60% figure of locally generated housing need is unjustified. Disagree with basic assumptions. Single occupancy may not continue to increase and could decrease. There is uncertainty concerning household projections.
- (b) Policy does not take account of the reduced requirement under current Government Guidance and the abandonment of predict and provide.
- (c) It is unclear whether conversions and HMOs are counted in the windfall calculations. Definitions relating to small windfall sites are unclear. Policy does not take into account windfall development. Object in principle to any windfall allowance for sites over 0.4ha.
- (d) Potential ramifications for the District in terms of town cramming are not considered; increased strain on educational system. Plan does not contain any sensitivity analysis or alternative policies for housing.
- (e) Object to assessment of housing land supply; it will not enable sufficient development to meet strategic housing requirements.
- (f) There should be less dependence on windfalls/unidentified sites. Should plan for expansion with accompanying employment and community requirements, which is better than town cramming.
- (g) Inadequate allowance for non-implementation of sites with planning permission and allocations – a 10% allowance should be made for non-implementation. Plan should meet the full Structure Plan allocation and make provision for a larger proportion of these dwellings on allocated sites. No reasons are offered for the reduction in the amount of housing on new strategic sites.
- (h) Figures incorrect in Table 2 (misprint); should read 1930 dwellings, not 1903.
- (i) Policy does not accord with Policy H1 of the Structure Plan, as it does not refer to completed dwellings, only "provision will be made for".
- (j) Unclear where the figure of 220 dwellings from 'Local Plan designations 1991-2011 is derived from. All allocations should be identified in the Plan and outstanding permissions above 0.4ha listed.
- (k) Policy should set out the needs for each community. Particular problems of a lack of affordable housing in Marlow.

In response to proposed Pre Inquiry Changes:

- (l) Object to assessment of supply as optimistic. Too great an emphasis on urban sites (particularly Wycombe Marsh); constraints could affect deliverability. Propose a robust approach to land supply, especially given that the Structure Plan requirement does not meet all local demand.
- (m) Disagree with change to land availability 'base date'.
- (n) Propose that a higher non-implementation allowance of 10% not 5% should be made.
- (o) Object to too much reliance on windfall. No evidence to support level of windfall; possible double counting. Greater reliance should be placed on positive allocations creating urban extensions.
- (p) Definition of windfall in PPG3 has changed and needs to be taken into account; requires windfall allowance to exclude any element of greenfield land. Need to assess past trends to ascertain proportion of windfalls on previously developed land. It is not considered reasonable or realistic to anticipate any housing provision from windfall development on sites in excess of a hectare, given the exhaustive search for allocations on previously developed land which the Council has undertaken.
- (q) Doubtful whether the new allocations introduced will come forward affecting ability to meet requirements of H1.
- (r) Policy should be based on needs or requirements of communities in terms of social and economic, not on housing land availability.
- (s) Question whether completion data is correct; does it exclude 'carry over' and is it 'net'.
- (t) Object to the no discount for non-implementation of identified sites.
- (u) Suggest a review of non-housing allocations, especially land allocated for employment purposes.
- (v) There are minor errors in 1998-1999 housing land availability figures leading to discrepancy in completions figures in Table 2.
- (w) An urban capacity study as defined in PPG3 should be carried out.
- (x) Suggest that Table 2 is misleading as it fails to illustrate that the full housing requirement is not being met. Suggest a revised table resulting in a need for new allocations of 683.

## **Inspector's Reasoning and conclusions**

### **General**

3.1.1 The key issues concerning overall housing provision and land availability in the District were discussed at the Housing Round Table Session (RTS) on 10 October 2000. The notes of this meeting, agreed by all participants as accurate, are attached as Annex 3.1. I deal first with the general issues of the adequacy of the Council's proposed allocations.

3.1.2 Policy H1 provides an overview of the number of dwellings the Council seek to provide, based on the requirements of the Structure Plan, which was approved in March 1996. To meet government guidance in PPG3, the Plan must ensure that it conforms to the Structure Plan by providing as a minimum 7,200 net additional dwellings, as set out in SP Policy H1. In setting this figure, the County Council will have been aware of the potential effects on the density of development within the urban areas (taking account of environmental constraints outside) and the pressures on the educational system. The Plan, Monitor and Manage approach set out in PPG3 does not revise this basic requirement, as paragraphs 2 and 28 state quite clearly. This approach is re-iterated in the companion guide 'Planning to Deliver'

3.1.3 Some objectors referred to possible changes to Structure Plan requirements that might arise from a revision of regional planning guidance. However, RPG9, issued in March 2001

several months after the round table discussion on housing figures, envisages a slight increase in the average annual level of new dwellings to be provided in Buckinghamshire. At this stage it is too early to reach firm conclusions about how this requirement will affect projected housing provision in Wycombe District. As the County Council's representative at the RTS pointed out, the Structure Plan Review will have to reflect the new level of provision; in any event, it seems unlikely to lead to the significant reduction in new housing sought by some amenity group objections. It also helps to confirm the need to meet the current requirement in full.

#### Completions

3.1.4 There was no dispute at the RTS that the Council's figure of 3048 completed dwellings to 31 March 2000 was incorrect. I have no firm evidence from written representations that the number has been under or overestimated. The updating of the base date for calculations and the inclusion of more recent statistics for completions and permissions provides a more accurate basis for decisions about housing need.

3.1.5 Similarly, the figures for outstanding planning permissions on the same date were also agreed. Most parties accepted that there was little likelihood of these proposals failing to come forward, at least to any significant degree. I consider therefore that it would be unrealistic to allow for a non-implementation allowance.

#### Windfall

3.1.6 Based on past trends, continued upward pressure on house prices throughout the District, and hence the value of residential land, can be expected. This may increase over the plan period, if the local economy remains healthy and 'natural' demand for in migration cannot be satisfied by existing strategic limits on new housing, bearing in mind the strong environmental constraints around the main urban areas. These constraints have no doubt contributed to the high proportion of new dwellings from windfall permissions within the urban areas. I note that past trends do not reflect the increased density of development now sought by PPG3. In particular, an increased supply from the type of schemes mentioned in 'Tapping the Potential', such as subdivisions, previously developed land in other uses, flats over shops, conversions of commercial buildings, can be expected with confidence. I recognise that the amount of infilling in certain areas may be limited by the need to protect existing residential environments. However, the general housing policy context indicates that windfall developments are likely to continue to materialise at similar rates to those in recent years, at least for the plan period up to 2011. Although the Council's forecasts rely quite heavily on windfalls, I consider the detailed evidence of past rates justifies its predictions for the following categories.

#### Small sites

3.1.7 The type of estate development in parts of the District may preclude significant extra windfall in small schemes on small sites (up to 0.4 ha). Overall, however, I consider this is more than likely to be counteracted by the increased density of developments, in accordance with PPG3, on sites in other locations, such as town centres. The Council confirmed that despite fluctuations, the average number of small site completions had been around 100 dwellings per year. I concur with the Council and most objectors, who agreed that the annual level of provision from this source was likely to remain unchanged.

#### Medium sites

3.1.8 In similar vein, it was argued at the RTS that the supply of medium-sized sites (0.4 to 1 ha) would also dry up, particularly with regard to employment land. However, I consider this to be an unduly pessimistic view, particularly taking account of the reinforced emphasis on recycling urban land. Other land uses may be rationalised and/or redeveloped. As for small sites, past rates of development have fluctuated considerably, but as the HBF's representative accepted recent figures suggest that some 30 dwellings are likely to come forward from this source each year. In my view using this figure would be a suitably realistic approach.

### Large sites

3.1.9 Several objectors argued that the potential supply of housing from large windfall sites should be treated with much more caution, primarily because they should be identified as part of the plan process itself. The Council had substantially modified the plan to include several new urban sites that had become available since the deposit stage. They also suggested that two other large sites at Cressex Island and RAF Daws Hill were likely to become available at some time during the life of the plan. I consider the objectors' arguments that these should be identified on the plan if they are suitable, but that both are subject to great uncertainty, have considerable force. I note that the Highways Agency maintain an objection to the wording of the plan relating to Cressex Island, dealt with in section 7.22 below. Written representations submitted after the RTS (but before 11 September 2001) concerning the MoD's intentions for the Daws Hill site show that some progress in the planning of substantial additional housing development has been made. However, no firm decisions were made known before the close of the inquiry. In these circumstances there is no firm evidence to show that large numbers of unplanned dwellings will definitely come forward on this site. Nevertheless, paras 35-36 of PPG3 refer to windfall sites of all sizes, but suggest that no allowance should be made for greenfield windfalls. In the circumstances I consider the Council's very conservative estimate of just 100 dwellings on large sites should be retained.

### Conversions

3.1.10 The figure for likely numbers of new dwellings from conversions was broadly agreed at the RTS. Although there has been some variation in the housing gain from such schemes in recent years, I see no good reason to differ from the Council's approach of averaging past performance. This should provide a robust basis for predicted growth from this source over the next 10 years.

### Flexibility

3.1.11 Most objectors considered the Council's assumption about take-up rates of outstanding planning permissions to be reasonable. Indeed there is already some evidence that housing is likely to be built at greater density on some of these sites than the existing permissions allow, following the guidance of paragraph 58 of PPG3. Although it would remain prudent to allow for some reduction for failure to implement permissions, I consider the 10% allowance proposed by objectors would be too great in the particular market circumstances of the Wycombe District.

3.1.12 The Council has also included an allowance of an extra 5% over the residual requirement for new sites to meet the Structure Plan allocation. The estimated capacity of the sites which could meet this shortfall takes into account the revised minimum density of 30 dwellings per ha set out in PPG3. I consider that as a matter of past experience a flexibility allowance at the rate proposed would be prudent to cater for unforeseen events that might affect the ability to deliver the expected housing numbers on new sites in full.

### Conclusions

3.1.13 Taking account of all the above points, I set out my own version of Table 2 below:

<b>Housing Land Supply</b>	
Structure Plan allocation (1991-2011)	7,200
Completions (to 31/3/00)	3,048
Identified Sites (with planning permission)	627
Windfall: Small sites	1,100
Medium	330
Large	100
Conversions	230
Sub total	5,435
Requirement on new sites (Policy H2)	1,765
<b>Requirement</b> (including 5% flexibility allowance)	<b>1,853</b>

3.1.14 I deal with the issue of how the outstanding requirement is to be met, taking account of the significant changes to the Plan made in June 2000, in my discussion of Policy H2 below. This section deals with the geographical distribution of new housing throughout the District. The table shows a projected need for 1,853 dwellings on allocated sites up to 2011. I deal with other objections as to how this can be met, taking into account all relevant site specific objections, in my discussion of Policy H2.

#### *Other matters*

3.1.15 As explained at the RTS, figures for Houses in Multi-Occupation (HMOs) are not included as part of the Structure Plan requirement. I acknowledge the Council's comment that this type of accommodation is important for certain groups, such as students, but there is no firm evidence to suggest that a shortage of such housing is a significant problem in Wycombe District. Given the relatively small number of further education establishments in the main urban areas I see no need for any change to the plan to ensure better provision in this field.

3.1.16 The Council undertook some review of employment land with a view to identifying further housing sites before publishing changes in June 2000. However, evidence given to support objections to the employment strategy (at the RTS in January 2001) and other site specific objections indicated that this review was by no means comprehensive. I deal with this aspect in my report on individual sites and Chapter 4 below.

## **RECOMMENDATIONS**

- H/1/1 Modify paragraphs 3.09 to 3.13 of the Plan, including Table 2, to reflect my comments in paragraphs 3.1.1-16 above.



**POLICY H2: HOUSING DEVELOPMENT – GENERAL**

**The Objections**

0137/12	<i>The High Wycombe Society</i>
0408/2	<i>Ercol Furniture Ltd</i>
0571/5	Laing Homes Ltd
0599/1	F V Savage
0831/11	Miss M B Messenger
0840/28	Marlow and District Chamber of Trade & Commerce
0922/15	House Builders Federation
0937/4	Miss P M Kimber
0960/2	Mr & Mrs D Price
0974/5	Chiltern Society
1010/1	Brian Austin
1114/1	Mrs H Mumford
1141/2	Beazer Strategic Land
1200/3	<i>English Nature</i>
1201/9	<i>Mr C G Hamilton, Clerk to Downley Parish Council</i>
1294/13	<i>Environmental Records Officer, Bucks County Museum</i>
1298/1	John Nichols
1338/6	Pimms Action Group
1414/17	Michael J Overall
1475/4	Mr D V Baker
1780/6	Mr & Mrs A J Garner
1980/1	Mr K Clements

**PIC 3/3 Objections**

0345/2511	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/31	Axa Equity and Law Life Assurance Society PLC
0524/19	Thames Valley Chamber
0922/25	House Builders Federation
1141/40	Beazer Strategic Land
1218/19	R J Newell
1579/20	Oxford Land Limited
159512	Berkeley Homes (Chiltern) Ltd

**PIC 3/4 Objections**

0408/29	<i>Ercol Furniture Ltd</i>
0579/10	Michael Lambert
0808/11	Linden Homes South East Ltd
0817/39	Croudace Ltd
0922/26	House Builders Federation

**PIC 3/23 Objections**

03/245/20	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/82	Axa Equity and Law Life Assurance Society PLC
0379/75	Sport England
0524/35	Thames Valley Chamber
0571/40	Laing Homes Ltd

0579/29	Michael Lambert
0817/48	Croudace Ltd
0922/26	House Builders Federation
1071/15	Persimmon Homes (TV) Ltd
1141/56	Beazer Strategic Land

### Summary of Objections

- (a) Object to the distribution of proposed allocations. Allocation at Princes Risborough is too large and disproportionate to need. Propose further residential development at Stokenchurch. Propose the need to identify land at Marlow for 200 affordable houses. Policy fails to explain how the High Wycombe Urban Area allocations relate to and promote an integrated transport strategy. Should strengthen the urban focus on High Wycombe in accordance with the Structure Plan.
  - (b) Object to the Comparative Site Assessment and site selection criteria as they are largely subjective. Object to: the failure to undertake stand alone assessments; inconsistent application of criteria; undue weight to public opinion; inadequate weight to valuation and cost/benefit analysis; robustness of landscape study; insufficient account of availability of site in plan period; more analysis required of suitability of allocations for affordable housing.
  - (c) Allocations do not take into account additional traffic generation and congestion, particularly combined sites.
  - (d) Local Plan should set a target for more sustainable use (eg housing) of significant areas of land currently used for car parking and other transport purposes (e.g. filling stations).
  - (e) The Plan makes insufficient provision for housing. Allocations will need considerable financial input to make them viable. Sites over 0.4ha with outstanding planning permissions should be listed, and the windfall allowance deleted.
  - (f) Household formation points to a demand for more flats and small houses at high density, suited to brownfield sites, removing the need for greenfield sites.
  - (g) Sites under Policy H2 are contrary to General Development policies (environmental impact; views etc).
  - (h) Lack of consideration given to people of retirement age who wish to move to smaller properties in the same community.
  - (i) Biological Assessment required of the allocated sites.
  - (j) Propose a 'New Town' which could reduce housing requirement on other areas.
  - (k) Number of dwellings on each site is questioned. Capacity guidelines should not be prescriptive targets as site characteristics need to be taken into account. Wish to see Development Briefs.
  - (l) Concern at loss of agricultural land.
- In response to Proposed Pre Inquiry Change 3/3:
- (m) Propose that Plan should make additional provision in order to provide greater certainty. Reduction in strategic allocations is not accepted, particularly the lower allocation of 1400 in the High Wycombe Urban Area.
  - (n) Object to a strategy which focuses on providing dwellings at High Wycombe, whilst ignoring opportunities for sustainable development elsewhere in the District. A balanced strategy is required and some provision should be included at Princes Risborough. Object to concentration in High Wycombe due to traffic problems. Should be a greater share for Marlow.

- (o) Question the inclusion of the 'School Sites' having regard to other policies in the Plan and Government guidance. Proposed change also involves loss of employment land.

In response to Proposed Pre Inquiry Change 3/4:

- (p) It should be made clear that the housing numbers are guideline figures only.
- (q) Inclusion of green spaces and fields is contrary to the spirit of Government housing policy. Council needs to provide a clear justification for the release of these sites.
- (r) The character of the list has entirely changed, which raises questions about the status of previous proposals.
- (s) The sites allocated do not represent a suitable allowance for non-implementation. Object to deliverability of allocations in general due to constraints such as contamination, infrastructure and land ownership. Sites listed will not provide sufficient housing supply to meet Structure Plan requirements.

In response to Proposed Pre Inquiry Change 3/23:

- (t) Object to under provision of housing land as now proposed. Will fail to meet Structure Plan requirements. Contrary to PPG3. The Plan from the outset should demonstrate how the full requirement would be met. The addition of (B) to the Policy is an inadequate response to the outcome of initial monitoring. Plan should allocate further sites.
- (u) Object to the deletion of the reference 'maximise the number of dwellings to be allocated within High Wycombe' in paragraph 3.15.
- (v) Object to wording in paragraph 3.17 which implies that Policy H2 only allocates previously development urban sites or green field sites, when in fact 18% of houses are to be developed on urban green space.
- (w) Downley Middle and Turners Field have been added to the Policy without any reference to their status and low priority phasing. The Council should undertake a proper urban capacity study; this should be done before the Plan is placed on deposit.

### **Inspector's Reasoning and conclusions**

3.2.1 Many objectors expressed deep concerns over the Council's acknowledged failure to show that the Plan would meet the Structure Plan housing requirement in its entirety. The Council's interpretation of the 'Plan, Monitor and Manage' approach is that extra sites can be included within the Plan at review stage, following a full urban capacity study. I appreciate the difficulties concerning the lack of time for the Council to produce such a study after the deposit version of the Plan was published. Some objectors argued that the Council should not have allocated any 'greenfield' sites until a capacity study had been undertaken, following the guidance in 'Tapping the Potential', which was published while the inquiry was in progress. The Council replied forcefully that the disadvantages of delay would have been considerable. In the circumstances the approach taken has enabled more urban sites to have been brought forward at an earlier stage than if the Local Plan process had been suspended for a full urban capacity study following government guidance.

3.2.2 A considerable amount of work had already been completed by the time the first round of PICs was published in March 2000. I consider the Council's strategy to make the best of a reasonable amount of information available during the deposit and pre-inquiry stages to have been reasonable. However, the thrust of paragraphs 2 and 28 of PPG3 is quite clear: that the Plan should show how the full requirement of Structure Plan provision for Wycombe District is to be met. The failure of the Plan to do this is a fundamental deficiency which needs to be put right.

3.2.3 In allocating land much will depend on the efficiency of monitoring to ensure that reserve green field sites are not released prematurely before developers of windfall and allocated urban sites have been given the opportunity to provide new housing in the preferred

locations. As I explain later, this approach should not preclude the allocation of new greenfield sites to make up any shortfall in the overall housing numbers. I deal with objections to individual sites under separate headings but my conclusions on the overall pattern of the housing allocations, and the balancing of merits and disadvantages of competing sites, is set out below.

#### Location of new housing

3.2.4 The Structure Plan requires that only about 60% of the District's housing needs to be met within its confines, primarily due to environmental constraints. This approach, and the long-established planning constraint of the green belt boundary, has had a strong influence on the ability of specific local communities such as Marlow to meet their own needs.

3.2.5 Policy H2 of the SP indicates that of the 2,400 dwellings expected to be built on new strategic sites, some 1,500-1,700 (62%-70%) should be located within the High Wycombe urban area. As the County Council accepted at the RTS, the Structure Plan's original intention that dwellings should be provided on strategic sites is not sacrosanct, if it can be shown that the overall requirement can be met on other more sustainable sites elsewhere. As I conclude above, taking into account expected provision from windfall etc, sites for 1853 dwellings need to be allocated. To accord with the broad thrust of Structure Plan Policy H2, however, it seems reasonable that at least 60% of these (about 1110) should be concentrated in the High Wycombe area.

#### **Comparative site assessment**

##### General

3.2.6 I have considered the H2 table of allocated sites in the light of all the evidence about the large number of suggested 'omission' sites that were considered throughout the inquiry, together with objections and responses concerning the sites included in the Deposit and 'Changed' versions of the Plan. Detailed comments on all these sites are contained elsewhere in this chapter. In general I support the way the Council has applied the sequential approach to site selection required by PPG3. Although the Council did not undertake a full urban capacity study of the type outlined in 'Tapping the Potential', which was published after the PICs, I consider that they have made the best attempt possible to revise the Plan in accordance with the broad thrust of PPG3, given the time available. The elaboration of government advice at both the Minister's speech to the HBF on 4 October 2000 and in a letter to North Herts DC in July 2000 indicates that a long and costly delay to the Local Plan process would not be appropriate.

3.2.7 The most important site in the plan is at Wycombe Marsh. In broad land use terms, it meets a number of significant policy objectives for providing much needed retail, employment and housing development on previously developed land in a sustainable location. The mixed-use allocation was subject to a number of objections concerning its sustainability, practicality, viability, prospective timing and the environmental impact of associated measures. I deal with these matters in full in section 3.5 of my report. In summary, I have concluded that this key site would be capable of providing about 400 dwellings. My reservations concerned the likely phasing of development, which I consider unlikely to take place until the middle of the second half of the Plan period.

3.2.8 Turning to other sites within the High Wycombe urban area, I have considered objections to the loss of playing fields and other open space on school sites, and the effect of government policy on densities. However, in general the proposed school sites have moderate to good accessibility as shown on the Council's index (Appendix 9 of the Plan). Objections to the loss of playing fields and open space have largely been addressed by the Council's strategy for additional pitch provision elsewhere and by the availability of other facilities near the sites. I found no other critical physical constraints regarding access or ecology for example to recommend against the allocations. These sites fall within the definition of previously developed land in PPG3, with the exception of part of one site, which I found to perform well in

comparison with other greenfield sites. I therefore endorse the Council's proposals for allocation as housing, to be brought forward in the early stages of the Plan period.

3.2.9 I share some of objectors' misgivings about loss of employment sites, particularly those on flat land in major route corridors. However, redevelopment of the Ercol site has been put in train by the start of construction of new premises at Princes Risborough, and is a given input to the Plan strategy. The Bucks Free Press site is not fully occupied and lies on the edge, rather than at the heart of, an employment area and adjoins a recent housing development. On balance I found it was not particularly well suited for employment redevelopment, and that a new housing scheme at this sustainable location would be more appropriate.

3.2.10 However, High Wycombe is not an area with significant over-allocations of employment land with little prospect of development, of the type referred to in paragraph 42 of PPG3. Indeed, at the time of the Employment Round Table Session (RTS), it was argued that the town was almost a 'hotspot', and had a shortage of opportunities for modern commercial development. After pre-inquiry changes, the Plan now provides less employment land than the deposit version. I have considered the merits for housing allocation of other employment sites within High Wycombe and Princes Risborough in comparison with greenfield sites adjoining the urban areas. For the reasons outlined in more detail in Chapter 4 of my report I consider that there is a strong need to retain good sites for continued employment use. The potential sites would not comply with the first criterion of paragraph 31 of PPG3, in that they would not remain empty or under-used if higher value residential redevelopment were not an option. I have not therefore recommended any as housing allocations.

#### High Wycombe – urban extensions

3.2.11 The sites within the urban area of High Wycombe would provide about 54% of the residual dwelling requirement. To accord with Structure Plan guidance on the distribution of housing throughout the District I have considered the potential of other undeveloped land, including Abbey Barn North, to make up the shortfall. In following the sequential test of paragraph 30 of PPG3, I have considered potential urban extensions. The green belt is a firm constraint to much of the urban area, with boundaries in many places drawn tightly up to existing development. However, previous plans have identified Areas of Special Restraint (ASRs) between the green belt and developed area as locations for future growth. In these circumstances I consider the provisions of paragraph 68 of PPG3 do not apply and that the Council was right to discard all sites within the green belt. I have therefore compared the merits of the ASRs, renamed Areas of Safeguarded Land (ASLs) in the Plan, for additional housing as the next stage in the site identification process.

3.2.12 My own assessment has been carried out using as a basis the criteria of paragraph 31 of PPG3, taking into account all the detailed evidence presented by all parties about all of the potential sites. Unlike some of the objectors, I have not prepared a detailed chart of the pros and cons of all 6 sites under a number of headings, which can lead to some loss of fine distinctions between sites and distortions of weighting of the factors involved. Instead I have concentrated on key differences between sites under the main headings.

3.2.13 Turning first to physical and environmental constraints, two of the sites, at Grange Farm (including Widmer Farm) and Lane End Road, lie within the AONB. I consider that housing development on the scale put forward by the objectors would be defined as major development to which the criteria of PPG7, as clarified by Ministerial statement dated 13 June 2000 apply. In assessing such proposals, these stipulate that the following should be taken into account: the need for the development in national terms; the cost and scope of developing elsewhere; the detrimental effect on the landscape and possible moderating measures. As I discuss in my detailed comments on these sites, I consider that there is an inconsistency between the application of this policy and the implied acceptability of development on the ASLs in the long term, where other land outside the AONB is available. I consider that the scale of housing development encompassed by the allocation of either site for housing would have a severely detrimental effect on the landscape of highest national importance. This would be a critical

constraint to their allocation.

3.2.14 The Gomm Valley was considered for AONB status but rejected due to lack of visual continuity with adjoining AONB to the east, from which it is separated by a ribbon of residential development in Hammersley Lane. Nevertheless I consider it to be a very attractive, prominent local landscape area of comparable value to many parts of the AONB itself. Even if development were restricted to the bottom half of the valley, the harmful effect on this almost unspoilt dry valley is a compelling reason against allocation. I consider the Council has overstated the value of the landscape of Terriers Farm, which is moderately attractive, but not of the same value as the adjoining AONB of Grange Farm. This site and the Abbey Barn North and South sites (ABN and ABS) all have slightly different visual qualities but I would not wish to draw a strong distinction between their overall values as components in the wider landscape of High Wycombe.

3.2.15 All sites involve the loss of some best and most versatile agricultural land, although allocation of ABS would involve the greatest loss of grade 2 land. With regard to ecology, the Gomm Valley proposals would result in the loss of part of a proposed SINC, offset by a management scheme that would improve the remaining area and an SSSI which is already protected. Large scale development at Grange Farm would have some adverse effects on wildlife in the western part of the area, but any features of interest at Terriers Farm would be retained by proper planning. The same applies to ABS, but the considerable ecological value of the calcareous grassland at ABN imposes a severe constraint on the extent of developable area and is a major factor in my recommendation to delete the site from the Plan.

3.2.16 Despite its shortcomings for detailed appraisals of the overall accessibility of individual sites, I consider the Council's Public Transport Accessibility Map (Appendix 9 of the Plan) provides a valuable means of gauging the relative merits of the competing sites. The Grange Farm site, especially the Widmer Farm part, the land at Lane End Road, and ABS are all located at the extremities of the urban area and score accordingly. Although ABN and the Gomm Valley are closer to the main public transport corridor of London Road, the centre of the proposed housing development is not within easy walking distance of bus stops and other facilities. The accessibility appraisal by Axa in support of Gomm Valley allocation places a high value on future improvements resulting from developer contributions, which may not be assured in the long-term future. Terriers Farm is the only site to lie within Zone 3, as a result of its proximity to a variety of frequent services along Amersham Road. Taking all aspects into account, I consider this site would provide the best access to jobs, shops and services by modes other than the car.

3.2.17 With regard to physical and social infrastructure, none of the sites suffer from particular long-term constraints that would inhibit future development. In most cases they are large enough to generate value from development sufficient to provide funding to meet any deficiencies. In my view there is little to choose between the sites with regard to the issue of community identity. As urban extensions, all sites would create the opportunity for new residents to assimilate into existing social structures without great difficulty.

3.2.18 In summing up the evidence relating to all the High Wycombe area sites I consider that Terriers Farm is the best 'greenfield' site that should be added to the list of allocations in High Wycombe urban area. In comparison to ABN, it is more accessible by public transport (since part falls within zone 3 of the Council's index compared with zone 4 for ABN). It has less ecological interest, is visually well related to the existing urban form, and is level enough to be developed at a relatively high density. Adequate access can be achieved, and the site does not suffer from any other constraints, such as the need to safeguard substantial areas for new highways. The ABS site suffers from poor accessibility, a critical disadvantage, and significant loss of good agricultural land. I consider the very attractive and prominent landscape of the Gomm Valley to be an overriding argument against development in comparison with other safeguarded land and the absence of further housing need. The two sites in the AONB cannot be supported in preference to other available potential housing land.

### Rest of District Allocations

3.2.19 With Terriers Farm, the sites in the High Wycombe urban area would comprise about 75% of the total allocations. Bearing in mind the thrust of government policy in PPGs 3 and 13 about directing new housing to urban areas with a range of facilities and public transport, I consider this balance acceptable. Of the remaining 25% in the rest of the District, the largest site is Park Mill Farm, itself a relatively well performing site adjoining Princes Risborough where residents without a car would have relatively good access to the town centre, employment opportunities and the railway station. In this respect it performs better than competing sites at Oak Tree Farm, to the north of Longwick Road and, particularly, land at the outlying village of Longwick. As I discuss in section 3.2.5, the strengths and weaknesses of these sites with regard to other criteria of paragraph 31 of PPG3, such as physical constraints of agricultural land, landscape value, and community identity are quite finely balanced. There is an issue concerning the adequacy of the road infrastructure to support more development than the 600 dwellings in the western sector of Princes Risborough. I consider the programming of construction in what I recommend as the second of two housing phases starting in 2006 would have considerable benefits. It would help to revitalise the retail element of the town centre and retain commercial strength and foster new employment links with businesses moving to the redeveloped Princes Estate. Continuation of development into the next Plan period would be realistic and subject to proper monitoring would avoid over-provision of housing in the town and district as a whole. I do not envisage the need to replace the existing sewage works or the provision of a single main access as overriding constraints to the implementation of the allocation.

3.2.20 In my assessment of sites outside the High Wycombe area, I have also taken into account the Slate Meadow site. For the reasons explained in section 3.2.6, I consider the loss of a small break between two housing neighbourhoods need not have an unduly adverse effect on their community identity. Similarly, the potential loss of an individual parcel of Grade 2 agricultural land is not an overwhelming constraint. The site is located about 1km from the shopping centre at Bourne End, the fourth largest settlement in the District. This has a reasonable range of facilities, though nowhere nearly as comprehensive as those found in High Wycombe and Princes Risborough. The site falls within zone 4 of the public transport accessibility index, reflecting the relatively infrequent half-hourly bus service to High Wycombe and Maidenhead. This factor weighs against the allocation of the site in place of Park Mill Farm, but I consider the relatively highly performing site should be retained as an ASL for future consideration.

3.2.21 There is little scope to provide more housing at Marlow due to the constraints of the green belt, AONB and flood plain. The Portlands site comprises previously developed land in the middle of the urban area and is rightly programmed for development in the early stage of the Plan period. I found no strong objection to the re-instatement of the site at Great Marlow School, which can accommodate 50 dwellings (see section 3.2.6 of my report)

3.2.22 I summarise my findings in the form of a new table below:

Table H2 (i)

Site	Area (ha)	Capacity
HIGH WYCOMBE URBAN AREA		
Bucks Free Press	1.8	80
Downley Middle School/Turner's Field	2.5	50
Ercol	5.9	265
Garratts Way	3.0	100
Heights County First School, Downley	1.1	40
Terriers First School	1.6	60
Wycombe Marsh	19.9	400
Terriers Farm	23.1	400
<b>Sub total</b>	<b>58.9</b>	<b>1395</b>
REMAINDER OF DISTRICT		
Portlands	1.6	50
Great Marlow School	1.6	50
Park Mill Farm	26.2	350
<b>Sub total</b>	<b>29.4</b>	<b>450</b>
<b>TOTAL</b>	<b>86.7</b>	<b>1845</b>

### Capacity

3.2.23 I agree with the Council's estimates of capacity for each of the sites, except for Ercol, where a higher number of dwellings seems realistic, given its location near public transport and the LPA decision to grant planning permission for 265 dwellings subject to completion of a Section 106 planning obligation. I note that these give a broad indication of future numbers, but should not be regarded as maxima. Development in accordance with the guidelines in PPG3 should help to ensure a greater number of smaller dwellings to meet new demands from small households.

### Phasing

3.2.24 I appreciate the Council's difficulties concerning the detailed operation of phasing proposals, which need to be framed with great care. I comment further on this in section 3.4. Much will depend on the efficiency of monitoring to ensure that reserve green field sites are not released prematurely before developers of windfall and allocated urban sites have been given the opportunity to provide new housing in the preferred locations. However, I am satisfied that the sites recommended for allocation, together with windfall allowances can be programmed to ensure that adequate housing in urban locations according with the sequential test can be achieved at the right time.

### Other matters

3.2.25 I am satisfied that the allocations put forward have been assessed with regard to their implications for traffic generation and congestion, based on the detailed testing undertaken by the Council's highway consultant (CD/M1ff). The detailed studies of individual sites show that traffic can be accommodated on the network, subject to appropriate management measures



specified in Appendix 2.

3.2.26 I have expressed some concerns about the general level of investigation into ecological value of sites, which was not thoroughly tested at deposit stage by Gillespies' landscape assessments. However, I am confident that there would be no unduly adverse impacts on wildlife interest on the identified sites, which involve a large percentage of previously developed land. Similarly, the effect of any loss of any good quality agricultural land would have to be assessed alongside other factors, such as landscape impact, the accessibility of sites etc.

3.2.27 It follows from my assessment of housing requirements set out above that I see no need for a new town to meet the scale of development required by the Structure Plan. Such an approach would not accord with the thrust of PPG3 to provide housing at sustainable locations according to a sequential test giving preference to previously developed land and then urban extensions if greenfield sites have to be used.

## **RECOMMENDATIONS**

- H/2/1      Modify Table (I) in Policy H2 and supporting text in accordance with Table H2 (i) above

## **ALLOCATED SITES – HIGH WYCOMBE AREA**

POLICY H2ia: ABBEY BARN NORTH

### **The Objections & PIC 3/4 Objections**

See Appendix 3A

### **Summary of Objections**

- (a) Development of site will lead to increased congestion, pollution, noise and greater incidence of accidents, loss of amenity. Little scope to improve existing roads and junctions. Development will generate access and egress problems. Development contrary to Policy T1 'Accessible Development & Sustainability'. The relative proximity of the site to the town centre is not conducive to convenient accessibility. Limited proposals for public transport, cycles and pedestrians set out.
- (b) Insufficient research to evaluate environmental capacity on the site. A biological assessment of the site is required. Development in conflict with European Union Law on conservation of natural habitats. Site is a Biological Notification site. Loss of flora and fauna. Damage to setting of adjoining ancient woodland. Reduction in sites capacity as an existing wildlife corridor. Existing meadow and grassland supports a high diversity of plants. Habitats Directive requires appropriate management of valuable wildlife corridors. Bat species protected under law. Site should be designated as a Local Landscape Area. There is a need to take full account of Deangarden Wood SINC and Heritage Woodland. Substantial part of site merits TPOs.
- (c) Visually intrusive to adjacent Green Belt and Local Landscape Areas. Assessment appears to undervalue the site in terms of visual quality. Any housing should only occupy the lowest part of the site, well below the 85m contour. Size of allocation should be reduced to no more than 100 dwellings. Reference to previous applications, which the Council has refused permission for development. Reference to pending application for designation of footpaths through and around edges of site.
- (d) Development will add obstacles to the re-opening of the High Wycombe to Bourne End railway line.
- (e) Loss of valuable high grade agricultural land.
- (f) Development will lead to erosion of buffer and urban sprawl between High Wycombe and Flackwell Heath and Loudwater. Countryside should be protected. Site is the only greenfield site left in High Wycombe.
- (g) No certainty as to when the site can be brought forward for development.
- (h) Excessive weight appears to have been given to the limited public objection to the scheme.
- (i) There are opportunities to develop alternative sites such as Compair and Great Marlow School, and sites previously used for employment purposes.
- (j) Halving of capacity through proposed Pre Inquiry Change is not justified; contrary to Government advice and policies of the Plan to increase densities. Site is capable of taking more than 100 units, being close to main transport routes and town centre.
- (k) Question viability/deliverability, having regard to proposed Pre Inquiry Changes to reduce capacity on the site and delete Abbey Barn South as an allocation.

## Inspector's Reasoning and conclusions

### General principles

3.2.1.1 The whole site comprises a natural bowl of about 11.5 ha on the north facing side of the Wye valley, about 2 km south east of the town centre. However, the site suffers from a number of constraints, examined below, which restrict the developable area to about 3.1ha (out of 11 ha) on the Council's estimate. Therefore, PIC 3/4 reduced the expected number of dwellings on the site from 200 to a maximum of 100, located on the central lower slopes of the bowl.

3.2.1.2 The Council supports the allocation of the site as an 'urban extension' in the context of the sequential test set out in PPG3. New housing development would comply with the requirement of Structure Plan Policy H2, since the site falls within the urban area of High Wycombe. A substantial gap between the edge of new development and the village of Flackwell Heath would remain, preventing the coalescence of settlements.

3.2.1.3 One of Verco's main points concerns the release of this greenfield site before undertaking a full urban capacity study of other better sites within the urban area. I deal with this in my general discussion of Policy H2 and in my report on the specific Chapel Lane site objection. In summary, I think the Council was reasonable to proceed with the Plan, as amended in the light of the best information available at the time but without a full capacity study, to prevent undue delay. While there are shortcomings with the site, I consider that there are no valid objections that it would be better to replace it with a sequentially preferable site within the main urban area.

### Accessibility

3.2.1.4 The site is within 350m of a primary school at Abbey Barn Road and within 600m of a local shop at Beech Road. Recreational facilities are further, and a more extensive parade of shops at London Road is 1200m away. The site is well located for cycle access, being adjacent to the main east-west route. The nearest bus stops to the site are about 350m away from the centre of the site at Kingsmead Road and Abbey Barn Road. Although these are within a reasonable walking distance, they provide access to a service that runs just once per hour between High Wycombe town centre, Bourne End and Maidenhead. In this context the site has a relatively poor accessibility level of 4 in the Council's District-wide assessment.

3.2.1.5 However, it abuts the zone 3 area immediately to the north, reflecting the much better services along London road, about 750m from the site centre. As the Council accepted, re-routing some of these services along Kingsmead Road would have potentially serious revenue implications for the operators. Given my findings about the Wycombe Marsh site (see section 3.5 below) I consider it likely that further development nearby would consolidate the role of public transport in the area towards the end of the Plan period. However, if the revenue from re-routing the services would not cover the extra costs, which is more than a faint possibility, the estimated cost of about £500,000 to provide support for extra services to and from the town centre for 3 years is considerable.

### Landscape Impact

3.2.1.6 The site is almost entirely undeveloped, apart from some stables and associated outbuildings. However, it lies outside the AONB or Policy L2 Local Landscape Area (LLA) designations which cover Deangarden Wood to the west and the steeply sloping land to the south east of Abbey Barn Lane. Generally, the landform of the bowl and surrounding woodland restrict views into the lower part of the site, especially in summer. A dense belt of copse along the south-east bank protects views from Abbey Barn Lane and scrubland at the northern end of the site screens the central area from Deangarden Rise. Views of the proposed developable area from the higher land on the opposite side of the Wye valley are limited and screened by vegetation, although it can be seen from parts of Micklefield between Cock Lane and Hatters Lane. At present there is a footpath to the group of buildings in the middle of the site but no

public right of way through the land.

3.2.1.7 Parts of the site, particularly the allotments, are neglected and others show urban fringe characteristics such as paddocks enclosed by unsightly fencing. However, the generally uncultivated nature of the land, the vegetation cover and the lack of buildings and hard surfaces combine to create a strong rural character. The allocation would not contribute to any immediate danger of coalescence between High Wycombe and Flackwell Heath, since the intervening land is green belt. However, even though the backs of houses in Deangarden Rise are clearly visible, most of the land lies outside the distinct edge of the urban area along the valley floor to the north. This point is illustrated clearly by the 3 dimensional image attached to the Council's planning evidence. The dry-ski slope is an isolated feature at present (see RT4), but the extension of urban form close to the bottom of the slope would create a much more significant intrusion of development into the valley side as a whole. In addition, the provision of an emergency access from Abbey Barn Lane would have an adverse impact on the appearance of the prominent wooded bank along the eastern boundary of the site. In summary, the allocation would have result in new housing extending beyond the existing urban limits, with some adverse visual impact on the landscape in this area of High Wycombe.

#### Ecology

3.2.1.8 A substantial part of the site is a Biological Notification Site (BNS). The upper slopes of the western half of the site are an important area of chalk grassland, an increasingly rare habitat for a rich variety of species, despite some encroachment from scrub, as shown in the Council's detailed Botanical Survey (CD/I/27). Such areas are recognised as worthy of protection through both County and UK Biodiversity Action Plans (BAPS). The Council has recognised the ecological value of these areas by reducing the developable part of the site to 3.1 ha and the expected number of dwellings to 100. I note however that this area includes part of the BNS and part of a field in Zone A of the Plan submitted by the Council's ecology witness outside the designated 'optimum development area'.

3.2.1.9 This part of the site is also an important foraging area for badgers living in Barrowcroft Wood, although no setts were found on site in February 2000 (CD/I/27). The development itself would lead to the loss of the horse grazing in the middle of the site which provides an even better foraging area for the badgers, thus severely disrupting their patterns of movement and 'lifestyle'. The calcareous grassland also shows evidence of supporting lizards, another protected species.

3.2.1.10 The Council's witness' view that the BNS would lose its value as a wildlife resource in 10-25 years through scrub and tree invasion and extension of horsiculture was not disputed. I recognise the Council's case that residential development of the site would enable a management regime for the protection of the remaining BNS area to be instituted. However, as BBOWT suggest, the site could be grazed as a nature reserve now, depending on the availability of subsidy. It is not for me to comment on the likelihood of such subsidy, which may be influenced by factors such as the extent of loss of the ecologically valuable area and the potential level of threat of disturbance to the rest.

#### Highway issues

3.2.1.11 One of Axa's objections to the allocation concerned the practicality of providing suitable access to the land in conjunction with other necessary works to gain access to the Wycombe Marsh and Abbey Barn South sites. As I accept in section 3.5, any development of this site should be phased after construction starts on the previously developed land at Wycombe Marsh. Access to latter could be to Abbey Barn Road from the existing works access road alongside school. If so, the proposal to construct a T-junction to Kingsmead Road (west) would be satisfactory.

3.2.1.12 However, in the longer term some improvements to the southern end of Abbey Barn Lane would be necessary if the Abbey Barn South (ABS) site were to be developed. In that event I consider that a roundabout with a 25m inscribed circle diameter and a low profile

inner island would be adequate in this location, bearing in mind the surrounding road network and the traffic levels it carries. A satisfactory configuration could be achieved to link into Kingsmead Road (east) and Abbey Barn Lane by a slight widening of the carriageway within highway land. The junction into the site could be positioned further east to allow for another footway on the south side of Kingsmead Road. There would be no need for a pedestrian link into Wycombe Marsh on the north quadrant of the roundabout, since the existing footpath from Abbey Barn Road could be retained. Although full details had not been worked up, there appears to be sufficient space to provide a continuation of the cycleway along Kingsmead Road alongside the River Wye.

3.2.1.13 Although the roundabout would have a steep approach from Abbey Barn Lane, this would be no different from the existing gradient to the current priority junction here. The Highway Authority has agreed that the proposed gradient of 10% and the alignment of the access to the site would be acceptable. While this is steeper than what is sought as best practice for road design, I consider it would be acceptable, given the limitations of the site. Similarly, a pedestrian route into the site at a gradient of 7% could be achieved to the west of the main service road. However, the cutting and grading required to facilitate this both parts of this infrastructure would also take up some of the developable area, reducing its housing capacity.

3.2.1.14 The steep rise in the landform to the south has a very significant effect on the alignment and land take of any possible improvement to Abbey Barn Lane. This has to be safeguarded to ensure that safeguarded land outside the green belt at Abbey Barn South can be developed at a future date beyond the life of the Plan. This factor further reduces the developable area of Abbey Barn North, adding weight too the argument that the proposal to develop the site would result in an inefficient use of greenfield land.

#### *Other matters*

3.2.1.15 In considering the other criteria for allocations set out in paragraph 31 of PPG3, there is no evidence of any problems with regard to the capacity of social and physical infrastructure to support the development. Bearing in mind the somewhat isolated position of the site, new residents would not be integrated particularly easily with the existing community in the Bassetsbury Lane/Kingsmead Road area, but they would no doubt give some support to the shops in Abbey Barn Road. There are no issues regarding factors such as contamination or flood risk. The allocation would result in the loss of a small area (about 1.2ha) of Grade 2 agricultural land from a very small holding, but this would be insignificant in the wider policy context of protecting the best resource.

3.2.1.16 There was no evidence other than supposition to support Beazer Land's argument that the site would not be deliverable because the four separate owners involved might reach agreement, or release required parcels at the appropriate time. Given sufficient financial incentive, the development of the site independently of either Wycombe Marsh and/or Abbey Barn South is not constrained by access considerations. However, it is entirely possible that the owner(s) of land needed to safeguard an improvement to Abbey Barn Lane would not wish to agree to detailed proposals until the future of Abbey Barn South was finalised. In any event, deleting the allocation in this Plan period may enable the adoption of a more comprehensive strategic approach for the two sites, as originally proposed in the deposit draft.

#### *Conclusions*

3.2.1.17 I have concluded that the site should not be allocated for residential development during the life of this Plan for several key reasons:

- ❑ The site is rather detached from the rest of the urban area, and has worse access to public transport within walking distance than might be expected.
- ❑ The highway constraints of safeguarding potential access for Abbey Barn South, allowing vehicular and pedestrian site access at suitable gradients reduce the

efficiency of the site with regard to land take per dwelling.

- Critically, much of the site provides an extremely valuable resource for wildlife, greatly restricting the developable area; high density development in close proximity could put the BNS and adjoining areas at risk.

3.2.1.18 In comparison with other sites, I have found that Terriers Farm performs better with regard to accessibility, ecological impact, and efficient use of land than Abbey Barn North. Although I have concerns about its future development, there are significant problems, worse in some instances, with other safeguarded sites around High Wycombe. I do not therefore consider that the site should be taken out of the equation for development during some future plan period, as local residents' groups suggested.

### RECOMMENDATIONS

- H/2/ia Delete the allocation; notate whole site as safeguarded land and designate all the site except the 3.1 ha net developable area shown on the Council's 'Illustrative Layout plan' as Local Landscape Area

POLICY H2ib: ABBEY BARN SOUTH
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### The Objections

See Appendix 3B

### PIC 3/4 Objections

0579/13	Michael Lambert
1579/21	Oxford Land Limited
1739/4	Lord Carrington's Grandchildren's Settlement
2063/10	Wycombe Summit Ltd / Wycombe Option Ltd
2140/2	Brian Gilbert

### PIC 3/23 Objections

1579/39	Oxford Land Limited
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### Summary of Objections

- (a) Development will increase traffic congestion, pollution (noise, light and air) and rat-running. Surrounding road network already at capacity. Existing high accident rate in the area. Development contrary to PPG13. Adverse impact on Handy Cross; until such time as the results of a study to consider the proposed development of the site, together with Abbey Barn North and Wycombe Marsh enables the traffic impact to be assessed it would be premature to include the sites in the Plan.
- (b) Development will set precedent for further development and lead to loss of countryside, leading to contiguous development between Flackwell Heath and Daws Hill. Loss of a buffer zone. Site should be added to the Green Belt to prevent further sprawl.

- (c) Development will lead to increased pressure on local schools. No specific proposals to retain or achieve a sustainable quality of life for existing residents, particularly of Flackwell Heath. Will lead to loss of existing community spirit.
- (d) Development will lead to irreversible damage to local landscape and natural habitats; loss of wildlife, ancient hedgerows. Adverse impact on adjoining AONB and Deangarden Wood SINC. Adverse impact on skyline; the site is elevated and appears remote from the town. Site should be designated as a Local Landscape Area. Landscape assessment of the site (Value Class 2) is inconsistent with allocating development on the site. Loss of an Area of Outstanding Natural Beauty. Destruction of an amenity area.
- (e) Development will lead to the loss of best and most versatile agricultural land.
- (f) Site is greenfield. There is a need to consider brownfield sites for development first. Plan does not consider redevelopment of RAF Daws Hill, Safeway and Sainsbury sites, nor Booker Hospital, Cressex, Sands, Loudwater and Marlow.
- (g) Gomm Valley proposed as a more sustainable site, linked to a fully integrated public transport system. Propose alternative new village to west of Wycombe Air Park.
- (h) Development will lead to loss of green belt. Development in the green belt is unacceptable.
- (i) Development will devalue local properties leading to claims for compensation. Will result in an increase in unemployment and crime.
- (j) Deliverability of the site is uncertain; site is dependent on redevelopment of Wycombe Marsh.
- (k) Widening of Daws Hill Lane unacceptable. Car access to Deangarden Rise should be resisted.
- (l) Propose relief road between Abbey Barn Lane and Junction 4 (M40). Proposed additional direct link to Marlow bypass. Junction 3 (M40) should be upgraded to two way access.
- (m) Development will lead to adverse impact on High Wycombe Town Centre, as returning commuters will shop elsewhere.
- (n) Site should be allocated for industrial premises and offices. Housing is not a good use of the site. Land too close to motorway to provide decent housing (noise problems). Insufficient new business / employment opportunities to cater for additional families. Question why so much development is concentrated in East Wycombe. Adverse impact on Wycombe Summit.
- (o) Development will lead to an increased risk of flooding.

In response to proposed Pre Inquiry Changes:

- (p) Object to deletion of site, as site adjoins residential development is capable of some limited development (20-30 houses).
- (q) Object to deletion, as site is an integral part of the Eastern Sector sites strategy and its suitability for development has been consistently recognised. There is a shortfall in the provision of employment and housing land in the District and site should be reinstated. Development would be of a form advocated by PPG3 (a planned urban extension, complementing existing and proposed leisure uses at Wycombe Summit).
- (r) Object to deletion of site as three new greenfield sites have now been proposed under Policy H2, and original greenfield allocations should remain instead.

### **Inspector's Reasoning and conclusions**

The need for safeguarded land

3.2.1.15 Objectors to the deposit plan, including the Chepping Wycombe Parish Council,

had argued that should the site remain undeveloped, in accordance with the PICs, not just within the Plan period but in perpetuity, preferably as green belt. The concerns of many objectors to the deposit Plan have been met by the Council's PICs re-instating the site as safeguarded land outside the green belt. However, my analysis of the potential housing supply up to 2011 showed that there is a need within the plan period for more 'greenfield' land. To accord with Structure Plan policy H2c, a significant element of new housing supply should be located within the High Wycombe Area, which is strongly constrained by surrounding green belt and AONB. The site is one of few possible urban extensions that are available to meet future housing needs. Even though a future detailed urban capacity study may indicate no need for further land releases of undeveloped land beyond 2011, I consider it would be most imprudent to preclude development on 'safeguarded land' that does not fall within the AONB.

3.2.1.16 As the Council's earlier decision to allocate the site for development indicates, I consider Abbey Barn South to be a relatively high-performing site compared to some other safeguarded sites. Its development would not lead to any material sense of coalescence between the edge of High Wycombe and the main group of houses at Flackwell Heath, which would be separated by a gap of at least 1200m and the M40 motorway. Comments about pressure on local services such as schools are likely to apply in any locality where a substantial new residential development is proposed. The same reasoning applies to the implications for traffic generation. In this instance I have no reason to doubt the evidence of expert witnesses that a satisfactory solution to the provision of a safe access, with appropriate pedestrian and cycle facilities, could be found. Although some other factors, such as its landscape, agricultural land quality and accessibility have weighed against the argument for development soon, they are not so serious as to undermine the site's potential at a later date.

#### Housing need

3.2.1.17 My conclusions on the overall level of housing provision in the District are set out in detail in section 3.2 above. For the most part, I agree with the Council that housing requirements to meet Structure Plan objectives can be met by previously developed sites and through 'windfall'. However, there is a shortfall of land within the urban area in sequentially preferable locations to the areas of safeguarded land will have to be addressed by allocating another 'greenfield' site(s) for the second phase of development. The objection site would accord with the guidance in PPG3 as an urban extension, if developed, the next category of sites to be assessed after those inside towns. Although Abbey Barn South was summarised as a 'high-performing' area in the Council's Comparative Site Assessment, I have concluded that another site at Terriers Farm would be better placed to meet housing needs during the Plan period, in terms of landscape impact and accessibility in particular. I deal with the competing merits of the Gomm Valley site in section 3.2.5 and my general discussion of Policy H2.

#### Employment need

3.2.1.18 I have considered objections to the employment strategy of the plan, and the failure to meet a qualitative need for a business park, in more detail in Section 4 of this report. I note that Policy E1 of the Structure Plan allows for the provision of major new employment areas in the High Wycombe area in order to secure necessary economic restructuring. This is subject to the proviso that new land is in substitution for an equivalent area within the District which is to be redeveloped for non-employment use. Paragraph 142 of the explanatory memorandum states that replacement employment land may be needed to secure a more diversified employment base. The Council accepted that the original allocation of part of the site as a business park was in compliance with this policy, following a decline in the supply of such land over the last decade. The parties agreed that employment land had reduced by about 25% since 1991. In addition to losses of about 17 ha in the early 1990s, (Wycombe Employment Study 1995) sites such as Ercol and Bucks Free Press would be lost to employment in the near future.

3.2.1.19 During the inquiry RPG9 was published, setting out up to date government planning policy for the south-east region. In general, the guidance is supportive of further



economic development, even in the western corridor, although policies should be devised to ensure a proper balance between jobs and housing.

3.2.1.20 The Structure Plan also seeks to achieve a balance between homes and jobs, as set out in Policy BS2. The Council argued that in the early part of 2001 the economic signs indicated that the District was becoming an employment 'hot spot', with an unemployment rate of just 1.2%. The number of persons employed within the District rose steadily between 1991 and 1998, by about 20%. I note also that the size of the resident workforce is predicted to fall in the period up to 2016, due to a projected ageing population. While these figures are subject to variations due to the economic cycle, they do not indicate an overall shortage of land at present.

3.2.1.21 However, these latest employment figures do not in themselves show that there is no longer any need for a business park in the High Wycombe area. Much will depend on commuting rates. The extent to which a new business park would reduce out-commuting to specialist service jobs elsewhere, particularly central London, is unknown. There is a considerable amount of new floorspace in the development pipeline, about 91,000 sq m of Class B1 space in early 2000. Although office rents have risen, they remain rather lower than at other locations in the Thames valley.

3.2.1.22 However, the objectors' case is founded on assumptions that the patterns and type of commercial development favoured in the past would continue without significant change. The site is not especially prominent from a major motorway. Even though it is relatively close to junction 4 of the M40, road access is via a congested junction and a speed-restricted residential road. At present the site has very poor accessibility by non-car modes to most local facilities. As I discuss below, the objectors' proposals for a bus service would improve the position considerably, but would not fully overcome the peripheral location of the site. Although it is just large enough to create its own separate image, the new development would have no strong links to other employment areas and would be isolated from associated services, other than Wycombe Summit Ski Centre.

3.2.1.23 In summary, I consider there is some justification for the Council's change of stance regarding the need for a business park, even though this has become apparent after the policy decision was made. I have given considerable weight to the following factors:

- the evidence of the strength of the local economy in early 2001;
- the amount of Class B1 floorspace in the pipeline;
- the potential of other objection sites for redevelopment with business use;
- the strong emphasis on locating new employment development close to existing transport nodes and routes in PPG13.

On this basis I consider that there is no overriding need for the allocation of a business park, at what is admittedly the best 'greenfield' location, during the plan period.

#### Agricultural land

3.2.1.24 About 7.9ha of the agricultural land at the site is Grade 2, a further 1.4ha is Grade 3a, and 2.1ha is Grade 3b. A further 6.9ha is non-agricultural. If the majority of the landscaped ride at the southern end of the site were retained, the objectors' proposals would result in the loss of 17.9ha of 'best and most versatile land'. However, the Council's consultants, CPM, concluded in their assessment that the land forms part of a holding that had already been fragmented into 6 parcels, primarily by the M40. The allocation would not therefore jeopardise any holding. Bearing in mind the recent Ministerial revision to PPG7 regarding the weight to be attached to agricultural considerations, I do not consider the productive value of the land to be an overriding constraint.

#### Landscape Impact

3.2.1.25 The Council accept that development could take place at some date in the future and raise no fundamental constraints in terms of landscape quality. The site is generally well

screened to views from the north by Deangarden Wood, and from the south by the M40 cutting. To some extent the visual quality of the site itself is compromised by surrounding features such as the Wycombe Summit ski centre, the RAF base to the west, and a very prominent telecommunications mast on the south-east boundary. Although some buildings would be on or close to the skyline, the main visual impact would be limited to views from a relatively short stretch of Abbey Barn Lane. The small dry valley at the northern edge of the site, leading into the wood, could be retained in part as an open space, if appropriate.

3.2.1.26 The southern half of the site comprises a flat area of pasture parkland and mature trees in the form of a woodland ride. Most of the trees are protected, principally a double avenue of limes and associated spinneys along an east-west axis. These trees lie outside the area of a registered garden and are now separated from the western focal point of Daws Hill House. The main ride could be excluded from the development area. I see no reason why the objectors' proposal for a new focus at the eastern end, near Abbey Barn Lane should have a detrimental effect on the health of the trees, subject to normal design safeguards. I consider that such a visual stop would have considerable potential to be an interesting feature that would add to the landscape and create a special sense of place at this location.

3.2.1.27 To improve the accessibility of the site, a new busway has been suggested which would also cross the tree avenue, but with minimal impact. A proposal for a new footpath and cycleway to the town centre through Deangarden Wood would require lighting and some earthworks associated with a zigzag alignment to overcome the steep gradient. Although this would have some effect on the rural quality of the area, it would not impinge on the main area of amenity woodland. I consider that potentially the most serious visual impact would result from the widening and re-alignment of Abbey Barn Lane. Although no final detailed scheme has been prepared, it is clear from a number of drawings produced at the inquiry session concerning the Abbey Barn North site that a substantial amount of cutting would be needed to improve the steep narrow section of road where it crosses the former railway line. A significant part of the copse along the west bank of the lane would be lost, opening up the side of the hill to views from the ski slope and beyond. I see this as a serious disadvantage of the allocation.

#### Ecology

3.2.1.28 Much of that part of the site proposed for development is arable land. The hedgerows between fields are broken and generally denuded of large trees; they do not provide a species-rich habitat. A report from Bioscan (UK) submitted by the objectors' planning witness (App 8) indicated that the site has fairly low nature conservation value, a view shared by English Nature. I see no reason to suppose that any features of interest in the parkland ride, including the protected trees, could not be retained in any development. Suitable landscape buffers would protect the ecology of Deangarden Wood.

#### Highway safety

3.2.1.29 A number of highway matters were resolved during the inquiry, particularly with regard to measures that would be needed to implement the allocation without adverse effects on the highway network generally. These included:

- site access roads, incorporating a revision of the Wycombe Summit entrance
- the improvement and possible re-grading of Abbey Barn Lane
- a new junction at Kingsmead Road/Abbey Barn Road
- works at the junction of Daws Hill Road and Marlow Hill
- a new roundabout at the junction of Abbey Barn Lane and Heath End Road.

The Council's transport model indicated that all junctions would be able to cope with predicted traffic flows in 2011 if these highway infrastructure improvements were carried out. The overall congestion index for the surrounding highway network (1.37) would be very marginally improved compared with from its predicted level under the revised Local Plan scenario (1.38). While I appreciate the concerns of objectors to the original allocation about general traffic

congestion in High Wycombe, these cannot override the strategic need for new housing and employment re-structuring set out in the Structure Plan.

3.2.1.30 The main area of dispute between the Council and Oxford Land on highway matters concerned the acceptability of developing the site before Wycombe Marsh. The Council argued that the junction of Abbey Barn Road and London Road would be unable to cope with the combined traffic from the objection site and Abbey Barn North wishing to travel east in peak hours. As a result queue lengths would be unacceptable and/or there would be increased rat-running along roads such as Ford Street, Mead Way or Kingsmead Road. This point is somewhat academic in that I have concluded that it is realistic and proper for Wycombe Marsh proposals to go ahead in the second half of the Plan period, and to recommend reserving the objection site and Abbey Barn North for possible allocation in a later plan. If this does not materialise for any reason, some form of redevelopment of the combined Sewage Works and Bunzl Paper Mills site incorporating new highways linked to London Road remains a realistic prospect in the medium term. The Council's point adds weight to the arguments for allocating Wycombe Marsh for development as early as practically possible. However, I find it hard to imagine that the potential highway problem identified would completely preclude development of the objection sites if circumstances were to change, provided that traffic lights at the junction were installed to allow easier egress for eastbound traffic from Abbey Barn Road.

#### Accessibility

3.2.1.31 At present the site falls within zone 5 on the accessibility map appended to the Plan, indicating one of the worst locations for access to local services. The nearest bus stop is over 400m away, served by a bus that runs on college days only. There are no local facilities nearby, apart from the bar/café at the Wycombe Summit Ski Centre, where the proposed expansion to include a health and fitness centre seems uncertain. Other than St Augustine's Roman Catholic School, the nearest schools are Wycombe Marsh Infants, 1.6km away by road, and Beechwood Juniors, about 2.6km by road. The Council argue that potential pupils would be more likely to be placed at Beechwood, given current capacities, but these may change if the site were to be developed towards the end of the Plan period. In any event, neither school is particularly convenient.

3.2.1.32 As for other facilities, the nearest shop, which sells basic provisions, is located at Kings Square, about 1.9km by road. A number of other social and commercial facilities are found on or near London Road. Access by foot and cycle to the London road corridor would be hampered by the gradient of Abbey Barn Lane, even after improvement.

3.2.1.33 As the Council accept, it would be possible to improve pedestrian and cycle links from the site to Daws Hill Lane (through the RAF base) Abbey Barn Lane and to Heath End Road. However, providing a better link to the town centre has many difficulties. I share the Council's reservations about the visual impact of a cycleway at Keep Hill, through Deangarden Wood. The necessary earthworks, surfacing and lighting associated with a new route across a steep gradient would have a significant detrimental effect on the landscape and ecology of the adjoining area. The potential conflict between pedestrians and cyclists on such a steep, winding route could add to the risk of injury when using the route. While the lack of a more direct cycle route to the town centre would not prevent development in the future, it remains a disadvantage in terms of accessibility in comparison to some other potential sites.

3.2.1.34 The objectors argued that allocation of the site for a business park and residential development would generate sufficient revenue to secure a commitment to run an improved bus service on a circular route to and from the town centre via Cressex Industrial estate and Abbey Barn Lane. Although such a service running every 15 minutes in peak times would be a considerable improvement (from zone 5 on the public transport accessibility index to zone 3) the site would still not have a particularly good rating. Moreover, there is no guarantee that the service would continue to operate after the initial 5-year subsidy period.

3.2.1.35 In summary, residents and workers at the site would be reliant on the car or subsidised bus service to have access to a wide range of commercial and social facilities. Despite the potential advantages of a mixed-use development, which might include a local shop, I agree with the Council that the site performs relatively poorly at present under this heading.

#### Other matters

3.2.1.36 In section 3.2.3 of my report I consider objections to the allocation of Downley Middle School/Turners Field, which meets the tests of PPG3 as primarily a previously developed site within the urban area. The owners of the site are no longer seeking a hotel as part of the mixed development proposed and the Council has met other objections to the Deposit Draft Plan by deleting the allocation. An objection to the omission of a hotel on the site of Abbey Barn Farm is dealt with in Chapter 12 Policy RT6(5). The southern parts of the site in particular suffer from noise from the M40, although the proposed residential area would be a sufficient distance to prevent any unacceptable disturbance to residents. The Council agreed that the allocation could complement any re-development of the adjoining RAF Daws Hill Base. No firm information about proposals for the base, currently used for the most part by the USAF, was available at the close of the inquiry, shortly after the events of 11 September 2001. Although such a redevelopment would not be prejudiced by the original allocation, the Council may wish to consider how to achieve a better synergy between the two potential development areas, particularly with regard to road access and public transport, if and when Daws Hill comes forward.

#### Conclusions

3.2.1.37 Although I found that the Plan does not provide sufficient housing to meet Structure Plan requirements in its changed form, I consider that the Abbey Barn South is not the best location to meet this shortfall in comparison to another site, Terriers Farm. I recognise that the site compares well with other safeguarded sites and remains suitable for development, if needed, beyond the plan period. Environmental, ecological and agricultural constraints are not fundamental, especially in comparison with other safeguarded land in the High Wycombe Area. Disadvantages with regard to accessibility could be overcome to some extent by a new bus service, and footpath and cycle links. Substantial new highway works would be needed to provide adequate access for private vehicles, principally the improvement to Abbey Barn Lane. Although this would have an adverse effect on the local landscape, it would also enable the lane to be used as part of a circular bus route. Nevertheless, the relative inaccessibility of the site remains a weakness that would not be fully overcome by new investment.

3.2.1.38 The objectors made a strong, but not conclusive, case in favour of a new business park on the site. The Council had previously accepted that the District suffered from a qualitative shortfall of premises for new technology industries, which could not be better met anywhere else. Having considered all the evidence, including the discussion at the Employment RTS, I have concluded that the qualitative shortfall of suitable land for business development is not so serious as to justify the independent allocation of the site at this time. Despite the potential benefit of some limited synergy between the uses and possible 'clawback' of out-commuters, I see no clear need for the release of a greenfield site remote from public transport interchange for a particular employment use predominantly based on the car.

### RECOMMENDATIONS

- H/2/1b Delete the allocation in accordance with part of PIC 3/4 and PIC M/1

POLICY H2ic: ASHWELLS

**The Objections**

See Appendix 3C

**PIC 3/4 Objections**

0376/37            Axa Equity and Law Life Assurance Society PLC  
2140/4            Brian Gilbert

**Summary of Objections**

- (a) Development is not near public transport. Additional traffic would lead to increased congestion and rat-running in the area. No sustainable transport options on offer. Poorly accessible by foot or bicycle. Site is not well related to proposed Park & Ride facilities.
- (b) Access to the site is unsatisfactory and would place additional pressure on Cock Lane.
- (c) Development will place a strain on local amenities and generate the need for a new school. Development will lead to 'loss of community'.
- (d) Development sets a precedent for future development of the whole of the Gomm Valley.
- (e) Loss of agricultural land Grade 3(a).
- (f) Loss of valuable countryside. Site is part of the Gomm Valley and is an SSSI. Area has high landscape value and the site is visually prominent. Valley should remain undeveloped. Site is adjacent to Green Belt and should be added to that. Development would lead to pressure on wildlife and nature; loss of hedgerows and mature trees. Biological assessment required.
- (g) Gomm Valley is used for recreation and should be conserved for future generations. Development would destroy a vital part of village heritage and a natural amenity for local people.
- (h) Tylers Green is identified as an area deficient in open space. Proposed development would further erode open space available.
- (i) Object to tenuous advantages defined in the Comparative Site Assessment. Does not give an accurate or balanced picture. Disagree with the listings of development opportunities and negotiable constraints.
- (j) Very little employment opportunities proximate to the site.
- (k) Development will lead to a weakening of the separate identity of existing community. Potential coalescence with Micklefield or Tylers Green. Loss of important 'lung' between the settlements.
- (l) Quality of existing environment will be adversely affected by new development (safety, noise, pollution, security issues etc.)
- (m) Proposed buffer planing would serve to artificially serve to segregate the site from the valley.
- (n) Policy should refer to 1.5ha only, with a capacity for 30 dwellings.
- (o) Site should not come forward in isolation from a more comprehensive development at Gomm Valley.
- (p) Council are influenced by financial gain in developing this site.

In response to Proposed Pre Inquiry Change 3/4 to delete the site allocation:

- (q) Deletion should be embraced within the comprehensive land use proposal for the whole of the Gomm Valley.
- (r) Object to deletion as the reasoning behind the deletion was greater emphasis on brownfield sites, but three new greenfield allocations have been proposed instead. Original greenfield allocations should remain, but with fewer dwellings built.

### **Inspector's Reasoning and conclusions**

3.2.1.39 The Council has met many of the objections to the allocation in the deposit Plan by PIC 3/4, which deleted the site from the schedule of proposed housing land in the High Wycombe area. This was justified by the revised calculations of housing supply and the argument that enough housing to meet strategic requirements could be provided on other 'brownfield' sites that had become available since the Plan had been placed on deposit. For the reasons set out in section 3.1 above, which also covers matters such as the need to meet strategic requirements for the distribution of new housing within the District, I did not accept this analysis in full.

3.2.1.40 I deal in detail with objections to the PICs and regarding the failure to allocate the whole of the Gomm Valley, including Ashwells, as a mixed use site for housing, employment, open space and a park and ride facility in section 3.3 below. As to the PIC objections specific to the Ashwells site, I consider the appearance of the site, including its relationship to the whole valley, to be a key factor. The site comprises 3 relatively flat fields used as pasture and paddock almost at the head of the Gomm Valley, adjoining the south-western edge of a quite low density residential estate and school which forms part of the older village of Tylers Green/Penn. The site is generally well screened from longer views to the south by a strong boundary hedgerow containing mature trees. Although some of the adjoining dwellings, including the older houses in Sandpits Lane which back onto the east boundary are visible, it retains a clear rural character. I consider that the land is an integral part of very attractive landscape that separates Penn and Hazlemere from suburbs of Micklefield and the mixed development in the London Road corridor to the south. In terms of landscape quality, therefore, I consider that there are good reasons not to allocate the site for housing at the present time.

3.2.1.41 Similarly, this parcel of the larger area of safeguarded land does not score well with regard to ease of access to commercial, social and community facilities by modes other than the private car. Major employment and retail opportunities in the London road corridor are about 1.5km to the south. Local shops, public house and community facilities in Tylers Green are about 0.5km from the northern boundary of the site as the crow flies, but about 1km by public highway. Although prospective residents would have safe and easy access by foot to the local school in Cock Lane, the site lies on the edge of the settlement, poorly located for many facilities. Moreover, public transport availability is not good; the site lies on the boundary between zones 4 and 5 of the Council's Accessibility Map. The nearest bus service runs from New Road/Church road on a circuitous route to Wycombe town centre via Hazlemere and Amersham Road, at half hourly intervals during weekdays. Overall therefore, I consider that the scale of the proposed allocation at this location would not provide all future residents with easy access to public and commercial facilities.

3.2.1.42 Many residents expressed concerns about the effect of extra traffic from occupants of the new houses on highway safety in Cock Lane. This retains the character of a country lane, a substantial length of which between Ashwells and Lance Way is of restricted width suitable for one vehicle only. There are some passing spaces but no footways in this section. I consider that the additional vehicles likely to use this road would increase the risk of collisions and would be a serious disadvantage of the allocation of the Ashwells on its own. I note also that the highway authority objected to the two points of access proposed from Wheelers Avenue and Ashwells.

3.2.1.43 I deal with other objections to the PICs concerning general housing policy, including Structure Plan requirements, in sections 3.1 and 3.2 above. I see no reason why an acceptable density and design quality in accordance with PPG3 could not be achieved on this level and reasonably enclosed site. Pollution from additional vehicles would occur at any new housing site, which emphasises the need for new allocations to be planned at the most sustainable location possible.

3.2.1.44 I have therefore concluded that the site is not appropriate for development during the Plan period, because housing needs can be met better elsewhere. I do not recommend, as some objectors suggest, that the site should be included within the green belt. There exceptional circumstances have arisen since this issue was last considered at the previous Local Plan inquiry in the mid 1990s, nor has there been any significant change in the strategic planning context. Bearing in mind the shortage of land around High Wycombe that is not constrained by green belt or designation as AONB, I consider that the site should be retained as safeguarded land to meet future needs.

## RECOMMENDATIONS

- H/2/ic Modify the plan in accordance with PICs 3/4 and M/1

POLICY H2id: COPPERFIELDS

## The Objections

0026/1	Wallace MacMillan
0137/11	The High Wycombe Society
0394/1	Mr Richard Mundy
0418/1	Andrew J M Todd
0446/1	David R Dakin
0555/1	Mr Kenneth Peters
0571/10	<i>Laing Homes Ltd</i>
0588/1	Stephen J Morris
0598/1	Mrs Maureen Hadlow
0629/1	Mr Andrew Richards
0630/1	M J Perrett
0631/1	Ms Sylvia Evans
0633/1	Mr Keith M Davidson
0634/1	Mr S M & Mrs E M Wallington
0636/1	Philip Barrington
0646/1	Ms Annette E Todd
0732/1	Colin R Platt
0827/1	Colin Primett
0867/5	West Wycombe Parish Council
0903/1	Gerard Anthony Gallagher
1022/1	Wendy Green
1141/6	Beazer Strategic Land
1200/35	<i>English Nature</i>
1314/1	Alan Garwood
1320/4	Banner Homes
1321/1	Mrs H C Morris
1464/1	Mr & Mrs K N Beale
1468/1	Mr & Mrs H Page

1472/1	Mr & Mrs Smieszek
1478/1	W Salter
1481/1	Bernard Creed
1588/1	Maxine Nagel
1591/1	Mark Hobson
1597/3	The National Trust, Thames & Chiltern Region
1736/1	A T Potrykus
1829/1	Althea E Summers
2066/1	Mr Michael R Swan

### **PIC 3/4 Objections**

0867/9 West Wycombe Parish Council

### **Summary of Objections**

- (a) Inadequate existing single access to the site. Development will lead to an increased risk of accidents. Visibility at access is poor, traffic on the A40 is dense, fast and often hazardous.
- (b) Insufficient existing off street-parking. Road is currently insufficient to accommodate additional two-way traffic. Pavements have become largely unavailable for pedestrian use. Gardens in existing development are small and children need space to play away from traffic and danger. 150% increase in traffic will exacerbate existing problems. Traffic impact study should be undertaken during the evening or weekend to reassess situation. Narrowness of road will make provision of a cycle lane difficult.
- (c) Additional access to Chapel Lane would make the option more viable, provided restrictions prevented rat-running. A smaller, more physically separate development from Copperfields would be more appropriate.
- (d) Selection of Copperfields through the Comparative Site Assessment is misleading inaccurate. No community facility is adjacent to the site. Development will not enhance the character and quality of existing residential environment; will not encourage other modes of transport and it is unclear why a 'south facing site' minimises energy use.
- (e) Design and density of the site should reflect that fact that it borders on West Wycombe Park, a park of special historic interest. A detailed assessment of visual impact and long term implications of proposal on the park is required.
- (f) Not satisfied that site has been assembled, or is capable of full assembly within the Plan period (involves 33 separate ownership's).
- (g) No reason for the site to be allocated for housing; residential development is permissible under the Adopted Local Plan. Site should be regarded as windfall opportunity.
- (h) Proposed development will obscure views and lead to a loss of privacy for existing residents.
- (i) Object to the loss of space for children to play.
- (j) Deterioration of quality of life for existing residents.
- (k) Upgrading of existing community facility will downgrade adjoining residential properties and the West Wycombe Park. Site should be considered as an Area of Outstanding Natural Beauty.
- (l) Object to loss of urban wildlife, habitats, mature trees. Biological assessment is required.
- (m) Propose that development should be car-free.



- (n) 50 dwellings on the site will be extremely difficult to achieve, particularly if the excessive open space requirement is levied.
- (o) In response to proposed Pre Inquiry Change, welcome the reduction to 30 dwellings, however consider that the infrastructure still can not cope with the increase in traffic which will be generated.

### Inspector's Reasoning and conclusions

3.2.1.45 Most of the objections to the allocation of this land for housing have been overtaken by the Council's proposed Pre-inquiry Changes to delete the site from the Proposals Map and consequent amendments to the text of the Plan. I note that outline planning permission for residential development of a slightly smaller area than originally proposed was granted in December 2000. In this context I consider the Council's treatment of the site as an outstanding commitment rather than a Plan proposal is appropriate, and consistent with the approach to other sites.

3.2.1.46 Many of the detailed matters raised in the objections will be considered when the reserved matters pursuant to the outline permission are assessed. With regard to the capacity of the site, PPG3 supports construction of a site within the urban fabric of High Wycombe at as high a density as possible. However, in order to avoid too great a number of dwellings being served from a cul-de-sac, it would seem right to expect a maximum of about 30 dwellings, taking account of the need to provide a second emergency access via West Wycombe road. This appears to be acceptable to the highway authority and I conclude it would be a reasonable assumption to carry forward into the commitments table for total housing numbers.

3.2.1.47 Concerning questions of deliverability, the reduction in site size has also reduced the number of ownerships involved. Furthermore, a Section 106 agreement has been signed and a prospective developer is actively pursuing a detailed scheme, through the submission of a reserved matters application. I consider the issues of parking layout, drainage and archaeology raised by the Wycombe Society, could be addressed in the usual way without materially affecting the number of dwellings or development phasing.

### RECOMMENDATIONS

- H/2/id Modify the Plan in accordance with PICs 3/23, A2/26 and M/5.

POLICY H2ie: ERCOL
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### The Objections

0526/16	Chepping Wycombe Parish Council
0571/11	Laing Homes Ltd
0700/1	John and Sheila Turner
0859/5	F J Alexander
1141/7	Beazer Strategic Land
1200/36	English Nature
1725/6	E R Foster

### Summary of Objections

- (a) Development will lead to increased traffic generation (additional noise and pollution) in an already congested area. The combined developments of Abbey Barn North, Wycombe Marsh and Ercol will lead to over-development. Development will have a detrimental affect on residential amenity and quality of life.

- (b) Question the securing of a satisfactory access to the highway network. Links for pedestrians and cyclists are lacking.
- (c) No certainty that development will be achieved within the Plan period. Availability of site depends on Ercol's ability to relocate. Benefits of the site for residential use could be significantly offset if the factory is located to a less accessible area.
- (d) Availability of site depends on decontamination.
- (e) Immediate site environment is poor and shape of site is not conducive to a convenient housing layout. Doubts whether 200 dwellings can be achieved, given local topography, linear shape of site and noise constraints of the railway.
- (f) Object to the loss of a viable factory and loss of employment land. Consideration should be given to maintaining an element of employment to serve local housing area.
- (g) Allocation should be reduced to 130 dwellings.
- (h) Development will result in the loss of open space, wildlife and habitats. A biological assessment is required.
- (i) Object to Council flats of more than one storey on the site.
- (j) Row of conifers sited on the edge of existing footpath should be retained.

### **Inspector's Reasoning and conclusions**

3.2.1.48 The Ercol site is another where many of the objections have been overtaken by events, namely the Council's decision to grant planning permission for 265 dwellings, subject to the conclusion of a satisfactory Section 106 agreement. In general policy terms the allocation for redevelopment accords with government policy in PPG3 which gives priority to the identification of previously developed land for housing. It also complies with Policy H2 of the Structure Plan, which seeks to concentrate new housing in Wycombe district in the High Wycombe urban area. The site lies in a relatively central location in the town, in Accessibility Zone 2, close to the major public transport corridor, thus meeting the broad thrust of PPG13 regarding sustainable development.

3.2.1.49 The allocation complies with the other selection criteria for housing developments in paragraph 31 of PPG3. There are no known infrastructure constraints, new residents would be able to support existing local services and any previous contamination (thought to be limited to sawdust) is not likely to prove a serious constraint to redevelopment. Replacement of the existing industrial use, which creates some air and noise pollution, with new housing would improve the environment for neighbouring residents. The relocation of Ercol to new premises under construction at the Princes Estate in Princes Risborough is well under way, securing the future of the company within the District. Objections to the loss of employment at this location, also overtaken by events, are dealt with briefly in section 4.4 of my report. A number of factors, in particular the cramped layout, outdated buildings, poor access and proximity to housing, have led me to conclude that the site is no longer suitable for manufacturing use.

3.2.1.50 From the technical evidence on highway safety, and the committee report on the latest planning application for housing, I note that the Highway Authority is satisfied that the 265 dwellings proposed would be acceptable, subject to the measures set out in the report. In essence, a Traffic Impact Assessment (TIA) showed that residential redevelopment would generate fewer traffic movements than re-use for industry and would allow some highway improvements to be instigated. The revisions to Appendix 2 show that there will be no through traffic at the site, with about 50 dwellings served from Hatters lane. As previously developed land, with buildings at high density, there are few natural features on the site other than a row of cypresses along the northern boundary.

3.2.1.51 With regard to the objections to the proposed changes, the County Council appears satisfied that no contribution towards further educational provision could be reasonably required. Whatever the negotiated outcome with regard to affordable housing in the particular circumstances of the Ercol relocation, I consider it appropriate for the development principles to reflect Policy H11.

### RECOMMENDATIONS

- H/2/ie Modify the Plan in accordance with PICA2/5 and A2/17

POLICY H2if: GARRATTS WAY
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### The Objections

0167/1	Mr & Mrs P T Whittle
0379/23	<i>Sport England</i>
1141/8	Beazer Strategic Land
1200/37	English Nature

### Summary of Objections

- (a) Object to the closure of the two schools; development will lead to a shortage of schooling for the area. Stated benefits of the site could be offset by increase in traffic movements if replacement school site is not so well related to current catchment of schools.
- (b) Development will disrupt adjoining residential properties.
- (c) Object on the grounds that public opposition to the proposal was not reported in the Comparative Site Assessment.
- (d) Development will lead to loss of open land with no guarantee of adequate replacement.
- (e) Question the level of housing provision anticipated on the site.
- (f) Object to the loss of playing fields. Contrary to Policy RT3 'Playing Pitch Provision'. In the absence of an up to date assessment of playing pitch requirements in the District, it is not possible to demonstrate that there is no longer a current demand for such facility.
- (g) A biological assessment of the site is required.

### Inspector's Reasoning and conclusions

3.2.1.52 The objection site lies within a suburban residential area of High Wycombe about 3km north-west of the town centre. It comprises two schools (Bellfield First and Middle) both of which have been closed and boarded up. These buildings and associated playgrounds, car parking and playing fields occupy an elevated position overlooking the Wye valley, with extensive views to the south.

3.2.1.53 The allocation of the site for housing accords with the broad thrust of government policy in PPG3 to re-use urban land before seeking greenfield sites, and to encourage development in sustainable locations. Housing development would comply with Policy H2 of the Structure Plan, which seeks to focus development in the High Wycombe urban area. In considering the extent of proposed development, the guidance in PPG17 that the loss of playing fields should be resisted is also particularly relevant.

3.2.1.54 In terms of the criteria for residential development identified in paragraph 31 of PPG3, the site is located within an established housing area where new residents can contribute towards community development, it is free of major service constraints and satisfactory access can be provided. The site has good accessibility by public transport, straddling Accessibility Zones 2 and 3, being located close to services with 5 buses per hour.

3.2.1.55 Development in accordance with the housing location would involve the loss of 2 small pitches used for school football separated by a significant change in level. Neither area meets normal FA standards for pitch size and the Council advise that the engineering difficulties involved in grading the land to create one full sized pitch could be insuperable. There is certainly more than one significant break in the ground as the site falls away to the south-east, which would be very costly to deal with.

3.2.1.56 The Council has put forward proposals to replace the loss of playing fields at 4 school sites allocated for housing in the Plan. This package includes the provision of 2 extra pitches at Redfords playing fields, together with improved changing facilities and car parking. I note that the Wycombe Playing Pitch Study (CD/1/5) found that there was no overall shortage of pitches in High Wycombe, other than a slight shortage of junior mini pitches. The Council's strategy should address this shortage, and provide for a wider range of better managed facilities in appropriate locations that will meet the needs of potential users. This argument has been accepted by Sport England, the body charged with advising on adequate provision. In this context I consider that the replacement arrangements would outweigh any objection to the loss of 2 small pitches at the objection site.

3.2.1.57 While residential redevelopment would result in the loss of some open space, this land is not generally available for public use at present. The development principles stipulate an area 0.6 ha to be provided as public open space, which will make a substantial contribution to improving access to green spaces in an area of known deficiency at the 400 and 800 m thresholds. The lower part of the site has some landscape value, with views into and out to the Wye valley, which should be incorporated into the overall housing design, including the location of the replacement open space. I believe that following these principles will create the correct balance between making the best use of urban land while protecting valuable green spaces.

3.2.1.58 As to objectors' concerns about the environmental quality of the site, I saw no important natural features that would be likely to be lost if a well-designed residential development took place. Two very attractive mature beech trees stand close to the northern boundary and could be retained subject to suitable protective measures in accordance with their TPO status. While the site may provide a wildlife resource at present, at the time of the inquiry there was no evidence of any rare species present. I note that the County Council has accepted that the BNS status of the site is now defunct. The dwelling gardens and proposed open space could provide a more useful wildlife habitat than the former playing fields.

3.2.1.59 Neighbouring residents may suffer some short term nuisance while the new housing development is under construction. However, the site is large enough for new dwellings to be sited far enough from surrounding dwellings to avert significant permanent problems of undue disturbance or overlooking .

3.2.1.60 The issue of school closures is a matter for the County Council as Local Educational Authority. The Plan proposals reflect the current trend of reducing numbers of primary school children and increasing need for secondary places. The schools on the site have already been closed and I understand that the alternative provision at the new Disraeli school would meet the needs of residents in the catchment area, with a projected surplus of 175 places by 2005. The new school is within a few hundred metres of the site and is on a bus route. I consider that fears of extra traffic generation from a relatively small number of additional houses in the context of the wider area are unfounded, as the Council's traffic assessment (CD/M/47) indicated.

3.2.1.61 The dwelling capacity of the site is based on a likely density of about 40 dwellings per ha. Although this is somewhat higher than the prevailing density of housing in the surrounding area (about 27 dw/ha), I do not consider the assumption unreasonable. The density complies with the guidance in PPG3, paragraph 58 of which sets a range of 30-50 dwellings per ha, in order to make more efficient use of land. The average density on a net developable area of about 2.9ha (including the open space required for the scheme) is about 34 dw/ha, not much greater than the minimum required.

3.2.1.62 This report is concerned with objections to the Plan which concern broad land use planning principles. It is beyond my role to comment on other matters such as restrictive covenants, property values. I see no reason to question that adequate foul and surface water drainage cannot be provided satisfactorily in this urban location.

### RECOMMENDATIONS

- H/2/if Modify the Plan in accordance with PICs 3/4, 3/23, A2/6, A2/18 and A2/27.

POLICY H2ig: PIMMS CLOSE
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### The Objections

See Appendix 3D

### PIC 3/4 Objections

0376/38	Axa Equity and Law Life Assurance Society PLC
0579/21	Michael Lambert
2140/3	Brian Gilbert

### Summary of Objections

- (a) Proposed development represents a 66% increase in housing; this will lead to over-development and destruction of environmental quality.
- (b) Development will lead to increased traffic congestion and undue reliance on the private car. Will lead to increased pollution and accidents.
- (c) Access to the site is unsatisfactory. Cock Lane will require extensive improvement to the detriment of its character.
- (d) Site can not be easily serviced by public transport. Services are remote and irregular. No sustainable transport options on offer.
- (e) Existing schools have little or no spare capacity. Site is poorly related to local facilities.
- (f) Object to loss of a greenfield site. Site should be retained as open countryside. Loss of landscape and amenity value. Development will compromise wildlife corridor, flora and fauna. Require biological assessment of site.
- (g) Loss of important amenity which provides recreational opportunities and open space.
- (h) Proposed development sets a precedent for future development of the Gomm Valley.
- (i) Site should be added to the Green Belt to prevent further urban sprawl.
- (j) Site is not suitable for affordable housing.

- (k) Development will lead to a loss of existing 'community'.
- (l) Development would involve the loss of best quality agricultural land.
- (m) Site provides an important open aspect between the settlements of Penn/Tylers Green and High Wycombe/Loudwater which should be retained.
- (n) Disagree with the conclusions of the Comparative Site Assessment.

In response to Proposed Pre Inquiry Change to delete the site allocation:

- (o) Object as the site is entirely suitable for residential development, and should form part of the comprehensive land use proposals for the Gomm Valley as proposed by the objector.
- (p) Site is capable of taking a reduced number of dwellings (20).
- (q) Object, as the reasoning behind the deletion was greater emphasis on brownfield sites, but three new greenfield allocations have now been proposed instead. Original greenfield sites should be reinstated, but with fewer houses built.

### **Inspector's Reasoning and conclusions**

3.2.1.63 Many of these objections have been addressed by the Council's proposed Pre-Inquiry Changes which deleted the site from the list of suggested locations for new housing. For the reasons explained in more detail in the section of the report dealing with the whole of the Gomm Valley and in the comparative assessment in section 3.2 above, I consider that in the context of overall housing numbers none of the safeguarded land at Gomm Valley should be allocated for development during this Plan period to 2011. Other previously developed sites within the High Wycombe urban area are better placed to provide new dwellings in compliance with government policy in PPG3 and the criteria of Structure Plan Policy H2 regarding the location of development. I concluded that even though more housing land would be needed to meet Structure Plan requirements, another site at Terriers Farm was the best option to bring forward, rather than the greenfield sites originally proposed in the deposit version of the Plan. In summary, the Pimms Close site forms part of a countryside area with high landscape value, is not particularly well related to shops and public transport, and, in isolation, would give rise to significant highway safety concerns about extra traffic in Cock Lane.

3.2.1.64 Other objections regarding the retention of the whole of the Gomm Valley as Safeguarded Land are also considered in chapter 9 of my report. For the present I consider the site should be retained as safeguarded land, subject to consideration for development at some future date when the Plan is reviewed.

#### **PIC objections**

3.2.1.65 I deal with Axa's objections regarding the proposal for mixed development over the whole Gomm Valley later in this section of my report. With regard to the objection that the site should be allocated for a reduced number of units, say 20, the same arguments apply as for the deletion of the whole site, ie that other potential housing sites, including those identified in the PICs, are preferable. A reduction in density on this site would create another conflict with the advice in PPG3 to make the best use of housing land by developing at 30-50 dwellings per ha.

3.2.1.66 I do not share the third objector's view that the Council has been inconsistent by allocating what are in effect 'greenfield' school sites in the PICs. As I explain in other parts of this section in the report, the schools fall within the PPG3 definition of 'previously developed land'. I have also addressed the issue of loss of playing fields, which the Council have resolved by a District-wide strategy of replacement in concentrations of facilities. As I explain in section 3.1, I have no authority to question Regional Planning Guidance on the overall housing requirements for the District. The Plan also has to follow Structure Plan guidance with regard to the broad distribution of housing throughout the District, directing most new growth to the High Wycombe urban area in accordance with Policy H2. Again, as discussed in sections 3.1

and 3.2, I consider has allocated broadly the right level of growth in the various major settlements in the District, including Marlow and Princes Risborough, which must take a smaller share to accord with Policies H2 and H3 of the Structure Plan.

## RECOMMENDATIONS

H/2/f Modify the Plan in accordance with PICs 3/4, A2/7,9/1, 9/12 and 10/6.

POLICY H2ih: WYCOMBE MARSH
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## The Objections

0006/3	William O Highley
0030/3	Elizabeth Taylor
0055/2	William John Pressney
0082/2	Mrs D Atkinson
0125/1	J E Brenchley
0142/3	Mr & Mrs I Green
0168/6	Ian Campbell
0197/2	Mr & Mrs McGarel Groves
0323/5	Arthur E Hawkswell
0352/3	Colin Hingston
0355/2	C S Clark
0367/7	Highways Agency
0376/4	Axa Equity and Law Life Assurance Society PLC
0378/7	George Wimpey PLC
0506/5	Bassetsbury Area Protection Group
0526/15	<i>Chepping Wycombe Parish Council</i>
0571/13	Laing Homes Ltd
0639/5	Mr John Leslie Fabel
0859/7	F J Alexander
0942/5	Lisa Todd
1009/6	Mr J E Pickering
1033/3	Mr L Twigg
1065/3	Dr and Mrs C D Nowers
1075/16	Little Marlow Parish Council
1141/10	Beazer Strategic Land
1145/8	C Livesey
1155/1	A P Sotte
1166/3	Miss L Wootton
1167/6	Miss N J Neath
1193/7	Environment Agency
1200/39	English Nature
1228/1	Mrs S J Latimer
1264/7	Stephen Robert Cooper
1309/1	Helen Lytollis
1311/4	David and Sally Smith
1320/8	Banner Homes
1560/1	W J T Norris
1570/2	Mr J Woolgar & Mrs P Woolgar
1679/3	Mr & Mrs Brant, Kingsmead Road Caring Residents

1685/2	Mr L V Strange
1715/1	Mrs E Levings
1716/1	Mr C M Baker (Chairman Wooburn Residents Association)
1720/5	Mrs K L Sewell
1725/7	E R Foster
1770/3	Mrs Pamela Canty

### **PIC 3/4 Objections**

See Appendix 3E

### **Summary of Objections**

- (a) Proposal will lead to over-development in the east of High Wycombe.
- (b) Site has previously been used as an industrial site; no published data on possible levels of toxicity, stability, water table level and contamination available. Site investigations need to be undertaken to consider both soil and groundwater remediation measures
- (c) Development will lead to increased congestion. Increase in noise and light pollution and significant worsening of traffic conditions on the A40. Adjustments will be required to Abbey Barn Lane. Unclear how widening will reduce congestion.
- (d) Development will lead to adverse impact on the River Wye and loss of amenity for local residents. Question how current water levels are to be maintained; current effluent discharge constitutes 70% of the downstream flow. Unsustainable proposal.
- (e) Development would lead to increased noise and air pollution leading to a deterioration in the quality of life of existing residents in the area and loss of privacy.
- (f) Propose that the Sewage Works site should be converted to a nature reserve. Existing wildlife and birdlife on the site will be adversely affected by development. Loss of natural habitats and adverse impact on ecology in conflict with European Union law. Requirement to carry out a comprehensive survey of the site. Wildlife corridors should be managed. True value of the site as a wildlife reserve has not been ascertained.
- (g) Enlargement of sewage works at Little Marlow should only be contemplated if it is an improvement on the existing facility; ie odour free, with compensation flows to maintain the River Wye. No apparent justification for removal and relocation of existing facilities at sewage works. Feasibility of relocation queried.
- (h) Economic viability of the proposal yet to be demonstrated. Uncertain that site (in whole or parts) will be available over Local Plan period. Major concerns over the deliverability of the site related to the relocation of the water treatment works, the need for ecological mitigation and associated capital and revenue costs.
- (i) Development will have an adverse impact on adjoining Conservation Area.
- (j) Adverse impact on Handy Cross; until such time as the results of a study to consider the proposed development of the site, together with Abbey Barn North and Abbey Barn South, enables the traffic impact to be assessed, it would be premature to include the sites in the Plan.
- (k) Propose deletion of site allocation and alternative site at Gomm Valley. Propose relocation of Handy Cross (quarter of a mile south), and use of land between old and new motorway for housing.
- (l) Proposed density of development should be reduced.
- (m) Site is not a true brownfield site as it is not derelict. Site effectively acts as a green space separating High Wycombe and Wycombe Marsh giving a rural feel to the area. Labelling



the site as greenfield is an over-simplification. Site cannot really count as brownfield if development can only be justified by building a new Sewage Works on a greenfield site.

- (n) Loss of allotments.
- (o) Pressure on existing community facilities (schools) and recreation facilities.
- (p) A higher proportion of 30% affordable housing would be more appropriate on the site.
- (q) Question the need for the allocation, when the population is static.
- (r) Unsightly garages along Abbey Barn Lane should be replaced.
- (s) The Comparative Site Assessment considered this site and the Paper Mill site together. They are very different sites and in different ownership and should be considered separately.

In response to proposed Pre Inquiry Changes:

- (t) Propose that the site's capacity is reduced to 350 and the employment allocation increased to 4 hectares.
- (u) Object to the fact that the Council is now placing even greater reliance on the site coming forward, when its availability and viability are uncertain.
- (v) State that account must be taken of the Environment Agencies LEAP.

### **Inspector's Reasoning and conclusions**

3.2.1.67 I deal with many of the objections to the allocation of the key site at Wycombe Marsh Sewage Works and the adjoining former Bunzl Paper Mill site in my discussion of objections to Policy H5A. This covers a number of issues such as:

- ◆ The capacity of the Eastern sector of High Wycombe to accommodate more development, including the capacity of the highway network
- ◆ Remediation of contamination, and likely costs
- ◆ Nature conservation, including the effect on the river Wye
- ◆ Flooding
- ◆ Feasibility, viability and programming
- ◆ Planning policy and practical implications of expanding Little Marlow Sewage Works
- ◆ Effects on the environment surrounding the site, including nearby housing areas

3.2.1.68 There is no need to repeat the arguments about those issues in this section of the report. I concluded that there were no planning objections of sufficient strength to outweigh the very significant benefits of redeveloping this strategic site with a mixture of uses, particularly given its sustainable location. Any reduction in housing density on this site would create another conflict with the advice in PPG3 to make the best use of housing land by developing at 30-50 dwellings per ha. My main reservations concerned the timing of the proposed residential element of the allocation; I consider that the earliest contribution the site could make towards meeting housing targets would be in the second half of the Plan period.

### **RECOMMENDATIONS**

- H/2/ih Modify the Plan in accordance with PICs 3/6, A2/8, A11/2, 12/6 and M/11C

**ALLOCATED SITES – REST OF DISTRICT**

POLICY H2ia: GREAT MARLOW SCHOOL

**The Objections**

0379/24	<i>Sport England</i>
0571/14	<i>Laing Homes Ltd</i>
0654/1	<i>Marlow Bottom Residents Association</i>
0709/6	<i>Bryant Homes Technical Services Ltd</i>
0790/2	<i>J B Thomas</i>
0840/25	<i>Marlow and District Chamber of Trade &amp; Commerce</i>
0919/1	<i>Mr Maxwell Cowlin</i>
1141/14	<i>Beazer Strategic Land</i>
1144/7	<i>Mr R and Mr A Mash</i>
1200/40	<i>English Nature</i>
1866/1	<i>M R Cary</i>

**PIC 3/4 Objections**

0371/9	<i>Marlow Town Council</i>
0579/22	<i>Michael Lambert</i>
0840/66	<i>Marlow and District Chamber of Trade &amp; Commerce</i>
2140/5	<i>Brian Gilbert</i>

**Summary of Objections**

- (a) Object to the loss of playing pitches. Contrary to Policies RT1 and RT3. Oppose development unless an exception to provide replacement pitches is met.
- (b) Release of the site is uncertain, as the allocation on playing fields comes with the ambit of the Town & Country Planning (Playing Fields) (England) Direction 1998 requiring consultation with the Secretary of State. The outcome of such an application is uncertain. Allocation of site is also premature pending outcome of the Playing Pitch Study.
- (c) Development will further compound the deficiency of open space in this area of Marlow. If site is considered surplus, it should be developed as open space.
- (d) Loss of Green Space.
- (e) Whilst dual use of the school facilities could balance against loss of open space and Green Space, there is no published information as to how this would be achieved or guaranteed.
- (f) Development would lead to increased traffic congestion and parking problems.
- (g) Schools in Marlow are expanding and more schools are needed. Site should not be developed.
- (h) Biological assessment of the site is required.

In response to proposed Pre Inquiry Change to delete the allocation:

- (i) Propose that the site should be reinstated. Site can accommodate 25 dwellings and should be developed similar to sheltered units in the vicinity. Support development of a different area of the site that has less environmental impact than that identified in the Deposit Local Plan.

- (j) Object to the deletion of this green field site, as the reasoning behind the deletion was greater emphasis on brownfield sites, however three new greenfield sites have been allocated under H2. Site should be reinstated.
- (k) Question why there is a deficiency of open space when there is a playing pitch adjacent to the site.

### **Inspector's Reasoning and conclusions**

3.2.2.1 This site has been deleted from the Plan by the Council's proposed changes, meeting the original objections, most of which have been conditionally withdrawn. I deal with the essence of the argument that the site should be re-instated in place of the 'new' sites proposed by the PICs in section 3.2.3 below. In summary, I have found no overriding objections to the 'replacement' sites. I accept the Council's argument that the school sites can be considered as previously developed land (as defined in PPG3) even though they contain significant areas of open space, previously used as playing fields. This provision can be replaced elsewhere in High Wycombe, thus meeting the requirement of PPG17 that a balance be struck between providing much needed housing in appropriate locations and the need to protect open space from development.

3.2.2.2 However, I consider that the Council has provided insufficient land to meet Structure Plan housing requirements and some assessment of the objection site in relation to the criteria set out in paragraph 31 of PPG3 is necessary. The Council has quite rightly given the new housing elements of the Plan an urban focus, based on High Wycombe, in accordance with Structure Plan Policy H2 and PPG3. The only housing site in Marlow included in the Plan as proposed to be changed is the Portlands town centre site for 50 dwellings, which I recommend should remain in the Plan (see M5). I consider further modest development at Marlow would help to meet some local housing needs without compromising the strategy of the Structure Plan, particularly on a site such as this, which is large enough to provide the welcome benefit of some affordable housing.

3.2.2.3 The Council acknowledge that the site performed well in the initial comparative assessment of potential housing land carried out before publication of the deposit draft. Safe and convenient access can be obtained from Wycombe Road, which is used as a bus route (CD/M/61). The site lies just over 1 km from Marlow town centre, with its range of facilities, and, like most of the town, is within Accessibility Zone 4. The land is very gently sloping and laid to cut grass, having no special amenity value. The broken hedgerow along the road frontage contains no particular wildlife interest.

3.2.2.4 It appears that the main drawback of the site in the revised comparative assessment undertaken by the Council concerns the value of the land as open space/playing fields. I note that this objection site lies within an area of critical open space deficiency at the 800m threshold (CD/I/8), and is proposed to be designated as Green Space (PICM/5). The land is maintained as part of the main school playing field but as far as I am aware it is not available for use by the general public at present. The context of the site's location within a suburban housing area can be seen clearly through the gaps in the boundary hedges, particularly along Wycombe Road. While the openness of the site makes a positive contribution to the wider environment, the physical features on the flat site are of no special significance. In the Council's landscape appraisal, it was described as 'not intrinsically distinctive'. I consider that a well-designed housing scheme, subject to the original development principles contained in Appendix 2, could be integrated into the surroundings without any material detriment to the environment of the area as a whole.

3.2.2.5 I attach some weight to the argument that the site should be developed to bring forward planning advantages in the form of income to the school which could be used to provide better facilities. This essentially commercial consideration could be applied to a number of other sites. I have to determine the merits of the allocation taking into important planning factors such as housing location policy, accessibility, environmental impact and open space needs.

Nevertheless the allocation and subsequent development would enable strengthened sports facility provision at the school, which would have enough retained land for adequate grass pitches. I note that the report on playing pitch provision prepared by McAlpine Thorpe and Warrior concluded that there was no deficiency in Marlow. Sport England do not object to the loss of the land subject to the provision of a new all-weather pitch and a new Sports Hall, both of which in their view should be made available for community use.

3.2.2.6 I acknowledge that the site can be differentiated from other school sites in High Wycombe which have former school buildings present, whereas this land is entirely open. However, my assessment of the merits of the deposited Plan proposal is that it falls clearly within the urban fabric and that it complies with the definition of previously developed land in PPG3. Although some open space would be lost a substantial area of playing field would be retained by the school, maintaining a green lung in this part of Marlow, albeit one with no public access. On balance I consider the retention of the allocation would make a significant contribution towards making up the shortfall of housing across the District. The general strategy to direct new housing to the High Wycombe urban area would not be compromised by the level of development proposed. This would however be sufficient to provide the worthwhile benefit of some affordable housing at a location with little scope for further substantial residential development.

## RECOMMENDATIONS

- H/2/ia Re-instate the allocation for 50 dwellings in accordance with the Deposit version of the Plan

POLICY H2iib: PORTLANDS
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## The Objections

0709/7	Bryant Homes Technical Services Ltd
0840/27	Marlow and District Chamber of Trade & Commerce
0847/2	Waitrose Ltd
1141/13	Beazer Strategic Land
1200/41	<i>English Nature</i>
1660/1	Paul Orchard
1917/1	Mrs J G Orchard

## Summary of Objections

- (a) Question viability of the site. The site is unable to provide 50 dwellings; layout respecting the conservation area would be difficult to achieve; residential development will generate additional traffic; Waitrose are unlikely to release the site; access and heritage issues.
- (b) The site should be redeveloped for retailing or leisure, as these are more appropriate uses for a town centre location, particularly as it is the only site available and suitable for comprehensive retail development and it complies with the sequential test.
- (c) Propose transfer of the housing allocation to the Waitrose Site, subject to concern regarding traffic, integration with existing shopping, servicing and proposals for the existing site.
- (d) Propose that the H2 allocation can be partly realised on the Portlands site and partly on the Riley Road site.
- (e) Biological assessment of the site is required.

### Inspector's Reasoning and conclusions

3.2.2.7 From the size of the site and its configuration, I see no reason to question the proposal for 50 dwellings on the site, which would be provided at a density in accordance with the advice in PPG3. Similarly, the character and appearance of the Conservation Area could be preserved or enhanced through high quality design that respects its surroundings. In this respect the scheme could follow the lead of the pattern and style of development at the nearby brewery site.

3.2.2.8 Objection (b) (c) and (d) are considered fully in Chapter 6 of the report, which recommends against the use of the site for retail or leisure purposes. In these circumstances, I consider it unlikely that Waitrose would prevent the opportunity for a housing scheme to proceed in the hope of retail expansion at a date well into the future. The finer grain of the surroundings of the Portlands site make it more suitable for housing than the Riley road site.

3.2.2.9 The proposal is for some housing on a previously developed site at a highly sustainable town centre location, in full accord with policy in PPG3. As such the residents of the dwellings would have good opportunities to travel by modes other than a private car.

3.2.2.10 There is no suggestion from English Nature that the site has any particular nature conservation interest, nor has my site inspection revealed any likelihood of such interest.

### RECOMMENDATIONS

- H/2/iib Modify the Plan in accordance with PICs 6/12 and 6/13.

POLICY H2iic: PARK MILL FARM / OAK TREE FARM, PRINCES RISBOROUGH
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### The Objections

See Appendix 3F

### PIC 3/4 Objections

0571/27	Laing Homes Ltd
0817/40	Croudace Ltd
0927/3	Mr and Mrs T Cotton
0209/2	Mrs R M Turner
0345/12	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0524/10	Thames Valley Chamber
0579/23	Michael Lambert
0929/5	Paul Turner
1071/9	Persimmon Homes (TV) LTD
1205/17	Princes Risborough Town Council
1218/18	R J Newell
1429/6	Christopher Dennis

### Summary of Objections

- (a) Proposal breaches existing town boundary of the railway line. New development will not be fully integrated within the town, will destroy the rural character, quality of life and community

spirit within the town, and will set precedent for future development between Monks Risborough and Summerleys Road.

- (b) Size of proposed development would strain existing facilities in the town. Inadequate scope for further community facility provision. Size of development disproportionate to the other housing allocations in the area, and is not representative of local needs. Propose a more modest development in the town, based on affordable housing.
- (c) Current road network and public transport infrastructure is insufficient to cope; will lead to increased congestion and pollution. Development would be detrimental to Alscot Conservation Area and to pedestrians and cyclists, and would breach existing footpaths.
- (d) Insufficient employment opportunities in the town. Development will create a dormitory settlement. New residents unlikely to use the town for shopping and would therefore not stimulate local economy.
- (e) Development of greenfield site, encouraging urban sprawl. Propose that the Princes Estate would be a more suitable site for housing as it is brownfield.
- (f) Loss of Grade 2 agricultural land.
- (g) Development would have a detrimental impact on Chiltern's Areas of Outstanding Natural Beauty and nearby Green Belt. Development would destroy the amenity of the local landscape and locally and nationally important views, particularly from Whiteleaf Cross.
- (h) Loss of local wildlife habitats. Site encroaches on a Site of Importance for Nature Conservation. Biological assessment of the site is required.
- (i) Development would encroach on the village of Longwick, jeopardising its character.
- (j) Proposed development conflicts with sustainable development objectives. It will increase the need to travel to work, schools, shops etc. The development will have a detrimental effect on air quality.
- (k) Development will threaten the safety and security of the town.
- (l) Infrastructure and facilities provision should be established before embarking on development. Sewage treatment works is potentially contaminated land.
- (m) Proposal under-utilises the capacity of the site.

In response to proposed Pre Inquiry Change:

- (n) Additional housing should be provided in and adjoining High Wycombe Urban Area.
- (o) The change will not permit Structure Plan housing targets to be met. A greater proportion of new housing should be provided outside the High Wycombe area at Princes Risborough. Oak Tree Farm is ideal location to provide housing land being unconstrained by environmental policies and designations.
- (p) Object to the site's allocation in isolation. Given the site's limited scale, it is unlikely to provide an appropriate level of infrastructure / facilities. Realistic capacity of the site exceeds 300 dwellings. Providing for additional capacity on the site would provide greater flexibility in housing land supply.
- (q) Site cannot achieve 2 points of access, as required. There are advantages in providing a critical mass on Park Mill Farm/Oak Tree Farm. The site has good defensive boundaries and would achieve 2 points of access.
- (r) The allocation should be moved to Oak Tree Farm site, which is nearer to Tesco. Development of this site complies with Structure Plan policies.

## **Inspector's Reasoning and conclusions**

### **Park Mill Farm**

#### General housing policy

3.2.2.11 I have concluded in section 3.2 above that there is a shortfall of housing land allocated in the Plan as proposed to be changed compared with Structure Plan requirements for the period to 2011. It follows that I consider those objections to any development at Park Mill Farm have the significant factor of housing need weighed against them. Many of those objectors such as Risborough Area Residents Association (RARA) who have disputed the scale and location of this allocation have accepted a need for some new housing at Princes Risborough. Structure Plan Policy H2 directs strategic new housing development to the High Wycombe urban area. However, the policy allows a substantial proportion of housing on new sites to be located elsewhere in the District. Policy H3 sets out criteria for assessing other locations for significant housing growth. These include the relationship to other land uses such as employment and community facilities, the likely effects on travel patterns and environmental constraints.

3.2.2.12 The site lies immediately west of the Princes Risborough to Aylesbury railway line, which delineates the western boundary of the town. Parts of the site amounting to 4.74 ha amounting to 18% of the total (the sewage treatment works and the poultry farm fronting Longwick Road) can be classified as previously developed land. However, in essence the site comprises an urban extension on greenfield land in the terms of PPG3. RARA argued that such a site should not be allocated for development unless a full urban capacity study of the town had been undertaken. However, as discussed at the Housing RTS and other inquiry appearances, the Council had tried to meet the broad thrust of PPG3 without carrying out a full capacity study of the whole District. I have accepted the Council's argument that it would have been inappropriate to further delay the production of the plan while such work was being carried out; this stance has been given some support by GOSE in its letter to North Herts DC of 31 July 2000.

#### Employment/housing balance

3.2.2.13 I have also concluded in chapter 4 of my report that the current balance between housing and employment is appropriate over the whole District. Relatively strong demand for industrial and commercial premises at the time of the inquiry indicated that Wycombe is not an area where substantial allocations of employment land have laid vacant with little prospect of take-up for many years. In my view the Council's decision to exclude most employment sites from consideration for housing was therefore reasonable.

3.2.2.14 This applies equally to Princes Risborough as to High Wycombe. The balance of land uses would be supported by the housing allocation of Park Mill Farm, which would complement the redevelopment of the Princes Estate. While the relocation of Ercol from High Wycombe is likely to result in some displacement of employment, rather than create new jobs, other opportunities will be provided by new premises on the remainder of the site. Existing employment sites near the station, at Longwick Road just north of the site and in the town centre would remain in accordance with my recommendations on other objections concerning their potential for housing elsewhere in this section of my report. Future residents of the site would be well placed to take advantage of jobs at these locations, which are needed to retain a balanced community in Princes Risborough. Overall therefore, I have found that the need to avoid delay to the Plan outweighs the limited drawbacks of the allocation, as identified in the discussion below.

3.2.2.15 The site lies outside the green belt and the AONB and any other landscape designations. As intensively farmed arable land, it contains minimal ecological interest. However, about 70% of the site is classified as best and most versatile agricultural land, of which most is Grade 2 land. This important factor has to be weighed in balance against other advantages of development, taking into account the revised guidance about agricultural land

quality in paragraphs 2.17 and 2.18 of PPG7 dated 21 March 2001.

#### Accessibility

3.2.2.16 At its nearest point, the site is about 500m walking distance from the town centre, with no part of the site further than 1200m. The provision of a suitable link across the railway via a subway, as required by the Development Principles, would ensure an attractive route for pedestrians and cyclists to the wide range of commercial and social facilities available for a town of 8,200 people. It may be possible to provide another link further to the south, subject to investigations into scheme design to protect privacy of nearby residents. Chiltern railways provide a frequent service between London and Birmingham via the railway station, which is about 800 m from the nearest point on the southern boundary of the site. Some residents could be expected to walk or cycle to the station

3.2.2.17 At present the bus service within the town could not be adapted to pass through the site. It runs at hourly intervals between 1000 and 1630 hours only, and the same vehicle also serves Bledlow Ridge and Longwick Village. Although two services run along Longwick Road, the interval between buses is almost 2 hours in one direction. In short the level of current services is inadequate and significant improvements would be required in accordance with the suggested development principles to cater for residents as the largest single housing allocation in the Plan is developed. A route passing from the town centre through the site through a new bus only link along Mill Road to the station is proposed. I agree that a service operating at up to 4 times an hour in peak periods, co-ordinated with the main train times, would be appropriate, bringing all parts of the site to within 400 m of a bus stop. This measure, together with the proposed underpass, would improve the index of accessibility as shown on Appendix 9 of the Plan from zones 4/5 to 3/4.

#### Town character

3.2.2.18 Princes Risborough contains a wide range of community facilities including schools at all levels, health centre and doctor's surgery, private hospital, sports hall, vet's dentists and a number of places of worship. Although not a major shopping focus, the town centre contains 2 supermarkets, a number of smaller shops and hosts a weekly market. As the third largest settlement in the District, it has a population of just over 8,000 people (1996). I note that the town has seen very little new housing in recent years compared with the rest of the District (88 dwellings 1995-2000 compared to 1762 District -wide). The allocation for 570 dwellings would therefore bring about the most significant change to the structure of the town for many years. Nevertheless, Princes Risborough is no longer a medieval village and the proposed allocation would not result in any greater proportional increase in population than occurred on some occasions from estate development after 1945 (as shown in the CPRE evidence).

3.2.2.19 There is some danger that the development of a substantial number of 570 dwellings on the other side of the railway line would be perceived as a somewhat remote addition to the town. However, the infrequently used single track railway is not a major physical barrier, and the development proposals include provision for a new subway to link the development with the town centre, just 400m from the edge of the site. The distinct boundary would help to give identity to the new housing, which is likely to be developed at a density significantly higher than the existing suburban area of Manor Farm to the east of the railway. The fabric of the enlarged town would not extend beyond the employment area at Longwick Road, which also breaches the structural break of the railway line.

3.2.2.20 The appearance of the town when seen from the important viewpoints on the Chiltern escarpment, particularly from Whiteleaf Hill, would undoubtedly change. I note the panel who conducted an EiP for the previous Structure Plan in 1987 considered that the effect of such a change would not have a critically adverse effect on the landscape. The housing area would be framed to an extent by the sewage works and the industrial premises on Longwick Road. A strong landscape framework within the new housing, together with



substantially reinforced planting along the outer boundary, would help assimilate the buildings into the wider pattern of development. This includes the redevelopment of the Princes Estate, which will consolidate new building to the west of the railway line. Given the scale of development compared to the existing wide spread of the urban area beneath the scarp, I agree that a view of a somewhat larger built-up area would not have any real detrimental effect on these views and the surrounding countryside as a whole. The site is over 1 km away from Longwick, retaining a significant expanse of open countryside to avoid any sense of coalescence.

3.2.2.21 Although most of the site is open countryside I concur with the Council that it contains no special inherent landscape attraction itself, being flat featureless arable land. Although the proposal would create a new edge to the settlement, I see no reason why this could not be at least as attractive as the current railway embankment.

3.2.2.22 While the housing would undoubtedly generate more traffic in the town, the relatively good accessibility of the site to the town centre, discussed below, would help to reduce the impact of increased vehicles in the historic core. Road capacity in the centre is physically limited in any event, and further management measures, including the proposed bus service, may help to encourage travel by other modes.

3.2.2.23 In assessing this issue, I have taken into account the evidence from objectors referring to the past comments of other Inspectors, which were made in circumstances different from those pertaining now. I note in particular that the findings of the inspector into the Wycombe Rural Areas Local Plan concerned just part of the site, the panel reporting on the examination in public of the 1996 Structure Plan considered that an extension of the town to the west would not have an unacceptable environmental impact.

#### Community integration

3.2.2.24 As already noted, the site lies within 500m of the town centre, and new residents should obtain better access to all its facilities than many established inhabitants. There was some confusion at the inquiry about the position of the Town Council regarding the use of part of Wades Park for a new pedestrian and cycle link to the town centre. However, subsequent correspondence dated 16 March 2001 indicated that there was no overriding objection in principle to this aspect of the proposals, subject to consultation about detailed implementation. The proposed bus service to the station and town centre (initially at 15 minute intervals) should also help new residents to gain easy access to the town's facilities.

3.2.2.25 I have noted the concerns of residents about the impact of new residents on the capacity of services such as education, health, and other community services to meet increased demand. However, I have no firm evidence from any providers of such services that they anticipate problems if the housing goes ahead in the latter half of the Plan period. The Development Principles for the allocation allow for potential contributions towards local school provision and for sporting and community facilities for new residents. I note also that a substantial proportion of residents support some development in Princes Risborough; 43% of those surveyed by the RARA were in favour of up to 200 more dwellings. A survey in 1997 for the Guinness Trust showed support for 120 affordable homes in the town.

#### Transportation matters

3.2.2.26 The revised development principles allow for a single access to the development from a roundabout at Longwick Road, linking via a wide carriageway to an internal loop road through the site. A second signalised emergency access would be created along Mill Lane to Summers Lane. The latter would also be used by buses, cyclists and pedestrians. I deal with objections to the adequacy of these arrangements in my discussion of Oak Tree Farm. Objections by Persimmon.

3.2.2.27 Many residents questioned the ability of the road network in the town to accommodate the predicted traffic from the allocation. A previous proposal published in the

1993 draft of the Structure Plan to locate 1500 new houses in Princes Risborough would have required a by-pass to the west of the town. However, shortly after, a traffic study into the effects of new residential development off Longwick Road concluded that 600 dwellings could be accommodated without exceeding available highway capacity. The County Council tested and then accepted these findings.

3.2.2.28 A number of new factors have changed over the intervening period, but these have not fundamentally affected the highway authority's view about the previous analysis. Although the construction of the Tesco store has clearly had a particular impact on traffic flows and patterns, this was forecast with a good level of accuracy. Many residents have given anecdotal evidence of congestion in the town, lack of space in car parks and delays on approaches to the Tesco roundabout in particular. However, I have seen no technical evidence to question the County Council's more recent analyses of projected traffic impact. Indeed a traffic count by one of the objectors indicates that the County Council's Arcady analysis was reasonably accurate. The Council's highways witness presented evidence at the inquiry to update Technical Note 38, using the same methodology. This indicated the effects of predicted flows in the morning and evening peaks, taking into account proposed improvements through widening at the Tesco roundabout on the north side (outside the former surgery) and the New Road arm.

3.2.2.29 The results showed that the Horns Lane and Sportsman roundabouts would be able to cope in their existing form with up to 600 new dwellings off Longwick Road at all times. The extra vehicles generated by the new housing at would create more congestion at the Tesco junction, with particular problems on the Longwick Road and New Road approaches. Even with the suggested improvements, there would be a queue of up to 28 vehicles in the morning peak on Longwick Road approach, but the New Road arm would remain below capacity. If a further minor change in the layout of the junction to widen the carriageway outside Tesco were made, as proposed by Bryants, the potential developers of Park Mill Farm, the model shows that the highway network in the area could accommodate up to 600 more dwellings. I consider these works are realistically achievable on land within the control of the highway authority.

3.2.2.30 I note residents' concerns about traffic conditions generally in the town, although they appear no worse than most towns in south-east England, and better than very many. The Council's factual evidence about car park use at present showed that over half of users parked for less than one hour and that over the day each space had been used just half the available time. The traffic predictions took into account proposals for the redevelopment of the Princes Estate, and the proposal for new traffic lights at the junction of the estate entrance on Summerleys Lane. The very good pedestrian and cycle access to the town centre along a short level route would help compliance with government policy to reduce travel by private car. Although the allocation will undoubtedly make the town centre busier, I do not think that it would lead to any unacceptable problems overall.

#### Site access

3.2.2.31 A number of objectors raised the issue of the safety of the proposed access arrangements, with particular regard to the intention for a single estate entrance from Longwick Road serving up to 600 dwellings. The transportation witness for Persimmon Homes, referred to the advice in DB32 and the County Council's standard that normally up to 300 dwellings is the maximum that would be allowed off a single access. DB32 states that in such an event the internal road layout should be a circuit, with the shortest possible connection to the point of access on the main road. In this case the connecting road would be about 360m long. The amended Development Principles would provide for a wide carriageway and a second emergency route paved with grasscrete along the western edge of the entrance corridor. A second access for buses and emergency vehicles only would be provided via Mill Lane, part of which would be one way working with traffic signals.

3.2.2.32 The Council argued that these measures would be sufficient for the first

proposed phase of development in the Plan, up to 300 dwellings. However, it was accepted that for up to 600 dwellings, the second access via Mill Lane should be available for all traffic if both of the routes to Longwick Road became blocked at the same time. The objectors accepted that such an event along the route of the principal access, such as a major incident involving a fuel lorry, would be an unlikely occurrence. However they argued that the alternative access via Mill Lane would be unsatisfactory, because of the combination of its narrow width and vehicle movements to and from existing residential property, which could not be controlled by the traffic signals. I note that there would be a significant length of road subject to single way working (over 100m). However, the number of residential properties which could generate traffic likely to cause conflict with those entering or emerging from the site is very small. Although pedestrians would have to share part of the carriageway where it is wide enough for vehicles to pass, the occasions when this arrangement would operate, if at all, are likely to be extremely rare. In those circumstances, all road users would have a likelihood of I consider that on balance the proposals would not present unacceptable risks to highway safety.

3.2.2.33 I agree that a new subway linking to Church Lane across Wades Park would be a welcome route that subject to a high quality design would encourage residents to travel to the town centre on foot or cycle. Bryant Homes argued that the second railway crossing sought by the Council would be impractical, due to the significant land take of a bridge and possible problems of overlooking into residential property. The Council's proposed changes have introduced some flexibility into the development principles as far as this issue is concerned, even though their transport witness retained a preference for 2 crossings. From my site inspection of the levels to the south of Wades Park I can appreciate that a new bridge might create some potential amenity difficulties. However, the Council's suggested wording change does not require a bridge, but would allow this desirable feature to be provided if a suitable design to protect the privacy of adjoining residents could be achieved, which I believe is certainly possible. This would ensure good links to the existing footpaths to Horsenden, Little Horsenden and Summerleys and further improve access to the town centre in accordance with established local, sub-regional and national policy.

#### Sewage Treatment Works

3.2.2.34 The present sewage treatment works is rather unsightly and is almost at capacity. Thames Water advises that up to 200 more dwellings could be serviced by the works in the short term. Any greater number would involve preferably an expansion of another works at Haddenham, or a new package plant on site. I agree with the Council that retaining the works would be likely to give rise to some nuisance for residents of the new housing through unpleasant odours if it were retained. Therefore it would be desirable for the works to be removed. I see no reason why the Haddenham expansion should not be achieved, since the required land is within the water authority's control and the economics of a substantial new housing development would be sufficient to support the costs involved. Nevertheless, the wording of the suggested change gives the developer scope to phase such works according to a realistic programme.

#### Density

3.2.2.35 I note the concerns of many residents about the proposed density of development, particularly in comparison with past patterns of housing estate construction in the town. However, the Council's proposed changes reflect accurately government policy in PPG3 that new housing should be built a minimum density of 30 dwellings per ha. The site does not directly abut the Manor Farm estate and the clear boundary of the railway line would enable a different style of housing to be created, linked to the town by a strong landscape framework, especially along the new paths either side of the new subway. The Council did not dispute Bryant's point that the site may eventually be capable of accommodating up to 600 dwellings, but for the reasons set out above, I consider that any additional homes should be provided in the next plan period after 2011.

3.2.2.36 Persimmon Homes also questioned whether the site could accommodate the

revised number of dwellings proposed. The guidance in PPG3 leaves some room for interpretation but it was agreed that any structural landscaping on the edge of the new housing should be excluded from the net density figure. Taking into account the potential proximity of Wades Park, I see no need for the development to provide open space serving a wider area. The sewage treatment works would ultimately be included in any development of the whole site. In this instance I consider enough is known about the site and the likely particular requirements to apply a net density figure to the expected developable area, rather than take a more crude gross density figure as suggested by Persimmon. Even allowing for some small scale commercial development and /or some live/work units (which would not be on the scale of a District Centre) I consider the Council's estimate of a net site area of about 19 ha at 30 dwellings/ha, the lowest end of the density scale required by PPG3, to be reasonable.

#### Phasing

3.2.2.37 The revised Plan proposals allow for 300 dwellings in the period from 2008 to 2011, with a further 270 dwellings committed beyond the Plan period. On the calculations provided by the Council and Bryants, I consider that this density of development would accord with the new direction of policy in PPG3 to make the best use of housing land by building at a minimum density of 30 per ha. In this case I consider that Council's assumptions about the net developable area to be prudent, although there would be no objection to a greater level of development at the end of the construction period should this prove practical without any adverse environmental effects. These would include the effect of extra traffic on the local road network, in particular the capacity of the Longwick Road roundabout at Tesco to cope with more vehicles.

3.2.2.38 As I discuss in sections 3.2 and 3.4, I consider the phasing provisions of the Plan introduce rather artificial distinctions which neither reflect those of the Structure Plan nor result from national policy in PPG3. This merely gives the opportunity to set 3 phases of development but is not prescriptive. The companion guide to PPG3 'Planning to Deliver' states that there are no hard and fast rules for the duration of phases in plans, but refers to the need to dovetail with Structure Plans. I recommend just two 5-year implementation phases, to reflect the Bucks Structure Plan provisions.

3.2.2.39 Even though Princes Risborough has seen little major development for more than a decade, to promote the Park Mill Farm site in advance of other previously developed land, most of which lies in High Wycombe, would breach the clear policy of PPG3 for a sequential approach to be followed. I accept that the site performs well against a number of the criteria in paragraph 31 of PPG3, with regard to access to jobs, public transport, provision of community benefits etc. However, on balance I consider that any advantages of the Park Mill Farm land are not so great as to outweigh the equal or greater benefits of other identified 'brownfield' sites in High Wycombe and to justify setting aside the presumption in paragraph 32 of PPG3. The need to secure more difficult schemes on previously developed land before granting permissions on greenfield sites would indicate a start time in the second phase, after 2006.

3.2.2.40 In my reworking of the Council's table in Policy H2, I have concluded that up to 350 dwellings will be required at Park Mill Farm to meet the predicted shortfall of new housing. This takes into account the suggested deletion at Abbey Barn North and additions elsewhere in the District, principally at High Wycombe. The same phasing considerations would apply to the additional greenfield site at Terriers Farm as to Park Mill Farm. The scale of available sites on previously developed land in the High Wycombe area, where new housing should be concentrated, would preclude implementation before the second Plan phase. As indicated in my discussion of Policy H4, I would expect both sites to run broadly together towards the end of the plan period.

3.2.2.41 I consider that it would be inappropriate to allocate more housing land than the Structure Plan requires. A substantial level of infrastructure will be needed to support the new housing, which will almost certainly include the removal of the sewage treatment works and the

provision of extra capacity at the Haddenham works. Therefore, it would seem logical to undertake development continuously over a few years, to achieve an early return on significant investment in infrastructure. However, these costs implications would be similar whatever the start date for construction and need not entail building all 570 dwellings by 2011. On the prospective developer's (Bryants') draft programme, completions are expected to occur at a maximum rate of 150 per year. This would imply a construction programme at the end of this Plan period and the beginning of the next. The Plan need not be more prescriptive than that; the exact start date within the second phase of housing construction would depend on the developer's maximum building rate for each year up to 2011.

3.2.2.42 The identified site has logical boundaries along the railway lines to the south-east and west, industrial estate and Longwick Road to the north-east and the poultry farm and a field boundary to the north-west. The Council has accepted that the poultry farm need not be included in the site, since it is not required for the access road, nor would it be suitable for housing. If it could be used for extra planting, the scheme would benefit. However, it would not be sensible to reduce the size of the site as suggested by one objector to avert the need to provide more housing than currently needed in the next Plan period. I note that the County planning authority has not objected to the proposal to stage development in this way. I consider the remaining commitment to just 170 or so dwellings would not be so significant in the wider sub-regional context as to prejudice any future housing strategy. Indeed the phasing of a comprehensive scheme over a number of years will enable a full range of benefits from the development to be achieved. I note Bryants' reference to the approach taken in another local planning authority where some over-provision relative to County housing requirements was allowed. The circumstances in that case may not have been comparable with those in Wycombe District, where I believe the benefits of the allocation may still be realised in full if implementation were to be delayed until Phase 2 of the Plan.

3.2.2.43 I see no reason why the allocation following these boundaries need set a precedent for more development at a later stage. Although the Plan now excludes the site of Oak Tree Farm, a position with which I agree for the reasons outlined below, any further expansion onto this site would have to be considered on its own merits when the Structure Plan and Local Plan are due for review.

#### Other matters

3.2.2.44 There is no indication from flood maps previously prepared by the Environment Agency that the site is subject to flooding.

#### **Oak Tree Farm**

3.2.2.45 The Council acknowledged that the area of Oak Tree Farm was a relatively highly performing site against the criteria of PPG3 and Structure Plan policies H2 and H3. I note that there would be some advantages in undertaking a comprehensive development of both sites. As I have already discussed, a better highway arrangement could be achieved, with two main access roads connecting to Longwick Road. A larger site would give the opportunity for a strong belt of woodland to be planted along the north-western edge of the site, creating a clear boundary to the built environment of the town. It could also give scope for more supporting commercial and social facilities within the scheme.

#### Accessibility

3.2.2.46 However, the centre of the site is some 150m further from the town centre than the middle of Park Mill Farm, and the railway station is a similar distance further. In general accessibility terms therefore Oak Tree Farm is less attractive for development. In any choice between the two, Park Mill Farm is preferable, particularly because much more of the site is within realistic walking distance of the town centre.

## Density

3.2.2.47 Both the Council and Persimmon agreed that the site had a potential capacity of about 300 dwellings, although they arrived at this figure by different means. Given the strong commitment to achieving higher residential densities in PPG3, I consider this estimate to be a minimum figure. The Council's appraisal subtracted about 7 ha of the total site area of 19.2 ha, as a requirement for community woodland, as proposed in the deposit Plan, together with a further 2 ha or so for boundary landscaping. I consider this to be realistic. Persimmon stated that they did not expect more than 570 dwellings to be accommodated on the deposit plan site, as originally intended. However, even in the unlikely event of the retention of the sewage works, I consider this does not reflect the revised density requirements of PPG3. As I have already said, I agree with the Council's estimate that 570 dwellings could be provided on Park Mill Farm alone.

3.2.2.48 On this basis, the total number of new dwellings on both sites would be approaching 900. I therefore I accept the Council's view that the retention of this part of the original allocation would provide substantially more houses than are required during the Plan period. This would also shift the balance in the distribution of housing throughout the District, and if allocated in full would jeopardise the express intention of Structure Plan Policy H2 to direct major growth to High Wycombe. The traffic generated by up to 900 more dwellings would be well in excess of the road capacity in Princes Risborough identified by the County Council and private developers. To provide for an allocation of this size, other improvements at the Tesco and Horns Lane roundabouts would be needed. There appears to be considerable doubt that such measures are achievable, as private landowners interests are affected.

## Landscape impact

3.2.2.49 Development on Oak Tree Farm would extend further into the open countryside than Park Mill Farm, with a less well-defined outer boundary. However, the general topography and landscape value of the site are very similar to those of Park Mill farm and in my view would not be a major constraint on development.

## Other matters

3.2.2.50 Although the site adjoins a SINC Longwick Bog, there need be no adverse effects on nature conservation interests provided the design of any development incorporated a sufficient buffer zone

3.2.2.51 One of the original justifications for allocating the Oak Tree Farm site was opportunity to provide a second access to Longwick Road for a combined development with Park Mill Farm. For the reasons set out above, I accept that the proposed access arrangements with a single main access for up to 600 dwellings would meet basic highway safety requirements, subject to a number of other safeguards. Although the combined site would enable a better highway layout to be achieved in this regard, I do not consider that to be an overriding advantage that outweighs the strong housing policy reasons to restrict the number of dwellings in this area of Princes Risborough to 600.

3.2.2.52 I see no overriding reason why the site would not be an appropriate location for further expansion of Princes Risborough, if approved at strategic level. However, any such proposal would have to be assessed in comparison with other possible urban extensions, having regard to the factors such as green belt policy, landscape impact, transportation and accessibility covered in this report.

## Overall Conclusion

3.2.2.53 In conclusion, I consider that the Park Mill Farm allocation meets the tests of paragraph 31 of PPG3 and Structure Plan Policy H3 as a location for significant housing growth. The site is well related to the main sources of employment in Princes Risborough, in particular the redevelopment of the Princes Estate, industrial concerns near the station and service jobs in the town centre. The proximity of the site to these land uses, together with the

flat terrain, will encourage travel on foot and cycle. The development principles sought by the Council will provide for improved bus services... The allocation lies outside the Green Belt and AONB or any other landscape constraint. The only environmental constraint of note is the agricultural value of much of the land, which is Grade 2. Other sustainability considerations, such as the ability to provide easy access to the town centre and station, suggest using land of this quality. Finally, I consider the northern boundary of the site, along Longwick Road, provides a firm edge to development at a sufficient distance from Alscott and Longwick as to prevent any coalescence of settlements.

3.2.2.54 In this instance there is a proven need to go beyond previously developed land within urban areas to meet housing requirements. I acknowledge that these other sites should be given priority in the phasing of new housing development, but the benefits of a planned expansion of Princes Risborough are sufficient to recommend a firm commitment to allowing the development to start between 2006 and 2011. I have concluded that to allow up to 350 dwellings in this period would not compromise the Structure Plan strategy to direct most new development to High Wycombe.

### **RECOMMENDATIONS**

- H/2/iic/1 Modify the Plan in accordance with PICs 3/4 and M/8 to delete the Oak Tree Farm allocation
- H/2/iic/2 Modify the Plan in accordance with PICs A2/10, A2/20, 3/36 and 3/37 but with an amendment to specify only 350 dwellings to be constructed in the period 2006-2011, with the remaining dwellings to be completed beyond the Plan period.

## REPLACEMENT ALLOCATIONS

POLICY H2ib : BUCKS FREE PRESS, GOMM ROAD

### PIC 3/4 Objections

0376/32	Axa Equity & Law Life Assurance Society PLC
0524/21	Thames Valley Chamber
0526/34	Chepping Wycombe Parish Council
0571/23	Laing Homes Ltd
0709/10	Bryant Homes Technical Services Ltd
1141/41	Beazer Strategic Land
2120/4	William Vere (Properties) Ltd

### Summary of Objections

- (a) Object to loss of employment land. Site is in close proximity to other established employment uses and with good access to the A40 and is an existing viable site in use.
- (b) Capacity of the site is significantly lower than 80 dwellings.
- (c) Object to loss of woodland, which merits TPO status.
- (d) Development will lead to increased congestion on already overloaded network.
- (e) Proposed development fails tests (3) and (5) of the criteria in paragraph 31 of PPG3.
- (f) Doubts over viability of site for development; site is steeply sloping and adjacent to the railway. Concerns over noise impact on a housing environment.
- (g) Object on the ground that if the Council intended to re-allocate land previously allocated for employment use for housing, then an assessment should be undertaken of all land presently allocation for employment purposes, not simply as a response to objections lodged at Deposit stage. A site at Chapel Lane should have been allocated for residential use instead.

### Inspector's Reasoning and conclusions

3.2.3.1 I deal with the objections to the loss of employment land in section 4.4 of my report. I understand that Bucks Free Press occupy only part of the total floorspace on site and are planning to relocate to offices in High Wycombe. Although I consider that roughly the current balance between employment and housing land should be retained, I consider that in this instance the site is by no means one of the most suitable for continued employment use. It lies on the edge of a mixed commercial area, including significant retail elements. The current buildings are out-dated and poorly suited to manufacturing use. The long, narrow, steeply sloping site is not suitable for development with large buildings and associated parking and service areas. General industrial or warehouse uses would be likely to be poor neighbours for the residential development adjoining the site to the south and east.

#### Physical constraints

3.2.3.2 The 5<sup>th</sup> bullet point of paragraph 31 of PPG3 indicates that allocations for new housing in development plans should take into account physical constraints such as flood risk, the level of contamination etc. The sharp change in levels across the site from the railway down to the southern boundary presents some problems for residential redevelopment, but these would be more severe if the land were to be redeveloped with the larger scale buildings and parking areas normally associated with employment use. I have no firm evidence that housing redevelopment would not be viable. Indeed, the experience of a very similar size and shape of



site adjoining to the south, recently developed with affordable housing, supports this view. I have concluded therefore that there are no insuperable physical constraints to the amount of development proposed and that there would be no conflict with paragraph 31 of PPG3.

3.2.3.3 The railway line would also present some design challenges. However, these are not unusual in High Wycombe, and can be dealt with successfully, as the development on part of the former G Plan premises illustrates. The most recent data supplied by the Council shows that the site lies within Noise Exposure Category B as identified in PPG24. In such areas noise should be taken into account and conditions imposed to ensure adequate protection against noise (see G15). This technical analysis has not been tested by any alternative data from the objectors and I find nothing questionable in the methodology employed. Well designed external and internal house layouts, combined with suitable high quality double or triple glazing, can do much to attenuate railway noise. I have no doubt that an interesting group of buildings could be designed that would both act as a barrier to any noise and provide main living areas facing south with views across the Wye valley.

#### Accessibility and traffic

3.2.3.4 The highways testing undertaken by the Council showed that a suitable access could be provided from Gomm road with a separate emergency access. The traffic generated by residential development, even above the minimum density of 30 dwellings per ha sought by PPG3, would be unlikely to generate as much traffic as would redevelopment for B1 use. In addition, the Development Principles require the developer to make a contribution towards improvements at the London road/Gomm Road junction.

3.2.3.5 The site lies close to a number of bus routes along London Road, the main public transport corridor with more than 15 buses per hour into the town centre. In short, it is in a highly sustainable position.

#### General

3.2.3.6 The wooded embankment along the railway line has some visual and ecological value, but from inspection I agree with the Council's point that it does not contain specimen trees of sufficiently high amenity value to warrant TPO status. However, given the steep gradient involved it would not be physically possible to build on this part of the site, which would be protected in its current form through the Development Principles in Appendix 2. Although this would reduce the developable area of the site, I consider that the Council's estimate of 80 new dwellings to be reasonable, bearing in mind the highly accessible location of the site. This represents a net density of about 57 dw/ha, in accordance with paragraph 58 of PPG3, which does not specify an upper limit.

#### **Chapel Lane**

3.2.3.7 Verco, the owners of an industrial site at Chapel Lane, argued that the process adopted by the Council in carrying out a review of housing allocations before publicising proposed changes was flawed. I have some sympathy with this point with regard to the treatment of employment sites, which were omitted from the trawl of potential housing sites at deposit plan stage. The Council admitted that a full urban capacity study had not been undertaken, in order not to cause a lengthy delay in the publication of revisions to the Plan. This stance was understandable in the circumstances and I believe the Council tried to meet the broad thrust of emerging policy in PPG3 without significantly jeopardising the whole programme for the scrutiny and approval of the Plan.

3.2.3.8 I deal with the general position with regard to employment land in my discussion of objections to Policies E2 and E4 in chapter 4 of my report below. I concluded that the Plan had achieved roughly the right balance with regard to the retention of employment land. I noted the increase in employment throughout the District in the 1990s, despite a fall in the amount of employment land. Although I agreed with the Council's view that the local economy would continue to thrive without the designation of a 'greenfield' business park, I concluded that the

other major employment areas should be retained. I consider that such areas should provide future opportunities for redevelopment with premises to meet a variety of modern business needs, not just new buildings falling within Class B1 of the Use Classes Order.

3.2.3.9 The Bucks Free Press site was the only employment site specifically included as a new housing site in the PICs. Three others were considered at this stage but not specifically for housing: Compair and De la Rue at High Wycombe; and Hypnos at Princes Risborough. Objections concerning these sites are also reported in chapter 4. The Ercol site had already been included in the Plan as a housing site, due to its location surrounded by housing and its poor access, and now has planning permission.

3.2.3.10 Verco referred to paragraph 42 of PPG3 which indicates that local planning authorities should review the need for employment allocations that cannot realistically be taken up during the life of a plan. However, this situation does not apply in areas such as High Wycombe, which the Council consider is an employment 'hotspot'. I consider there is considerable force in the Council's argument that it has taken a consistent approach by allocating for housing only those employment sites that would not undermine the integrity of the whole employment area. I see this policy objective as a fundamental cause for concern with regard to the Chapel Lane site.

3.2.3.11 The objectors claimed that the Chapel Lane site was underused land, since the current occupiers were on short leases at low rents, which did not reflect long-term commercial reality/stability of occupation. However, 80% of the premises on the site continue to be occupied and there has been no attempt to market any part of the property. The Council produced evidence to show that many of the current occupiers wish to remain at Chapel Lane. The site provides employment to about 50 or so people, including part of the established business of Kurt Mueller which has made some significant investments to improve its premises. Although some of the land is used for open storage, this also fulfils a useful economic function. The promotion of housing on the site would leave the Verco and Kurt Mueller buildings as a much smaller employment area, somewhat isolated by surrounding residential property.

3.2.3.12 The other detailed evidence about demand for industrial and warehouse property did not lead me to conclude that there was a significant oversupply of such stock. The vacancy levels quoted by the objectors represented a relatively small proportion of the overall supply of such premises. Evidence from those occupying the site and the local Chamber of Commerce and Industry (CCI) indicates that there is a strong demand at appropriate rents for secondary accommodation to serve a variety of local needs.

#### Employment suitability

3.2.3.13 Unlike the Bucks Free Press site, the land at Chapel Lane is generally flat, with a regular shape. There are few dwellings in close proximity to the site, along part of the southern boundary, together with a small terrace at the north-east corner. Any redevelopment of the land would provide the chance to achieve a more neighbourly separation between the uses with regard to noise.

3.2.3.14 The site lies adjoining the A4010, linking Aylesbury and West Wycombe with the M40. There are a good bus links to the town centre, with up to 8 buses per hour passing within 400m of the site at peak times. While the site may not be in a prime office location, it is well able to provide perfectly adequate accommodation for a variety of employment needs, including local firms associated with the furniture industry.

#### Housing suitability

3.2.3.15 The Verco site has reasonable accessibility, with 8 buses per hour passing within 400m of the site at peak times. These services, while not as good as those close to the Bucks Free Press site, provide good public transport access to the town centre in particular. I have no reason to suppose that traffic generation or highway safety issues would prevent

redevelopment for housing, given existing access points and traffic levels to and from the current commercial uses.

3.2.3.16 However, the site lies close to the premises of Verco, the trading arm of one of the objectors. The company is a significant large manufacturing employer, and remains at present an integral part of a substantial block of industrial and commercial development in the western sector of High Wycombe. I note the company's statement that it intends to consolidate its operations at the site, which has capacity for expansion. However, the cohesion and integrity of this significant employment area, and its potential to support a wide range and number of jobs, would be undermined if a major section were redeveloped for residential use.

3.2.3.17 The residential environment next to the remaining factories would be far from ideal. I note that the Verco factory is subject to a condition limiting hours of operation and that the company would be prepared to carry out further noise reduction measures in association with residential development of the site. This would have to be designed with a single aspect block along the northern boundary to provide acoustic screening to the rest of the site. However, the main factory of one of the occupiers of the site, Kurt Mueller, adjoins the northern boundary. The company carries out manufacturing operations falling within Class B2 of the Use Classes Order, on a 24 hours per day basis at the time of the inquiry. I note that the activities generate noise at a level 22dB greater than the ambient noise level in the surrounding area, considerably in excess of the level at which complaints might be expected. This difference in noise level is still prevalent after the company took measures to attenuate disturbance by investment in acoustic protection. I consider the proximity of such noise generators so close to the site would be a very significant constraint on new housing development. This background noise from the adjoining furniture factory is a direct result of the manufacturing operations and cannot be controlled by planning powers.

#### Conclusions

3.2.3.18 Although Chapel Lane site is not particularly suitable to meet the need for Class B1 business premises, it fulfils a valuable role in providing a range of sites for general industrial and warehouse uses. Vacancy schedules submitted to the Employment RTS indicated that there was some evidence of a shortage of premises for medium/large sized businesses. I consider the Verco site better suited for continued employment use than the Bucks Free Press site; it forms part of larger, flatter area with more cohesion as a significant provider of local jobs. Any loss of part of this bigger site would begin to undermine the integrity of whole area, increasing pressure on remaining businesses to redevelop for higher value residential use. In the context of overall employment provision within the District, and the wider planning need to maintain the correct balance between competing uses, I consider that the Verco site should be confirmed as part of an employment allocation where Policy E4 applies.

#### RECOMMENDATIONS

- H/2/ib Modify the Plan in accordance with PIC 4/5.

POLICY H2id: DOWNLEY MIDDLE SCHOOL/TURNER'S FIELD
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#### PIC 3/4 Objections

See Appendix 3G

## Summary of Objections

- (a) Site capacity should be reduced. Site adjoins Conservation Area and a high density scheme is considered inappropriate. Site too small to support 50 dwellings if development is to accord with the Downley Village Design Statement.
- (b) Site should be treated as a windfall opportunity.
- (c) Object to loss of playing fields.
- (d) Object to loss of green space. Site currently used for passive and active recreation.
- (e) Object to reduction of housing proposed across the rest of High Wycombe, in favour of cramming houses onto small sites. Downley is already overdeveloped.
- (f) Object to increased traffic, parking nuisance, noise and congestion.
- (g) Site is not a redundant site and there is no guarantee that the County Council will close it within the Plan period. Site should be retained to meet future educational needs.
- (h) Location and accessibility of the site is poor; in particular walking and cycling to facilities is difficult because of gradients. Site will generate considerable private car use. Turner's Road is a quiet cul-de-sac which will be affected by taking a road through the site.
- (i) Council has not demonstrated the suitability of the site or its ability to deliver 50 dwellings.
- (j) Alternative use of the Victorian School house should be considered.
- (k) Existing trees, green spaces and established hedgerows should not be disturbed. Object to the loss of historic footpaths.
- (l) Object to the broader impact on village community; overload on facilities. Financial benefits of development should be kept locally to mitigate for the effects of traffic/parking in the village.
- (m) Object to allocation without public local consent.

## Inspector's Reasoning and conclusions

### General principles

3.2.3.19 Many objectors argued that the site should not have been included in the Plan in preference to other previously identified sites, which were better for housing on environmental grounds. I deal with the suitability of these areas in my summary comparative assessment and my detailed comments on objections to their removal from the deposit draft. Given my comments about the projected shortfall of housing in relation to Structure Plan targets, replacing some of the earlier sites would not necessarily avoid the need to retain the sites put forward in the PICs.

3.2.3.20 I agree with objectors to the allocation of Abbey Barn North that the constraints on the effective developable area of the site reduce its value for housing provision in comparison with other sites. However, I consider that Abbey Barn South should be kept as an ASL until the Plan is reviewed, primarily because of its relatively poor accessibility. Many of the issues raised by objectors to the allocation of this site for housing also apply to the other school sites put forward in the PICs, and there is necessarily some duplication in the reporting on these matters.

3.2.3.21 The site is a former school with associated playground and playing field, together with an adjoining area of open space to the east of a public footpath. The issue of school closure is for the local education authority to determine, in accordance with its restructuring programme, not the Local Plan process. The whole of the site lies close to the edge of but within the urban area of High Wycombe, as defined on the Plan and the previous Local Plan. It is surrounded by housing on all four sides. Although the Common and older houses fronting it bring a rural feel to the area, Downley nevertheless is clearly part of the much

larger urban area. And is in principle a suitable location for new housing. There can be no doubt that Downey Middle School falls within the definition of previously developed land as set out in PPG3. As such, it should be placed relatively high in the order of sequential preference redevelopment.

#### 3.2.3.22 Open space issues

3.2.3.23 The allocation would involve the loss of the school playing field. I understand that at the time of the inquiry the school playing field was used by a local team once a week, in addition to its earlier use by the school. The ground would be replaced for school sports by other pitches at West Wycombe School, which the County Council is considering making available for dual use. In addition, the loss of pitches at 4 school sites has been accompanied by a compensatory package of improvements at the former Redford playing fields, Totteridge. These would comprise two more senior pitches, which can also be used for mini-soccer, and improved changing facilities and parking.

3.2.3.24 I note that these facilities are a considerable distance from Downley; access by public transport involves two bus rides via the town centre. However, the package proposal meets many of the needs of potential users identified in the Wycombe Playing Pitch Study 1999 (CD/I/15), which identified an adequate supply of football pitches in the District. It should also enable a more efficient maintenance regime than that for many pitches dispersed throughout the town. The proposal has the support of Sport England, who have conditionally withdrawn their original objection to developing the site. I consider the package approach also meets the thrust of government policy as set out in the revision to PPG17, July 2002, in that the Plan seeks to meet identified local needs arising from a full study

#### Turners Field

3.2.3.25 The Council argued that Turners Field was owned by the education authority and was part of the school, having been purchased for educational purposes. However, the objector gave evidence that it had never been used as such, even though it had been fenced off. I understand that the land has been used as open space by local residents for many years, who had obtained access through a gap in the fence (see also L3). From what I saw, this part of the site has a different, more natural, appearance from the school playing field, despite the maintenance regime of two grass cuts each summer. There are some views into the site from the footpath and there are some attractive mature trees along some boundaries.

3.2.3.26 In my view therefore, Turners Field is best described as open space within the urban area, to which the provisions of PPG17, revised in July 2002, apply. Paragraph 10 states that existing open spaces should not be built upon unless a study has been undertaken to show that it is surplus to requirements. In this case the education authority have advised that it is no longer needed by the school, which has closed. There is no public right of access to the land, which is not within an area of open space deficiency as assessed by the Council's open space study in 1996 (CD/I/8). The development principles for the site allow for a new open area of about 0.7ha as a focus for the new housing and surrounding area. While the area would be smaller than the existing green spaces, this would create a positive benefit of formalising the availability of public open space in Downley. The new space would not be in the format of a traditional village green, but could provide a children's playground as indicated in the Downley Village Statement. Looking at broader context of open space in the Downley area, the site lies close to the extensive area of informal open space at Downley Common to the north. The size of the natural common and its proximity to and easy accessibility by residents of Downley is a critical factor. In these circumstances I consider that the retention of 0.7 ha of greenspace within the proposed housing would be sufficient.

3.2.3.27 In accordance with the sequential test of PPG3, this part of the site should not be considered for residential allocation until previously developed land has been taken up. I have found that the Council has made such a reasonable attempt in the circumstances under which it was prepared to carry out an interim study of urban capacity of sites in the High

Wycombe area. Despite the identification of new sites, including the objection site, I found a need to provide more housing land on 'greenfield' sites to meet Structure Plan requirements. I consider Turners Field compares favourably with other potential sites as yet undeveloped for the reasons below.

#### Accessibility and highway safety

3.2.3.28 The site is located within 400m of local shops and within 15 minutes of a journey by car or bus to High Wycombe town centre. It falls between zones 3 and 4 on the Council's Public Transport Accessibility map, being served by 3 routes operating along Commonsides 7 days per week, including evenings. The bus stops on this route are within 200m walking distance of the site.

3.2.3.29 Adequate vehicular access to the site can be obtained from School Close, widened within highway land by 0.5m, with a second emergency access from Turners Field. Although the sightlines at the junction with Plomer Green Lane are marginally below standard, appropriate traffic management measures to reduce vehicle speeds would ensure that highway safety would not be prejudiced.

3.2.3.30 As to an objector's concerns about traffic generation in the area, the modelling undertaken by Halcro Fox (CD/M/52) showed that the surrounding highway network could cope with the relatively small numbers of extra vehicle movements likely to be generated by the allocation. In any event the numbers of vehicles would be similar to the previous use as a school.

#### Density

3.2.3.31 The Downey Village Statement acknowledges the likely redevelopment of the school site and suggests this should be in sympathy with adjacent properties, and include some affordable housing. However, guidance in paragraph 58 of PPG3 is explicit that a reduction in density below 30 per ha should occur in rare instances. In general Downley appears to have been developed at typical post war suburban density, somewhat lower than the PPG3 guideline, but not particularly dispersed. The site is surrounded by housing estates, which are pleasant but not of such special character as to be within the designated conservation area. In this case, the net developable area of the site, excluding 0.7ha of open space intended to serve a wider area, is about 1.6ha. The proposed density thus equates to about 31 dwellings per ha, at the bottom end of the range quoted in PPG3.

3.2.3.32 The scale of development envisaged for the site would have a negligible effect on the overall housing numbers in Downley. I consider therefore that the allocation would not lead to local services being stretched to an undue degree.

#### Other matters

3.2.3.33 The other criteria of paragraph 31 of PPG3 are met. There are no problems with infrastructure and services. There is no reason why the new residents could not be integrated with the existing community at Downley; in addition the existing Victorian school building could be retained for community use, adding to the provision of facilities in the area and the development of community activities.

3.2.3.34 Other than grass, most of the vegetation within the site lies along the boundaries, where a number of mature trees could be retained within new housing. From the objector's evidence to the inquiry, it appears that the site is frequented by a number of birds, bats and foxes on some occasions. Many of the fauna may presumably visit from the larger habitat of Downley Common, a short distance to the north. However, some open space would be retained in accordance with the development principles, which together with gardens would provide a habitat for much of the flora and fauna found within the site.

## RECOMMENDATIONS

- H/2/id Modify the Plan in accordance with PICs 3/4, A2/13, A2/23 and A2/28

POLICY H2ig:HEIGHTS COUNTY FIRST SCHOOL, DOWNLEY

**PIC 3/4 Objections**

See Appendix 3H

**Summary of Objections**

- (a) Object to cramming development onto small sites. Proposed dwelling numbers should be reduced. Site too small to accommodate 40 dwellings, if development is to accord with the Downley Village Design Statement.
- (b) Object to loss of playing fields.
- (c) Object to loss of green space and loss of open space.
- (d) Object to loss of trees and hedgerows.
- (e) Downley is already overdeveloped. Proposal will lead to increased traffic, parking, nuisance and noise. Village atmosphere will be lost. Road traffic infrastructure has not been sufficiently assessed.
- (f) Site is not previously development and is still in use.
- (g) Location and accessibility of the site is poor. Walking and cycling to facilities will be difficult due to steep gradient.
- (h) Site could be required for future education needs and should be retained.
- (i) Council has not demonstrated suitability of the site or its ability to deliver 40 dwellings.
- (j) Restricted access to the site. This will create an accident black-spot.
- (k) Site occupies the brow of a hill; extant houses adjacent to the site are significantly lower than the level of playing fields. This could lead to overlooking, loss of amenity etc.
- (l) Unreasonable for Downley to bear the brunt of housing development in the area, when other sites have had their allocations reduced or deleted.
- (m) Object to the allocation without public local consent.

**Inspector's Reasoning and conclusions**

3.2.3.35 Many objectors argued that the site should not have been included in the Plan in preference to other previously identified sites, which were better for housing on environmental grounds. I deal with the suitability of these areas in my summary comparative assessment and my detailed comments on objections to their removal from the deposit draft. Given my comments about the projected shortfall of housing in relation to Structure Plan targets, replacing some of the earlier sites would not necessarily avoid the need to retain the sites put forward in the PICs.

3.2.3.36 The site is a former school with associated playground and playing field, located within the urban area of High Wycombe, as defined on the Plan and the previous Local Plan. It is surrounded by housing to the east, south and west, and adjoins an informal open space containing the village pond to the north. I understand that the school has closed, having been replaced by new buildings at Wycombe West School. The issue of school closure is for the local education authority to determine, in accordance with its restructuring programme, not the Local Plan process.

3.2.3.37 In principle the site is a suitable location for new housing, as it lies within the

urban area of High Wycombe, where new housing development is directed by Policy H2 of the Structure Plan. The whole curtilage of the school falls within the definition of previously developed land as set out in PPG3, and residential allocation accords with the broad thrust of government policy and Policy H7 of the Structure Plan to make the best use of urban land. The Council's detailed site assessments schedules (CD/I/18) show that there is no conflict with the criteria of paragraph 31 of PPG3. The site is largely surrounded by housing, is free of major constraints to development, would help contribute to community development through the provision of open space and lies in a relatively accessible location with regard to public transport and a local shopping centre. It therefore scores relatively well in any sequential test for new housing development.

#### Open space issues

3.2.3.38 The Development Principles for the site set out in Appendix 2 specify a comprehensive design solution linking a new toddlers' play area to the green and pond immediately north of the site. It is also proposed to delete the housing notation on part of this area, which would be retained as open space in its entirety. This would go some way towards meeting the needs of Downley residents for informal recreation. Bearing in mind the proximity of the neighbourhood to the open countryside to the north west, I consider that this provision would be adequate.

3.2.3.39 The allocation would involve the loss of the school playing field, although this area was too small to accommodate a full-sized pitch for senior or junior football. The existing school pitch would be replaced by others at West Wycombe School, which the County Council is considering making available for dual use. In addition, the loss of pitches at 4 school sites has been accompanied by a compensatory package of improvements at the former Redford playing fields, Totteridge. These would comprise two more senior pitches, which can also be used for mini-soccer, and improved changing facilities and parking. This proposal meets some of the needs of potential users identified in the Wycombe Playing Pitch Study 1999 (CD/I/15), which identified an adequate supply of pitches in the District. It should also enable a more efficient maintenance regime than that for many pitches dispersed throughout the town. The proposal has the support of Sport England, who have conditionally withdrawn their original objection to developing the site. I consider the package approach also meets the thrust of government policy as set out in the revision to PPG17, July 2002, in that the Plan seeks to meet identified local needs arising from a full study.

3.2.3.40 The playing field has some role as a green lung within the built up area of Downley, although there is no public right of access at present. The Council intends to place TPOs on the trees around the western and southern boundaries of the site so that they could be retained in any redevelopment. There is no evidence of the site holding significant ecological value.

#### Density

3.2.3.41 The proposal for 40 dwellings on a site of 1.1ha (39 per ha) falls squarely within the guideline density figures of 30 to 50 dwellings per ha set out in paragraph 58 of PPG3. This form of development would be comparable with the density on the east side of Grays Lane, at 35 dwellings per ha. I note that the Downley Village Design Statement indicates that the style and density of future development should be appropriate to its immediate context. In my view 40 extra dwellings in Downley would not have a material impact on the character of the neighbourhood, which covers a substantial area. The open space element of the proposal is to serve local needs, not the wider area, and should not therefore be deducted from the relevant development area. While the required density may be rather greater than the surrounding housing, I see no reason why a well designed scheme could not be achieved on this relatively flat site. Detailed proposals should deal sensitively with the potential problem of overlooking adjoining dwellings to the south and west from the higher ground of the site, but this should not be a significant constraint.



### Highway safety and accessibility

3.2.3.42 The County Council as highway authority have agreed that the existing access point would be suitable for a development of up to 40 dwellings, subject to some improvements (CD/M/53). The strip of available land can accommodate a 4.8m wide carriageway plus 2m footway and verge to meet normal requirements for this scale of development. I have no technical evidence to suggest that the surrounding highway network could not cope with the additional traffic likely to be generated by the new housing. The site lies within 100m of local shops and the entrance is within 490m of a bus stop on Grays Lane which has a service of more than 4 buses per hour to the town centre. Such a location would help to minimise car travel and would provide reasonable access to a range of services for those without access to a car.

### Other matters

3.2.3.43 The other issues raised by the objectors, such as the mix of housing, provision for community needs, pedestrian routes, prevention of crime, can be addressed by the adherence to the development principles at detailed design stage.

## RECOMMENDATIONS

H/2/ig15 Modify the Plan in accordance with PICs 3/4, A2/13, A2/23 and A2/28

POLICY H2ih:TERRIERS FIRST SCHOOL
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### PIC 3/4 Objections

0376/34	Axa Equity and Law Life Assurance Society PLC
0379/68	<i>Sport England</i>
0571/25	Laing Homes Ltd
0579/19	Michael Lambert
0709/13	Bryant Homes Technical Services Ltd
1141/44	Beazer Strategic Land
1579/24	Oxford Land Limited
2113/1	Mr & Mrs A Mills
2138/1	Mrs Susan Chilton

### Summary of Objections

- Proposed site capacity too high. Council has not demonstrated the suitability or ability of the site to accommodate 60 dwellings without overcrowding.
- Object to loss of playing fields.
- Object to loss of Green Space and open space.
- Object to loss of existing car park on the site and waste recycling facility. This area of land should be excluded from any residential potential.
- Site should be treated as a windfall and not an allocation.
- Inclusion of flats in prominent corner building could help to maintain the housing numbers, whilst protecting the existing green space.

- (g) Site fails location and accessibility test. Walking and cycling to facilities will be difficult due to site being located in a hilly area. Development will lead to dependence on the private car, increased congestion and is unsustainable.
- (h) Site could be required for future educational needs and should be retained.
- (i) Object to loss of views and privacy.

### **Inspector's Reasoning and conclusions**

3.2.3.44 Many of the issues raised in considering objections to other school sites included in the Plan as housing allocations at PIC stage apply to Terriers First School. The site is a former school with associated playground and playing field, and includes a small public car park with 24 spaces and a bottle bank. It is located within the urban area of High Wycombe, as defined on the Plan and the previous Local Plan. The site lies to the south of Totteridge Lane within a largely residential area, with housing adjoining to the south east, and south west. On the other side of Totteridge Lane to the north is the Terriers Conservation Area and Kings Wood, and Totteridge playing fields can be easily reached via a short footpath link from the southern corner of the site. The school buildings have been demolished, following a review of school needs in the whole of High Wycombe. The issue of school closure is for the local education authority to determine, in accordance with its restructuring programme, not the Local Plan process.

3.2.3.45 In principle the site is a suitable location for new housing, as it lies within the urban area of High Wycombe, where new housing development is directed by Policy H2 of the Structure Plan. The whole curtilage of the school falls within the definition of previously developed land as set out in PPG3, and residential allocation accords with the broad thrust of government policy and Policy H7 of the Structure Plan to make the best use of urban land. The Council's detailed site assessments schedules (CD/I/18) show that there is no conflict with the criteria of paragraph 31 of PPG3. The site is clearly part of a larger housing area, is free of major constraints to development, would help contribute to community development through the provision of open space and lies in a relatively accessible location with regard to public transport and a local shopping centre. It therefore scores relatively well in any sequential test for new housing development.

#### **Open space issues**

3.2.3.46 The former school playing field has some role as a green lung within the built up area of Totteridge, although there is no public right of access at present. The Development Principles for the site set out in Appendix 2 specify a comprehensive design solution and the provision of an informal open space of 0.36 ha, to include an equipped children's play area. The car park and waste recycling facility would be retained. The site is located close to extensive areas of public open space in Kings Wood which links to the open countryside north of Amersham Road. These links could be retained if Terriers Farm were developed as I recommend, and residents of the site would have excellent access to a variety of open space for informal recreation.

3.2.3.47 The allocation would involve the loss of the school playing field, although this area is too small to accommodate a full-sized pitch for senior or junior football. The loss of pitches at 4 school sites has been accompanied by a compensatory package of improvements at the former Redford playing fields, Totteridge, not far from the site. These would comprise two more senior pitches, which can also be used for mini-soccer, and improved changing facilities and parking. This proposal meets some of the needs of potential users identified in the Wycombe Playing Pitch Study 1999 (CD/I/15), which identified an adequate supply of pitches in the District. It should also enable a more efficient maintenance regime than that for many pitches dispersed throughout the town. The proposal has the support of Sport England, who have conditionally withdrawn their original objection to developing the site. I consider the package approach also meets the thrust of government policy as set out in the revision to

PPG17, July 2002, in that the Plan seeks to meet identified local needs arising from a full study.

3.2.3.48 However, The Council intends to place TPOs on the trees around the western and southern boundaries of the site so that they could be retained in any redevelopment. There is no evidence of the site holding significant ecological value.

3.2.3.49 Density

3.2.3.50 The proposal for 60 dwellings on a site with a minimum net developable area of 1.35ha (excluding the car park and bottle bank and possibly an area for a community building) would be at a density of 41 per ha. This falls squarely within the guideline density figures of 30 to 50 dwellings per ha set out in paragraph 58 of PPG3. Bearing in mind the relatively good accessibility of the site (within Zone 3) and the nature of the development fronting Amersham Road, I consider density at this level to be entirely appropriate. The open space element of the proposal is to serve local needs, not the wider area, and should not therefore be deducted from the relevant development area. A well-designed scheme could be achieved on this relatively flat site which would fit in with the surrounding area. Detailed proposals should deal sensitively with the potential problem of overlooking adjoining dwellings to the south and west from the higher ground of the site, but this should not be a significant constraint.

Highway safety and accessibility

3.2.3.51 The County Council as highway authority has agreed that the site would require a single main access from Totteridge Lane and a secondary route for emergency vehicles only (CD/M/51). The extra traffic generated by the 60 dwellings would add to congestion at the Amersham Road/Totteridge Lane junction, but these could be mitigated by improvements. I have no reason to believe that the allocation would lead to unacceptable conditions elsewhere on the surrounding highway network.

3.2.3.52 The site lies within 200m of local shops and is a short car or bus journey of less than 15 minutes to the town centre. There are bus stops within 400m of the site with more than 6 buses per hour to the town centre, so it falls within Zone 3 of the Council's accessibility index in Appendix 9 of the Plan.

Other matters

3.2.3.53 The other issues raised by the objectors, such as the mix of housing, provision for community needs, pedestrian routes, prevention of crime, can be addressed by the adherence to the development principles at detailed design stage. I appreciate concerns that it would be inconsistent to require contributions towards education provision on a site released by the education authority as no longer required for that purpose. However the Development Principles are not prescriptive about this issue.

Conclusion

3.2.3.54 Many objectors argued that the site should not have been included in the Plan in preference to other previously identified sites, which were better for housing on environmental grounds. I deal with the suitability of these areas in my summary comparative assessment and my detailed comments on objections to their removal from the deposit draft. Given my comments about the projected shortfall of housing in relation to Structure Plan targets, replacing some of the earlier sites would not necessarily avoid the need to retain the sites put forward in the PICs.

## RECOMMENDATIONS

- H/2/16 Modify the Plan in accordance with PICs3/4, A2/15, A2/25 and A2/30

## **HOUSING DEVELOPMENT PROPOSALS – HIGH WYCOMBE AREA**

TERRIERS FARM
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### **The Objections**

0522/2	Redrow Homes (Southern) Ltd
1141/1	Beazer Strategic Land
1207/10	Resident's Action Group on Gomm Valley

### **Summary of Objections**

- (a) Object to the non-inclusion of Terriers Farm site for residential use (120-400 dwellings proposed, with appropriate employment). Refer to the uncertainty in the timing of release and availability of other housing allocations in the Plan. The Council has not given due regard to meeting the development needs of the District in the most sustainable way. The site has more advantages than other sites allocated under Policy H2. It appears that the site has been rejected due to the level of public objection.
- (b) Site is located on a well-used public transport route with easy access to the town centre and other employment locations. There is the opportunity to provide major public transport improvements including a dedicated bus route and park and ride. The site is not subject to significant ecological, landscape, environmental or agricultural constraints and is well located in relation to existing local facilities. Site can be contained and features protected. Site is located on urban edge, surrounded by urban development on three sides. Site is readily available.

### **Inspector's Reasoning and conclusions**

#### Introduction

3.2.4.1 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. In my assessment as to how this shortfall can be met, summarised in section 3.2, I have given considerable weight to Structure Plan Policy H2, which directs major new housing to the High Wycombe urban area. This section of the report analyses the suitability of the Terriers Farm site for new housing development. I take into account the proposal for a potential park and ride site, which is dealt with in detail in section 7.17 of the report.

3.2.4.2 The site comprises about 23.1 ha of pasture located to the north of Amersham Road about 2km north east of the town centre. The Redrow objection relates to about 4.9 ha in the southern part of the site, whereas the other objections concern the whole site. All the land lies within an area safeguarded from the green belt. The Council accepted that this designation meant that the site was considered suitable for development at some future date, but argued that in the context of its own assessment of need the Abbey Barn North site was sequentially preferable. A very substantial number of objectors, represented by the Grange Action Group, argued that the site should be designated as green belt, together with adjoining land within the AONB at Grange Farm. I deal with these objections in Chapter 9, but have taken into account the evidence put forward to support that case in my discussion of this objection seeking housing allocation, particularly with regard to matters such as landscape quality, community identity, accessibility and highway safety.

#### Landscape Impact

3.2.4.3 The site lies outside the AONB, from which it is separated by the strong physical

boundary of Ladies Mile, a bridleway lined by mature hedgerow trees on both sides. The land comprises a number of gently sloping fields, many of which are bounded by hedgerows, and includes the group of buildings at Terriers Farm, although the objectors propose they should be retained outside the residential allocation. The Countryside Commission's character study 'The Chilterns Landscape' indicates the site forms part of a sub-type of landscape designated as 'Level Plateau', itself falling within a larger division of dip slopes, often at the head of dry valleys, as in this case. I consider the most accurate indication of the landscape type at Terriers Farm is provided by the County Council's Buckinghamshire landscape assessment, which classifies it as 'Incised Dip Slope', characterised by small scale intimate farmed land, with remnants of historic landscape patterns, narrow lanes and suburban development. Although much of the site retains a rural character, its location at the edge of a substantial urban area is obvious. This is particularly apparent in the southern part, which exhibits some urban fringe characteristics such as pony paddocks and views of adjacent employment development.

3.2.4.4 The Council's landscape assessment, undertaken by Gillespies (CD/1/12) identified the Terriers Farm site as having Class 1 value, sufficient to indicate that development should be strongly resisted. This judgement was based on a comparison of form with the western half of Grange Farm, which was considered a more intimate and attractive landscape than the more open rolling arable fields to the north east. This view of the visual quality of the wider area is clearly not shared by the Countryside Commission, which omitted the site from the AONB when it was extended in 1990. While the general topography of the site is similar to the AONB land, its overall visual quality is lower. The site is linked visually to the AONB by some gaps in the hedges along Ladies Mile, but these are infrequent and the density of vegetation in the hedges gives the site a sense of enclosure and separation from the countryside beyond.

3.2.4.5 The Council argued that the landscape value of the site was enhanced by its value as a strategic gap between the separate communities of Hazlemere and High Wycombe. The site also performed an important role in maintaining a green corridor from the Gomm valley, through Kings Wood and the site out to the open countryside of Grange Farm and beyond. However, I consider the link between the open spaces is less strong than the Council claims. Substantial parts of the area shown as green space on the Council's annotated aerial photo are 'heavily wooded and treed residential areas' which nevertheless contain significant building cover. For example, the width of the green gap at the northern end of Kings Wood is restricted by the new housing development at the Axa site. Although this is at relatively low density, it nonetheless intrudes significantly into the open space. Next to the site itself the substantial group of buildings at Terriers also break into the green wedge, which is crossed by a busy main road, where there is no sense of rural tranquillity. The site would continue to be separated from Hazlemere by the sizeable recreation ground to the north east, and is likely to have its own distinct physical identity compared with the low density suburbs to the south.

3.2.4.6 The objectors argued that the green space could be continued across the site to link into the larger area of AONB at Grange Farm through careful design. I see no sound reason why a substantial green wedge could not be retained through the middle of the site to achieve this aim. If this were based on the established hedgerow that runs north-south through the middle of the site, currently classified as a BNS, it could also act as an important wildlife corridor. Visually this part of the site could be connected to the open space within the Terriers Conservation Area, helping to retain its setting and allowing the countryside to reach into the town.

3.2.4.7 In essence there must always be some element of subjectivity in any landscape quality appraisal. I consider that the location of the site on the urban fringe and its physical characteristics and use detract slightly from its value in the wider Chilterns landscape. On balance I concur with the objectors that the landscape value of the site is less than the Council claims.

## Ecology

3.2.4.8 As already noted the site contains one BNS where the main interest is the age of the hedgerow resulting in a large number of species. Another BNS, the southern hedgerow along Ladies' Mile, adjoins the northern boundary of the site. Clearly the development principles should emphasise the importance of retaining and protecting these features. However, that should present no difficulty; the site is large enough for a sensitive design to allow adequate buffer zones and for the north-south hedgerow to become the focus of a green lung in the heart of the new housing. Although the main access road would have to breach the hedge, this could be achieved at a point near the middle of the hedge where there is already a significant gap; the remaining lengths could be left undisturbed

3.2.4.9 Local residents and the National Trust gave evidence that badgers live relatively close to, but outside, the site. While parts of the site may be used for foraging, other areas are available nearby on Grange Farm. The proposed green corridor through the site would enable continued movement of wildlife to Kings Wood and beyond.

## Accessibility

3.2.4.10 The Council accepted that the site had moderate accessibility overall, lying on the border between zones 3 and 4 of the index shown in Appendix 9 of the Plan. Local shops and a garage in Amersham Road lie within about 400 m of the site. The nearest primary school is less than 600m away, although it is located on the other side of the main road. A total of 6 schools or other educational establishments, including Buckinghamshire Chilterns University College, are within 1200m of the site. The local centre at Hazlemere, with a range of shops and services, is about 1 km from the centre of the site, within easy reach by cycle. The Council has plans to improve the cycle route from Kingshill Road to the town centre via green Road and alongside Amersham Road.

3.2.4.11 Amersham Road is a main public transport corridor in High Wycombe, along which 10 buses run each hour. Residents of the site without access to a car would be in a relatively good position to reach the wide variety of shops, services and community facilities available in the town centre, just a 2.5 km bus ride away. The bus services provide reasonably good access to other important employment destinations such as Cressex Industrial Estate, Amersham and Chesham. As I discuss in my own comparative site assessment, I have concluded that the advantages of Terriers Farm on this count weigh heavily in its favour.

## Transport issues

3.2.4.12 The Council's initial concerns about the method of highway access to the site were addressed by the objectors before the relevant inquiry appearance. I am satisfied that it would be possible to provide a safe road entrance along Kingshill Road, together with a secondary access for emergency vehicles only. The Council did not argue that any substantial improvements to the road network in the vicinity of the site would be required to deal with extra traffic from another 400 dwellings here. However, some contribution towards junction improvements at Totteridge Lane/ Amersham Road/ Kingshill Road would be needed, together with footways, pedestrian crossings and cycle routes. While I note the concerns of local residents about traffic congestion in the Terriers locality at peak hours, which I experienced myself, this problem is prevalent throughout the High Wycombe urban area on all approaches to the town.

3.2.4.13 Depending on further studies, these problems may be addressed by traffic management measures and, if needed, park and ride schemes. The objection site would provide an alternative park and ride site to the proposal at Hazlemere, deleted from the Plan by PIC 7/12 The Council has now put forward a criteria-based policy, which I recommend with some modification for adoption in section 7.17 of this report. I note that the Hazlemere site enjoys the operational advantages of an outer location that would help to minimise car travel within the urban area and may allow bus routing other than along the congested Amersham road corridor. That site lies within both the green belt, where a park and ride scheme may not

be inappropriate subject to the criteria outlined in Annex E to PPG13 and Policy T17, but also the AONB. The Terriers site would avoid development in the green belt and more significantly the AONB, where the test of national need would apply to any proposal that would compromise the natural beauty of the area. In the event of a decision to proceed with the park and ride scheme, a detailed assessment of the merits of both sites would be necessary at a later date. In the meantime, part of the Terriers site should be safeguarded for such a scheme pending the outcome of both the general review of the need for park and ride and the merits of individual sites.

#### Independent development of the Redrow Site

3.2.4.14 From my analysis of housing need I consider that the development of the whole site can be justified in order to meet Structure Plan requirements throughout the Plan period. If the southern part were developed alone, as safeguarded land the remainder would remain suitable for development and adequate access provision would have to be safeguarded also. I agree with both the Council and Beazer that the comprehensive planning and development of the site with primarily residential development would secure the most efficient use of the land. I deal with the suggested provision of a site for park and ride in section 7.17.

#### Other matters

3.2.4.15 The site is not particularly valuable as agricultural land. Only a small proportion is classified as Grade 3A, comprising a narrow band through the middle of the site and the eastern edge. The majority is Grade 3B, currently used as pasture, the loss of which would be insignificant in the wider District-wide context and the change in emphasis on retention of good quality land set out in the recent revisions to PPG7.

3.2.4.16 New buildings on the site could be designed and laid out to be sufficiently distant from Terriers House to have no discernible effect on the listed building or its setting. The small copse along the northern edge of the Conservation Area could be supplemented by further planting within the site to preserve its separate identity and character.

3.2.4.17 I have noted the concerns of local residents and the Council that development of Terriers Farm would result in the coalescence of Hazlemere and High Wycombe, with a consequent adverse effect on the sense of community identity that residents currently enjoy. However, while perceptions of community are important, on the ground the two parts of the urban area are linked on the south side of Amersham Road for all but a narrow break at the northern end of Totteridge Lane, within which sits the Beech Tree public house and its garden. To the immediate east of the site the recreation ground would retain a green space between the new neighbourhood and the older core of Hazlemere. In these circumstances I consider the minor disadvantage of some loss of space between different parts of the built up area would be outweighed by other benefits, including the proximity to a main public transport corridor. I acknowledge that here is some strength of public opinion against the development of the site, as there is with all other sites, but I have dealt with them all on their planning merits.

#### Conclusion

3.2.4.18 In conclusion, Terriers Farm is a high performing site where new housing development would form a logical urban extension to High Wycombe. In comparison with other sites it lies in a relatively good position for those residents without access to a car to be able to reach a variety of facilities and services by other modes of transport. The site scores well with regard to environmental impact, ecology and transportation. Taking into account the need to safeguard a park and ride site, provide a green wedge and possibly a small local centre, the site has a capacity of about 400 dwellings. In my own comparative assessment I considered these advantages combine to make the site the most attractive of the opportunities to meet the shortfall in housing identified in section 3.2.

## RECOMMENDATIONS

- H/2/4/1 Modify the Plan by allocating the site for residential development with 400 dwellings in the period 2006-2011. Set out development principles in Appendix 2 of the plan that include provision for a green corridor through the middle of the site and land safeguarded for a park and ride site, pending the outcome of the relevant policy review.

AXA SUNLIFE, AMERSHAM ROAD, TERRIERS

### The Objections

0017/2	Leigh & Lesley Edwards
0034/5	Dr David J Brickwood
0036/5	<i>Mr RE Chilton &amp; Mrs AS Chilton</i>
0753/2	Paul Wagstaff
0829/14	Trevor Fazackerley
1028/3	Mrs Eileen F Backhouse
1130/4	Mrs H L Hide
1183/2	B J Wood
1250/2	Mr & Mrs G Gomm
1272/2	E A Evans
1274/2	Robert James Leftwich
1285/2	A H McGovern
1287/2	K A Mills
1288/3	David & Philippa Marfleet
1289/2	Norman Brown
1354/2	A D Carpenter
1357/2	Anthony Sagar
1368/2	J Bartle
1369/2	Mr & Mrs T Groom
1379/3	Raymond Brooks
1381/2	A R James & M Kelly
1408/2	C Johns
1415/6	Ron and Sue Long
1418/2	Mrs G m Brailsford
1491/2	Air Commodore & Mrs M I David
1535/5	Susan Brown
2056/2	Mrs J Brickwood

### Summary of Objections

- (a) Propose Axa Equity & Law site for housing, thereby reducing pressure on green field sites. Site is within a residential area and should be allocated as a spacious residential area, for which there is an urgent need. Housing would protect the environment, maintain the character of the area and give security to surrounding residential properties. Residential use of the site is a more suitable use than business use.

### Inspector's Reasoning and conclusions

3.2.4.19 The site has planning permission for housing following an appeal decision and construction was under way at the time of the inquiry. The broad thrust of these objections that the site should be developed for housing has been met and no further comment is necessary.



## RECOMMENDATIONS

- H/2/4/2 Modify the Plan in accordance with PIC 4/2

BOOKER COMMON ALLOTMENTS
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### The Objections

0508/16 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) Site should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

### Inspector's Reasoning and conclusions

3.2.4.20 The site consists of a roughly rectangular field, used as allotments, to the south west of High Wycombe. The site is in the green belt and abuts the AONB, outside the settlement boundary for High Wycombe.

3.2.4.21 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.22 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. Even though the site is located at the edge of the urban area, it falls within PTAM Zone 4 (see Appendix 9 of the Plan) and cannot demonstrate a sufficient degree of sustainability to support this argument. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet the green belt functions of preventing the spread of the west side of High Wycombe, preventing the merger of High Wycombe with Lane End, protecting the countryside from encroachment and encouraging the development of urban land.

3.2.4.23 As regards the objector's argument that the allotments comprise previously developed land, PPG 3 is quite clear that this definition would not apply to allotment land and similar urban spaces such as parks and recreation grounds. Similarly, given its low accessibility rating, the site's location at the edge of a settlement does not necessarily make it a sustainable site. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing and with established policies to protect the green belt.

## RECOMMENDATIONS

- H/2/4/3 No modification

GOMM VALLEY

**The Objections**

0376/5            Axa Equity and Law Life Assurance Society PLC  
0378/4            George Wimpey PLC

**Summary of Objections**

(a) Propose the deletion of housing sites at Abbey Barn North, Abbey Barn South and Wycombe Marsh, and the allocation of the Gomm Valley for 500 to 600 dwellings. Refer to potential of existing rail corridor and ability to provide a fully integrated public transport system, alongside other uses to be incorporated in the proposed development of Gomm Valley. Note one objector refers to the site as Gomms Farm.

**Inspector's Reasoning and conclusions**

3.2.4.24            Axa put forward a comprehensive scheme for a mixed development on the southern part of the Gomm Valley, excluding the Ashwells housing site shown on the Deposit Plan, but including Pimms Close. The suggested uses comprise: an extension to the Peregrine Business Park; a mixed use area of live/work units; a local centre; about 400 new dwellings; a park and ride facility with 400 parking spaces; a nature reserve; and a local park. In this section of the report I deal with the housing aspects of the proposal but also the other elements. The Wimpey objection was made in written form with reference to general principles rather than detailed plans. This section of the report deals with both objections, albeit with particular emphasis on the proposals put forward by Axa.

3.2.4.25            In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. This assessment takes into account the sequential approach to site selection as set out in PPG3 and Structure Plan policy to direct major new housing to the High Wycombe Urban area. It also deals with a major allocation at Princes Risborough and other smaller sites at Marlow.

3.2.4.26            The proposal for this urban extension on previously undeveloped land has been considered alongside other sites, including other ASLs and land within the main urban areas of the District. My findings below have informed this comparative site assessment. In summary, I recommend the allocation of the sites proposed by the Council in the Plan as proposed to be changed, excluding Abbey Barn North, and an additional housing allocation at Terriers Farm. I concluded that the Gomm Valley site was not preferable to these other sites and should not be allocated within the life of this Plan. I am confident that my recommended allocations will provide sufficient dwellings to allow the Plan to meet the Structure Plan housing requirement and that there is no strategic need to allocate any additional sites.

3.2.4.27            I conclude in Chapter 4 that on balance the Council's employment strategy is likely to provide for the continuing health of the local economy. While the justification for removing/deleting a new greenfield business park was limited at the time, the robust nature of the High Wycombe economy gives a strong indication that a new allocation would lead to some overheating. In any event the proposal put forward in the objector's masterplan is too small to meet that need. Other sites nearer town centre may become available.

Transport

3.2.4.28 Access to Axa's development proposals would be from Cock Lane and Pimms Grove, Gomm Road and Hammersley lane. The Council accepted that these arrangements would provide for safe access to the site, albeit with some inherent delays if drivers were to use Cock Lane and Hammersley Lane. New pedestrian and cycle routes would be provided within the site and a new footway constructed under the Hammersley Lane bridge.

3.2.4.29 The proposals involve the use of a new traffic signal controlled section of one way working in Hammersley Lane, similar to the current arrangements over the railway bridge at the southern end of Cock Lane. The proposals also include new traffic signals at the junction of Hammersley Lane and London Road, the provision of speed reduction measures and extra passing bays in Cock Lane north of the railway bridge. The traffic models used by the objectors and the Council also assume that other proposals for traffic signals at the junctions of London Road with both Cock Lane and Gomm Road would be implemented.

3.2.4.30 The Council accepted that across the whole town congestion would be little different as a result of the Gomm Valley proposals. However, at the inquiry there was some discussion about the likely effects on traffic congestion along London Road. If Gomm Valley were to replace the Wycombe Marsh site it was accepted that the volume of additional traffic congestion would be minimal, although some opportunities for junction improvements using land within Wycombe Marsh would be lost. However, I have recommended that the Wycombe Marsh site should form a cornerstone of the Plan and provide a substantial number of new homes as part of a mixed development in the last 5 years of the Plan period. In that event the Gomm Valley site would generate additional traffic along the London Road corridor. The Council's witness had tested this scenario on the traffic model used to assess different plan proposals, involving the sites allocated in the PICs and Gomm Valley. This test indicated an increase in the congestion index for London Road from 1.65 to 1.72 once all sites were developed, assuming a park and ride facility at Gomm Valley rather than Wooburn Moor. Such a result is not surprising, given the amount of new development involved, the extra distance travelled along London Road by users of the Park and Ride and the limited additional infrastructure improvements attributable solely to the Gomm Valley scheme (traffic lights at the Hammersley Lane junction).

3.2.4.31 The objectors argued that in any final analysis this small increase in projected congestion levels should not preclude more housing in the London Road corridor. The overall congestion level would still be rather lower than if no development (and accompanying traffic management measures) were to occur at all. Given the congestion levels on all of the major routes into High Wycombe during peak hours, additional development is not likely to create an overall improvement in the transport system, wherever it is located. In this context I consider the traffic congestion issue to be neutral with regard to the Gomm Valley proposals.

#### Sustainability

3.2.4.32 The development proposals are based on the centroid of the site being located some 600m north of London Road. The site lies within Zone 4 of the Council's Accessibility map (Appendix 9 of the Plan). Looking at accessibility to local facilities, the nearest schools are 1100m (Marsh County First, to the south of London Road); 1600m (Beechfield Middle); and 2km (Hatters Lane Secondary). The nearest retail area of any significance is on London road to the west of Micklefield Road, some 1200 m from the site. Given car ownership rates in Wycombe District and the gradients from much of the new housing area to the valley floor, I agree with the Council that a significant proportion of these trips will be by car. The proposed local centre would help meet some needs, but would not be large enough to avert many combined trips to other destinations in the town.

3.2.4.33 Looking at public transport, the centroid of the site is some 400m from a bus stop in Orchard Road and 550m from a stop in Cock Lane. At the time of the inquiry 2 services (Nos. 307 and 327) operated at a frequency of about 20 minutes to and from the town centre using these stops. The 307 service (via Orchard Road) took a rather convoluted route via Hatters Lane, with a journey time of about 25 minutes; the twice hourly service on the 327 took

about 15 minutes each way. A third route, No. 301, passed along London Road between the town centre and Flackwell Heath at roughly half hourly intervals, with extra school buses. Bearing in mind the distances to these services, the gradients involved, their frequency and journey times, I consider the site as a whole is not especially well served by buses at present.

3.2.4.34 The objectors indicated that they would be prepared to make significant contributions to secure bus service improvements, in particular by subsidising diversions of routes 301 and 327. These services were being reduced at the time of the inquiry and there must be some doubt about their sustainability in the longer term. The benefit of the diversions to Gomm Valley residents would to some extent be at the expense of residents living elsewhere in the town, since their journeys to and from the town centre would take longer. Also, because of timings, the services to the site would in practical effect be every half hour.

3.2.4.35 Nevertheless, the expected contribution to the development of bus services and the Wycombe Transport Study would be beneficial. Whether this would be greater than the potential improvements that are likely to occur if a competing site were developed is uncertain. The proposed park and ride scheme would offer additional potential benefits of trip reduction and improved accessibility of the site for some future residents. It should be noted that there is scope to provide a similar scheme at Terriers Farm. As I discuss below, for policy and operational reasons the Gomm Valley park and ride is by no means certain to occur in the manner proposed by Axa. An intermediate facility may be provided, but adding another stop to the service within Gomm Valley may conflict with other operational objectives. Overall therefore, the package of measures proposed by the objectors would provide an improved level of bus service, but I consider the objectors' claim for 'an extremely well served site' to be a very optimistic estimate of the long-term future position.

3.2.4.36 I note the objectors' comparative accessibility study and the scoring methodology involved. The weightings in any exercise such as this are critical; for example, Gomm Valley is attributed a high score to the site with regard to potential for a station. Bearing in mind the recent comments of Chiltern Railways about the extremely remote prospect of a new halt so close to High Wycombe station, I consider this analysis to be overstated. Similarly, the exercise gives an equal proportion of the score to potential improvements in public transport services as to existing provision. As I indicate in my comparative assessment of competing sites in section 3.2 of the report, I have strong reservations that this particular method does not reflect properly the true relative accessibility of the sites.

3.2.4.37 In similar vein, the claimed reduction in the number of car based trips resulting from mixed use development on the site is based in part on journey to work patterns taken from 3 nearby wards of High Wycombe. These have lower levels of income and car ownership than other parts of the urban area. I have sympathy with the Council's point that this may lead to a higher estimate of trip reduction than might occur in reality.

#### Park and ride

3.2.4.38 The objectors also propose a 400 space park and ride scheme, to be located in the south east corner of the site, with access from Hammersley Lane. I deal with the transportation aspects of the Council's policy for Park and Ride schemes in section 7.17 of the report. In summary, I recommend broadly in favour of the Council's PIC 7/12 to substitute the Deposit Plan policy and 4 identified sites with a criteria-based Policy T17, subject to some suggested amendments. The retention of the site as an ASL would allow such a proposal to come forward if it were needed at a future date, were in conformity with T17 and also included in the LTP.

3.2.4.39 The park and ride element would be located in a relatively inconspicuous part of the site, although even on its own would detract from the landscape value of the whole valley, particularly when viewed from Hammersley Lane and public footpaths in the southern part of the site. This location, combined with other parts of the proposal such as high density housing and the topography of this part of the site, would not allow for easy expansion of the facility if

needed. From the objectors' evidence of discussions with Arriva, it appears that the scheme would be viable; anticipated usage of 800 cars per day charged at a rate significantly lower than town centre car parks would generate enough income to cover expected running costs, with a substantial margin for error.

3.2.4.40 However, the access to the facility from London Road would be somewhat tortuous, under a single track bridge, which may discourage some drivers, even if traffic signals were phased to encourage easy entry to the site. The lack of 'presence on London Road and delays to turn right (even on the objectors' figures) are additional disadvantages. More importantly, the location of the site closer to the town centre than junction 3 of the M40 is an operational disadvantage of considerable weight, since the scope of the facility to reduce car mileage would be much reduced. An intermediate facility may be a possibility, catering for traffic from the new development and the roads feeding into London Road from the south, including those from Flackwell Heath and Bourne End. At present there is no certainty that the District and County Councils will decide to proceed with the provision of park and ride sites as part of a revised transport strategy incorporated in a Local Transport Plan (LTP). Should they do so, the site could still be considered in comparison with others in the eastern corridor against the criteria of Policy T17.

#### Transportation conclusions

3.2.4.41 In summary, the objection site would have a broadly neutral effect on traffic congestion, subject to contributions to help implement the Wycombe Transport Strategy and other site specific measures. For those without a car, the site lies in a reasonable, but not outstanding position with regard to access to local community and commercial facilities. Implementation of the proposed park and ride scheme, and any possible associated benefits, is at best doubtful, and certainly longer term.

#### Agricultural land

3.2.4.42 A relatively small part of the site in the middle of the valley floor is grade 2 agricultural land, and a significant area of the northern end is Grade 3A. The loss of this best and most versatile land is a disadvantage, but not a critical one, taking account of the revised guidance in PPG7 about the need to weigh such losses against other factors.

#### Ecology

3.2.4.43 The site includes an SSSI extending to about 4.5ha on the eastern slopes of the valley. This part of the site comprises former calcareous grassland, much of which has been colonised by dense scrub, in some parts almost woodland. The southern margins include an ancient hedgerow and woodland. Axa argued that much of the original ecological value of the area had been lost through natural changes. However, they had an agreement with the Berks Bucks Oxon Wildlife Trust (BBOWT) which would enhance its value by fencing off the area and securing its proper management as a wildlife reserve. The Council raised concerns about the proximity of a main spine road to the south west corner of the SSSI but this could easily be addressed at the detailed stage, as a revised plan shows. I consider that subject to retention of the important hedge (Hedge 1) running east west across the middle of the site, which already has one break, would ensure that danger of colonisation from ruderal or windblown species would be little different from now.

3.2.4.44 English Nature had objected to the proposals, apparently because of their adverse effect on another area of local nature conservation interest immediately to the south of the SSSI, which the Council indicated had been put forward as a SINC. The designation of such areas is undertaken by a panel led by the County Council, and had not been finalised during the inquiry. I deal with the objections to the application of Policy L9A to as yet undesignated SINCS in section 10.9 of the report. The area comprises a mixture of calcareous grassland and scrub on the steeply sloping east side of the valley, with a generally more open

nature than the SSSI. The area is contiguous with the railway embankment but this link would be severed by the main entrance road from Hammersley Lane, which turns north to link into the main part of the site. The development proposals shown on the objectors' masterplan would result in the loss of about 1.1 ha out of the 2.5ha of the proposed SINC to mixed-use development at its southern end.

3.2.4.45 The witnesses at the inquiry disputed the ecological value of the proposed SINC, where the grassland is also under threat from scrub colonisation. I saw that this is particularly the case in the northern half of the land, but the loss of the more open area would be a significant disadvantage of the scheme. This loss would be offset by the addition of 0.9 ha further up the slope and the prospect of better management of this area with regard to nature conservation interests. The Council acknowledged that the proposed SINC would deteriorate over the life of the Plan, but this may be averted if grants for sympathetic management were taken up.

3.2.4.46 The site also contains a number of hedgerows, Little Gomm Wood and Pimms Grove, all of which are known to be the site of a number of badger setts. In general these areas would be undisturbed. While some of the foraging area would be lost, other ground would be gained in the new park. The revision to the Masterplan might avert the need to move a sett in the middle of Hedge 1. Tunnels would be necessary to protect known runs, but I believe that the scheme need not impinge on this protected species to an undue extent. Another important hedgerow (Hedge 2,4,6) running north-south and linking across the middle of site to the SSSI would be retained. The Council accepted that effects on other fauna, such as birds and reptiles in the southern part of the proposed SINC, would not be so serious as to prevent the type of development proposed. Gomm Wood could also be retained.

3.2.4.47 In summary, I find the issue of ecological impact finely balanced. I have borne in mind the point that the Council accepts through the ASL allocation that development may take place on the site at some time in the future in any event. I consider there would be no adverse effect on the SSSI. The unfortunate loss of a significant area of the best calcareous grassland would be offset to some extent by proper management of the proposed nature reserve and the creation of the Gomm Valley Park, which would have nature conservation as well as leisure benefits. Some of the concerns of English Nature, except the separation from the railway embankment, which would not be critical, could be addressed. I have concluded therefore that while the concerns about ecology may weigh against the site in comparison with others, they would not fundamentally preclude the development of the area in broadly the manner proposed by Axa in the long term.

#### Landscape

3.2.4.48 The site comprises a dry valley which drops from the Chilterns plateau at its northern end quite steeply to the lower Wye valley floor to the south. The very attractive area of predominantly rural character has distinctive rolling topography, with relatively steeply sloping sides in the lower half. At present a significant part of the valley is farmed as arable land, but the area also includes two woods, a number of hedges and an area of unfarmed grassland and scrub on the eastern side, which includes the SSSI.

3.2.4.49 The Council's landscape consultants classified the whole site as value class 1 in their comparative site assessment exercise (CD/I/12). The objectors pointed to flaws in the methodology of this assessment, particularly with the weighting given to the value of nationally classified AONB landscapes. While I share their concerns with regard to the value of Grange Farm in particular, I consider the combination of attributes found in the Gomm Valley create an overall impression of very high landscape value, of comparable quality to much of the AONB itself. It meets the Council's criteria concerning distinctive visual quality, reasonable scale, well defined boundaries for designation as a Local Landscape Area, which I discuss in Section 10.3. The land also performs an important strategic role in separating the community of Tylers Green from the main urban area of High Wycombe. However, given its notation as an ASL, and the limited number of such sites to meet future needs in High Wycombe, I consider it would be

unrealistic to confirm the LLA designation.

3.2.4.50 The site is separated from the nearest boundary of the AONB by a thin ribbon of housing along Hammersley Lane, which was apparently an important factor in its exclusion when it was considered for AONB status in 1990. Nevertheless, to my eye the housing at Pimms Close and along Cock Lane forms a distinct edge to the east side of High Wycombe. By contrast, the smaller residential area to the south of Robinson Road, closer to the main valley bottom, appears as a separate self-contained block of development. Therefore the Gomm Valley as a whole relates more strongly visually to the open countryside to the east than the main urban area and is not seen as an isolated green wedge surrounded by suburbia.

3.2.4.51 The objectors argued that the complex topography of the ridges and valleys around High Wycombe created a similarly complex pattern of views of the site from surrounding areas. In general, hardly any of the valley can be seen from the AONB or green belt, while visibility from the north is limited to the Ashwells area. However, many parts of the site are prominent from Pimms Close, Hammersley Lane and Gomm Road. As the objectors' analysis and photographs showed, the whole of the large site is not visible from any location. Nevertheless, the main elements of the valley can be viewed from a number of locations on the other side of the Wye Valley as a vital component of the landscape structure of the town. The two spurs below Pimms Grove and the SSSI are particularly prominent. The objectors' proposals have deliberately kept these spurs free from development, much of which would be located in the valley floor. However, the new housing area would extend up the valley side towards Pimms Close in a location open to view from the south east. Even if well designed, development would require some cut and fill operations and the new buildings would be hard to screen, however extensive the landscaping. The incursion of development into the last substantial green finger feeding down to the valley would be glimpsed from the M40, and from a number of points on the side of the Wye valley directly opposite.

3.2.4.52 I note the Inspector's comments in reporting on objections to the previous Local Plan that suitable, sensibly designed development could be visually acceptable in this location. Those words are not absolutely prescriptive and the ASL designation on the Plan in itself implies that development may be acceptable at some future date. However, I consider that the extent of new built form would have a very serious adverse impact on the landscape of the valley, and would change the structure of the town for the worse. The employment and mixed-use elements of the scheme, and to a lesser extent, the park and ride facility, would detract from the attractive rural character of the site, adding to the intrusion of new buildings in the countryside. Much of the new housing would be more prominent, cutting across the rolling grassland and arable fields, destroying its very attractive rural character. While a green link to Kings Wood would be maintained, the essential character of the valley as a wide green finger defining the eastern edge of the town would be lost.

3.2.4.53 I have taken account of the objectors' point that the proposals concern only part of the whole ASL, substantial parts of which would remain undisturbed, or would be improved. However, my main concern is that the very high value of the whole dry tributary, a unique piece of countryside extending to the heart of the main valley floor, would be lost. I have concluded that this disadvantage detracts very substantially from the merits of the proposed allocations compared with other potential development sites.

Other matters

3.2.4.54 While the objectors proposals would lead to some danger of coalescence between High Wycombe and Tylers Green, the extent of development envisaged would not unduly compromise their separate community identity unchanged. I have no firm evidence that any archaeological remains would be adversely affected; if a survey were to indicate the possibility of any artifacts, proper investigations could be secured before development.

Conclusion

3.2.4.55 The objectors' proposals would help to overcome a substantial shortfall of

housing in the second half of the Plan period. However, the employment development of some 9,000 sq m, even as an extension to the Peregrine Business park would be unlikely to generate the critical momentum to provide the type of commercial resurgence envisaged in the Deposit plan proposals. Similarly, the park and ride scheme suffers from operational disadvantages which may preclude its implementation.

3.2.4.56 I have considered the need for the housing element of the proposals in comparison with other available sites in the High Wycombe area. With regard to the factors affecting this site, the site lies outside the green belt and has long been safeguarded for development at some future date. I have found that the site would offer a reasonable, but not outstanding, level of access to schools, shops and other community facilities. Allied to the recommended site at Wycombe Marsh, it would add to congestion on London Road, although in my view this would not be a critical constraint. There would inevitably be some adverse effects on the ecology of the whole valley. However, the SSSI would be protected within a nature reserve, which would include the other area of local ecological importance likely to be designated as a SINC. Subject to these elements of the proposals being incorporated into the development principles for the whole site, the wildlife interest of a managed nature reserve is likely to improve. Critically, however, I consider that the scheme put forward by the objectors, even though much development covers only the lower parts of the valley, would have a severely detrimental effect on a local landscape of considerable beauty and value. In this instance therefore I have identified sound reasons why Gomm Valley should not be allocated for development proceed during the life of this Plan.

## RECOMMENDATIONS

- H/2/4/4 No modification

PIMMS GROVE
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## The Objections

0378/9 George Wimpey PLC

### Summary of Objections

- (a) Site at Pimms Grove, Cock Lane should be allocated as a Policy H2 Housing site. It is physically well contained with a strong landscape framework. Site is level and could be developed if necessary independently of the more substantial Gomm Farm proposal.

## Inspector's Reasoning and conclusions

### Introduction

3.2.4.57 The objection site comprises Pimms Grove, a small mature broadleaf woodland, and some rough grassland, located at the south-west end of the Gomm Valley. The objectors seek a housing allocation on some 3 ha out of the total site of just under 7 ha, to accommodate about 100 dwellings. The proposal involves a new access to Cock Lane through the southern part of Pimms Grove, the rest of which would be retained as woodland, and expanded at its south eastern corner.

3.2.4.58 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are



set out in section 3.2 of the report above. This assessment takes into account the sequential approach to site selection as set out in PPG3 and Structure Plan policy to direct major new housing to the High Wycombe Urban area. The site falls within an area designated as an ASL on the Plan, outside the green belt and AONB. The Council did not dispute that the ASL designation meant that the site would be suitable for development at some stage; the issue was whether it was needed during the life of the Plan.

3.2.4.59 The proposal for this urban extension on previously undeveloped land has been assessed in comparison with other sites, including the larger Gomm Valley area. I concluded that the allocation of the land proposed by Axa, which retained this site as open land, should not take place in this Plan period, if not further into the future. My findings below have informed my own comparative site assessment, where I concluded that the site should not be allocated within the life of this Plan in place of other allocations proposed by the Council and an additional housing allocation at Terriers Farm.

#### Transportation

3.2.4.60 At present the site falls within PTAM Zone 4. There is a circuitous hourly bus service to the town centre from stops at Cock Lane. At the inquiry the objectors stated that they would be prepared to improve accessibility by giving financial support for the reinstatement of the half-hourly service on route 327, which had recently been stopped. However, they had not entered discussions with the operator and I find it hard to imagine that 100 extra dwellings would generate sufficient custom to tip the balance in favour of long term viability for this service. Much more frequent and direct bus services are available from London Road, but these stops are 600m from the centroid of the site. This is well beyond the normally accepted walking distance of 400m, although the quality of service available would be an incentive to walk further to a bus stop.

3.2.4.61 I agree with the Council's witness that the site is not particularly well related to community and commercial facilities. The nearest school is Marsh First, some 900m away from the centroid of the site on the other side of London Road. Other schools, including the nearest middle and secondary schools are further. The closest shops, including a post office, are 800m away on London Road, towards the town centre. The gradient between the site entrance on Cock Lane and London Road, 1 in 5 at its steepest, would be likely to discourage a significant number of walking trips, including those to better bus services. Similarly, no improvements to cycle routes are proposed, so that access to the east-west route along the valley floor is over the narrow bridge in Cock Lane down a steep gradient. On balance therefore I agree with the Council that the site would provide at best moderate accessibility to services for those without a car, and would lead to relatively high rates of car use by those with the opportunity to travel by this mode.

3.2.4.62 The proposed allocation for 100 houses would be likely to generate about 65 to 70 extra vehicle trips in the peak hour. Although not a serious impact on the wider road network, the extra traffic would have some marginal adverse effect on congestion London Road. The Council expressed concern that the access arrangements would not provide for a secondary means of access for emergency vehicles, as required to meet County Council standards. This could be provided to Cock Lane, at a cost of losing more woodland. I note that other highway authorities have a higher limit of dwellings up to which a single access, which in this case would be a short stretch of road through a wood, is acceptable. Given the ecological damage a second access would cause, I consider that a strong argument could be made for an exception in this case, if that were the only objection to development.

#### Ecology

3.2.4.63 It was agreed that the grassland where the housing is proposed is recently established on former arable land and has low ecological value. The access road would result in the loss of part of Pimms Grove, which the objectors say is largely an area of semi-mature ash planted or naturally generated in the latter half of the 20<sup>th</sup> century. However, about 0.1 ha

of ancient woodland containing 2 or 3 mature hazel coppice stools would be lost. This area does not contain any species not found elsewhere in the wood, nor would the viability of the remaining area be threatened. The objectors' proposals to move some of the vegetation and create an additional piece of woodland to the south east would be of some marginal benefit but several decades would pass before a similar woodland structure to that which would be lost would evolve. The impact of the new access on this small area of wood would be a disadvantage of allocating this area independently of the main Gomm valley ASL. However, I accept the objectors' point that this impact would be mitigated by translocation, new planting and better management, so that in the wider picture it should not preclude development on its own.

#### Landscape

3.2.4.64 The site comprises the western spur at the mouth of the Gomm Valley, with extensive views outwards to the south and east. The grass field slopes steeply away from Pimms Grove, which itself is a prominent feature in the landscape of this part of High Wycombe. As well as from the other side of the Wye valley, the site is also clearly visible from residential areas along the valley floor, for example from Kingsmead Road. The visual zone of influence extends up to and beyond the M40, to the south- eastern edge of Flackwell Heath.

3.2.4.65 In summary, the site is an integral and most important part of the Gomm Valley, which itself is a vital element of the landscape structure of the town and defines its eastern edge. Although some development in High Wycombe is set on the ridgelines and upper slopes of valleys, the Gomm valley is generally unspoilt, apart from the housing on the skyline in Pimms Close, and a less visually intrusive ribbon of dwellings, mostly bungalows, along Hammersley Lane. The sides of the valley remain intact and the only real incursion north of the railway is the Peregrine Business Park, which lies in the valley floor at a much lower level than most of the site. The Council has put forward a PIC to include the site within an area of local landscape importance, which I address in section 10.2.3.1 of the report.

3.2.4.66 The incursion of the access road through the wood would have some minor, but not critical, adverse visual impact. More seriously, I consider the housing development on the field would compromise the setting of the town by closing the mouth of the valley in a very prominent location. I accept that building on this site would not lead to problems of coalescence between Tylers Green and High Wycombe. However, as I have already said in my report on the Axa objections above, much of the structural value of the landscape derives from the integrity of a complete green finger stretching almost to the floor of the Wye valley itself. The scale of the proposed allocated 'nail' would be a significant encroachment into the whole, with a disproportionate level of visual intrusion, because of the prominent sloping ground. Although the proposed housing would be close to the existing urban area, it would break the pattern of development here for the worse.

3.2.4.67 In my view the landscape value of the Gomm valley is almost directly comparable with that of AONB. This factor contributed strongly to my own conclusion in comparing potential 'greenfield' housing sites outside the green belt that it should be not be one of the first ASLs to be developed. Even in circumstances where no further possibility of extra capacity within urban area was apparent, I think that other less prominent parts of the valley may be more suitable for development.

#### Other matters

3.2.4.68 The improved grassland is not an area of best and most valuable agricultural land, which poses no effective constraint. The site would not integrate particularly well with other housing to the west of Cock Lane, but residents would no doubt integrate into the wider community of High Wycombe as time progressed. However the lack of constraint in these respects does not overcome the strong planning reasons against allocation that I have already identified.

## Conclusion

3.2.4.69 I have found that the site lies in at best a moderate position with regard to accessibility to local schools, shops and other community and social facilities. The good public transport links along the London Road corridor are not within such easy reach on foot as to encourage significant numbers of trips other than by car. While the impact of development on the ecology of the site would not be significant, I consider the proposed housing allocation would have a severely adverse effect on a landscape of great local value, and the physical structure of the town generally.

## RECOMMENDATIONS

- H/2/4/5 No modification

### BOTTOM SW CORNER GOMM VALLEY

## The Objections

1207/7 Residents' Action Group on Gomm Valley

## Summary of Objections

- (a) 4 to 5 hectare site, completely enclosed on all sides by hedges, railway line and employment area, should be allocated for housing. Development would only have a small adverse affect on landscape value of valley as a whole. Site is within easy walking distance of shops and public transport, can be satisfactorily accessed and is on MAFF agricultural land classification 'moderate – 3B'.

## Inspector's Reasoning and conclusions

3.2.4.70 At the hearing dealing with this objection, the Action Group stated that it was **not** proposing development on the land being put forward by Wimpey in place of the proposal for housing on the Ashwells site as shown on the Deposit plan. The group sought the removal of the whole of the Gomm Valley from the designation as ASL, an objection I deal with in section 9.1 of my report. In any event I have covered the merits of any such proposal in my analysis of the Wimpey objections regarding the Pimms Grove site covering essentially the same area (see above).

## RECOMMENDATIONS

- H/2/4/6 No modification

### BUCKS FREE PRESS, GOMM ROAD

## The Objections

0465/2 Bucks Free Press

### Summary of Objections

- (a) Site is unsuitable for employment uses, being restricted in terms of its future layout due to topographical considerations and proximity to residential areas. Site is poorly related to transport network given the large number of commercial vehicles likely to visit the site. Site is isolated and not well related to other employment areas. Predominant use of land in the locality is no longer employment generating, given development of the land to the south by Guinness Trust. Site should be relocated for housing.

### Inspector's Reasoning and conclusions

3.2.4.71 This objection has not been withdrawn, although the Council has accepted that the site should be allocated for residential development. I deal with other objections against the housing allocation put forward in PIC3/4 in section 3.2.3 above, where I recommend in favour of the Council. It follows there that I agree with the substance of this objection and recommend modification of the plan accordingly.

### RECOMMENDATIONS

H/2/4/7 Modify the Plan in accordance with PIC3/4

DOWNLEY FARM BARNs & FIELDS
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### The Objections

0508/3 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) Site should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

### Inspector's Reasoning and conclusions

3.2.4.72 The site consists of a large irregularly shaped parcel of land at the north western edge of High Wycombe. The site is located in the green belt and the AONB and is outside any recognised settlement boundary.

3.2.4.73 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.74 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have

been approved or other exceptional circumstances exist. In this case the site continues to meet the green belt functions of preventing the spread of High Wycombe into the countryside to the north west of the town, whilst encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.4.75 PPG7, and also Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located on the Chiltern's plateau, which is typified by a pattern of sporadic housing on undulating small field separated by hedgerows and tracks. The site is in an exposed location and the introduction of a dense development form would be overbearing when compared to the more loose development pattern typical of this locality. Development of a site of this size would therefore have a significantly detrimental effect on the rural character of the AONB.

3.2.4.76 The complex of buildings at Downey Farm, which has been converted to a residential use, contains several listed buildings. The pattern of small fields that surrounds this complex forms a highly attractive setting for these buildings, the effect of which is exacerbated by the steep slope. The maintenance of this field pattern is of crucial importance in preserving the setting of these listed buildings and also forms a highly significant part of the Downley Conservation Area, which has a similarly open character. The introduction of a even a low density developed form to the site would destroy this field pattern, regardless of the standard of design, and the open nature of this part of the conservation area would be compromised. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt, the preservation of the natural beauty of the AONB and the protection of the historic environment.

## RECOMMENDATIONS

- H/2/4/8 No modification

GRANGE FARM AND WIDMER END FARM, HAZLEMERE
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### The Objections

0486/4	Frank Brunner
1141/18	Beazer Strategic Land
1320/1	Banner Homes
0571/18	Laing Homes Ltd

### Summary of Objections

- (a) Site should be developed as it is preferable to other sites allocated under Policy H2. Site has already been compromised and its development could relieve other areas of genuine value and beauty.
- (b) Consideration should be given to the release of the site during the Plan period, due to the constraints on other identified sites and concerns over their deliverability. Refer to Gillespies Landscape Assessment of the site which identified potential for development at Grange Farm, despite its AONB status.
- (c) Seek the inclusion of 7.3ha of Widmer Farm as a housing allocation (150 dwellings). The site is considered to be a more sustainable location than others designated. Although within the Area of Outstanding Natural Beauty, housing would be less visible than at other

sites and could be visually contained. The site would represent a logical extension of the existing settlement and has other advantages.

### **Inspector's Reasoning and conclusions**

3.2.4.77 Grange Farm is an extensive area of about 109 ha of undulating farmland located on the northern edge of High Wycombe, to the south of Hazlemere and Widmer End. The Banner Homes site is a small part of Grange Farm, in the south west corner adjacent to Kingshill Road. Widmer Farm comprises about 8.4 ha of land in the north-east corner of the larger site, adjoining the southern and western edges of Widmer End. The whole of Grange Farm is allocated as safeguarded land outside the green belt, carrying forward the designation of the previous Local Plan. In 1990, all the land up to the hedgerow along the southern boundary with Terriers Farm was designated as AONB.

#### Landscape quality

3.2.4.78 Government policy for the AONB is set out in PPG7, as clarified by Ministerial statement dated 13 June 2000. This re-iterated previous guidance that the landscape qualities of AONB are equivalent to those of the National Parks, and carry the same protection. Paragraph 4.5 of PPG7 sets out 3 criteria that should be taken into account when assessing applications for major development in the AONB, namely:

3.2.4.79 The need for the development in terms of national considerations and the impact of refusing it on the national economy

3.2.4.80 The cost and scope of developing elsewhere outside the area to meeting the need in some other way

3.2.4.81 The detrimental effect on the landscape and the extent to which it could be moderated.

3.2.4.82 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. This assessment takes into account the sequential approach to site selection as set out in PPG3 and Structure Plan policy to direct major new housing to the High Wycombe Urban area. It also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. In summary, I recommend the allocation of the sites proposed by the Council in the Plan as proposed to be changed, excluding Abbey Barn North, but including a new housing allocation at Terriers Farm, the site immediately adjoining Grange Farm to the south. I consider that these allocations would provide sufficient dwellings to allow the Plan to meet the Structure Plan housing requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.83 The allocation for housing of Grange Farm, which is large enough to provide up to 3000 dwellings at the minimum density recommended in PPG3, would certainly fall within the definition of major development. I have found that the housing needs of the District can be met without impinging on the AONB and I am unaware of any national considerations to justify building at this location. The Council's landscape assessment undertaken by Gillespies (CD//12) categorised the western part of Grange Farm as having 'a distinct and positive character with a cohesive structure and many special features which are of great importance and essential to conserve'. These include trees and hedgerows providing a high level of enclosure and visual diversity, a BNS on the boundary, a county archaeological site and part of a conservation area. However, as I discuss in more detail in section 9.1 of the report, the assessment of the eastern part of Grange Farm as being less distinctive does not reflect the designation of the land as AONB. This more open rolling arable farmland is attractive in a slightly different, but no less significant way.

3.2.4.84 In any event, the construction of a substantial number of new homes would

destroy the open rural character of the whole site, to its severe detriment. Many natural features would be lost, the fundamental rural character and beauty of the land would be destroyed forever and the mass of the development would also change the character of the adjoining AONB to the north, whence the new dwellings would be clearly visible. Essential infrastructure, including the new road described below would also have a severely detrimental impact on the landscape. I consider it would be impossible to mitigate the effects of development on this scale. I have concluded therefore that such an allocation would not comply with the criteria of PPG7 for the protection of the AONB during the life of this Plan.

#### Community identity

3.2.4.85 Although the settlement at Widmer End merges with Hazlemere to the south east, the open expanse of countryside at Grange Farm performs a pivotal role in separating this distinct community from the larger area of High Wycombe to the south west. Clearly, the loss of the gap between the two settlements would have some adverse impact and influence the perception of Widmer End residents in particular as having been 'swallowed up' by their larger neighbour of High Wycombe.

#### Agricultural land

3.2.4.86 About half the site is graded 3a agricultural land, which falls within the category of best and most versatile land. PPG7 states that where development of agricultural land is unavoidable, areas of poorer quality should be used unless sustainability considerations indicate otherwise. While the quality of the land may not preclude its use for new housing, the loss of such farmland is a disadvantage of any proposed housing allocation.

#### Ecology

3.2.4.87 I deal with the ecological value of Grange Farm in more detail in section 9.1 of the report, where I discuss objections to the continued designation of the site as safeguarded land. Much of the land is arable farmland with minimal wildlife interest. However, there are a number of features in the western half of the site which warrant protection. This factor should be taken into account in any comparative assessment of the merits of various sites for development in the future, beyond the life of this Plan.

#### Transport

3.2.4.88 Development on the scale envisaged would result in very considerable extra traffic in this sector of High Wycombe, which already suffers from severe congestion at peak hours. The Council state that in these circumstances significant new infrastructure would be required, including possibly the Hazlemere Diversion, a new road planned to run from the site across Kingshill Road and through countryside designated as green belt and AONB to Hughenden Road. I deal with objections to the safeguarded route, which was first mooted in 1969, in section 7.20 of the report. The analysis supporting the need for the route is contained in research by Halcrow Fox in Technical Note 31, which showed a significant projected increase in congestion index from 1.4 to 1.44, based on a development of 1100 houses plus employment (CD/M/40). The County Council's witness also put forward a view that the route would be useful in helping to relieve general traffic congestion along the Amersham Road (A404) and Hughenden Road corridors, as a useful addition to highway network. Programmed improvements to the A404 would not be sufficient to cope with the flows along the road, particularly if Grange Farm were to be developed at current density requirements of 30 dwellings per ha.

3.2.4.89 As I state in section 7.20, the road would have very considerable environmental impact. This adds significantly to the environmental cost of the potential allocation at Grange Farm.

#### Banner Homes

3.2.4.90 The site put forward for housing by Banner Homes is a relatively small part of the whole. At present it lies somewhat isolated from the main urban area of High Wycombe,

which lies to the south of the gap created by the grounds of Buckinghamshire Chilterns College. Even when Terriers Farm is developed, I believe the site would still be perceived as an outlying block of housing beyond the firm boundary of the town along Ladies Mile. The farm buildings of Terriers Farm and the adjoining house and nursery school would remain in place, creating a low density edge to the town. I consider the allocation of this site in isolation would be an extension of built form poorly related to the rest of the town. The accessibility index of this site is poor compared with Terriers Farm. It lies more than 400m from Amersham Road and bus services along Kingshill Road are relatively infrequent, with the first bus on weekday mornings arriving at 0930 hours. As a result of this outlying location, new residents would suffer from weak links with the existing communities at Widmer End or the main urban area at Terriers.

3.2.4.91 The new housing would appear as an intrusion in countryside which has been accorded the highest landscape value of AONB, with equivalent status to a National Park. To my mind there is a considerable degree of inconsistency in the designation of the site as both AONB and safeguarded land outside the green belt which may be suitable for the future expansion of High Wycombe at some future date. However, I note the comments of the Inspector reporting on the last Local Plan inquiry that this site would be one of last areas for further development. I recommend retaining the land with the 'safeguarded' notation as part of the wider area of Grange Farm, subject to a strategic policy review at a later date.

#### Widmer Farm

3.2.4.92 The objectors argued initially that the part of the site of Widmer Farm, extending to an agreed figure of 8.4ha, could be expected to provide about 150 dwellings if it were allocated for residential use. I note that land alongside the proposed access from North Road would not be developed to preserve the setting of the farmhouse, a listed building. The objectors propose that part of the site should be allocated for a playing field to serve an area wider than the site. Nevertheless, at the minimum density of 30 dw/ha set out in PPG3 the dwelling numbers appear to have been underestimated. In general housing policy terms, the site could be classified as an urban extension which should be considered only after the possibility to develop within the urban area, preferably on previously developed land, had been exhausted. I have already indicated, I consider there is no need to provide additional greenfield housing allocations on this scale in the High Wycombe area, other than the one at Terriers Farm. I deal with the relative merits of all possible sites, including Widmer Farm as a subdivision of Grange Farm, in section 3.2 above. The paragraphs below provide some more detailed reasoning that informed my comparative assessment.

#### Landscape quality

3.2.4.93 Clearly, the development of Widmer Farm would have a less significant impact on the landscape than building on the whole of Grange Farm. The objectors argued that allocation for housing should be considered entirely in a local, not national, context, referring to paragraph 4.5 of PPG7. They argued that the allocation of the site would not therefore constitute a major development in the context of the Ministerial statement of June 2000 to which the test of national need would apply. However, PPG3 identifies a threshold of 150 houses for Ministerial call-in cases, ratified in the relevant Direction which came into force on 17 October 2000. The revision to PPG7 specifically widens the tests to be applied to include 'major development, not just industrial or commercial development. I consider that by any reasonable interpretation of the relative scale of planning proposals, the construction of about 200 dwellings would result in environmental changes of sufficient significance for the scheme to be classified as a major development in the AONB under the terms of PPG7. In this context there is clearly no national need for the allocation, since other land outside the green belt and AONB is available to meet housing needs.

3.2.4.94 The examples of new housing in the AONB quoted by the objectors related to very different circumstances to those pertaining in this case. Firstly, the site in West Berkshire was withdrawn from the Local Plan after the Ministerial statement. The second case involved a



town completely washed over by the AONB, where presumably there was no alternative greenfield site outside the designation.

3.2.4.95 Most of the land in question comprises two relatively flat fields of rough grassland. In landscape terms, they form part of a wider area of the Chilterns plateau, characterised by medium to large fields, mainly arable, often with long views framed by deciduous woodland. The eastern field is reasonably well screened from views from the south by a strong deciduous hedgerow and a shallow ridge in the adjoining larger field, which the objectors did not propose for housing allocation during this plan period. The western field is more open to views through breaks in the hedgerow of ash trees along the southern boundary. Despite its different use, I consider that the Widmer Farm site is an integral part of the arable farmland covering more than half of the extensive area of Grange Farm. The Council's landscape assessment had concluded that this eastern part of the larger site could accommodate some change. The objector's landscape witness concurred with this view, arguing that the degree of harm to the AONB would not be great at this location. Central to this point was the loss of visual quality caused by the position of the site at the urban fringe, adjoined on two sides by suburban housing.

3.2.4.96 However, while the two halves of Grange Farm have a different character, they enjoy the same landscape status in national policy terms. The eastern section, including Widmer Farm, is more typical of the open rolling plateau than some of the more intimate landscape in the south western quadrant of the whole of the ASL land in particular. The value of these two different landscape types is to an extent a subjective matter, but in national and sub regional policy terms they should be treated the same. The urban edge is fairly well defined by boundary hedges, which limit the sense of intrusion. It follows a logical boundary which I believe would not be improved to any great advantage by a stronger line of planting around the edge of the proposed allocation. I have no doubt that the development of Widmer Farm would erode the rural beauty of the AONB, both through loss of the rural character of a significant area in itself and by extending the town further into the countryside. This would increase the separation of the area to the immediate south from the main expanse of the Chiltern plateau to the north-west. The adverse change in the landscape would be open to view from surrounding dwellings and users of the extensive footpath network within the site. The harm to the landscape would be a severe constraint to development in any comparative assessment.

#### Agricultural land

3.2.4.97 All of the site proposed for housing allocation is graded 3A in the MAFF land classification dated 1999. While this need not be an overriding constraint to development in the long term, particularly since the revision of advice in PPG7 about the value of such land in comparison with other factors, it nevertheless weighs against the allocation of the site in any comparative assessment of need in the short term.

#### Ecology

3.2.4.98 None of the site has any classification with regard to ecological interest. Although a small section of hedgerow may be lost, the overall balance of wildlife habitat in the much wider area would remain broadly unchanged. I see no fundamental constraint to development on ecological grounds.

#### Accessibility

3.2.4.99 The site falls at the edge of Zone 4 on the Council's Accessibility Map (Appendix 9 to the Plan). Two local schools are within easy walking distance (400 m). Within 470m are bus stops providing 2 buses into the town centre during the morning peak hour. Other services are available from the Hazlemere District centre, at Lodge Lane which is just under 1 km from the centre of the site. This centre has a reasonable range of shops to meet local needs,

although they are not within easy walking distance of the site for a return trip. The nearest shopping facilities within a reasonable walking distance, at Georges Hill, are much more limited. At present there are few employment opportunities near the site. There is a recreation ground with tennis court immediately west of the site, but in general most other leisure facilities are located in the town centre or further south. The local bus services during normal leisure time (evenings and weekends) are reduced to one bus each hour. In conclusion, bearing in mind the peripheral location of the site about 5km from the town centre, I do not think that this site meets the stringent criterion of PPG13 that new housing development should be 'highly accessible' to local services.

3.2.4.100 The objectors argued that the method of calculating the accessibility index of the site did not accurately reflect its true position as an urban location with relatively good access by foot and/or bus to a range of facilities. However, the Council's methodology was based on a generalised public transport journey time, which reflected travellers' aversion to walking to or waiting at a bus stop. Re-applying the same principles to suggested walk times, the Council calculated that the site fell within Zone 4 of the Accessibility Map, a finding consistent with the original analysis. I note that the Council's analysis has been applied to all other potential development areas, which would have to be re-assessed on the objector's basis to achieve a similar comparison. This point has not therefore altered my conclusion that the Widmer Farm site lies in a relatively inaccessible location compared with other potential sites in the High Wycombe urban area.

3.2.4.101 The objectors claimed that the development of 150 dwellings would have a marginal impact on congestion in the north-west sector of High Wycombe, bearing in mind the ease of access to local facilities in Hazlemere. From the Council's congestion indices and my own experience of travelling near the site during the long-running public inquiry, I treat this evidence with caution. Development at the density recommended in PPG3 would lead to higher traffic generation. Traffic delays on Kingshill Road and at the junction with Amersham Road can be severe at peak morning rush hour, when there is effectively no spare capacity on the main distributor roads into the town centre. The Council's policy to discourage rat-running through residential areas of High Wycombe will direct traffic from this proposed development onto Kingshill Road and would lead to worse congestion at the junction with Amersham Road.

#### Community identity

3.2.4.102 New housing on the site would have the advantage of building on the existing community at Widmer End. However the peripheral location of the land in relation to a variety of shops, services and community facilities would not greatly sustain local services. While the provision of more open space for the settlement would be welcome, this would be offset by the loss of an area used for informal recreation.

#### Other matters

3.2.4.103 I note that the site has been the subject of an application for it to be classified as a village green, which, if successful, may preclude further development. However, the outcome of that application is uncertain and I have to deal with this objection on its planning merits. I note that the area of Widmer End near the site lies within an area of open space deficiency at the 800m threshold. However, a playing field and tennis court lie immediately west of the site and the value of the existing footpaths for informal recreation would be seriously compromised by a new housing scheme. While the open space proposed by the objectors would be of some benefit, I consider therefore that it would not outweigh the other planning disadvantages of a new housing allocation at this location.

#### Conclusion

3.2.4.104 I for the same reasons as I have already identified with regard to the whole area of Grange Farm, I consider that the allocation of land within the AONB for housing allocation even on the smaller scale of Widmer Farm would not meet the requirements of the tests in PPG7 regarding national need. I consider that the difficulty of reconciling the status of the site

as both AONB and yet also a suitable location to meet the long term housing (and other development) needs of High Wycombe should be addressed at the next review of sub-regional policy. I also consider the site scores poorly in terms of accessibility to social/commercial facilities, which also adds to my conviction that it should not be allocated for housing in the life of this Plan.

## RECOMMENDATIONS

- H/2/4/9 No modification

GREEN FARM, HIGH WYCOMBE
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## The Objections

1578/4 M J Jeanes (Group) Ltd

### Summary of Objections

- (a) 50 acres of land at Green Farm, High Wycombe should be allocated for residential use under Policy H2, with further land adjoining as public open space. Allocations have been determined through an exercise which pre-dates the more recent and relevant government guidance on sustainability. There is an over provision of new housing in Princes Risborough. Provision should be increased in High Wycombe.

### Inspector's Reasoning and conclusions

3.2.4.105 The site is an irregularly shaped parcel of land located to the north of High Wycombe. The site is in the green belt and the AONB, and is outside any recognised settlement boundary.

3.2.4.106 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.107 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. The site is reasonably close to High Wycombe Town Centre and is relatively accessible by non car based transport. However, I consider that the identified housing sites perform better under sustainability criteria than this site, and so its release on these grounds could not be justified. Furthermore the use of safeguarded land rather than allowing the release of green belt land follows both national and local planning guidance on the protection of the green belt. The alteration of green belt boundaries should only take place following Structure Plan review or in exceptional circumstances, which I do not exist in this case. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet the green belt functions by preventing the spread of the north of High

Wycombe and the merging of High Wycombe with Hughenden Valley, preventing encroachment into the countryside and encouraging the development of urban land. Its development would therefore conflict with established policies to protect the green belt.

3.2.4.108 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located in an attractive valley that is visually linked to the rolling countryside to the north. The presence of a belt of trees to the north of the site helps to increase the feeling that the site is part of open countryside rather than providing any separation and the site helps to frame the Parks and Historic Gardens of Historical Interest to the north west. Extending the dense urban form of High Wycombe to the north would have a detrimental effect on the rural character of the AONB by breaking the link with the wider countryside beyond. For the reasons I have explained in section 7.20, I do not consider that the route of the proposed road link should be safeguarded in this Plan. Nonetheless, the allocation of the site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

### RECOMMENDATIONS

- H/2/4/10 No modification

HATTERS LANE SECONDARY SCHOOL

### The Objections

0818/5 Buckinghamshire County Council – Land & Property

### Summary of Objections

- (a) Object to Green Space designation on the frontage land to Hatters Lane Secondary School and propose that site be allocated for residential development. The land along the frontage does not form part of the useable playing fields and the adjacent land, and that opposite, is established residential development.

### Inspector's Reasoning and conclusions

3.2.4.109 The site comprises about 0.8 ha fronting Hatters Lane, but forms part of a larger green space, including playing fields, that extends to the north and east of the school. I deal with the value an objection to the green space designation in section 10.3, where I conclude that the space provides a good setting for the school buildings. I agree with the Inspector who considered a similar objection at the last Local Plan inquiry that the land performs a valuable function, as both informal open land available to school users and in part as a formal games court. It breaks up the suburban form of development along the street (see L3(3)) and its loss would be likely to exacerbate shortages of open space at the 400m and 800m threshold in two adjoining areas in a wider area.

### RECOMMENDATIONS

- H/2/4/11 No modification

HUNTS HILL & LE FLAIVE CENTRE, NAPHILL

## The Objections

1695/4 Mr A Rush

### Summary of Objections

- (a) Site should be allocated for either residential or commercial development, as it is sandwiched between existing housing development and an industrial estate.

### Inspector's Reasoning and conclusions

3.2.4.110 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.

3.2.4.111 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.

3.2.4.112 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

- H/2/4/12 No modification

LAND SOUTH OF HANDY CROSS JUNCTION
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## The Objections

1725/8 E R Foster

### Summary of Objections

- (a) Proposed that Handycross junction is moved a quarter of a mile south, and that the land between the old and new line of the motorway is used to build affordable housing.

### Inspector's Reasoning and conclusions

3.2.4.113 The site consists of land to the south of High Wycombe between the current location of the M40 and the River Thames. The site is located in the green belt and AONB and is outside any recognised settlement boundary.

3.2.4.114 In my discussion of the general housing strategy of the Plan, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.115 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet the green belt functions of preventing the spread of High Wycombe to the south and the merging of Marlow and High Wycombe, preventing encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.4.116 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. At the moment the M40 forms a defensible boundary between the south of High Wycombe and the open countryside that forms the AONB to the south of the motorway. The realignment of the motorway would take up a large area of this open countryside and have a devastating effect on the rural character of the AONB. As I have not been made aware of any intention to move the M40 in the course of current studies on improvements to Junction 4 (see T17(3)), and there is no justification on housing grounds, for the reasons I have set out above, the loss of such a large part of the AONB could not be justified. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

### RECOMMENDATIONS

- H/2/4/13 No modification

LAND AT LANE END ROAD, SANDS
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### The Objections

0010/4 Banner Homes

### Summary of Objections

- (a) Propose Lane End Road site for residential purposes, for low density housing which could engender highway and environmental improvements. The site is of average to poor agricultural grade and the Council has confirmed (in identifying the site as safeguarded

land) that it may be required to meet longer term development needs and that it is capable of development. Propose a residential capacity of 150 dwellings.

### **Inspector's Reasoning and conclusions**

#### Introduction

3.2.4.117 The objection site comprises 9.7 ha of land at the western edge of High Wycombe. It is divided into two roughly equally sized pasture fields separated by a low hedge, with a group of farm buildings at the northern end. The land is crossed by an overhead power line running south-east to north-west across the northern field.

3.2.4.118 This section of the report concerns the objection to the omission of the site as a housing allocation under Policy H2 of the plan. I deal with other objections concerning the suggested allocation of an employment area in section 4.2 and to the safeguarded land designation by other objectors in section 9.1.

3.2.4.119 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. This assessment takes into account the sequential approach to site selection as set out in PPG3 and Structure Plan policy to direct major new housing to the High Wycombe Urban area. The site falls within an area designated as an ASL on the Plan, outside the green belt. However, apart from a narrow strip at the northern end of the site, classified as a LLA, most of the site lies within the Chilterns AONB.

3.2.4.120 The proposal for this urban extension on previously undeveloped land has been assessed together with other sites, including other ASLs and land within the main urban areas of the District. My findings below have informed my own comparative site assessment, where I concluded that the site should not be allocated within the life of this Plan in place of other allocations proposed by the Council and an additional housing allocation at Terriers Farm.

#### Landscape

3.2.4.121 Government policy for the AONB is set out in PPG7, as clarified by Ministerial statement dated 13 June 2000. This re-iterated previous guidance that the landscape qualities of AONB are equivalent to those of the National Parks, and carry the same protection. Paragraph 4.5 of PPG7 sets out 3 criteria that should be taken into account when assessing applications for major development in the AONB, namely:

- The need for the development in terms of national considerations and the impact of refusing it on the national economy
- The cost and scope of developing elsewhere outside the area to meeting the need in some other way
- The detrimental effect on the landscape and the extent to which it could be moderated.

3.2.4.122 The Lane End Road site is a site of nearly double the threshold size of 5 ha which the Secretary of State has set for referral to him before new greenfield housing schemes can be approved. The proposed allocation would provide about 300 dwellings at the minimum density set out in paragraph 58 of PPG3, although the objectors have put forward an illustrative plan which shows a layout for about 150 dwellings and an area of open space alongside the adjoining woodland to the west. I consider therefore that there are strong grounds to argue that development on this scale could be considered major in the context of the test of outlined in PPG7 for development in the AONB.

3.2.4.123 Whether the need to meet Structure Plan housing requirements reflects a national need in my view is very doubtful, since such need is at its highest sub-regional. The

Council did not dispute that the ASL designation meant that the site would be suitable for development at some stage; the issue was whether it was needed during the life of the Plan. However, I consider the argument of other objectors that the safeguarded land designation is inconsistent with government and strategic policy to protect the AONB has much force. This dichotomy, which in essence concerns the relative weight to be attached to green belt and AONB policies, is beyond the scope of resolution in my report on this Plan. I suggest the proper forum to address the matter should be at the next Structure Plan review.

3.2.4.124 In any event, the construction of a substantial number of new homes, however well designed, would destroy the open rural character of the whole site, to its severe detriment. Although the character of the woodland of the adjoining AONB to the west would be unchanged, the new dwellings would be clearly visible from Lane End Road and the elevated housing area to the east, even in summer. The site is typical of other shallow dry valleys in the Chilterns, and is particularly valuable as an attractive open setting for the western edge of High Wycombe, which would be lost. I consider it would be impossible to mitigate the effects of development on this scale. I have concluded therefore that such a residential allocation would not comply with the criteria of PPG7 or Policy LS2 of the Structure Plan for the protection of the AONB. I have accorded this critical constraint considerable weight in my comparative assessment of sites, and their ranking of suitability to meet the projected shortfall of housing during the life of this Plan.

#### Transportation

3.2.4.125 The site lies within Zone 5 on the Accessibility Map appended to the Plan. Sands Industrial Estate, providing a range of employment opportunities, adjoins the site. However, access for those without a car to schools, shops, and social, community and leisure facilities is poor at present. The nearest bus services at the time of the inquiry were the 315 and 326, which stop about 1km away at the Hour Glass public house, well beyond normal walking distance. These routes provided a service between Booker and Micklefield via the town centre every 15 minutes during the day in the week and hourly between Lane End and Bourne End in the evenings. The objectors argued that the development proposed would provide funding for public transport improvements. However, the Council's description of a 'deeply unenthusiastic' attitude of the local bus operator appears accurate. The letter from Arriva dated 8 August 2001 indicates the considerable level of annual subsidy needed to provide a 15 minute service to and from the site. In these circumstances the long term viability of an adequate service must be questionable at best.

3.2.4.126 There is a single shop about 800m from the site on foot and a parade at Mentmore Road over 1km on foot, uphill. The nearest school is about 1170m away by road. Overall therefore I consider that the site has poor accessibility to most facilities, either on foot or by public transport.

3.2.4.127 The objectors have suggested that access to the site should be from a new roundabout on Lane End road, which would have the advantage of slowing down traffic as it entered the urban area. Satisfactory arrangements for the nearby access to the industrial estate could be accommodated in this proposed layout. The Council expressed concerns that the sightlines required for the safe operation of this new entrance would entail considerable loss of the hedgerow along the site frontage, to the detriment of the AONB. However, I note that this would be lost if a longstanding proposal for a road improvement here were to be implemented. The loss of vegetation would be unfortunate, but could be mitigated in time by replanting on a regraded embankment.

#### Agricultural land

3.2.4.128 The site was assessed by MAFF as having a small percentage of Grade 4 land, 33% Grade 3b and 58% grade 3a. The objectors' survey indicated that all the land bar a similar small area of Grade 4 was Grade 3b. The main difference between these results appeared to derive from an estimate of the proportion of large stones near the surface. Both



surveys appeared to employ similar methods of sampling and the same number of trial holes/pits. Without more detailed evidence, I have assumed that the position lies somewhere between the two estimates, which would lead to a conclusion that the site contained a substantial proportion, maybe about one third, of Grade 3a land. Bearing in mind the revised advice of PPG7 about the need to consider agricultural land quality in the round with other site selection factors, I consider the loss of some 3-4 ha of good quality agricultural land from a small holding would not be a critical constraint in this instance.

Other matters

3.2.4.129 The Council did not raise any real concerns that development would have any serious ecological consequences. There was some discussion at the inquiry about the costs and procedures for re-aligning or removing the overhead power lines. Such works may prove expensive, but would not make the housing scheme unviable. If necessary legal agreements could not be obtained, I have no reason to question that the retention of the lines would be an overriding constraint on development.

## RECOMMENDATIONS

H/2/4/14 No modification

OAK FELL DOWNLEY
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## The Objections

0508/4 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

## Summary of Objections

(a) The site is a single building plot and should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

## Inspector's Reasoning and conclusions

3.2.4.130 The site consists of a small square parcel of land on Downley Common to the north of High Wycombe. The site is within the green belt and AONB but outside any recognised settlement boundary.

3.2.4.131 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.132 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5

and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet the green belt functions of preventing the spread of High Wycombe, the merging of Downley with Naphill, protecting the countryside to the north of High Wycombe from encroachment and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.4.133 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is part of a garden between two fairly isolated houses at the end of an unmade track in an area of open common land. Although construction of a new building on the site would be between two existing properties, this would not be in keeping with the loose knit nature of Downey Common, and this increase in density would have a detrimental effect on the rural character of the AONB. The site therefore would not be appropriate for infill. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

### RECOMMENDATIONS

- H/2/4/15 No Modification

SOUTH OF BOOKER AIRFIELD
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### The Objections

1935/8            Anthea Hardy

### Summary of Objections

- (a) Propose a new village on land south of Booker Airpark; and area which has no particular landscape value, with a motorway running through it. The Council's lease to the airport falls in 2014, when that area might be included for more industry. Airport causes much annoyance in the AONB.

### Inspector's Reasoning and conclusions

3.2.4.134        The site comprises the Booker Airpark and an extensive area of countryside to the north of the airpark and the M40, extending in total to about 185 ha. The objector proposes new development over much of this area, to incorporate: a new manufacturing estate on the airpark with a business park to the north; a new major road linking Clay Lane with the Sands industrial area via a new M40 interchange; and a new village with school and open space to the north of the M40. The Air Park is allocated as a Major Developed Site in the green belt; the rest of the site falls within the green belt and AONB. I deal with the broad thrust of the proposals here, but summarise the employment aspects in section 4.2 of the report.

3.2.4.135        In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met,

together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.136 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. Clearly this is a bold proposal for what would be a large satellite settlement separated from High Wycombe by a substantial area of retained woodland. The site falls within Accessibility Zone 5 (see Appendix 9 of the Plan) but would generate new requirements for public transport services that would significantly alter existing patterns of provision. However, even in that context the site is not well located with reference to existing routes and in my opinion is not likely to demonstrate a high level of sustainability to support this argument.

3.2.4.137 Most importantly, a key feature of the green belt is its permanence. PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. Policy E3 of RPG9 confirms that there is no case for reviewing green belt boundaries in the light of the regional strategy. A comprehensive scheme such as this could well have ramifications for regional transport and housing strategies. I consider that housing needs can be met from the existing urban area and safeguarded or other land outside the green belt. The site continues to meet the green belt functions of preventing the spread of the west side of High Wycombe, preventing the merger of High Wycombe with Lane End, protecting the countryside from encroachment and encouraging the development of urban land.

3.2.4.138 The new housing area falls entirely within an unspoilt area of rolling Chilterns plateau to the west of Booker Common, Spring Coppice, High Barbers Wood and Sunter's Wood. The attractive part of the incised dip slope is typical of the countryside around High Wycombe. Government policy for the AONB is set out in PPG7, as clarified by Ministerial statement dated 13 June 2000. This re-iterated previous guidance that the landscape qualities of AONB are equivalent to those of the National Parks, and carry the same protection. Paragraph 4.5 of PPG7 sets out 3 criteria that should be taken into account when assessing applications for major development in the AONB, namely:

- The need for the development in terms of national considerations and the impact of refusing it on the national economy
- The cost and scope of developing elsewhere outside the area to meeting the need in some other way
- The detrimental effect on the landscape and the extent to which it could be moderated.

3.2.4.139 By any measure this proposal would qualify as a major development in the context of the test of outlined in PPG7 for development in the AONB. Whether the need to meet Structure Plan housing requirements reflects a national need in my view is very doubtful, since such need is at its highest sub-regional. The construction of a substantial number of new homes, however well designed, would destroy the open rural character of the whole site, to its severe detriment. The new dwellings would be visible over a wide area and would have a major adverse effect on a substantial tract of AONB countryside. It would clearly be impossible to mitigate the effects of development on this scale. I note the objector's comment that the area has less visual interest than the Gomm Valley area of safeguarded land. However, the facts are that the site has been classified as being of national landscape significance, to which very strong policies for its protection apply. I have concluded therefore that such a residential allocation would not comply with the criteria of PPG7 or Policy LS2 of the Structure Plan. This

factor and the need to retain permanent boundaries to the green belt are compelling reasons to recommend against the objection.

3.2.4.140 I have dealt with the general planning principles raised by this objection, rather than detailed matters. A comprehensive scheme of this nature would undoubtedly raise a number of another issues, such as the technical feasibility of the new junction so very close to J4 on the M40, which were not explored in any depth at the hearing.

## RECOMMENDATIONS

- H/2/4/15 No modification

TREMARTYN, TYLERS GREEN
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## The Objections

0708/1 Mr & Mrs C G Jamison, Mrs C Leslie & Others

## Summary of Objections

- (a) Site should be allocated for relatively low density housing. Site is already in residential use and has further planning permission, it is within and well related to the existing pattern of settlement, surrounded by housing and is well contained.

## Inspector's Reasoning and conclusions

3.2.4.141 The main part of the site comprises a dwelling known as Tremartyn, set on the west side of Hammersley Lane, and its garden, together with an area of paddock land and a small wood. The site is within the green belt and abuts the AONB, which extends to the east on the opposite side of the lane.

3.2.4.142 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.4.143 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. Even though the site is located at the edge of the urban area of Hazlemere/Penn/Tylers green, it falls within Accessibility Zone 4 (see Appendix 9 of the Plan) At the time of the hearing a bus service ran every half hour from a stop within 400m of the site to and from High Wycombe town centre. There are schools within a reasonable walking distance, although there was pressure for places, and Tylers Green has some local shops, a public house nearby and community facilities. However, these are no extensive nor so easily reachable on foot that the site can demonstrate a sufficient degree of sustainability to support this argument.

3.2.4.144 A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved

or other exceptional circumstances exist. The land was included in the green belt in 1988, albeit against the recommendation of the inspector at that time. I note that a subsequent objection to the inclusion of the site in the green belt at the 1993 local plan inquiry was not upheld.

3.2.4.145 The objector argued that the site did not fulfil a green belt function, being divorced from the surrounding countryside to the east. However, I consider the site retains a rural, rather than suburban character, partly because of the openness of the paddock land and the vegetation, including protected trees. The site is reasonably contained, but the lack of visual objection does not set aside the strong policy objective of keeping the green belt free from further development. In this case the site continues to meet the green belt functions of preventing the spread of Tylers Green, protecting the countryside from encroachment and encouraging the development of urban land. Although the Local Plan inquiry is the appropriate forum to discuss matters such as minor revision to green belt boundaries, to agree to changes in the absence of very special circumstances would undermine the effectiveness of the policy in the future.

3.2.4.146 The Council also raise an issue concerning the suitability of potential access to the site. Certainly the access to Hammersley Lane has restricted visibility, due to the hedge along the site frontage and other property boundaries, including the front wall of Sheppards Cottage. However, the required sightline of 4.5 by 90 m may be achievable through use of third party land; alternatively, access may be obtainable to the west via Wheelers Avenue. I consider neither this potential difficulty, nor the addition of extra traffic onto the local network generally, need be an insurmountable obstacle to development. However, in the current policy context, the conflict with green belt policy is a fundamental reason not to allocate the site for residential development.

## **RECOMMENDATIONS**

H/2/4/16                      No modification

## **PROPOSED SITES: PRINCES RISBOROUGH**

LAND OFF SUMMERLEYS ROAD, PRINCES RISBOROUGH

### **The Objections**

1320/10            Banner Homes

### **Summary of Objections**

(a) Land off Summerleys Road, is a better alternative which is available in the town, to developing Park Mill Farm which is on high grade agricultural land. Planning benefit could be gained from developing a cluster of small sites within the town. A site specific allocation with potential for approximately 100 dwellings on land off Summerleys Road should be made.

### **Inspector's Reasoning and conclusions**

3.2.5.1     In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. My findings on this site as set out below have informed my own comparative assessment of competing sites. This takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with the proposal for a major allocation at Park Mill Farm, which I recommend should go ahead. I consider that these recommended allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of Princes Risborough.

3.2.5.2     The site comprises about 10 ha of land to the west of Princes Risborough between the main railway line to Birmingham and Summerleys Road. I have dealt with objections concerning the western half of the site as a business park in section 4.2 of my report below.

3.2.5.3     The site does not lie within the green belt or the AONB, but in my view building here would not constitute a logical urban extension to the fabric of Princes Risborough. The proposed housing would be located in an isolated position beyond the main urban area, which is defined by the branch railway line to Aylesbury and the bridges in Summerleys Lane. The development would appear as a poorly related satellite to the main body of the town, adding to the haphazard sprawl of development along the lane. The proposal would not meet the criterion of PPG3 concerning the development of community identity.

3.2.5.4     The centre of the site is about 1200m from the railway station, significantly further than the centre of the Park Mill Farm site, parts of which would be within relatively easy walking distance of the town centre. By contrast, the objection site is some distance from the facilities and better public transport in the town; these can be reached at present by a public footpath over a field, which has no lighting, or by road over a much longer route. The site is very poorly served by buses. Any form of subsidy to improve services would be expensive, and unlikely to be sustained in the long term.

3.2.5.5     The site has suffered from loss of rural character around the farm buildings as a consequence of the plant hire business operating from this part of the site. Although the Council's landscape assessment contains limited ecological survey data, the site has undoubted wildlife interest in the hedge along the road designated as a BNS, and in other features such as the pond and stream running through the middle of the site.

3.2.5.6 In summary, the poor location of the site in relation to the urban facilities and existing development at Princes Risborough, together with some loss of ecological features weigh against allocation. These disadvantages are in sufficient to give the site a higher ranking in comparative assessments than Park Mill Farm, despite the loss of high quality agricultural land at the latter.

### RECOMMENDATION

- H/2/5/1 No modification

HYPNOS SITE, STATION APPROACH
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### The Objections

0580/2                  Hypnos Ltd

### Summary of Objections

- (a) The continued use of the site for employment purposes is considered to be inappropriate, given the location of the site and state of the buildings. The site is more logically suited for residential purposes given the surrounding land uses and proximity to the station. A more dispersed pattern of housing development around Princes Risborough (as opposed to concentrated at Park Mill) will have a lesser impact on the settlement. Site is brownfield, and redevelopment would be wholly in accordance with Government guidance.

### Inspector's Reasoning and conclusions

3.2.5.7 I deal more fully with the objectors' proposal for redevelopment of their furniture factory with housing in section 4.4 of my report. In summary I concluded that there remained a strong need to retain the site for employment use. The site lies at the heart of one of the main employment areas in Princes Risborough, near the railway station and bus services. I agree with the Council that its redevelopment with housing would undermine the vitality of the area and could lead to further losses which would unbalance the provision of housing and employment in the town as a whole. The proximity of adjoining industrial premises, such as Whiteleaf Furniture, an unrestricted Class B2 use, would present difficulties in achieving a satisfactory residential environment if they were to continue with their current operations.

3.2.5.8 In the absence of employment need, the site would meet the tests of paragraph 31 of PPG3, in that it comprises previously developed land in an urban location with good access to public transport and a variety of commercial and community facilities by modes of transport other than the car. However, the loss of a number of jobs at this location is likely to lead to increased out commuting, weakening this argument.

### RECOMMENDATION

- H02/5/2 No modification

LAND OFF WILLIAMS WAY, LONGWICK

## The Objections

0378/13 George Wimpey PLC

### Summary of Objections

- (a) Object to the omission of land at Longwick for residential development, and seek the allocation of the site between the railway and the village for residential development. Site has previously been assessed favourably by the Council. Request allocation of the site for the development of up to 50 dwellings with open space and footpaths to link with existing village hall and playing fields.

### Inspector's Reasoning and conclusions

3.2.5.9 The site comprises an area of paddock land extending to about 3.4 ha, located immediately north west of housing in Williams Way and barn road. To the south west it is bounded by the London Oxford Birmingham railway. The site is shown without notation on the Proposals Map, but adjoins the residential area of Longwick, a settlement beyond the green belt and outside the AONB. The proposed allocation would be an expansion to the boundary of a village located some 3 km away from the town centre of Princes Risborough, well outside the urban area. I consider it could not therefore be classified as an urban extension in the context of the sequential test of PPG3. Self evidently, the allocation would not represent a development around a node in a good public transport corridor. I believe this lack of urban focus alone is a strong reason not to allocate the site, in a context where other sequentially preferable sites are available.

3.2.5.10 Paragraph 70 of PPG3 sets out the circumstances in which some additional housing in rural areas may be acceptable. In this case the local school is at or near capacity and there is no firm evidence that the limited retail and community services in the village are under threat. An affordable housing scheme has been completed recently and can be expected to have met the most urgent needs. There is no strong justification for further provision at a location with poor public transport accessibility (see below).

3.2.5.11 I note that Longwick has a limited number of facilities including a primary school (about 800m away by footpath) a post office (540m) and village hall (690m). These walking and cycling distances could be reduced in good weather and daylight by taking a shortcut through the adjoining recreation ground. There is a petrol filling station with shop at the Sportsman roundabout some 650 m away.

3.2.5.12 However, for most needs, including employment, residents of the village without a car would have to travel to Princes Risborough by cycle or bus. This would be a relatively short journey but at present there are 3 routes providing services to the town centre at infrequent intervals. One operates 3 journeys in the middle of the day at 2 hourly intervals; another makes one trip to and from the town and upper school on schooldays at 0826 returning 1547 hours. The third passes just over 500m from the site at 2 hourly intervals throughout the working day with a single return journey in the late evening. Given the frequency and routes of these services, I agree with the Council's assessment that the site suffers from poor public transport accessibility at present.

3.2.5.13 The objectors referred to potential contributions to support improved bus services. However, route 79, which would provide the only realistic option for improvement, appears to be very heavily subsidised at present. The extra dwellings at the site would add about 25% to the total in the village. Even if the developer's subsidy of a better service generated a disproportionate increase in passengers, it would continue to need extra support after the initial



5 year period which I appreciate would be difficult to justify.

3.2.5.14 Princes Risborough railway station would be served by bus only at two hourly intervals during the working day. Although the route by cycle is flat, as I saw for myself, it involves crossing the busy B4009 at a point where visibility is restricted by the railway bridge. I consider that cyclists would not find the route particularly attractive. I note that no residents cycled to work from Longwick at the time of the 1991 census. The residents of the proposed allocation would certainly not have easy access to the much wider range of facilities found in an urban area if they did not have access to a car.

3.2.5.15 The Council's witness was also concerned that the existing highway layout to be used to obtain access would not accommodate an emergency access. The provision of a further 100 dwellings without this facility would conflict with the highway authority's normal standards. A second exit could possibly be provided through the recreation ground adjoining the site to the north, but this could not be assured by the objectors. However, the highway configuration would meet the arrangement suggested in DB32 for developments larger than the 130 dwellings involved here if the two ends of Barn Road and Williams way were joined. The traffic generated by the housing would affect flows through the Sportsman roundabout, which is predicted to be near capacity by the end of the Plan period. However, there is scope to make any improvements necessary for the roundabout to cope with extra traffic. Therefore I consider that neither of these issues would be of such concern as to prevent development if all other aspects were satisfactory.

3.2.5.16 I acknowledge that the site is a flat field of little visual interest, well enclosed to outside views by adjoining housing and hedges. As a proportion of the existing housing stock, the addition of another 100 dwellings would be a very substantial, but not overwhelming, expansion of Longwick. However, although the village is based on a linear form, other development has taken place behind the High Street and I think that the proposed buildings would have no real adverse effect on the physical fabric of the settlement. Although half of the field is classified as grade 3A agricultural land, the loss of part of a small unit would not be a critical constraint. No ecological features of significance would be lost if it were developed for housing.

3.2.5.17 The objectors point to the benefit of obtaining the surety of providing affordable housing on an allocated site compared to windfall schemes. However, I agree with the Council that it would be inappropriate to meet any general need for such housing in a rural location, where residents are more likely to be dependent on a car.

3.2.5.18 In summary, I consider the proposed allocation would conflict with national housing and transportation policy in PPGs 3 and 13 which seek to direct new housing to sustainable urban locations and to discourage travel by private car. It would also conflict with Policy H3 of the Structure Plan, which seek a close relationship between jobs and housing in settlements outside the main urban areas.

## RECOMMENDATIONS

- H/2/5/3 No modification

LONGWICK ROAD, PRINCES RISBOROUGH
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## The Objections

1141/16            Beazer Strategic Land

## Summary of Objections

- (a) Propose provision of 12ha of housing development totalling approximately 300 dwellings. Suggested advantages of the site are common with a number of other sites in the area. Release of site with Park Mill Farm would provide comprehensive development opportunity and would be preferable to the release of the Oak Tree Farm Site.

## Inspector's Reasoning and conclusions

3.2.5.19 The site comprises about 15 ha of farmland to the north of Longwick Road and west of the branch railway line from Princes Risborough to Aylesbury. The land lies outside the green belt and the AONB. It effectively adjoins the settlement boundary for Princes Risborough, which runs along the railway and Longwick Road, to the south of which are the industrial estate and the northern end of the allocated Park Mill farm site. The proposal would therefore be classified as an urban extension under the sequential test of PPG3.

3.2.5.20 The site lies about 1 km or so from the facilities in Princes Risborough town centre, including the Tesco store which is just 500m from the site at its closest point. The nearest school is a middle school about 500m away. Some employment opportunities are available on the other side of Longwick Road. Monks Risborough station is about 500m from the site, but much more frequent services with 3 trains per hour to and from London are available from the main station some 2km away. A number of bus services pass along Longwick Road. The proposal would provide the opportunity for a new urban bus route through the site and linking the residential areas on the east side of the town with the south eastern end of the High Street and the station. In summary, the site performs reasonably well in accessibility terms, falling with Zone 4 on the Map in Appendix 9 of the Plan. However, it is further away from the town centre, leisure centre and main employment areas of the town (setting aside Longwick Road) than Park Mill Farm.

3.2.5.21 This point is relevant in considering highway capacity. The County Council's most up to date evidence to the inquiry at the sessions dealing with Park Mill Farm indicated that the maximum number of new dwellings off Longwick Road that could be allowed before traffic at the Tesco roundabout exceeded capacity would be 600. In that event the potential for another 600 dwellings at Park Mill Farm, many of which would be constructed beyond this Plan period, would leave no spare capacity for traffic from this site. Although the objectors point to the possibility of another access to Mill Lane, this would be less satisfactory for substantial traffic flows. In any event, much traffic from the site would inevitably gravitate south to the Tesco and the town centre via Longwick Road. In turn this would still overload the Tesco roundabout if both sites were developed, unless further potentially substantial improvements involving third party land were made.

3.2.5.22 The site is rather detached from the main fabric of Princes Risborough by the railway line, which runs on an embankment at this point. However, it does not fall within the national designation of AONB, nor has the land been classified as of local landscape interest on the Plan. Although the combination of fields makes a pleasant rural scene, I consider that quality of this parcel of countryside is not so great as to impose a critical constraint on development. The site is not open to particularly long views and the very gently rolling topography is unexceptional. I agree with the Council however that the flat, very open, arable landscape of Park Mill Farm is inherently less interesting than this site.

3.2.5.23 The site adjoins the northern boundary of Allscot Conservation Area, a compact group of cottages and a Lodge. Particular care would be needed to protect the character of the Conservation Area by providing a substantial break between new and existing buildings, possibly with extensive planting. While the allocation would lead to some spread of the town towards Longwick, enough of gap would remain to ensure that both communities retain their separate identities. I think the Council's concerns on this point are overstated; one is aware of the urban influence of the industrial estate when approaching or leaving the town and the housing proposed for this site would extend only marginally further to the west. In this respect

the site performs in a very similar way to Park Mill Farm.

3.2.5.24 The southern part of the site consists of primarily Grade 2 and 3a agricultural land, with the northern part classified in 1999 as Grade 3B. PPG7 advises that where possible, poorer quality land should be released before best and most versatile land such as the southern half of the site, unless sustainability considerations suggest otherwise. The loss of such land is a disadvantage, but the site has generally a lower quality of land than the allocated site at Park Mill Farm. Although this factor should be weighed in any balance of competing sites, I do not consider it to be an overriding constraint in this instance.

3.2.5.25 I note that there are 2 BNSs adjoining the site, along the railway line and at Kingsmead Meadow and Pond. Neither of these sites need be affected by an development proposals. Within the site itself the hedges and pasture fields contain little ecological interest.

3.2.5.26 In conclusion, the site performs reasonable well against the tests of PPG3 as an urban extension with moderate accessibility and no overriding physical constraints with regard to the quality of the landscape, agricultural land value or ecology. However, in the context of additional housing releases at Princes Risborough I believe the site does not perform as well as Park Mill Farm. The concurrent development of these two major sites would provide the possibility for some benefit through better public transport within the town. However, even with a secondary access via Mill Lane, traffic from the site would still gravitate towards the Tesco roundabout, which would be at capacity after development of Park Mill Farm alone. Crucially, there would be no need for this scale of development during the life of this Plan, for the reasons explained in section 3.2 above.

## RECOMMENDATIONS

- H/2/5/4 No modification

PRINCES ESTATE, PRINCES RISBOROUGH
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## The Objections

0037/3	Mrs E Macfarlane
0080/3	Bernard Andrew Hill
0129/5	Mr & Mrs B R Simpkin
0564/3	Edward W G France
0647/3	Mrs Frances Dunn
0933/3	Mr T B Skilbeck
0968/3	Mrs S J Rogers
1060/3	Hugh McGarel-Groves
1091/3	Jane McGarel Groves
1187/3	Francis Gomme
1808/3	Risborough Area Residents Association
1812/3	Peter H Thomson
1922/3	Mr D G Marr
2025/3	M P Oates

## Summary of Objections

- (a) Industrial estate is under-used and should be allocated for mixed use of 100-200 dwellings and industrial units. Site has access from Summerleys Road and is close to railway station. Existing schools can absorb additional children and sewage works are adequate. Site enjoys all the characteristics of a brownfield site. Site is ideally suited form a sustainability

view point and would strengthen the population on the west side of Princes Risborough, and provide an opportunity to improve the bus network and link in with Sustrans. Housing should be low cost housing.

### **Inspector's Reasoning and conclusions**

3.2.5.27 Planning permission for the redevelopment of the site with industrial units, including a new factory for Ercol, has been granted and construction is under way. These objections have been overtaken by events. It would not be appropriate for the remainder of the site to be developed for housing in close proximity to general industrial uses, which would be likely to create unsatisfactory living conditions for residents of the proposed dwellings. In any event the remaining area is very suitable for further modern business and industrial units, site for which in locations close to good public transport links, such as this, are in short supply.

### **RECOMMENDATIONS**

- H/2/5/5 No modification

RECTORY FARM AND MONKS RISBOROUGH SCHOOL
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### **The Objections**

1541/3 P Tapping

### **Summary of Objections**

- (a) Propose revision to Green Belt boundary and allocation of the land adjoining the east site of the Aylesbury Road between Monks Risborough School playing fields and Rectory Farm, for housing, thereby completing the infill to the bounds of the last house heading north out of the town.

### **Inspector's Reasoning and conclusions**

3.2.5.28 The objection site comprises a grass field immediately to the east of Aylesbury Road about 2.5km north of Princes Risborough town centre, between the school and Rectory Farm. The whole of the site lies within the green belt and AONB. My earlier comments about the need for more housing apply equally to this site. My conclusions as to how the required housing can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.5.29 In general terms housing development in the green belt conflicts with green belt policy in PPG2 and the sequential test for new housing locations in PPG3. Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. The site is further from the town centre than the allocated site and this argument does not apply. A key characteristic of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of Princes Risborough, encroachment into the countryside and encouraging the development of urban land. Its development would conflict with

established policies to protect the green belt.

3.2.5.30 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Construction of new buildings on the site would harm its rural character by intruding into this part of the AONB, which is an important component of the wider countryside stretching up to Whitleaf Hill beyond.

## RECOMMENDATIONS

- H/2/5/6 No modification

### LAND AT SUMMERLEYS ROAD

## The Objections

0955/2 R G Avery  
1435/2 Mr J P Avery

## Summary of Objections

- (a) Propose residential development in the countryside at Summerleys Road, to become an Established Residential Area, having the same right to back garden development as everyone else. Site joins existing residential frontage on Summerleys Road, which forms an identifiable ribbon of development extending from the built up area of Princes Risborough. Site is well contained on three sides by existing built forms and further enclosure could be achieved by appropriate planting without any harm to the character of the area.

## Inspector's Reasoning and conclusions

3.2.5.31 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with the proposal for a major allocation at Park Mill Farm, Princes Risborough, which I recommend should go ahead. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.5.32 The objectors propose residential development on land adjoining 117 Summerleys Road, which is shown on the Proposals Map as land outside the residential limits of Princes Risborough, to which countryside Policy C11 applies (see section 8.11 of my report). The site is too small for allocation as a housing site. The objectors propose that development should be allowed by allocating the land as an established residential zone under Policy H14 (to be replaced by existing residential area under PIC 3/32). I consider the proposal would result in an unsightly extension to the existing ribbon of development along the road, which would detract from the largely rural character of the area. The dwellings would be at least 1.5km from the railway station and considerably further on foot from the facilities of the town centre. The proposal would not therefore accord with government policy in PPGs 3 and 7 to direct new housing to sustainable urban locations and to protect the countryside.

## RECOMMENDATION

- H/2/5/7 No modification

WYCOMBE ROAD, PRINCES RISBOROUGH

### The Objections

0808/4 Linden Homes South East Ltd

### Summary of Objections

- (a) The settlement boundary of Princes Risborough should be extended to include the land to the south-west of Wycombe Road, to be allocated as a Policy H2 housing site. Allocation would represent a logical rounding off to the southern edge of Princes Risborough, whilst not having an adverse effect upon the character or amenity for the surrounding countryside. Site integrates well into existing urban fabric without any major barriers to movement and therefore the need for major engineering works, as on other allocated sites.

### Inspector's Reasoning and conclusions

3.2.5.33 The site comprises about 3.6 ha of land, split into 3 parcels, adjoining the southern boundary of the Princes Risborough urban area. About 1.1ha in the south east corner of the site, comprising the dwellings at 106 and 108 Wycombe Road and their gardens, lies within the AONB. The whole of the site falls within the green belt, which extends right up to the rear boundaries of dwellings fronting Wycombe Road, Poppy Road and Almond Way.

3.2.5.34 Paragraph 2.7 of PPG2 states that green belt boundaries should not be changed unless alterations to the Structure Plan have been approved, or other exceptional circumstances exist. The objectors referred to paragraph 68 of PPG3, which re-iterates government support for maintaining the green belt, but states that where they have been tightly drawn, its boundaries may be reviewed where new development would be the most sustainable of the available options. They argued that those circumstances were applicable here, because the site was at least as well or better located in relation to local services than the Council's preferred allocated site at Park Mill Farm.

3.2.5.35 The Council argued that although the boundaries of the green belt were drawn tightly on the east side of Princes Risborough, there was no such restriction on development to the west. Hence the proposal to expand the town by developing Park Mill Farm met government policy, while this allocation would not. The Structure Plan allows for a proportion of new housing requirements to be provided outside of the High Wycombe urban area. I would not necessarily expect therefore that any green belt site such as this should prove to be the most sustainable option in the whole District. However it should also have been compared with other sites elsewhere which might also be capable of meeting housing requirements outside the High Wycombe area, for example the Slate Meadow ASL. Also, I attach considerable weight to the clear indication in paragraph 68 of PPG3 that it is intended to apply in exceptional circumstances. Whatever the reasons for drawing the boundary on its current alignment, the availability of other sites outside the green belt seriously weakens the objectors' case.

3.2.5.36 The site falls within Zone 4 of the Council's Accessibility Map (Appendix 9 of the Plan). While the site is closer as the crow flies to the station than the centroid of Park Mill Farm, many future residents of the latter would have a shorter walk to most town centre facilities. The objection site is nearer to Hypnos and other employment opportunities near the station, but there is better access from Park Mill Farm to the new Ercol premises at Princes

Estate. The physical constraints of the high quality AONB landscape and low lying marshy land next to a water course would limit the scale of development to the vacant land, 1.8 ha. The value of the likely number of dwellings here (probably at the lower end of the quoted range of 50-90, would be unlikely to support any significant improvements to local bus services to improve accessibility, in contrast to the much larger Park Mill Farm site. In these circumstances I consider the argument that the site is in a more sustainable location than competing sites unproven.

3.2.5.37 In testing the site against other criteria of paragraph 31 of PPG3, I note from other representations that the sewage works at Princes Risborough is virtually at capacity, which may prove a constraint on development.

3.2.5.38 I note the objectors' arguments that the site has no strong visual link with the adjoining countryside, and fulfils no green belt function. However, the position now would appear no different from that in 1990, when a previous Inspector confirmed the retention of the site within the green belt. Although much of the site is overgrown, that condition and the extent of urban influence are not a reason to remove green belt designation, as paragraph 1.7 of PPG2 states. I consider the site continues to fulfil the green belt policy objective of preventing the outward spread of Princes Risborough into the countryside. To release the land from the green belt other than in the exceptional circumstances required by PPG2 and PPG3 would undermine the effectiveness of the policy and lead to pressure for further encroachment into the countryside that would be difficult to resist.

3.2.5.39 In conclusion, the site performs well other than against the green belt policy restriction. However, in my view it would not be a more sustainable housing location than the Park Mill Farm site, or possibly other sites elsewhere in the District. I consider that there are no exceptional circumstances to warrant the release of this green belt site in advance of a strategic policy review into the future extent of growth at Princes Risborough and the value of the green belt on its eastern side in relation to other sustainability objectives.

## **RECOMMENDATIONS**

- H/2/5/8 No modification

## **HOUSING DEVELOPMENT PROPOSALS - MARLOW AREA**

BERWICK ROAD, MARLOW

### **The Objections**

0840/38 Marlow and District Chamber of Trade & Commerce

### **Summary of Objections**

- (a) Allotment site should be allocated for residential. This would be a 'rounding off' and due to the rising land to the North West, can be developed without any detriment to the surrounding countryside. Not all the allotments are used, and can be relocated on adjacent land.

### **Inspector's Reasoning and conclusions**

3.2.6.1 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. However, taking into account the criteria set out in PPG3, and Policies H2 and H3 of the Structure Plan, I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. This site lies in a relatively accessible position in relation to local shopping and bus services to the town centre, and does not suffer from any significant physical or policy constraints.

3.2.6.2 The Structure Plan does not direct major housing development to Marlow, the boundaries of which are tightly constrained in most instances by the green belt and AONB. The Council originally identified two new housing sites at Portlands and Great Marlow School, subsequently deleting the school site at PIC stage. As I discuss in section 3.2.2 above, I considered in the context of an overall shortfall of housing in the District, a limited number of new dwellings at Marlow would be beneficial. I recommend the re-instatement of this allocation; although 'green' land, the site lies within the built up area of the town in a relatively accessible position with regard to local services. I have assessed other proposed housing sites in Marlow against this background.

3.2.6.3 The objection site comprises an area of allotments extending up the hillside adjoining the northern edge of Marlow, at the rear of houses fronting Berwick Road. It lies adjoining but outside the green belt and the AONB. As such a housing development on the site would be an urban extension, in the policy terms of PPG3 sequentially less preferable to sites within the built up area. Nevertheless, the Council acknowledge that it was a relatively highly performing site in its initial comparative site assessments with regard to factors such as accessibility by public transport (Zone 4) landscape impact and physical constraints.

3.2.6.4 The Plan allocates the land as green space to which Policy L3 applies. Although some of the allotments are vacant, the site continues to fulfil a useful role for informal recreation and the production of food. A substantial replacement area of allotment land would be required if it were allocated for development. Although there are trees along the east and west boundaries, these could be retained in any detailed housing layout, and the allotments have no strong landscape value. The site does have some ecological value as a foraging area and stepping stone for wildlife. On balance I consider the role of the land as allotments justifies the green space allocation in the absence of any strong need to allocate more land in Marlow for housing.



## RECOMMENDATIONS

H/2/6/1 No modification

KINGSLEY DRIVE, MARLOW BOTTOM

### The Objections

0557/2 Mr J Perkins

### Summary of Objections

- (a) Amend Green Belt boundary to allow the site to be developed for community/residential purposes, in order to meet the need of local organisations for new and permanent formal community facilities. Residential use represents enabling aspect of proposal.

### Inspector's Reasoning and conclusions

3.2.6.5 The objection site adjoins the western boundary of Marlow Bottom as shown on the Plan, within the green belt and AONB. In general terms the use of housing in the green belt as enabling development for community facilities conflicts with green belt policy in PPG2 and the broad thrust of housing policy in PPG3. This sets out a sequential test for new housing locations as follows: the re-use of previously developed land and buildings: urban extensions; and finally development around nodes in good public transport corridors. My earlier comments about the need for more housing apply equally to this site. While I identified a shortfall of allocated land to meet Structure Plan requirements to 2011, I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. Therefore I find no need to identify any additional land outside the main urban areas. Even if there were, the Plan safeguards other areas excluded from the green belt for possible development in the longer term. Building on this site would conflict with Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be small scale, located within settlements and consistent with other policies, such as those to protect the green belt.

3.2.6.6 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of Marlow Bottom, encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.6.7 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Construction of new buildings on the site would harm its rural character by intruding into the AONB, which is an integral part of the wider countryside beyond. Information submitted by the Guinness Trust in support of the objection indicates that about 20 affordable homes are envisaged. The proposed allocation for residential and community buildings on such a scale would lead to a sizeable new development easily visible from the urban area and footpaths to the west.

3.2.6.8 I note the objector's argument that there is a strong local need for more community facilities in Marlow Bottom, including a new church. However, I understand from the Council that there is a social club and village hall, together with the Pegasus public house, which also helps to meet the social needs of the village. I have no information about other alternative

possibilities that may be available within the built-up area. I therefore conclude that the community need for the facilities proposed is of insufficient weight to set aside the clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/6/2 No modification

LAND NORTH EAST OF MARLOW AND WEST OF BYPASS
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### The Objections

0840/47 Marlow and District Chamber of Trade & Commerce

### Summary of Objections

- (a) Propose area of land between housing (in North-East Marlow) and the by-pass for development. Whilst this area is designated as Area of Outstanding Natural Beauty and Green Belt, the reality is that it contributes little to these areas, being squeezed between housing and a motorway. Area should be allocated for residential or an hotel.

### Inspector's Reasoning and conclusions

3.2.6.9 The site is a triangular shaped area of about 6 ha located to the north east of the A404/A4155 interchange. My earlier comments in paragraphs 3.2.6.5-7 above apply to this site. In general terms new housing in the green belt conflicts with government policy in PPG2 and the broad thrust of housing policy in PPG3, which sets out a sequential test for new housing locations, giving priority to the re-use of previously developed land and buildings. Although I identified a shortfall of allocated land to meet Structure Plan requirements to 2011, I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. Therefore I find no need to identify any additional land outside the main urban areas. A new housing allocation on this site would conflict with Policy H5 of the Structure Plan, which requires such proposals in rural settlements to be small scale, located within settlements and consistent with other policies, such as those to protect the green belt.

3.2.6.10 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of Marlow, encroachment into the countryside and encouraging the development of urban land. I see no reason to take a different view about the future of the site than the Inspectors who considered similar objections at the two previous Local Plan inquiries, recommending that the site remain in the green belt. Its development would lead to a loss of openness of the green belt in conflict with established policies for its protection the green belt.

3.2.6.11 PPG7, reflected in Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is an attractive

open grass field sloping down from the north towards the A4155 and is highly visible from a number of local viewpoints, including Winter Hill on the other side of the River Thames. The northern part of the site in particular is an integral part of the open fields and woodlands on the plateau of the Chilterns beyond. Construction of new housing at the density required by PPG3 would create a major intrusion of built form into the AONB and would harm its rural character and appearance. The new development would be easily visible from many viewpoints, including the urban area and the main road to the east.

3.2.6.12 Similar arguments apply to the alternative suggestion of a hotel. There is no proven national need for another hotel at this location, especially since a new hotel is to be constructed nearby at the former Marlow Sewage Works site. This proposal, together with the hotel planned for the Wycombe Marsh site, are expected to meet District needs in the Plan period.

## RECOMMENDATIONS

- H/2/6/3 No modification

EAST OF WILTSHIRE ROAD, MARLOW BOTTOM
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### The Objections

1144/8 Mr R and Mr A Mash

### Summary of Objections

- (a) Propose land to the east of Wiltshire Road/Stapleton Close for housing. Site will require little highway improvements and provide environmental benefit to residents through soil bund and noise shadow reductions from the A404. Site would provide much needed housing in Marlow, will little effect on existing neighbours.

### Inspector's Reasoning and conclusions

3.2.6.13 From the representations the objection site lies to the east of Wiltshire Road and Stapleton Close, between the settlement boundary and the A404. It appears to cover part of the same area as the site put forward by the Marlow Chamber of Commerce. The land falls within the green belt and AONB and my earlier comments in this section above apply. In general terms new housing in the green belt conflicts with government policy in PPG2 and the broad thrust of housing policy in PPG3, which sets out a sequential test for new housing locations, giving priority to the re-use of previously developed land and buildings. Building on this site would conflict with Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be small scale, located within settlements and consistent with other policies, such as those to protect the green belt.

3.2.6.14 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of Marlow, encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.6.15 PPG7, reflected in Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Construction of new

buildings on the site would harm its rural character by intruding into the AONB. The proposed allocation for residential buildings would lead to a noticeable new development easily visible from the urban area and the main road to the east.

3.2.6.16 I have taken into account the objector's comments that the proposal would allow benefits to be provided in the form of measures to reduce noise from the A404. On the limited evidence before me of the likely effectiveness of such a proposal I consider that such improvements would not be sufficient to outweigh the harmful effects on housing and green belt policy and the landscape of the AONB.

### RECOMMENDATIONS

- H/2/6/4 No modification

## LAND ADJACENT TO SEYMOUR COURT ROAD, MARLOW

### The Objections

0840/42 Marlow and District Chamber of Trade & Commerce

### Summary of Objections

- (a) All or part of an area of land alongside Seymour Court Road could be designated for residential development without great detriment. Site is currently not well used.

### Inspector's Reasoning and conclusions

3.2.6.17 The site comprises about 2.2 ha of public open space on the east side of Seymour Court Road, within the urban area of Marlow. It is laid out as a playing field, with some play equipment. My earlier comments in this sub-section of the report in paragraphs 3.2.5.1-2 about the need for more housing in Marlow apply equally to this site. Policy H2 of the Structure Plan does not direct major housing development to Marlow, the boundaries of which are tightly constrained in most instances by the green belt and AONB. I consider that in the context of an overall shortfall of housing in the District, some growth at Marlow would be beneficial. I have recommended the re-instatement of the allocation at Great Marlow School; although 'green' land, this part of the school grounds site lies within the built up area of the town in a relatively accessible position with regard to local services. I have assessed other proposed housing sites in Marlow against this background.

3.2.6.18 In this case I agree with the Council that the site fulfils a useful green space function for formal games and informal recreation, which should be retained. It is of meaningful size, and accessible for public use. The land also performs some function as a green lung within the urban area, and contains some attractive trees along the northern boundary with Pinecroft. The loss of valuable open space in the absence of a local study showing it was no longer needed, or proposals for alternative provision, would conflict with recently revised government policy in PPG17.

### RECOMMENDATIONS

- H/2/6/5 No modification

REAR OF BT EXCHANGE, MARLOW

**The Objections**

0840/44 Marlow and District Chamber of Trade & Commerce

**Summary of Objections**

- (a) Propose land to the rear of the BT exchange in Dean Street, Marlow for development. This area has planning consent for 22 sheltered flats and should be shown as designated for residential.

**Inspector's Reasoning and conclusions**

3.2.6.19 The site has been developed with the housing scheme mentioned by the objector and is now occupied. The principle of residential use is firmly established and allocation would be unnecessary.

**RECOMMENDATIONS**

- H/2/6/6 No modification

LAND SOUTH OF SEYMOUR PLAIN, MARLOW

**The Objections**

0840/46 Marlow and District Chamber of Trade & Commerce

**Summary of Objections**

- (a) Three sites should be allocated for residential development, either together or separately.
- (b) The sites are part of the built up areas of Marlow and Seymour Plain. Closing the gap between these two parts of the settlement would have no detrimental impact on the surrounding countryside if existing tree belts were retained.

**Inspector's Reasoning and conclusions**

3.2.6.20 PPG7, reflected in Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted. In this case the sites would be capable of accommodating about 400 dwellings at the density recommended by PPG3. A major new development such as this could be allowed only if there were a proven national need that of such importance as to outweigh any adverse impact on the landscape. The sites are in a very prominent location near the top of the hillside overlooking Marlow and form an important part of the Chilterns plateau. Travelling up Oak Tree Road, the attractive fields provide a distinct edge to the town, which is quite distinct from the outlying group of houses a short distance to the north. New housing development would create a major intrusion of built form into the AONB and would harm its rural character and appearance. It would be highly visible from a number of local viewpoints, including Winter Hill on the other side of the River Thames valley to the south.

**RECOMMENDATIONS**

- H/2/6/7 No modification

LAND BETWEEN CHALKPIT LANE, SPINFIELD LANE, MARLOW

**The Objections**

0840/32 Marlow and District Chamber of Trade and Commerce

**Summary of Objections**

- (a) Propose large area of land between Chalkpit Lane and Spinfield Lane for residential development. Although designated as Attractive Landscape, the site is not particularly attractive and adds little to the countryside. Development would provide a large area of badly needed development with minimal impact on the environment and amenity.

**Inspector's Reasoning and conclusions**

3.2.6.21 The site comprises about 13 ha of land located outside the western edge of Marlow within the green belt. In general terms new housing in the green belt conflicts with government policy in PPG2 and in PPG3, which sets out a sequential test for new housing locations, giving priority to the re-use of previously developed land and buildings. The shortfall of allocated land to meet Structure Plan requirements to 2011 could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. Therefore I find no need to identify any additional land outside the main urban areas of the District. A new housing allocation on this site would conflict with Policy H5 of the Structure Plan, which requires such proposals in rural settlements to be small scale, located within settlements and consistent with other policies, such as those to protect the green belt.

3.2.6.22 Green belt sites may only be considered for housing in exceptional circumstances, for example where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of checking the western spread of Marlow, preventing encroachment into the countryside, maintaining an effective separation between Bovingdon Green and Forty Green, and encouraging the development of urban land. I see no reason to take a different view about the future of the site than the Inspectors who considered similar objections at the Local Plan inquiry in 1989, recommending that the site remain in the green belt. Its development would lead to a loss of openness of the green belt in conflict with established policies for its protection.

3.2.6.23 I deal fully with the objection to the designation of the site as an area of attractive landscape in Chapter 10.2 of my report. The area is one of four parts of the Thames Valley AAL as described by the County Council. The area retains a rural character and provides an important link between the two parts of the AONB lying to the north of Chalkpit Lane and south of Springfield Lane. Much of the very gently sloping land is open to view from roads and surrounding houses, except from the north. Development with housing would destroy the pleasant rural character of the area and its attractive open landscape quality.

**RECOMMENDATIONS**

- H/2/6/8 No modification

LAND AT SPINFIELD LANE AND ADJACENT TO BOVINGDON GREEN

**The Objections**

0731/2            Mr R Rockell  
1255/2            Mr P J Allen  
0840/34          Marlow and District Chamber of Trade & Commerce.

**Summary of Objections**

- (a) Site should be designated for residential use and the settlement boundary changed accordingly to create a more logical and defensible settlement boundary. The site is nominally an Area of Attractive Landscape, but is not particularly attractive.
- (b) Development of this area would be a rounding off and infilling of the built up area, without detriment to the landscape and would provide a useful addition to the developed areas.

**Inspector's Reasoning and conclusions**

3.2.6.24 The site put forward by the Chamber of Trade and Commerce (CTC) is located to the north of Spinfield Lane and lies adjacent to Bovington Green. It includes in the southern half 'Acres View', a bungalow set in a large open garden, and a strip of grassland, which are the subject of the objections by Messrs Rockell and Allen. Both parcels of the site adjoin the site of the previous objection by Marlow CTC, and the whole area lies within the green belt and an Area of Attractive Landscape (AAL). Once again, my earlier comments in paragraphs 3.2.5.21-23 above, the conflict of residential allocation with policies to protect the green belt, for the location of new housing and the conservation of the landscape apply equally to this site. In summary, there is no need for greenfield housing development at Marlow, particularly at a site such as this with poor public transport links to the rest of the town. Housing allocation would undermine the policy to retain the openness of a permanent green belt and would harm the appearance of an area of attractive landscape.

3.2.6.25 This site was part of a larger area put forward for housing and rejected when the previous Marlow Area Local Plan was scrutinised in 1989. Rather than rounding off the settlement boundary of Bovington Green, any new development would encroach onto the open countryside that separates the hamlet from Forty Green, potentially eroding its rural character. I note the Council's intentions to restrict infilling within the village, to help retain its open rural character. In my view development of this open site outside the clear edge of the village could not be considered infilling, which PPG7 defines as filling a small gap in a small group of houses. By contrast, it would erode the gap between two settlements, threatening their individual identity and undermining green belt policy.

**RECOMMENDATIONS**

- H/2/6/9      No modification

LAND AT HILL FARM, OFF NEW ROAD, MARLOW BOTTOM

**The Objections**

0840/52            Marlow and District Chamber of Trade and Commerce  
0937/4            Miss P M Kimber

## Summary of Objections

- (a) Propose land to the north of main part of Marlow Bottom, which is completely enclosed by existing residential development, for residential purposes. This area of land contributes nothing to the countryside or open nature of the environment due to it being enclosed and it could be developed with no detriment to the environment or amenity.
- (b) Policy H2 should be more flexible, allowing the allocation of other housing sites such as land at Hill Farm to satisfy market demand.

## Inspector's Reasoning and conclusions

3.2.6.26 The objection site comprises an overgrown grass field of about 1.4ha adjoining the northern boundary of Marlow Bottom as shown on the Plan, within the green belt and AONB. In general terms new housing in the green belt conflicts with government policy in PPG2 and in PPG3. This sets out a sequential test for new housing locations as follows: the re-use of previously developed land and buildings: urban extensions; and finally development around nodes in good public transport corridors. My earlier comments about the need for more housing on 'greenfield' land outside Marlow equally to this site. While I identified a shortfall of allocated land to meet Structure Plan requirements to 2011, I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. Therefore I find no need to identify any additional land outside the main urban areas. Even if there were, the Plan safeguards other areas excluded from the green belt for possible development in the longer term. Building on this site would conflict with Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be small scale, located within settlements and consistent with other policies, such as those to protect the green belt.

3.2.6.27 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. The argument that development would be a sensible 'rounding off' has not been successful in earlier appeal decisions, which have stressed the importance of retaining a permanent green belt where policy is applied consistently. In this case the site continues to meet green belt functions of preventing the spread of Marlow Bottom, encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.6.28 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Construction of new buildings on the site would harm its rural character by intruding into the AONB. Although the housing adjoining the site on two sides and the steeply sloping landform creates some sense of enclosure, the field links visually to and is an integral part of open countryside to the north beyond. Residential development would consolidate the appearance of the cluster of buildings at Hill Farm, which also lie within the green belt and AONB. The outward sprawl of development on this prominent site would be clearly visible from a number of viewpoints, including the footpath running along the southern boundary.

3.2.6.29 I note the objector's argument that there is a strong local need for more affordable housing in Marlow. However, the Council has other policies which seek to achieve such development, but the need is not so great as to outweigh established policies for the protection of the green belt and the AONB.

## RECOMMENDATIONS

- H/2/6/10 No modification



LAND OFF QUOITINGS DRIVE, MARLOW

### The Objections

0704/2                      Berkeley Homes (Chiltern) Ltd  
0840/36                    Marlow and District Chamber of Trade & Commerce

### Summary of Objections

- (a) The development of part of Quoitings would assist the Council in meeting its strategic housing land supply targets. There is doubt that other sites in Marlow will come forward. The site is available now.
- (b) The site is an unused area of land off the end of one of the existing residential roads and should be designated for housing.

### Inspector's Reasoning and conclusions

3.2.6.30 The objection site comprises part of the grounds of 'Quoitings', a recently demolished detached house, within the urban area of Marlow about 400m north west of the town centre, within the Conservation Area. The site of the house and eastern half of the garden is being redeveloped in the form of 9 two-bedroom apartments, a refurbished coach house and an extended summer house. The objectors propose an area of about 0.9ha for housing. This is divided into 2 parts, shown on Drawing CgMs01, Appendix 1 to the objector's representation No. CG/2485/P0001: an overgrown area in the western part of the site, notated scrub, which slopes quite steeply from the northern boundary to the south; and a relatively flat area of grass, notated paddock.

3.2.6.31 With regard to housing need, I identified a shortfall of allocated land to meet Structure Plan requirements to 2011. I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. Policy H2 of the Structure Plan does not direct major housing development to Marlow, the boundaries of which are tightly constrained in most instances by the green belt and AONB. However, I consider that in the context of an overall shortfall of housing in the District, some incremental/organic growth at Marlow within the settlement boundary would be beneficial.

3.2.6.32 I have recommended the re-instatement of the allocation at Great Marlow School; although 'green' land, this part of the school grounds site lies within the built up area of the town in a relatively accessible position with regard to local services. The Council argue that the Quoitings site should not be classified as previously developed land, because it but has always been separated from the garden of the house. However, it the objectors say the site falls within the curtilage of the former house and the two parcels proposed for development can be reached directly from the former croquet lawn. In general housing policy terms, I see little difference between this site and the school playing field. Both are 'green' sites within the urban area in more accessible locations than any possible urban extensions to Marlow, other than land that lies within the green belt and floodplain.

3.2.6.33 As Annex C to PPG3 says, the classification of a site as 'previously developed land' does not mean that all the available area should be developed. In this case some assessment of the value of the site as open space is necessary. The size of the site is meets the minimum for identified green spaces, although a substantial 'green' area would remain around the residential development now under construction. At present the land is privately owned and fulfils no public recreational role. The Council argue that it is visually accessible, but public views are limited to a view of the tree belt along the western boundary from the end of Quoitings Drive and a footpath that runs past the western edge of the school playing fields. From this aspect the site performs poorly as green space.

3.2.6.34 The Council argue that the allocated green space fulfils an important landscape function by linking with the school playing fields to the south to form an open buffer between the older part of the town and the suburban housing to the north. I acknowledge that the land to the south of the new buildings replacing Quoittings is particularly valuable in providing an open setting for buildings fronting Oxford Road, and for views from West Street. However, that separation would still be provided by the school field even if the site were developed, albeit in reduced scale. Similarly, the trees around the western and northern boundaries of the site could be retained and would continue to provide a backdrop to views from the town centre. The 'paddock' area of the site provides an important link in the chain of green spaces in this part of the Conservation Area, particularly with regard to the unbroken green area between west street and the new flats at Quoittings. However, I consider the western part of the site, notated 'scrub' on the objector's plan CgMs01, has far less significance in the overall open space network. Development on this area would come no nearer to the historic town centre than the dwellings along Quoittings Drive. I see no reason why the character and appearance of the Conservation Area should not be preserved by a sensitive development here, subject to high design standards and the retention of all protected and other mature trees.

3.2.6.35 I note that the kitchen garden area is not proposed for development, which is in any event precluded by a Section 106 obligation. Whether or not the school has a long term requirement for more playing fields, I have no firm evidence from the County Council of budget for such acquisition. I note that the 'scrub' land has no particular ecological interest, nor have any other planning objections to development been brought to my attention. In summary, I have concluded that the western part of the site has limited value as private open space. What role it has as a setting for the town centre is outweighed by the benefit of providing more housing in a relatively accessible location within the urban area of Marlow, for which there is a proven need to meet an overall shortfall within the District. However, the remaining developable area extends to about 0.72 ha, below the threshold the Council has identified for allocated sites under Policy H2. The area could be treated as an infill site once the boundary of the L3 designation has been modified.

## RECOMMENDATIONS

- H/2/6/11 Modify the Proposals Map to exclude the area notated 'scrub' on Drawing CgMs01, Appendix 1 to the objector's representation No. CG/2485/P0001 from the designation as open space to which Policy L3 applies.

UNITED REFORM CHURCH
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## The Objections

0840/40 Marlow and District Chamber of Trade and Commerce

## Summary of Objections

- (a) The United Reformed Church and poorly used surrounding area is known to be available, subject to certain work to the Church. Propose that part of Policy M6 designation, the area between the Church, the road and Platts car park, should be shown as allocated for residential.

## Inspector's Reasoning and conclusions

3.2.6.36 As I say in paragraph 6.18.2, the site is too small to justify a separate housing allocation, but some new dwellings could be provided as part of a mixed-use scheme at this

sustainable town centre location, as Policy M6 states.

### RECOMMENDATIONS

- H/2/6/12 No modification

## WESTHORPE CARAVAN PARK, MARLOW

### The Objections

1144/4 Mr R and Mr A Mash

### Summary of Objections

- (a) An alternative to low cost housing in Marlow (15-20 static dwellings) could be provided at Westhorpe Caravan Park.

### Inspector's Reasoning and conclusions

3.2.6.37 The site lies to the east of Marlow by-pass, within the green belt, where there is a presumption against new residential development, including additional permanent caravans. My earlier comments in this section about the policies to protect the green belt and the location of new housing apply to this site. In summary, there is no need for to use green belt land to provide more housing, including affordable housing, outside Marlow. The caravans would reduce the openness of the green belt, in conflict with one of its main purposes of preventing encroachment into the countryside. The permanence of the green belt is of the utmost importance and to change its boundaries here or to allow an extension to the park ij the absence of any exceptional circumstances would undermine the future effectiveness of the policy.

3.2.6.38 The need for affordable housing in Marlow can be met in part by a proportion of such dwellings on the two allocated sites, as required by Policy H11. The need is insufficient justification for allowing more development in the green belt.

### RECOMMENDATIONS

- H/2/6/13 No modification

## LAND ADJACENT GLORY MILL COTTAGE, WOOBURN

### The Objections

0348/3 Dawn Holdings SA

### Summary of Objections

- (a) Site is not suitable for agricultural use and an alternative use should be determined. Site should be excluded from the Green Belt or allocated as a housing site within the Green Belt.

### Inspector's Reasoning and conclusions

3.2.6.39 The site is comprises a small triangle of land extending to 0.2ha located at the end of a lane between the garden of a Glory Mill Cottage and the M40 motorway. The site lies within the green belt.

3.2.6.40 My earlier comments in this section about housing need apply equally to this site. In general terms new housing in the green belt conflicts with government policy in PPG2 and the broad thrust of housing policy in PPG3, which sets out a sequential test for new housing locations, giving priority to the re-use of previously developed land and buildings. The allocated sites recommended in section 3.2 would meet District-wide needs and no additional land outside the main urban areas is required. A new housing allocation on this site would conflict with Policy H5 of the Structure Plan, which requires such proposals in rural settlements to be small scale, located within settlements and consistent with other policies, such as those to protect the green belt.

3.2.6.41 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of checking the growth of Wooburn on its north side, preventing the merger of Wooburn and Beaconsfield, safeguarding the countryside from encroachment and encouraging the development of urban land. The site could be used for some countryside purpose other than agriculture; its lack of use is insufficient justification for removal from the green belt. Its development would lead to a loss of openness of the green belt in conflict with established policies for its protection.

3.2.6.42 I note also that the site has disadvantages as a location for a single dwelling, as the most recent appeal decision indicates. An additional dwelling would compromise highway safety and its residents would suffer an unacceptable level of noise from the adjoining motorway.

### RECOMMENDATIONS

- H/2/6/14

JACKSON'S FIELD, PRINCES ROAD
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### The Objections

1020/3                      Reit Asset Management

### Summary of Objections

- (a) Site should be removed from the Green Belt and designated as a strategic housing site with a guideline capacity of 90 dwellings.

### Inspector's Reasoning and conclusions

3.2.6.43 The site comprises a field of about 3ha located to the south east of Princes Road, within the green belt at Bourne End. In general terms new housing in the green belt conflicts with government policy in PPG2 and in PPG3. This sets out a sequential test for new housing locations as follows: the re-use of previously developed land and buildings: urban extensions;

and finally development around nodes in good public transport corridors. The suitability of this proposal for an urban extension has been compared with other sites, including ASLs such as Slate Meadow and land within the main urban areas of the District. My findings below have informed my own comparative site assessment. While I identified a shortfall of allocated land to meet Structure Plan requirements to 2011, I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe. Therefore I find no need to identify any additional land outside the main urban areas.

3.2.6.44 The objectors' main argument that the site was a more sustainable option than other ASLs and Slate Meadow in particular. They stressed the importance of PPG3, issued in June 2000, which heralded a fundamental change in housing policy, creating exceptional circumstances under which green belt policy should be reviewed. Paragraph 68 of PPG3 indicates that where green belt boundaries are tightly drawn there may be a case for reviewing them, and planning for development where this would be the most sustainable of options.

3.2.6.45 However, the guidance goes on to say that this should be regarded as an exceptional policy. In this case the Council has identified a number of other reserve sites between the green belt and the urban edge (ASLs) to meet future housing needs. The nearest of these is the Slate Meadow site, just 100m or so from the northern boundary of Jackson's Field. The Council's argument that the provisions of this paragraph do not apply in this case has considerable force.

3.2.6.46 In this case the site falls within Zone 4 of the Accessibility Index shown on Appendix 9 of the Plan. Although it is slightly closer to the centre of Bourne End, there is no material difference in ease of access to services and community facilities for those without access to a car are minimal. Compared to other sites, the level of bus service at two per hour, and the 10 minute journey time to the railway station are do not indicate better accessibility, as the test of paragraph 68 of PPG3 requires.

3.2.6.47 The current boundary follows a clear line on the ground around the ploughed field, which has an entirely different land use from the surrounding residential areas. The field is part of an attractive setting for suburban development in Bourne End, and to my eye it has higher landscape value than the rather unkempt appearance of Slate Meadow. Although less open to view than Slate Meadow, new development on the site would nevertheless be conspicuous from a number of points, including Princes Road and the surrounding housing.

3.2.6.48 The site fulfils the important green belt objectives of preventing the outward spread of the settlement, separating the more densely developed parts of Bourne End from the more open area of Hawk Hill and encouraging urban regeneration.. A key feature of green belts is their permanence. The loss of this parcel would lead to pressure for other releases and would undermine the key aspect of the policy. Even though the woodland along much of the southern boundary provides a firm physical boundary, this would not overcome the policy objection. In these circumstances I see no reason to take a different view from previous inspectors who recommended that the site should remain in the green belt.

3.2.6.49 In other aspects the site does not perform better than Slate Meadow. It is Grade 2 agricultural land, itself a constraint of significance. It is not for me to comment on the legal submissions concerning the applicability of Articles 1 and 8 of the Human Rights Act to the process for hearing Local Plan objections and the fairness of the inquiry.

## **RECOMMENDATIONS**

- H/2/6/15 No modification

SLATE MEADOW

**The Objections**

0709/4 Bryant Homes Technical Services Ltd  
0817/19 Croudace Ltd

**Summary of Objections**

(a) Site should be allocated for housing (150 dwellings). The site represents the most sustainable and deliverable option for residential development in this part of the District. The site exhibits a number of advantages when considered against the Great Marlow School allocation and more appropriately embraces the Plan's sustainable development and other objectives.

**Inspector's Reasoning and conclusions**

3.2.6.50 The site comprises about 10.2 ha of land on the east side of Cores End Road, just over 1 km from the shopping centre at Bourne End. The whole site is shown on the Plan as an ASL reserved for future development needs, lying outside the green belt and AONB. It is surrounded by housing areas on three sides, including land on the opposite side of Cores End Road, with a former railway line separating the land from green belt countryside designated as an LLA to the north. Part of the land lies within the River Wye floodplain; the objectors put forward a revised capacity figure of about 250 dwellings based on the minimum density put forward in PPG3.

3.2.6.51 The suitability of this proposal for an urban extension has been compared with other sites, including ASLs and land within the main urban areas of the District. My findings below have informed my own comparative site assessment of their suitability for inclusion as housing allocations within the life of this Plan. While I identified a shortfall of allocated land to meet Structure Plan requirements to 2011, I consider that this could be met for the most part by the allocation of a major site for 400 dwellings at Terriers Farm, High Wycombe.

3.2.6.52 The land is almost completely flat and is currently used primarily for horse grazing. The Council's Landscape Assessment (CD/I/12) gave the site a value class of 3, reflecting its rather unkempt appearance and indicating the potential to accommodate change. Although it retains some rural character, the surrounding development, dull topography and lack of vegetation contribute to its appearance as probably the least scenic of all the ASLs.

3.2.6.53 Bourne End is the fourth largest settlement in the District, with a reasonable range of facilities, though nowhere nearly as comprehensive as those found in High Wycombe and Princes Risborough. The site has a public transport accessibility index of 4, (Appendix 9 of the Plan). Although the nearest bus stop is only 50m away, this rating reflects the relatively infrequent half hourly bus service to High Wycombe and Maidenhead. Residents of the site would have good access to schools; the entrance to St Paul's Primary School is right opposite and Wye Valley secondary school is about 500m away. However, there are no other facilities within easy walking distance (400m). A number of employment opportunities are within cycling distance along a flat route along the former railway, which could be improved by developer contributions. Bourne End and Wooburn Green shopping areas are at least 1km away, well beyond easy reach on foot. Overall therefore, the site does not fare particularly well in accessibility terms, primarily because it is some distance from the much wide range of facilities found in the larger towns than Bourne End.

3.2.6.54 The Council argued that the site scored poorly in terms of the community identity criterion of paragraph 31 of PPG3, because its development would lead to the coalescence of Bourne End /Cores End and Wooburn Green. Bryants argued that this potential problem could

be overcome by providing a green space along the western side of the site, alongside the river. In my view this relatively narrow strip would not provide a sufficient break to prevent an impression of continuous built form between Bourne End and Wooburn Green. However, while I appreciate residents' concern about protecting neighbourhood identity, in physical terms on the ground much of the sense of distinct individual settlements has already been lost. I consider the site does not provide such an important break between these two areas that its loss would be an overriding constraint to development.

3.2.6.55 Virtually the entire site is Grade 2 agricultural land, which government policy in PPG7 states should be retained in preference to poorer quality land unless sustainability considerations suggest otherwise. In this case the site area of this independent parcel of land, unrelated to any other farm unit, is not highly significant in terms of the likely production that would be lost. At present there is no productive use and it seems unlikely that it would be commercially viable to farm the land in the short to medium term.

3.2.6.56 The adverse public opinion of those living nearby against development of the site is understandable but not limited to this particular potential opportunity. However, my role is to assess the planning merits of the evidence supplied in favour or against the proposed allocation. In similar vein, all the greenfield sites would lead to increased pollution in some form, although air pollution from vehicle emissions would vary according to the likelihood of encouraging travel by modes other than the car.

3.2.6.57 That part of the site within the River Wye floodplain would have to be kept free from development, reducing the available site area. However, an attractive public open space could be created along the river bank, providing a useful wildlife corridor.

3.2.6.58 In summary, the advantages of the site for development in the life of this Plan do not outweigh those of competing sites in more sustainable urban locations with a wider range of facilities. Despite that loss of good quality agricultural land and some possible diminution of community identity, I consider the site has considerable potential for development in the long-term and should be retained as an ASL during this Plan.

## RECOMMENDATIONS

- H/2/6/16

BRANTRIDE, NEW ROAD, BOURNE END
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### The Objections

0733/2                      Mr Arthur Wood

### Summary of Objections

- (a) Site should be withdrawn from Green Belt and designated for housing. Site falls at edge of settlement, has good access, is surrounded by housing and not visible from surrounding countryside. Site would ensure sufficient land is identified for housing, reduce reliance on windfall and provide housing in the Bourne End area.

### Inspector's Reasoning and conclusions

3.2.6.59 The site comprises a paddock of about 2.7 ha, located adjoining the north-east edge of Bourne End, within the green belt and a Local Landscape Area (LLA). My earlier comments in this section about the conflict of residential allocation with policies to protect the green belt, the location of new housing and the conservation of the landscape apply equally to this site. In summary, there is no need for greenfield housing development at Bourne End, particularly at a site such as this with relatively poor public transport links to the range of facilities found in larger urban areas. Housing allocation would undermine the policy to retain the openness of a permanent green belt and the gap between Bourne End from Flackwell Heath. The proposals would conflict with green belt policy objectives to prevent encroachment into the countryside, retain gaps between settlements and encourage urban regeneration. The permanence of the green belt is of the utmost importance and to change its boundaries here in the absence of housing need or any exceptional circumstances would undermine the future effectiveness of the policy.

3.2.6.60 Although the site is reasonably well contained visually, in my view development on this open area beyond the clear edge of the settlement would be seen from surrounding property and Northern Heights as an intrusion into the open countryside. I consider that new housing would spoil the area of attractive landscape in conflict with policies to protect the appearance of the LLA.

### **RECOMMENDATIONS**

H/2/6/17      No modification



## **HOUSING SITES – RURAL AREAS**

<b>POLICY H2: CHORLEY ROAD ALLOTMENTS</b>
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### **The Objections**

0508/5            Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### **Summary of Objections**

(a) Site should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

### **Inspector's Reasoning and conclusions**

3.2.7.1 The site comprises an area of allotments on Chorley Road about half a Kilometre to the north west of West Wycombe. The site is located in the Green Belt and AONB and is outside any recognised settlement boundary. In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.2 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. I have seen no further information to support the objector's argument that the site is suitable for development because of its sustainability. The site is an open greenfield land located within Accessibility Zone 5 away from significant public transport corridors. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of High Wycombe, encroachment into the countryside and encouraging the development of urban land. The site's development would conflict with established policies to protect the green belt.

3.2.7.3 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Construction of new buildings on the site would extend an existing ribbon of development, and this extension would harm the areas rural character of the AONB by reducing the open gap between this ribbon of housing and West Wycombe, which is visually linked to the wider countryside beyond.

### **RECOMMENDATIONS**

□ H/2/7/1    No modification

POLICY H2: FIELD AT TOP OF OLD DASHWOOD HILL

**The Objections**

0508/7 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

**Summary of Objections**

(a) Site should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

**Inspector's Reasoning and conclusions**

3.2.7.4 The site comprises a flat rectangular close to a short ribbon of housing on Old Dashwood Hill approximately 500 metres from Beacons Bottom. The site is in the Green Belt and AONB, and is outside of the settlement boundary of Beacons Bottom.

3.2.7.5 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.6 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of High Wycombe and the coalescence of Studley Green and housing to the top of Old Dashwood Hill, encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.7 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Construction of new buildings on the site would be in a visually prominent location somewhat from a significant settlement and would extend development along the road frontage and would close a significant gap between development at Studley Green and Old Dashwood Hill. This would significantly harm the rural character of the AONB by reducing the open appearance of this area of countryside. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

**RECOMMENDATIONS**

□ H/2/7/2 No modification

POLICY H2: FININGS FARM, LANE END

## The Objections

1036/3 I & M Mebbourne

### Summary of Objections

(a) Site should be designated for housing.

### Inspector's Reasoning and conclusions

3.2.7.8 The site comprises a rectangular grass field between two relatively isolated detached houses to the north of Lane End, outside the settlement boundary. The site is located in the Green Belt and the AONB and is immediately adjacent to the village's Conservation Area.

3.2.7.9 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.10 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of the western part of Lane End, encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.11 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Although the site is found between two detached dwellings and close views into the site are well screened along its eastern boundary, the site forms part of a broad sweep of open countryside extending to the west of the village. This is particularly apparent when viewed from the nearby motorway. Development of the site would cause an unacceptable visual intrusion into the open countryside that would harm the rural character of the AONB. Whilst the objector has suggested that the settlement boundary should be moved to include the site, I do not consider that would be appropriate. The boundary has been drawn to include the more dense central part of the village, which in turn protects the open nature of the surrounding countryside. To move the boundary to include the site would involve the inclusion of a significant area of largely open land within the settlement boundary the development of which would have a detrimental on the surrounding open countryside and the setting of the village.

3.2.7.12 Whilst the objector has suggested that the development of the site would enhance the Conservation Area, the development of the site would increase the density of the

open land to the West of Lane End, that forms the setting of the Conservation Area. Regardless of landscaping or similar mitigation, this incongruously dense parcel of development would have a detrimental on the setting of the Conservation Area. Similarly the objector has suggested that development of the site might allow improvements to parking and other facilities at the nearby playing fields. I recognise that there might be some community benefit by the improvement of these facilities. However in Local Plan policy terms there is no justification to set aside the national and local policies concerning the location of new housing, the protection of the green belt, the effect on the Conservation Area and the preservation of the natural beauty of the AONB.

### RECOMMENDATIONS

- H/2/7/3 No modification

## FLACKWELL HEATH LIBRARY SITE

### The Objections

0818/2 Buckinghamshire County Council – Land & Property

### Summary of Objections

- (a) Flackwell Heath Library site should be de-designated as a library and the reserved site allocated as residential. Provision has now been made for a new library at Carrington Middle School and there is no need for the library designation to remain in Flackwell Heath.

### Inspector's Reasoning and conclusions

3.2.7.13 The site comprises a roughly triangular site in the built up part of Flackwell Heath. The site was reserved for use as library in the Deposit Local Plan, but the County Council, the authority responsible for the provision of libraries objected as this designation was not longer appropriate and suggested that the site be redesigned for residential use. The site is a currently fulfils a number of valuable functions as public accessible open space that provides a focus for the heart of the village and greatly contributes to the village's character. Proposed Change PMAP/11 changes the designation of the site to Green Space, which reflects the site's current, use and I consider that given the valuable functions of the site, this change should be made. I note that the County Council has conditionally withdrawn their objection.

### RECOMMENDATIONS

- H/2/7/4 No modification

## POLICY H2: GRACE COTTAGE, CHURCH LANE

### The Objections

0970/2 Sarah Morgan

### Summary of Objections

- (a) Site represents a gap in the pattern of dwellings and is suitable for infill. Boundary of built up area within the Green Belt in Lacey Green Appears to follow an arbitrary line, excluding a number of existing properties, some of which are historic and would have been included in part of the original settlement area of the village. Suggest that boundary be extended to include the site, which could then contribute to the District' housing figures.

### **Inspector's Reasoning and conclusions**

3.2.7.14 The site comprises a triangular small field to west of Lacey Green adjacent to both the village's settlement boundary and Conservation Area. The site is located with the Green Belt and AONB.

3.2.7.15 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.16 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions by maintaining the open character of the green belt in this location, preventing encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt. Although the site is located in a gap between two properties, the gap between these properties contributes to the open nature of land at the village edge and I do not consider that the infilling of gap would accord with Policies GB2 and GB4. As I explain in chapter 9.4 of the report, I consider that the Policy Boundary Line for GB4 within which infilling will be allowed has been correctly drawn.

3.2.7.17 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Lacey Green is in a prominent position on the Chiltern's Plateau. The site is located between two properties and is to a certain extent set back from Church Lane, but forms part of a system of open fields to the west of Lacey Green and any new building on the site would cause a significant visual intrusion into this open countryside. Whilst it is difficult to speculate about the impact of development on longer range views of the site, particularly from the A4010, I consider the impact on short and medium range views would still harm the areas rural character of the AONB.

3.2.7.18 The site should not be included within the village development boundary, which is logically drawn in that it includes only the central dense core of the village whilst excluding isolated peripheral development. To extend this boundary would have an unacceptable effect on both the AONB and the Green Belt, as it would allow additional development that would detrimentally effect the open nature countryside that immediately surrounds the village. The site is adjacent to Lacey Green Conservation Area that mainly comprises the sporadic buildings that surround the Church to the south-east and exhibits a distinct rural character.

Development of the site would effect the setting of this Conservation Area by reducing the openness of the surrounding land and effecting views into the Conservation Area from the footpath that crosses the field. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/5 No modification

POLICY H2 : LAND ADJACENT TO WESTS YARD, SAUNDERTON
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### The Objections

0508/18 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) Propose land adjacent to Slough Lane industrial site for housing. Site is highly sustainable, being either adjacent to existing built-up areas or representing an infill plot in otherwise built-up frontage. The site can be brought forward without the need for additional infrastructure. The site is also suitable for Park and Rail facilities.

### Inspector's Reasoning and conclusions

3.2.7.19 The site comprises a large sloping open field (4.6 hectares) on a valley slope immediately to the south of the village of Saunderton. The site is located in both the Green Belt and the ANOB, and is outside any recognised settlement boundary.

3.2.7.20 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.21 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing encroachment into the countryside in the main transport corridor between Princes Risborough and High Wycombe and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.22 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape.

Construction of new buildings on the site would extend the edge of development of the village into open countryside to the south and west of Saunderton. Given the sites location on a north east facing slope, the proposed allocation for housing on such a scale would lead to a sizeable new development easily visible from the A4010 on the valley floor and from nearby local roads, although the embankment of the railway line does provide some shielding. This extension to the village would cause considerable harm to the rural character of the AONB by significantly intruding into the wider countryside beyond the built up edge of the village. The development of the site could be used to provide park and rail facilities, but any such proposal would have to be considered on its merits in the relevant policy context applicable at the time. At present there is no justification to change policies concerning the location of new housing, the protection of the green belt, and the preservation of the natural beauty of the AONB.

### RECOMMENDATIONS

- H/2/7/6 No modification

LAND ADJACENT CULVERTON MANOR & FARM
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### The Objections

0841/3 Lance Adlam

### Summary of Objections

- (a) Propose designating the paddocks fronting the Wycombe Road (A4010) for residential development together with improved access arrangements, thus relieving traffic pressures on the narrow Poppy Road.

### Inspector's Reasoning and conclusions

3.2.7.23 The site comprises two large detached houses in extensive grounds with mature trees and a farmhouse and its associated barns, yards and outbuildings. The site is adjacent to the southern built up edge of Princes Risborough on the A4010. The site is in both the Green Belt and AONB.

3.2.7.24 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.25 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. Although the site contains some building, the site remains sufficiently open to continue to meet green belt

functions of preventing the spread of the southern part of Princes Risborough, preventing encroachment of this built up area into the countryside, preserving the historic character of Princes Risborough and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.26 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Although adjoining the urban form of Princes Risborough the site has a largely rural appearance. Development of the site would harm the rural character of this area which is quite distinct from the more dense urban form within the settlement boundary. To allow the extension of the built up area of Princes Risborough would have a detrimental impact on the surrounding open countryside and harm the rural character of the AONB.

3.2.7.27 Whilst development of the site may lead have beneficial effects on highway safety by reducing the effect of congestion on the narrow Poppy Road, I have seen no evidence of how this would be achieved. On balance given the clear conflict with national and local policies concerning the location of new housing, the protection of the green belt, and the preservation of the natural beauty of the AONB, I do not consider that the possible reduction of congestion would provide sufficient justification to allow the allocation of the site for housing.

## RECOMMENDATIONS

- H/2/7/7 No modification

## POLICY H2: LAND AT BEACON'S BOTTOM

### The Objections

0508/9 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) The field to the north of the school at Beacon's Bottom should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

### Inspector's Reasoning and conclusions

3.2.7.28 The site comprises a rectangular steeply sloping grassed field immediately adjacent to the eastern edge of the village of Beacons Bottom outside the settlement boundary. The site is the Green Belt and the AONB.

3.2.7.29 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure



Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.30 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options, although adjacent to the village the site lies within Accessibility Zone 5 and this argument does carries little force. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of High Wycombe, the encroachment of built development into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.31 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Although development of the site would be adjacent to an existing built up area it would extend into the open countryside. Whilst I understand that this site is relatively small and enclosed to a certain degree, given the tightly undulating form of the valley head its development would represent an intrusion into the wider countryside and would harm the rural character of the AONB. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/8 No modification

POLICY H2: LAND AT ENTRANCE STUDLEY GREEN FARM
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## The Objections

0508/8 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

## Summary of Objections

- (a) The field at the entrance to Studley Green Farm should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure

## Inspector's Reasoning and conclusions

3.2.7.32 The site comprises a small relatively flat rectangular field located at the top of a valley, between Studley Green and Beacons Bottom on the A40. The site is in both the Green Belt and AONB and is outside Beacon's Bottom settlement boundary.

3.2.7.33 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account

Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.34 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of High Wycombe, the encroachment of built development into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.35 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is screened from close views by the presence of a mature hedge and is located close to some existing development, but is visible from distances away to the north as it is at the top of a valley slope, particularly from the A40. Given the site's prominent position in an open area of countryside, extending built development would have a detrimental effect on the appearance of open countryside and would harm the rural character of the AONB. Furthermore development of the site would close a gap between the small group of buildings that forms Studely Green and the settlement boundary of Beacon's Bottom. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/9 No modification

<b>POLICY H2: LAND AT MARTINS FIELD, LANE END</b>
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### The Objections

0605/1 Mr M Dickens

### Summary of Objections

- (a) Land at Martins Field, Lane End should be allocated for residential purposes. The site is bounded by residential development on three sides and development will neither form a precedent nor an extension of the settlement of Lane End. Development will assist in meeting the needs of Bledlow.

### Inspector's Reasoning and conclusions

3.2.7.36 The site comprises a roughly square paddock located to the south of the village. The site is outside Lane End's Settlement Boundary and lies within the AONB, but outside the Green Belt.

3.2.7.37 In my discussion of the general housing strategy of the Plan, following on from

the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.38 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Although the site is adjacent to housing on three sides, the site forms an attractive gap between the more dense village form to the north and the dispersed form that creates a transition between the village and open countryside. Development of the site would therefore harm the rural character of the AONB. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/10 No modification

POLICY H2: LAND AT SAUNDERTON RAILWAY STATION
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## The Objections

0508/17 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

## Summary of Objections

- (a) The site, adjacent to the new residential development of Deanfield Close, Saunderton should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

## Inspector's Reasoning and conclusions

3.2.7.39 The site consists of an irregular shaped parcel of land to the west of Saunderton close to the Railway Station and railway line. The site lies within both the Green Belt and AONB but outside any recognised settlement boundary.

3.2.7.40 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I

consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.41 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. Although close to Saunderton Railway, the site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing encroachment into the countryside along a main transport corridor and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.42 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located on a valley slope, in open rolling land that is clearly visible from the other side of the valley. The location of such a potentially large development in such an exposed position would significantly intrude into the surrounding countryside and harm the rural character of the AONB. Whilst development of the site for a Park and Ride Scheme may have beneficial effects on increasing public transport use and reducing congestion, I have seen no evidence of how this would be achieved. On balance given the clear conflict with national and local policies concerning the location of new housing, the protection of the green belt, and the preservation of the natural beauty of the AONB, I do not consider that the possible benefits of increased public transport use and reduced congestion would provide sufficient justification to allow the allocation of the site for housing.

## RECOMMENDATIONS

- H/2/7/11 No modification

## POLICY H2: LAND AT SMOKEY ROW, GREAT KIMBLE

### The Objections

1688/1 Matthew Homes Ltd

### Summary of Objections

- (a) Object to the non-allocation of land at Smokey Row, Great Kimble, for residential.

### Inspector's Reasoning and conclusions

3.2.7.43 The site is located immediately to the north of Smokey Row, Great Kimble to the west of the main railway line. The site is adjacent to, but not in, the Green Belt and AONB and is outside any recognised settlement boundary.

3.2.7.44 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account

Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.45 PPG7, reflected as Policy OC1 of the Structure Plan, indicates that new development in Open Countryside would not be permitted outside existing or planned settlements. I accept that the existing mature hedgerow around the site would provide some screening but given the potentially extensive nature of the development, I consider that this would significantly intrude into the open countryside, particularly given the rising nature of land to the south and east of the site. Furthermore, although outside the Green Belt, development of the site would have a detrimental effect on the Green Belts setting by effecting the openness of the countryside surrounding the Green Belt, contrary to Paragraph 3.15 of PPG3. As regards the objector's comments regarding homeworking, I recognise that this may have sustainability benefits in particular circumstances but have seen no precise details about how this scheme would be implemented in this instance. Furthermore given my earlier views regarding total housing numbers, I consider that no overriding need has been shown to there is a pressing need for accommodation for homeworkers. On balance given the clear conflict with national and local policies concerning the location of new housing, and the protection of the green belt, I do not consider that the possible sustainability benefits of allowing housing for homeworking would provide sufficient justification to allow the allocation of the site for housing.

## RECOMMENDATIONS

- H/2/7/12

POLICY H2: LAND AT WEST LANE, BLEDLOW
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### The Objections

0606/1 Mr R White

### Summary of Objections

- (a) Propose development on West Lane for residential purposes. Site is bounded by residential development on three sides and will neither form a precedent nor an extension to the settlement of Bledlow. Sites currently identified in Policy H2 will not assist in meeting the needs of Bledlow.

### Inspector's Reasoning and conclusions

3.2.7.46 The site is located on the western edge of the village of Bledlow and consists of a roughly rectangular flat field. The site is not in the AONB or Green Belt and lies outside any recognised settlement boundary and the village conservation area boundary.

3.2.7.47 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I

consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Furthermore development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.48 I have not seen any evidence of a need for additional housing Bledlow. Whilst I recognise that the site is close to development and its development would not be visually intrusive, Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/13 No modification

## POLICY H2: LAND BETWEEN 94 AND 116 CHORLEY ROAD

### The Objections

0508/6 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) The land between 94 and 116 Chorley Road should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

### Inspector's Reasoning and conclusions

3.2.7.49 The site consists of a small rectangular plot of land in a gap at the northern end of a ribbon of houses about half a Kilometre to the north west of West Wycombe. The site is located in the Green Belt and AONB and is outside any recognised settlement boundary.

3.2.7.50 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.51 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have

been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of High Wycombe and encouraging the development of urban land. The site's development would conflict with established policies to protect the green belt.

3.2.7.52 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located between two isolated ribbons of dwellings in the open countryside and development of the site would remove a significant gap. This closure would harm the areas rural character of the AONB by reducing views to the wider countryside beyond.

3.2.7.53 As regards the objector's argument that the site is suitable for development because of its sustainability, I have seen no further information to support this claim. The site is an open greenfield land located away from significant public transport corridors. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/14 No modification

POLICY H2: LAND EAST OF PIDDINGTON VILLAGE
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## The Objections

0508/11 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

## Summary of Objections

- (a) The land east of Piddington, to the west of Lower Farm Cottage, should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

## Inspector's Reasoning and conclusions

3.2.7.54 The site consists of a roughly triangular field to the east of the village of Piddington. The site is located in both the Green Belt and the AONB and is immediately adjacent to, but outside, the settlement boundary of the village.

3.2.7.55 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to

Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.56 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of Piddington and the encroachment of the village into the countryside, and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.57 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located to west of Piddington Lane, which forms a strong natural boundary to the expansion of the village. Development of the site for housing would intrude into predominately open rolling countryside and detract from the rural character of the AONB. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

## RECOMMENDATIONS

- H/2/7/15 No modification

POLICY H2: LAND EAST SIDNEY HOUSE, DENHAM ROAD
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## The Objections

0508/15 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

## Summary of Objections

- (a) The site to the south of the M40 at Lane End should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

## Inspector's Reasoning and conclusions

3.2.7.58 The site is located to the north of Lane End between the Lane End's settlement boundary and the embankment of the M40. The site is in both the Green Belt and the AONB. In my discussion of the general housing strategy of the Plan I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide



sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.59 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the growth of the northern part of Lane End and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.60 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is effectively bounded by built development and the motorway, and is in an enclosed secluded location, although it is from Lane End, and the M40. Construction of new buildings on the site would fill in an open space but this is not visually connected to the surrounding open countryside. Although the impact to the AONB may be small, allocating the site would be in the clear conflict with national and local policies concerning the location of new housing and the protection of the green belt.

## RECOMMENDATIONS

- H/2/7/16 No modification

POLICY H2: LAND OFF PARK LANE, LANE END
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## The Objections

0508/14 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

## Summary of Objections

- (a) The triangular field to the rear of 1-8 Pusey Way, Park Lane, Lane End, should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

## Inspector's Reasoning and conclusions

3.2.7.61 The site is located to the north east of Lane End between the Lane End's settlement boundary and the embankment of the M40. The site is in both the Green Belt and the AONB. In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure

Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.62 Green Belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the growth of the northern part of Lane End, the merging of Lane End and High Wycombe and preventing the encroachment into the countryside and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.63 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. Whilst the site is effectively bounded by the motorway embankment to the north, the minor road to the south of the site does not form as significant a boundary as the motorway and allows the site has some connection with the surrounding open countryside to the south. Construction of new buildings on the site would cause a loss of an open space which would have a detrimental effect on the rural character of the AONB. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB

## RECOMMENDATIONS

- H/2/7/17 No modification

POLICY H2: LAND OFF SIMMONS WAY, LANE END
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### The Objections

0508/13 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) The site to the west of Widdenton Park Wood should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

### Inspector's Reasoning and conclusions

3.2.7.64 The site consists of a collection of mainly open sloping fields to the east of Lane End. The site is in both the Green Belt and AONB, and outside Lane Ends Settlement Boundary.

3.2.7.65 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period

compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.66 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of the eastern side of Lane End and the merging of High Wycombe, stopping encroachment into the countryside to the east of Lane End and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.67 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site abuts the strong development boundary that forms the eastern side of Lane End, and marks a sharp transition from a dense urban form to that of open countryside and woodland. Although the site is largely surrounded by woodland to the south and east, due to its hillside and hilltop location the site is very visible from a variety of vantage points to the north and east. Development of the scale suggested would represent an intrusion of the dense urban form of Lane End into the wider countryside and would significantly harm the rural character of the AONB. The objector has suggested that the site would be particularly appropriate for low cost housing with associated public open space, although they do not specify they type of low cost housing that would be provided. The Council has other policies which seek to achieve affordable housing, with associated public open space, and I have seen no evidence of a specific overriding need for this locality. On balance the benefits of this provision are not sufficient to outweigh the clear conflict with national and local policies concerning the location of new housing and the protection of the green belt and the AONB.

## RECOMMENDATIONS

- H/2/7/18 No modification

POLICY H2: WEST OF PIDDINGTON VILLAGE
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### The Objections

0508/10 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

### Summary of Objections

- (a) The field to the west of Piddington, behind the Dashwood Arms pub, should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-

up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure

### **Inspector's Reasoning and conclusions**

3.2.7.68 The site consists of large reticular open field immediately to the west of Piddington. The site is in the Green Belt and AONB, and is outside of Piddingtons settlement boundary.

3.2.7.69 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.70 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the spread of Piddington to the west, safeguarding countryside to the west of Piddington from encroachment and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.71 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located immediately to the west of Piddingtons settlement boundary and because of its steeply sloping nature is highly visible from a number of locations. Although bordered to the west by a small road, the site is visually linked to the attractive rolling countryside to the west of the village. Development of such a large site would cause a major intrusion into the wider countryside that would harm the rural character of the AONB. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the preservation of the natural beauty of the AONB.

### **RECOMMENDATIONS**

- H/2/7/19 No modification

POLICY H2: WEST'S YARD, SLOUGH LANE, SAUNDERTON
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### **The Objections**

0905/2 Kenneth Barnes

## Summary of Objections

(a) Wests Yard would be better used for additional housing.

### Inspector's Reasoning and conclusions

3.2.7.72 The site consists of a small industrial estate immediately to the south west of Saunderton. The site is located in the Green Belt and AONB, and is not within any recognised settlement boundary. I deal with an objection requesting the site to be allocated as a Major Developed Site in the green belt in section 9.8 of my report.

3.2.7.73 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.74 Green Belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. Despite its proximity to Saunderton Railway Station, this site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case although the site is already developed I have seen no evidence of any exceptional circumstances that would justify allocating housing in this location. Therefore its development would conflict with established policies to protect the Green Belt.

3.2.7.75 Whilst it is clear that the development of the site would have to comply with policies to protect the AONB, as the site is currently developed, it is possible that development could occur that would be acceptable under Policy LS2 of the Structure Plan, which reflects PPG7. The site is also protected under Policy E5 which protects existing employment uses and the use of the site for housing would clearly be contrary to this Policy. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt and the protection of employment land.

### RECOMMENDATIONS

□ H/2/7/20 No modification

POLICY H2: LAND AT STOKENCHURCH
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### The Objections

0831/11 Miss M B Messenger

### Summary of Objections

(a) The site should be allocated for housing; it would provide better choice of provision.

### **Inspector's Reasoning and conclusions**

3.2.7.76 The site comprises about 80 ha of farmland to the south-west of the M40 at Stokenchurch. It lies within the AONB, outside the settlement boundary. The objector seeks to provide a new by-pass to the village, financed by substantial new housing on the part of the site. I deal with this road proposal in section 7.23 of my report.

3.2.7.77 Government policy for the AONB is set out in PPG7, as clarified by Ministerial statement dated 13 June 2000. This re-iterated previous guidance that the landscape qualities of AONB are equivalent to those of the National Parks, and carry the same protection. Paragraph 4.5 of PPG7 sets out 3 criteria that should be taken into account when assessing applications for major development in the AONB, namely:

- The need for the development in terms of national considerations and the impact of refusing it on the national economy
- The cost and scope of developing elsewhere outside the area to meeting the need in some other way
- The detrimental effect on the landscape and the extent to which it could be moderated.

3.2.7.78 Clearly a proposal for several hundred dwellings in the AONB, as envisaged here, would fall within the definition of 'major' development and these tests would apply. In my discussion of the general housing strategy of the Plan I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. This assessment takes into account the sequential approach to site selection as set out in PPG3 and Structure Plan policy to direct major new housing to the High Wycombe Urban area. I consider that the recommended allocations in or adjoining urban areas will meet the District's housing needs for the life of the Plan. Other urban extensions are available to meet future needs beyond 2011. There is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas.

3.2.7.79 I believe a housing allocation of the proposed size would have a severely harmful effect on the open rolling Chilterns landscape. Although there is a dip in the middle of the site, much of the new building would be open to view, intruding as a discordant urban element in the countryside. It is hard to imagine that any measures could effectively moderate such harm. The allocation would not comply with the test of PPG7, it would conflict with Policy H3 of the Structure Plan for the protection of the AONB.

3.2.7.80 There has been no feasibility study of the proposed road, for which I can see little need, bearing in mind that the M40 by-passes Stokenchurch. The motorway may well create a poor residential environment through noise, especially as it passes much of the site at an elevated position. I consider the potential traffic benefits of the road, which itself would further harm the appearance of the AONB, would be insufficient to outweigh the adverse impact on a landscape of national importance.

### **RECOMMENDATIONS**

- H/2/7/21 No modification

POLICY H2: WHEELER END ALLOTMENTS

**The Objections**

0508/12 Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust

**Summary of Objections**

- (a) The old allotments at Wheeler End should be allocated for housing under Policy H2. Site is highly sustainable, being either adjacent to existing built-up area or represents an infill plot in an otherwise built up frontage. Site could be brought forward without the need for additional infrastructure.

**Inspector's Reasoning and conclusions**

3.2.7.81 The site consists of two roughly square parcels of land adjacent to one another on Wheeler End common, approximately half a kilometre to the north of Lane End. The site lies in the Green Belt and AONB, and is outside Lane End's settlement boundary and Wheeler End Common Conservation Area.

3.2.7.82 In my discussion of the general housing strategy of the Plan, following on from the RTS, I identified a shortfall in the expected number of completions in the Plan period compared with Structure Plan targets. My conclusions as to how this shortfall can be met, together with summaries of my recommendations on major allocated and proposed sites, are set out in section 3.2 of the report above. The comparative site assessment takes into account Structure Plan policy to direct major new housing to the High Wycombe Urban area but also deals with a major allocation at Princes Risborough and other smaller sites at Marlow. I consider that these allocations provide sufficient housing to allow the Plan to meet its Structure Plan requirement and that there is no strategic need to allocate additional sites outside the settlement boundaries of the main urban areas. Development of this site would be contrary to Policy H5 of the Structure Plan, which requires housing allocations in rural settlements to be located within recognised settlement boundaries.

3.2.7.83 Green belt sites may only be considered for housing as an exception, where they may prove more sustainable than other options. This site lies within Accessibility Zone 5 and that argument does not apply. A key feature of the green belt is its permanence; PPG2 states that its boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. In this case the site continues to meet green belt functions of preventing the urbanisation of land to the west of High Wycombe and encouraging the development of urban land. Its development would conflict with established policies to protect the green belt.

3.2.7.84 PPG7, reflected as Policy LS2 of the Structure Plan, indicates that new development that would harm the natural beauty of the AONB will not be permitted, unless there is a proven national need that outweighs any adverse impact on the landscape. The site is located in a prominent sloping location in largely open countryside and the development of the such a large site in such a remote setting would be intrude into the wider countryside beyond, harming rural character of the AONB. Furthermore the site is located adjacent to the Wheeler End Conservation Area, which is typified by a small number of isolated groups of houses spread out over the open common land. Development of such a large site on the edge of the Conservation Area would be at odds with the Conservation Areas base knit feel and would significantly harm its setting. Allocating this site for housing would be in clear conflict with national and local policies concerning the location of new housing, the protection of the green belt, the preservation of the natural beauty of the AONB and the preservation and

enhancement of conservation areas.

**RECOMMENDATIONS**

- H/2/7/21 No modification



## **POLICY H3: NEW HOUSING DEVELOPMENT**

### **The Objections**

See Appendix 3I

### **PIC 3/24 Objections**

0376/83	Axa Equity and Law Life Assurance Society PLC
0379/76	Sport England
0571/39	Laing Homes Ltd

### **Summary of Objections**

- (a) The requirement to maintain a five year land supply should be deleted as it encourages greenfield development, undervalues importance of recycling brownfield sites and a falling population means less housing will be required. Local infrastructure can not support more population.
- (b) Development in the town centre, particularly sheltered accommodation, should be encouraged for an increasing elderly population, giving easy access to amenities.
- (c) A greater housing quota should be allocated to brownfield sites.
- (d) There is a need to recognise that allocating land for housing is more than a numerical exercise. Achievement of affordable housing targets should be regularly monitored to ensure an appropriate mix of housing.
- (e) Policy should be amended to include an appropriate clause ensuring adequate protection is given to playing fields.
- (f) Policy does not allow for the creation of small residential developments in the Green Belt or AONB to meet specific local needs.
- (g) Propose amending wording of policy to provide flexibility allowing housing development on sites where it is appropriate in order to provide choice and location.

In response to proposed Pre Inquiry Change 3/24:

- (h) Object to the deletion of paragraph 3.18 and the failure of the Council to introduce new text that explains the need for strategic greenfield land release.
- (i) Object to paragraph 3.20 and 3.21. The development of urban green space to the extent proposed in the Plan will not create sustainable patterns of development. Object to sites allocated for housing in the Plan which are playing fields.
- (j) Object to paragraph 3.19. The Plan fails to demonstrate a capability to meet the Structure Plan requirement. Changes to Policy H3 shift the balance too far in the direction of maximising housing within urban areas at the expense of their character and amenities.

### **Inspector's Reasoning and conclusions**

3.3.1 Many of these objections deal with matters which have already been referred to in discussion of objections to Policies H1 and H2. Policy H3 is permissive of development within identified residential areas and encourages development of previously developed land in urban areas. The supporting text emphasises the importance of monitoring under the government's new 'plan, monitor and manage' approach to the provision of housing. As such it accords fully

with the advice in PPG3. The PICs also changed references to the residential character zones, which have been deleted following PIC 3/32, which I support, for the reasons set out in section 3.14 of my report.

3.3.2 The objections to the requirement for a five year supply of housing land have been met by the deletion of this clause by the PICs. By its own admission, the Council has not sought to provide a 'reserve' list of greenfield sites that may be brought forward within the 1<sup>st</sup> phase of the Plan if windfall completions are lower than predicted. It justifies this stance by expressing great confidence in the windfall predictions and by giving 'great weight' to the lack of objection from GOSE. I note that the failure of GOSE to object to the PICs does not appear to be fully consistent with its advice to Horsham District Council in December 2000. It seems to me that the allocation of 'back-up' sites may discourage the development of difficult urban sites, such as those in a multiplicity of ownerships or suffering from contamination. However, the advice in PPG3 is clear that a primary consideration is the need to meet established housing requirements throughout the plan period, including the early years. To this end paragraph 34 states that '**sites**' for the first 5 years' supply should be identified in case windfalls do not come forward at the expected rate.

3.3.3 From Table 2 (as suggested to be revised) 4152 dwellings remain to be built in the 11 years from 1/4/00. From this, the 627 dwellings with planning permissions (which are not therefore subject to any real uncertainty) should be deducted. Five years' supply of the residual total equates to 1602 dwellings, a figure below my calculation of the total requirement for allocated sites. As I explain in section 3.5 below, that the highly complex nature of the Wycombe Marsh redevelopment is likely to preclude the availability of the housing element before 2006 at the earliest. Therefore sites are available for 1445 dwellings, just below the five years supply total. I do not consider this to be a critical shortfall, because I share the Council's confidence that on past trends there is very little likelihood of windfall failing to materialise.

3.3.4 A further complication arises from the allocation of Park Mill Farm, since development of the site in full would provide more dwellings than the 350 required to meet housing needs up to 2011. The suggested phasing therefore is after 2006, allowing the remaining development of 250 dwellings to continue beyond the plan period. However, this could be brought forward if absolutely necessary. The proposed phasing of sites is dealt with in section 3.4, where the broad thrust of the Council's policy changes to allow review of phasing proposals in the light of detailed monitoring of housing provision is supported. The Plan and supplementary guidance should try to provide a clear explanation of how this difficult process will be carried out.

3.3.5 As the Council point out, new housing competes with a number of other uses in town centre locations. Nevertheless a number of schemes are being promoted or have been permitted in High Wycombe, including sites identified in the Plan. Policy H10 facilitates sheltered housing provision for the elderly, for whom town centre locations may be highly suitable, subject to compatibility with adjoining uses. Similarly, objections concerning the provision of affordable housing in rural locations are addressed by Policy H12 and additional detail in this policy is unnecessary.

3.3.6 I have dealt elsewhere with objections to the loss of green spaces within urban boundaries; the available sites have to be considered in comparison with others within the urban area and with greenfield urban extensions. The policy refers to the need to comply with other parts of the Plan; Policy RT3 deals with the protection of playing fields.

3.3.7 The suggestion in favour of a general caveat would undermine the urban focus of the Plan and could lead to unacceptable pressure for development in unsustainable locations, in conflict with established national and strategic policy.

## RECOMMENDATIONS

- H/3/1      Modify the Plan in accordance with PICs 3/24 and 3/38

**POLICY H4: PHASING OF NEW HOUSING DEVELOPMENT**

**The Objections**

0033/4	Mrs S Seymour
0109/4	Mrs L Burch
0149/4	Mrs A Jackson
0218/5	Airways Housing Society Ltd
0345/8	<i>Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd</i>
0358/4	Mrs Pamela Cockton
0361/2	A Blunt
0376/10	Axa Equity and Law Life Assurance Society PLC
0408/3	<i>Ercol Furniture Ltd</i>
0507/4	P W Eldridge Esq
0522/3	Redrow Homes (Southern) Ltd
0560/4	Mr D H Hughes
0572/2	Fairview New Homes PLC
0652/4	Clive Seymour
0808/7	Linden Homes South East Ltd
0817/20	Croudace Ltd
0840/29	Marlow and District Chamber of Trade & Commerce
0922/17	House Builders Federation
0937/5	Miss P M Kimber
1038/1	Mrs Amy Goodchild
1218/10	R J Newell
1414/8	Michael J Overall
1579/7	Oxford Land Limited
1584/69	The Marlow Group
1595/4	<i>Berkeley Homes (Chiltern) Ltd</i>

**PIC 3/5 Objections**

0376/44	Axa Equity and Law Life Assurance Society PLC
0408/30	<i>Ercol Furniture Ltd</i>
0524/23	Thames Valley Chamber
0817/38	Croudace Ltd
0922/27	House Builders Federation
1071/16	Persimmon Homes (TV) Ltd
1141/21	Beazer Strategic Land
1218/21	R J Newell

**PIC 3/25 Objections**

0345/22	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/84	Axa Equity and Law Life Assurance Society PLC
0379/77	Sport England
0524/36	Thames Valley Chamber
0571/41	Laing Homes Ltd
0579/30	Michael Lambert
0817/49	Croudace Ltd

1071/16            Persimmon Homes (TV) Ltd  
1141/57            Beazer Strategic Land  
1579/40            Oxford Land Limited

### Summary of Objections

- (a) Land should be released at once, rather than in stages and released at the earliest opportunity and there is a serious shortage of housing. Park Mill / Oak Tree Farm site should not be phased.
- (b) Policy is unnecessary, given the paucity of allocated sites and greater reliance on windfall. Timing of release should be subject to market forces.
- (c) Policy is too inflexible and should refer to 'broadly phrase development'. Policy should not be too rigid as it may prevent schemes coming forward.
- (d) There is a lack of guidance to developers and service providers on any intended restrictions on the release of individual housing allocations. There should be a more precise phasing programme.
- (e) An exception dealing with the issue of windfall should be written into the policy, otherwise recycling previously development land to meet housing needs will be prejudiced.
- (f) More sites and a greater choice of sites will need to be brought forward due to inadequate provision.
- (g) Policy should define over-provision.
- (h) Sites should not be developed, until protective measures (e.g. traffic restraint) have been implemented.
- (i) Phasing ignores the locational aspects of future need and provision.
- (j) Supporting text should make clear that mixed use sites will not be held back by prescriptive application of policy.
- (k) Phasing is meaningless in the context of Marlow, it must be compatible with the changing pattern of employment needs in Marlow.
- (l) Policy should be amended to make it clear that the provision of affordable housing will normally be exempt from phasing.

In response to proposed Pre Inquiry Change 3/5:

- (m) Propose that the new text should explain that the housing building rate between 1999 and 1999 in the District has been 5% below the Structure Plan requirement.
- (n) Propose that policy should state that regard will be paid to advice in PPG3 when consideration is given to approval of housing sites. Urban brownfield sites should be afforded priority.
- (o) Object on the grounds that the policy provides inappropriate restrictions with an arbitrary set of figures.
- (p) Text should explain how monitoring of take-up and housing supply generally will be undertaken and in what circumstances the Plan will be reviewed and rolled forward.

In response to proposed Pre Inquiry Change 3/25:

- (q) Proposed phasing bands are unduly restrictive. Bands of less than 5 years should not be introduced. Conflicts with PPG12. Plan should proceed on the basis of the phasing bands set out in the Structure Plan.
- (r) Object to phasing of development in Princes Risborough outside of first band.

- (s) Unnecessary for decisions to be deferred on selecting sites for allocation to meet the strategic housing requirement for the reason that an Urban Capacity Study needs to be undertaken. The Council has already carried out such a study. The revised requirement of a Structure Plan Review will be relevant for the period beyond 2011.
- (t) The Council has interpreted PPG3 in a way which avoids proper planning and which seeks to under-provide housing locally below the strategic requirement. There is a need to allocate further sites for implementation before 2006.
- (u) Urban green spaces are not included within the PPG3 definition of previously developed land and the Plan should make it clear at what point in the phasing sequence urban green spaces will come forward. Phasing of green space / greenfield in the early period is contrary to PPG3.
- (v) Insufficient justification set out in respect of the three phasing periods and the number of dwellings within each. In the absence of some surety that sites will come forward in accordance with relevant policies, the necessary advanced works and funding to achieve the release of sites will not occur and will lead to unacceptable delays.
- (w) Phasing does not take account of the need for physical and social infrastructure to be improved and where the greatest need exists and can be met in the District.
- (x) Restrictions can not be sustained given the RPG for the South East and its likely outcome.

### **Inspector's Reasoning and conclusions**

3.4.1 The Council made substantial revisions to the phasing proposals after the deposit Plan had been published, in response to the revision of PPG3. Many of the objections relate to the superseded policy, but the number of phases remains at issue. The Council justify 3 relatively short phases by reference to paragraph 33 of PPG3, which states that one possible approach is to divide the Plan into 3 phases. However, I consider this guidance is far from prescriptive. 'Planning to Deliver' the good practice guide presaged in the same paragraph, states that there is no hard and fast rule for the duration of phases. The guide also requires the full life of the Plan to be covered, and advises authorities to ensure that the approach dovetails satisfactorily with the Structure Plan. Policy H6 of the Structure Plan makes no reference to different phasing periods, while paragraph 114 merely states that Local Plans will provide a more detailed interpretation of the 5 year phasing bands in the Structure Plan. The regional guidance in RPG9 provides for a continuation of existing Structure Plan housing requirements and gives no indication of any likely special phasing requirements in Buckinghamshire.

3.4.2 I consider the circumstances in Wycombe District indicate no real need to divert from that approach. Although a high proportion of housing is expected from windfall, I share the Council's confidence in its projections. By the time the Plan is adopted, a first phase concentrating on development of the 'brownfield' sites up to 2006 would be logical and realistic. Assuming that monitoring shows windfall sites coming forward at expected rates, greenfield sites could be held back until the second phase, which would coincide with the end of the Structure Plan period. By then planning permission for Wycombe Marsh should have been granted and the initial stages of preparing the site for development through the relocation of the sewage works should be well under way.

3.4.3 On this basis, the first phase should provide the following dwellings: 627 from already identified sites; 960 from windfall sites and conversions (taking an average annual rate of 160 from my revision of Table 2); and 695 on 'brownfield' sites, giving a total of 2017. A total of 1950 dwellings would be built in phase 2, comprising the remaining windfall, Wycombe Marsh and the two greenfield sites. This approach should lead to a fairly constant rate of development throughout the Plan period. The allocation of the revised list of sites to match these phases and the clause providing for delayed permission of the greenfield sites should be modified in accordance with these comments. The policy would ensure that previously developed land, including windfall sites, would be developed first, in accordance with PPG3 policy.

## RECOMMENDATIONS

- H/4/1 Modify Policy H4 to read as follows:

'THE DISTRICT COUNCIL WILL BROADLY PHASE NEW HOUSING DEVELOPMENT ALLOCATED UNDER POLICY H2 DURING THE PLAN PERIOD 2000-2011 AS FOLLOWS

2000-2006                      2017 DWELLINGS

2006-2011                      1950 DWELLINGS

IN ORDER TO GIVE PRIORITY TO THE DEVELOPMENT OF PREVIOUSLY DEVELOPED LAND AND BUILDINGS, PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT ON THE TERRIERS FARM AND PARK MILL FARM SITES MORE THAN 6 MONTHS BEFORE THE END OF THE FIRST PHASING PERIOD.

SUBJECT TO OTHER RELEVANT POLICIES OF THE PLAN, PLANNING PERMISSION WILL BE GRANTED FOR ALL OTHER SITES IDENTIFIED UNDER POLICY H2 AT THE EARLIEST OPPORTUNITY.

THE DISTRICT COUNCIL WILL REVIEW THE ALLOCATIONS IN POLICY H2 AND THE REQUIREMENTS OF THIS POLICY IN THE LIGHT OF REGULAR MONITORING OF THE HOUSING SUPPLY, THE RESULTS OF AN URBAN CAPACITY STUDY AND ANY REVISED REQUIREMENTS RESULTING FROM A STRUCTURE PLAN REVIEW. WHERE AS A RESULT OF ANY OF THESE FACTORS, A REVIEW OF THE HOUSING ALLOCATIONS UNDER POLICY H2 IS APPROPRIATE, SUCH A REVIEW WILL BE UNDERTAKEN IN ACCORDANCE WITH THE FOLLOWING SEARCH SEQUENCE:

- a) PREVIOUSLY DEVELOPED LAND AND BUILDINGS IN URBAN AREAS, THEN IF NECESSARY
- b) URBAN EXTENSIONS, THEN IF NECESSARY
- c) DEVELOPMENT AROUND NODES IN GOOD PUBLIC TRANSPORT CORRIDORS.'

## POLICY H5: PHASING OF NEW HOUSING DEVELOPMENT

### The Objections

0408/5	Ercol Furniture Ltd
0522/4	Redrow Homes (Southern) Ltd
0547/4	Mr & Mrs Beckford
0572/3	Fairview New Homes PLC
0808/8	Linden Homes South East Ltd
0817/21	Croudace Ltd
0922/20	House Builders Federation
1141/22	Beazer Strategic Land
1595/5	Berkeley Homes (Chiltern) Ltd

### Summary of Objections

- (a) Policy should be deleted; it is unreasonably restrictive and unnecessary. Initial allocation of sites should have regard to such matters. Development Briefs should deal with matters of undue pressure.
- (b) Policy should indicate that obligations should be related to the development (as per Circular 1/97). Policy is too prescriptive, restrictive and inflexible.
- (c) There is too much discretion, which could delay implementation of sites, raising questions about meeting Structure Plan requirements.
- (d) Information about phasing should be in the Plan and not in a non-statutory brief.
- (e) Development should be market led without the need for development briefs.
- (f) Phasing ignores locational aspects of future need and provision.
- (g) A programme of infrastructure provision should be in place to ensure that the strategic requirement can be met.
- (h) The Abbey Barn North and Wycombe Marsh sites should be phased so that they are not developed at the same time due to traffic generation problems.

### **Inspector's Reasoning and conclusions**

3.5.1 I consider the policy is soundly based, in that it reflects government policy to ensure that major new development is co-ordinated with the provision of infrastructure. I consider it appropriate to achieve this at development briefing stage, as the policy seeks, rather than at the level of the Local Plan, which should not be concerned with matters of such detail. The broad thrust of the policy to improve the quality of development accords with the guidance in paragraphs 54-56 of PPG3 and is not overly prescriptive in my view.

3.5.2 In normal circumstances development briefs would deal with the issue of phasing, taking into account the provisions of Circular 1/95. Implementation of schemes in this way would not conflict with the policy, nor invalidate its purpose. I note that Appendix 3 of the Plan requires briefs to be prepared for H2 allocated sites; in the normal course of events their preparation taking into account Policy H5 should cause no additional delay. This approach is supported by government policy.

3.5.3 Where future housing should be provided is addressed by other policies in the Plan. As the Council point out, the principle that developers should provide the infrastructure necessary to support a particular scheme is well established, and supported in Circular 1/95. This can be achieved through suitable planning conditions attached to permissions or through Planning Obligations. In normal circumstances the Council may have a co-ordinating role, but not a funding one.

3.5.4 I have recommended against the housing allocation at Abbey Barn North. If this safeguarded land is brought forward for development in the future, Wycombe Marsh should have been redeveloped and infrastructure requirements would be assessed according to conditions prevailing at that time.

### **RECOMMENDATIONS**

- H/5/1 No modification

<b>POLICY 5A: WYCOMBE MARSH</b>
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### **PIC 3/6 Objections**

0376/45	Axa Equity and Law life Assurance Society PLC
0483/26	Wooburn Parish Council

0524/24	Thames Valley Chamber
0526/38	Chepping Wycombe Parish Council
0817/37	Croudace Ltd
0839/22	Grange Action Group
0974/7	Chiltern Society
1071/11	Persimmon Homes (TV) Ltd
1075/24	Little Marlow Parish Council
1141/47	Beazer Strategic Land
1739/2	Lord Carrington's Grandchildren's Settlement
2063/8	Wycombe Summit Ltd/Wycombe Option Ltd
2117/1	G L Spurrell
2119/1	Wycombe Marsh Royal British Legion
2136/2	Thames Water (Property Division)
2409/2	N A Smith

### **PIC 3/26 Objections**

0137/24            The High Wycombe Society

### **Summary of Objections**

- (a) Propose amendment to include 4ha of employment and 350 dwellings. Site affords better opportunity for employment use due to polluted nature.
- (b) Development of the site will have to take into account the Secretary of State's code of practise on Conservation, access and recreation and LEAP's and the River Wye Study.
- (c) Object to loss of allotments.
- (d) Need to protect River Wye environment and ecology. Compensation flows may prove costly and the project may be jeopardised as a result. More details required. Concern over possible foundation damage to all those buildings adjacent to the Wye.
- (e) There should not be a minimum 10m strip along the River Wye.
- (f) Concern over the cumulative impact of traffic from this site, with others proposed or safeguarded on the highway network.
- (g) Concern over deliverability of the site within the Plan period given contamination, land ownership, legal agreements, mixed nature of site etc. Plans reliance on this site is unrealistic. Doubt whether the site can be brought forward with the Plan period, given the level of remediation required.
- (h) Residential potential of the site has been underestimated.
- (i) Delete reference to hotel. Wycombe Marsh is not the most appropriate location.
- (j) The Local Plan should not be prescriptive about the highways requirements of the scheme; these should be identified at the planning application stage.
- (k) Insufficient provision is made for the retail element.
- (l) Wycombe Marsh is still working efficiently, so it is not yet a brownfield site.
- (m) Concern over implications for Little Marlow and the Green Belt, if sewage works are relocated. This may increase nuisance. An Environmental Impact Assessment is required.
- (n) Propose that the 'community facilities' include the allocation for a site for the Wycombe Marsh Royal British Legion.



### **Inspector's Reasoning and conclusions**

3.5.5 A large number of objections were lodged concerning the Plan proposals for this key site. A summary of all the objections made to Policies H2ih, H5A, Appendix 2, E7 and S2 is contained in Appendix H5B. I have dealt with all these points in this section (other than the issue of retail policy) under a number of key headings:

- General land use principles
- Practicality/Deliverability
- Ecology
- Flood safety
- Effects of expanding Little Marlow SW (GB policy, floodplain)
- Transportation, including highway capacity/safety
- Costs/Viability
- Programming
- Other matters

#### ***General land use principles***

3.5.6 The objection site comprises some 20.2 ha of land in total, located within the largest settlement in the District, about 2.5km from the town centre. Much of the site is previously developed land, including all of the former Paper Mill site, the City Grove site and large areas of the sewage works itself. Its redevelopment with a range of uses is preferable in sequential terms to the creation of one or more schemes on a greenfield site or sites. The whole area lies along the southern side of, or close to London Road, the main public transport corridor in Wycombe. The site is within easy walking distance of an infant and a junior school, a parade of local shops, and within less than 1 km of a secondary school, a local provisions shop, large areas of open space, public houses and places of worship. By any measure it is a sustainable site in principle.

3.5.7 The site should present no particular construction difficulties. Although much is made-up ground, it is level and suitable access can be obtained. Subject to good design, surrounding uses do not create undue constraints on the form of development. It is suitable for a range of uses, including industrial, commercial and office buildings. A sizeable element of bulky goods retailing would act as enabling development by helping to offset the costs of relocating the sewage treatment plant. The provision of 400 new dwellings is a key element of the Plan's housing strategy. The characteristics and location of the site make it suitable for a relatively high density residential scheme that could incorporate a significant number of much needed affordable homes. If it were to go ahead, the development of the site could confer very substantial economic benefits and successfully underpin the strategic renewal of the London Road corridor.

#### ***Practicality***

3.5.8 In order to implement the proposed allocations for the Wycombe Marsh site, the existing sewage treatment works would have to be closed down, and all operations transferred to Thames Water's (TW) works at Little Marlow. In summary, this involves

- constructing a new trunk sewer between Wycombe Marsh and Little Marlow, comprising a 3 km tunnel and 2 pipelines over 1.8 km, linked to the tunnel by inverted syphon
- Substantial replacement of most existing plant at Little Marlow to cater for increased flows

- Constructing a new pumping station and a new main through the tunnel to return a proportion of treated effluent back to the river Wye
- Demolition of all structures at Wycombe Marsh and remediation of all contaminated ground

Thames Water estimate the total cost of the project to be £45m; objectors say that the most appropriate estimate would be £53.3m, which is within the 90% confidence level.

#### *Tunnel*

3.5.9 Dealing first with tunnelling issues, the proposed allocation is dependent upon the successful implementation of a major civil engineering project, which by its nature would be subject to some uncertainty with regard to cost and timing. However, it is clear from the evidence of the Council's engineering witness that considerable preparatory work, to the tune of £1m, has already been undertaken. As a result, the designs of both the tunnel and the main pipelines have been changed. I have no reason to seriously doubt that forced flow ventilation through the tunnel, as proposed, would not work properly, thus obviating the need for ventilation shafts. The tunnel would be maintained by 10 yearly inspections from a viewing platform within the structure. Although this change would reduce the flow capacity to 1.6 cu m per second (cu m/s), this is well above the critical figure of 1.3 cu m/s. The tunnel would be excavated from the Wycombe Marsh end, which would provide the capacity for storage of materials (overnight and at weekends during full 24 hour working) and treatment of water from the workings. The level of waste over a 12-month construction period would be equivalent to 6 lorry loads each day, which in my view would not create a disposal problem. Given the size of the site and the distance from the nearest residential property, I consider that any noise, dust or water pollution could be kept within acceptable limits.

3.5.10 The objectors were concerned that problems may arise from solution features (voids) in the chalk through which the tunnel would be routed. They were fearful that such features may well be exacerbated by tunnelling, with potential detriment to housing near Wycombe Marsh, for example in Bassetsbury Lane and Deangarden Rise. However, starting the tunnel 12m below the site in middle chalk, as proposed, would minimise this risk, which would be very localised. TW advise that potential variations in rock hardness could be dealt with by the proposed tunnelling machine and have been allowed for in their costings. I consider that the nature of the rock would not present undue tunnelling difficulties to a company with considerable experience of similar operations over a wide area in the Thames valley.

#### *Aquifer pollution*

3.5.11 The objectors argued that the chalk aquifer, the source for a number of boreholes, including a TW abstraction plant at Bourne End pumping station, could become polluted. At the Wycombe Marsh end the tunnel would pass through a class of soils with little ability to deal with pollution. Any leakage from the tunnel could pass directly through the aquifer into wells that form the drinking supply. However, up to half of the tunnel would be below the water table, where hydraulic pressure would prevent leakage of sewage. Two known private abstraction plants are not used for drinking water. TW's own assessment shows that the risk of bacterial contamination at Bourne End is not significant, due to the distance from the tunnel, which would be lined to minimise leakage. I cannot imagine that concerns about potential impact during construction of the tunnel on commercial production of lettuces at Little Marlow would be anything other than extremely limited, as the Council's witness suggested.

#### *Odour problems*

3.5.12 With regard to concerns about potential increased odour from additional use of the Little Marlow works, I note that existing problems arising from the composting building have already been addressed by TW. The redevelopment would involve converting the facility to a biological nutrient removal (BNR) process, using the best available technology. Although the volume of sewage through the works would increase, the new plant would minimise odour problems.

Bearing in mind the distance of the nearest dwellings and the prevailing wind, I consider it likely that living conditions of nearby residents would be unaffected.

#### *Legal Issues*

3.5.13 I see no reason to question the Council's opinion that TW would be entirely within its powers to carry out all necessary works to relocate treatment from Wycombe Marsh to Little Marlow. The Director General of Sewerage Services has already approved the scheme in principle. The minimal additional cost to water ratepayers of £13 pa, which would have to be agreed with OFWAT, would be offset by the benefits of operating a single plant with regard to factors that are hard to measure financially, such as odour, traffic generation etc. From the Council's legal submissions at the inquiry, I consider the possibility that the scheme would be delayed by a consumer's challenge to be very remote.

#### **Ecology/Environment**

##### *River Wye*

3.5.14 One of the main concerns of a number of objectors was that the ecology of the River Wye below Wycombe Marsh would be seriously threatened by the removal of a substantial part of the normal flow. The Wye is a chalk stream which is designated as a biodiversity habitat, where a number of species such as bullheads and ranunculus should be protected. The redevelopment of Wycombe Marsh is dependent on a satisfactory method of returning treated effluent back to the Wye from Little Marlow. The detailed costings provided by TW show a worst case estimate for return flow pumping of about £150,000 per annum. In practice, the cost may be less, if for example compensation return is not needed during some of the wetter winter months.

3.5.15 As to concerns about the possible temporary failure of the treatment works at Little Marlow, the EA is presumably satisfied that there is sufficient capacity for temporary storage at the works. The tertiary treatment required to make the water suitable for return to the Wye in accordance with up to date water quality standards has been allowed for in the costs for upgrading the Little Marlow works. The cost of a back-up pump for the treated effluent would not be a significant element of these overall costs.

##### *Wildlife on site*

3.5.16 The allocation for mixed use development has not been the subject of objection from English Nature or BBOWT, which suggests that the flora and fauna on the site are of no special interest. No part of the site has been designated as a SINC, neither has there been a statutory designation as an Site of Special Scientific Interest (SSSI) or a Local Nature Reserve (LNR). From my site inspection, I find the lack of international or even county recognition unsurprising. The objection that the site is protected by European legislation is therefore misplaced.

3.5.17 Local residents and Bassetsbury Area Protection Group in particular, were concerned that the site, could be a haven for rare species such as great crested newts. The Council responded by commissioning a survey, which indicated the presence of smooth, but not great crested newts. The present environment is far from ideal for amphibians, and smooth newts and frogs were present in small numbers only. The creation of new water features within the proposed development could improve the potential to support a number of species, compared to the cut grass which covers most of the undeveloped parts of the site. I consider the issue of appropriate mechanisms to ensure adequate width for the river corridors in my discussion of objections to Appendix 2. For safety reasons, the survey excluded the disused lagoon towards the eastern end of the works, although it is not likely to be of much value to amphibians. Any fauna present could be relocated to a new habitat created by changes to the Back Stream.

3.5.18 With regard to bats, although a survey in July 2000 showed considerable activity in the vicinity of the finishing tanks of the works, there is no evidence of any roosts actually on the site. There are other potential feeding grounds elsewhere near the site and the improvement of the river environs would be able to replace such valuable foraging grounds. The position in

considering a local plan allocation is fundamentally different from that when a planning application is determined. If, contrary to the latest surveys, any bats were subsequently found to be roosting on site, appropriate measures would have to be taken at that time to safeguard the mammals.

3.5.19 Similarly, any kingfishers on the site could be protected during the breeding season. Indeed, more planting would be an important benefit for wildlife generally once development was complete. The site is large enough to accommodate a significant area of open space without compromising the suggested level of development, particularly bearing in mind the housing density required by PPG3. I appreciate local residents' concerns that the allocation proposals would result in the loss of large open areas of cut grass in the middle of the site, although much of this space was previously developed with tanks and other structures. Most of the ground is made up, with some contamination, and appears to support a limited range of flora and fauna, certainly compared to genuine greenfield sites.

### **Flood safety**

#### *Wycombe Marsh*

3.5.20 As the name of the site implies, it lies at the bottom of the Wye valley, bounded on one side by the main channel of the river and on the other by Back Stream. Both these water courses have been significantly modified and the site does not have the usual characteristics of a natural water course and floodplain system. Surveys show that most of the ground is made up of fill to an average depth of about 1 to 1.5m (Dale proof, Plan 56161/4.3) and there are no records of flooding. The objectors' photographic evidence showed that the river was close to the top of its banks in February 2001, during one of the wettest winters on record, but did not exceed them. On this evidence alone it would appear that redevelopment of the site at present ground levels would not expose the occupants of any buildings to undue risk of inundation nor cause significant knock-on effects elsewhere up or down stream. In any event the Council argued that, if necessary, flood compensation storage could be provided at the Rye, on land within the Council's ownership already partly used for this purpose. From my site inspection I consider that any necessary bunding could be designed to be acceptable in visual terms at this location.

3.5.21 Since the relevant inquiry session the Environment Agency (EA) has prepared a draft map under Section 105 of the Water Resources Act 1991 of areas likely to flood. This shows that all but a small part of the site (a pond in the north west corner) lies outside the predicted 100 year flood event. I understand that any review of the draft maps by the EA is procedural only; indeed the Agency has withdrawn its objection to this part of the Plan (see G21A and G22). In these circumstances I have concluded that there is no justifiable objection to the allocation on flooding grounds.

#### *Little Marlow*

3.5.22 The Little Marlow works lies within the functional floodplain of the River Thames. The parties agreed that from the known risk of flooding to 500mm once in 56 years, the 1 in 100 year event is likely to be about 150 mm more. Paragraph 30 and Table 1 of PPG25 indicate that in sparsely developed areas such as Little Marlow new building in floodplains should be restricted to schemes such as essential transport and utilities infrastructure, in cases where an alternative low risk location is not available. Where development is permitted, it should be provided with the appropriate minimum standard of flood defence and should not impede flood flows or result in a net loss of floodplain storage. In this instance there would be no enlargement of the site of an existing facility. A revised plan of the proposed works (Doc G Unsworth App 4) shows that the total footprint of the structures would reduce. Although some of the tanks for a new BNR process would be higher than the old filter beds they would replace; the volume of obstructions in the floodplain would be reduced. The redevelopment of the works would also create opportunities to improve the flow of floodwater across the site, by moving tanks from the SW to the NE corner for example. The composting building would not need to

be enlarged, as it operates at considerably less than capacity at present.

3.5.23 Not all of the water from treated effluent would be returned to the River Wye, which may present difficulties in times of floods. However, these could be overcome by storing water in the tunnel if necessary; TW's witness confirmed in chief that this had adequate capacity. Alternatively, the scheme could be amended at a capital cost of £350,000 to provide extra capacity to pump back to the Wye.

### **Green belt policy**

3.5.24 The objectors argued that the proposal to increase the capacity of the sewage works at Little Marlow would conflict with the aims of policy to protect the green belt, wherein it lies. The site has been identified as a Major Developed Site (MDS) in the green belt, to which Policy GB8 of the Plan would apply. Although there has been an objection to the wording of the policy (dealt with in section 9.8 of my report), the broad thrust of its provisions apply. This reflects government policy set out in PPG2, in particular Annex C.

3.5.25 Although detailed designs of the new works were not provided to the inquiry, the plans and evidence about likely heights of new structures indicate to me that the new works may well conform to the policy with regard to volume, nature and height of built form. The building footprint would be reduced and the height of new tanks would be less than the tallest structure on site at present, the composting building. All works would be contained within the existing site, which would have scope for additional landscaping. When viewed from Winter Hill, near Cookham, the current site appears as a developed area in the flat open fields along the valley floor. Its redevelopment would not make any appreciable difference to the appearance of the green belt or the character of the AONB to the south of the river. There would be no material increase in traffic to and from the site. In summary, I see no fundamental reason why the redevelopment of Little Marlow works would not meet the important tests of green belt policy with regard to maintaining openness.

3.5.26 If the detailed scheme did not comply with the letter of Policy GB8, the advantages of the proposals in enabling a larger scheme at Wycombe Marsh that did meet a wide range of planning policies would have to be taken into account. It could be argued that some additional development has been displaced to the green belt, through foregoing the opportunity to reduce the Little Marlow plant significantly. However, the impact on the green belt compared with the existing position would be minimal. I believe the wider planning and economic benefits of allowing a mixed-use scheme at Wycombe Marsh would be sufficiently important to outweigh any harm to green belt policy objectives. These include the physical improvement of the site and the provision of a substantial number of new homes and job opportunities in a sustainable location. The advantages of the allocation would create the very special circumstances needed to justify setting aside the presumption against inappropriate development in the green belt.

### **Transport**

3.5.27 Local residents expressed strong misgivings that the local road network, and London Road in particular; would not be able to cope with additional traffic generated by the mixed development proposed for the site. The Council relied on revised traffic modelling, taking into account the changes to the package of highway improvements following the deletion of allocations at Abbey Barn South and the reduction of housing numbers at Abbey Barn North. On redevelopment, the Wycombe Marsh site would be expected to provide:

- New access junctions at London Road/Hatters Lane, London Road/Micklefield Road/Cock Lane and Abbey Barn Lane/Kingsmead Road or Abbey Barn Road
- A distributor road linking the above roads
- High quality routes for public transport to serve key areas of the site and connect with other routes

These requirements have been incorporated in revised development principles at Appendix 2 of the Plan. It is intended that the new roads through the site would be designed to reduce

through traffic. A level of development equivalent to the revised proposals for the site has been tested using the Council's network modelling (CD/M/64). This showed similar impacts on the highway network as the previous scheme. By 2011, congestion is predicted to get worse than it is now, but the plan proposals, including highway improvements, will not exacerbate this effect. Updated traffic figures produced by the Council in writing show that flows along London Road have varied little in the decade 1990-2000. Indeed the peak hour figures for 1992, the base date for much modelling, and 2000 are strikingly similar. These data corroborate the generally accepted point that the road has been near or at capacity for many years.

3.5.28 Any new development in High Wycombe is likely to create additional transport pressures; however, I concur with the Council's main point that these can be better dealt with at Wycombe Marsh, where public transport accessibility is high, than elsewhere in the urban area (see also T11-12). In this context I note that the Highways Agency has withdrawn its objections to the Plan regarding congestion arising from development at Handy Cross. Inevitably, the new development and associated highway measures are likely to change drivers' behaviour patterns and may lead to some extra traffic on minor roads nearby. I agree with the Council that additional measures to those already in place in Kingsmead Road should be considered at detailed design stage to address any such problems.

3.5.29 Other objectors argued that development at Wycombe Marsh would not safeguard a suitable access for Abbey Barn South. The allocation for a mixed use scheme at Abbey Barn South was excluded from the Plan at Pre-Inquiry stage, but the site remains designated as safeguarded land between the urban edge and the green belt where development may be required at a later date. Although I have not supported the objections to these changes (see section 3.2.1) clearly the planning of proposals for the sewage works site should allow for necessary improvements to Abbey Barn Lane, and the junction with Kingsmead Road in particular. The Council admitted that an early scheme for a flyover into the site may not be pursued, and produced an alternative proposal for a roundabout at the junction.

3.5.30 It would be possible to achieve access to the Wycombe Marsh site at its present position, off Abbey Barn Road, which would not affect any part of the site. With regard to objectors' concerns about the proposals for a small roundabout at the junction of Abbey Barn Road with Kingsmead Road, the allocation and development principles currently proposed would not prejudice a realignment of Abbey Barn Lane. I deal with the implications of the topography for the gradient and alignment of the road, and its consequent effect on the scope for development at Abbey Barn North, in section 3.2.1. I see no overriding reason why it would not be possible at detailed design stage to achieve a road configuration that ensures safe passage for pedestrians and cyclists without the need for third party land. Even if this cannot be achieved, the position would be no worse that it is at present.

### **Viability**

3.5.31 A fundamental argument of the objectors was that the proposed allocation would not be delivered within the plan period because it was not viable. The breadth of disagreement on this issue was very substantial. The Council/TW suggested that the full transfer option for the sewage works would generate a profit of at least £10m; whereas the objectors predicted a deficit of between £12m to over £41m. They argued that in that event, TW would pull out of the scheme, leaving a major shortfall in the Plan's housing strategy.

3.5.32 The estimated costs included in the appraisal of the sewage works transfer - the Review of Engineering dated February 2001 by Symonds Group Ltd had been reduced by £4m or so due to changes in the tunnel design, in particular the deletion of ventilation shafts. Calculations about the costs of remediation and allowances for ground conditions had been carried out in different ways, but were not far apart in total. Although the objectors' estimate for decontamination was £375,000 per ha more than TW's, this included allowances for hotspots and 'abnormal' foundations. These figures excluded an allowance for archaeological investigations, agreed by both sides as likely to amount to £150,000, reflecting the disturbed nature of the ground on site.

3.5.33 The main differences between the parties concerned sums for contingencies, based on the initial risk assessments. The objectors had argued that an uplift of 25% should be applied to the costs identified in the Symonds Report. This would be in addition to a 10% contingency sum already included in the costs estimates. The objectors' witness admitted that the 25% figure was somewhat arbitrary, based on the scale and complexity of the project. From the evidence, I consider the Council's more detailed and up to date evidence, taking into account further investigations since the publication of the Symonds report, is likely to prove a more reliable indication of engineering costs. For example, since the relevant inquiry sessions the Environment Agency had withdrawn its objection to the proposal and the S. 105 flood risk maps had excluded the site from the Wye floodplain. Nevertheless, the transfer option would be a very major engineering project subject to some areas of uncertainty, such as ground conditions, groundwater level changes etc. TW admitted that some other costs elements, such as the extent of measures to deal with contamination, could easily rise and I consider it would be prudent to add a sum equivalent to roughly 5% of the engineering costs (£2m) back into the equation.

3.5.34 There was disagreement about an allowance for 'betterment' at the Little Marlow sewage works, ie the costs of improving standards of treatment which would not be incurred by TW until a later date if Wycombe Marsh operations were not transferred. There are many uncertainties in predicting these estimated amounts for expenditure many years ahead, discounted to the projected occupation date of the Wycombe Marsh scheme. The objectors thought that the Little Marlow works would be in reasonable working order after committed expenditure up to 2005 had been incurred. They therefore estimated that improvements undertaken as part of the transfer option would provide benefits that would not otherwise have been expected for many years. There was no unequivocal evidence about this matter. It would be incorrect to deduct the £17.5 m that is due to be spent at both works in the period to 2005. From the Symonds report, about £10m would have been earmarked up to 2005 to bring Wycombe Marsh up to current water regulations standards. I consider it reasonable to deduct from the scheme costs the £7m or so that would have to be spent at the Little Marlow works in any event. Although this is not the full difference between the estimated expenditure with and without the transfer scheme, it seems to give some indication of the amount of extra investment proposed for the Little Marlow works to bring them up to the best current standards rather sooner than if the transfer did not take place. This betterment factor has a very significant effect on the potential viability of the scheme.

3.5.35 The parties had also taken a fundamentally different view about cash flow and interest. The objectors argued that the scheme would take until after the plan period to come on stream, without any income to offset development costs, and interest on borrowings. The Council made no allowance for this, arguing that TW already held the land, including the Bunzl Paper Mill site. However, this was purchased for £5.6m at the end of 1999 and has been subject to holding costs since then. While I do not believe the whole scheme would take until beyond the Plan period to be fully implemented, I think that the Council has been unduly optimistic about the timing of the proposed transfer and a start on site, as I discuss below. If the site were to be re-developed as a single entity, there is no sound basis to assume that the paper Mill area would be developed first in isolation, to generate some cash flow. The objectors' estimate seems rather inflated, but some deduction for interest on the net cost of transferring the works and the cost of holding the Paper Mill site would be reasonable. From the evidence about the projected construction period and interest rates, which have fallen since the inquiry, I have made a rough estimate of £4m at present value. Allowing say £1m for financing the Paper Mill site this roughly splits the difference between the two sides.

3.5.36 Other agreed costs covering matters such as transportation costs, contributions for education, open space, community facilities etc also must be taken into account. I have considered the effect of affordable housing requirements on the value of the site. In summary, I estimate the total costs of the works to provide the development site would be about £51m, as itemised below:

Item	£
Relocation of STW (net)	43,500,000
Revenue loss, demolition, remediation, archaeology (est)	4,500,000
Total - less £7m betterment	41,000,000
Interest (over 3 years @ 5%, plus £1m Bunzl PM costs)	5,000,000
Transportation, recreation, community payments	5,065,000
<b>Total costs</b>	<b>51,065,000</b>

3.5.37 The net value of the potential development site was also the subject of dispute, with estimates differing by £11m. The parties agreed the residential land would be worth about £3.1m per ha; the opportunity costs of implementing affordable housing provisions also were given similar values. The site is suitable for high density residential development at the upper end of the range quoted in para 58 of PPG3. Some land would be lost to a major distributor road through the site and an open space corridor along the two watercourses. However, given the proximity of large areas of open space at The Rye, no land would be lost to other open space, and buffer strips would be minimal. My only concern with the Council's estimated values, is the relatively small proportion of land for affordable housing land (about 20%) compared to the 30% ratio of bedspaces required by Policy H12.

3.5.38 I favour the Council's more bullish view of commercial values than the objectors', primarily because I consider the assumptions of rather higher density of development are realistic in the context of revised government policy, as the permission on the City Grove site illustrates. In addition, High Wycombe remains a very buoyant economy, with an acknowledged shortage of retail warehousing and good-quality modern business premises. Whether the retail warehousing land would achieve in full the very high values attributed by the Council is open to debate. However, I consider the allocation would create a gross development value of at least £55m.

3.5.39 Ransom money is unlikely to materially affect outcome of the viability assessment. The Council has allowed for access at the City Grove site in granting planning permission and as the objectors' valuer agreed, it would be unreasonable of Council to request a excessive amount for any land in its ownership. Other factors, such as the long-term value to TW of consolidating operations on single site, are hard to quantify.

3.5.40 In conclusion, it seems to me that there is some question about the viability of the proposed full transfer option, which is at the margins of profitability. On a purely commercial basis, a developer without any operational interest in relocating the sewage works would compare the likely profit from developing the Paper Mill site alone with that from redevelopment of the whole site. Bearing in mind the potential value of the existing planning permission at the Paper Mill, I consider the issue would be finely balanced. However, there is a clear intention on the part of TW to proceed with the transfer scheme, and considerable amount of expenditure has already been incurred.

3.5.41 I am also concerned that the consolidation option was less fully examined than the transfer option. TW will be obliged to spend a considerable sum (about £17 m) in the immediate future in any event to ensure that both works meet current regulations in the period up to transfer. It seems clear from the Montgomery Watson reports that it would be possible to redevelop the Wycombe Marsh site to build a new works incorporating more efficient processes without the major costs of constructing the pipeline. Pursuing this option would still create a large development site of about 7ha, plus the Bunzl Paper Mill site and the City Grove site. This would certainly be suitable for more employment development, as suggested by AXA, in addition to the retail warehousing proposed; alternatively a mixed use scheme including some high density housing would also be possible.



3.5.42 However, I appreciate that the consolidation of the sewage works, even a new one operating to current best standards with regard to smells, would not be an ideal neighbour for substantial high density housing or retail development. Any new plant would have to be subject to stringent odour and noise controls to enable redevelopment value to be released. Splitting the site would create additional difficulties with regard to achieving a cohesive design, satisfactory treatment of the whole length of both riversides and the penetration of public transport into the new development. In addition, TW clearly have decided that the operational advantages of combining the works, are a significant benefit to weigh in the balance against higher capital costs.

### **Programme**

3.5.43 The objectors argued that the Council's suggested programme, envisaging the start of residential development in 2005, was totally unrealistic. They foresaw first occupation on site in October 2013, after a much longer lead time at the planning stage.

3.5.44 A key consideration in programming is the attitude of the landowner of nearly all the site, TW. The evidence to the inquiry substantiated a clear commitment to progress the scheme as quickly as possible. Preparation of an Environmental Statement for the detailed proposals and master planning for the site were already in hand. Since then, further publicity has indicated that a planning application for the pipeline was due to have been submitted shortly before the close of the inquiry. I would not expect much other work to have taken place, before the publication of my report, which will be critical to the prospects for the principle of development. However, given my overall findings about the principle of the allocation, and the general acceptability of transferring the sewage works to Little Marlow, works could proceed rapidly thereafter.

3.5.45 One of the main differences between the parties related to the length of the planning process. The Council accepted that the question of whether minerals planning permission for excavation would be required is for Bucks CC to decide, depending on the end use of the chalk. Given the general support from BCC for the Plan, it seems unlikely that permission would be withheld unreasonably, or made subject to very onerous conditions. Changes to conditions attached to the planning permission for the composting building at Little Marlow would also be necessary, to allow for the level of throughput and the type of process. The concept of the proposals was tested thoroughly at 4 days of Local Plan inquiry, and it would be surprising if any further public inquiry were to be considered necessary.

3.5.46 Even so, I consider the Council's suggested programme to be unduly optimistic, even though the assumptions about the timing of my report have proved to be well founded. In my experience the anticipation of a gap of just 5 months or so between receipt of the Local Plan report and granting of planning permission for the schemes, including all Section 106 agreements, is unlikely to be accurate. The Council's supplementary written evidence includes a programme from TW which shows work starting at Little Marlow in mid 2002, well before planning permission could reasonably be expected.

3.5.47 The projected timescale for the engineering works themselves was generally agreed between the parties, apart from the anticipated time for archaeological excavations. From written representations submitted before the close of the inquiry it seems unlikely from Bucks CC evidence that the site contains any major unknown sites such as mills. Even if there were, from details of recent fieldwork at Bowden Mill on the City Grove site the programme would not be significantly delayed by if any remains were found. This is unlikely, given the very disturbed state off the ground. Some excavations could be undertaken before the planning application is determined, but I think the most likely scenario is that they would be carried out concurrently with de-contamination. I consider it would be prudent to allow about one year for cleaning up the site and archaeological digs. For cost reasons it would seem likely that the removal of the disused sludge lagoon would be undertaken in parallel with these other works.

3.5.48 In summary, I would expect the earliest the transfer of the works to start would be in

2003, if all went well. Given a 3-year construction period after remediation, new buildings would not be ready for occupation until 2007 at least, with most residential development coming forward in the middle of the second phase (2006-11).

### **Other matters**

#### *Allotments*

3.5.49 14 allotments to the north of Back Stream would be affected by the proposed allocation. A new road connection to Abbey Barn Lane would displace about 4 ploholders, who would be able to relocate to those south of the stream. Alternatively, subject to statutory provisions, it may be advantageous to relocate all the ploholders to the underused allotments at Bassetsbury Lane, with the costs of upgrading these particular plots borne by the Wycombe Marsh developer.

#### *Community uses*

3.5.50 There is plenty of scope for the site to cater for the provision of new community facilities, subject to a detailed survey of local needs. These may include new premises for the British Legion, or other organisations, but it would not be appropriate to specify particular uses at the Local Plan stage.

#### *Conservation Area*

3.5.51 Although a small length of the site boundary almost abuts the conservation area to the west, the railway embankment provides a strong visual barrier between the two areas. I therefore consider the allocation would have no effect on the character and appearance of the conservation area.

#### *Mix of uses*

3.5.52 I see no need to increase the employment allocation on the site, as requested by Axa. Although some industrial and commercial uses have been displaced from the London Road corridor, such as Ercol and (soon) Bucks Free Press, many remain. There are two employment zones close to the site; a small area of mainly industrial uses on the north bank of the River Wye, and a larger mixed commercial and industrial area with frontage to London Road to the east. I deal with the general issue of employment allocations in Chapter 4 of my report, where I suggest that existing employment land should be protected and in some instances improved to meet modern needs. However, the addition of another 2 ha at this site would not provide the opportunity to create a 'business park' of the scale and nature proposed by other objectors (including Oxford Land). I see no reason why a hotel and restaurant located close to the main public transport corridor in High Wycombe, would not complement the range of uses proposed. As discussed in Chapter 5 the retail element of the allocation would provide important value to support the transfer of the sewage works to take place and would help to enable environmental improvements and community facilities. The need for the latter could be assessed when detailed proposals are drawn up, to take into account a wide range of local aspirations for the site.

### **Overall conclusions**

3.5.53 In broad land use terms, the Wycombe Marsh site meets a number of significant policy objectives for providing much needed retail, employment and housing development on previously developed land in a sustainable location. Many of the objectors' concerns about the practicality of the proposal to relocate the sewage treatment works have been met. Tunnel maintenance can be achieved without the need for ventilation shafts, removing any potential impact on the AONB landscape. The tunnel would have capacity to store 14 hours? of flow if Little Marlow broke down. The risk of aquifer pollution appears to be minimal, given the proportion of tunnel below the water table, and construction and monitoring safeguards. There is no evidence of flooding at the made-up ground levels currently pertaining at the Wycombe Marsh site, which does not lie within the draft 1 in 100 year flood risk map prepared by the EA. The proposals to redevelop the Little Marlow works would not add to the volume of buildings,

tanks and other structures within the Thames floodplain; the footprint would be reduced. Sufficient treated effluent could be pumped back into the River Wye so ensure that the general ecology of the riverside environs would be protected.

3.5.54 With regard to costs and the overall viability of the scheme, I have some misgivings that the partial redevelopment option has not been fully explored. Taking into account the existing planning permission for the Paper Mill part of the site, Thames Water may have been unrealistic in their predictions of the value attributable to a combined site. From the engineering and valuation evidence, which showed very wide variations, I concluded that the revised Plan proposals are on the margin of viability. Nevertheless, it seems clear that the TW have given every indication that they intend to proceed with the scheme. There may be operational benefits with regard to running costs, safety, water quality, nuisance to nearby residents which are hard to quantify accurately in conventional viability analysis. Even if the transfer option proved to be unviable after further detailed analysis, there is sufficient scope to release a substantial area of the site after consolidation of the existing works. Together with the Paper Mill site, this would provide for a substantial amount of residential and commercial development such that the employment and housing strategies of the Plan would not be fundamentally undermined.

3.5.55 I consider it reasonable to annotate the Little Marlow works as a major developed site, where redevelopment would not conflict with green belt policy subject to limitations on the footprint and volume of new structures. In any event, the benefits of the total package of measures needed to release a suitable 'brownfield' site for development would outweigh any policy objections to the consolidation of operational works in the green belt. None of the other more limited objections raised, concerning matters such as highway planning and the very limited loss of ecological features at Wycombe Marsh, are of sufficient emphasis to counter the strong arguments in favour of the allocation.

3.5.56 My main reservations about the Plan proposals are concerning the implementation programme, particularly with respect to the housing element. I agree with the Council that a call-in inquiry for the proposals for Little Marlow works is unlikely in the context of my report findings, depending on time of adoption of plan with respect to any planning application for redevelopment of the site. However, a number of uncertainties remain; this is unsurprising given the scale of the project. Therefore I consider the Council's estimates to be somewhat optimistic. Housing completions are therefore more likely to come on stream towards the middle of the second half of the Plan period, which I have recommended as housing development phase 2.

## RECOMMENDATIONS

- H/5A/1 Modify the Plan in accordance with PICs 3/6, A2/8, A11/2, 12/6 and M/11
- H/5A/2 Modify the suggested phasing of housing proposals in accordance with my comments above and in accordance with recommendation H/4/1 above

<b>POLICY H6: DESIGN OF NEW RESIDENTIAL DEVELOPMENT</b>
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### The Objections

0158/10 High Wycombe and Marlow Green Party  
0379/25 Sport England

0817/22	Croudace Ltd
0872/22	Government Office for the South East
0922/19	House Builders Federation
1019/2	David Rhodes

### **PIC 3/27 Objections**

0571/42	Laing Homes Ltd
0579/31	Michael Lambert
1935/12	Anthea Hardy

### **Summary of Objections**

- (a) Object as the Policy fails to mention the topic of energy efficiency.
- (b) Policy should take into account the inadequacy of existing sport and recreation provision in different parts of the District based on a thorough assessment of local need.
- (c) Object to cross-referencing in the policy to other sections in the Plan. Where relevant, matters should be referred to in the supporting text. Policy duplicates matters covered in other policies. Parts (i), (ii), (iii), (iv) and (vii) are superfluous and should be deleted. (Croudace & HBF)
- (d) The Plan should set out, either here or elsewhere in the Plan, more detailed advice on increasing density of new housing development. (GOSE)

In response to proposed Pre Inquiry Change 3/27:

- (e) Object, as changes take the approach advocated in PPG3 to unacceptable extreme. Policy is confusing in terms of its relationship to Appendix 1; it implies that only selective compliance with criteria in the Appendix is required. No corresponding changes are proposed to the allocated sites for housing. It is assumed that they are capable of satisfactorily accommodating radically higher densities.
- (f) Quality design on previously developed land is a goal of PPG3. The Council should be clear on good design on the greenfield and green space sites it is proposing.
- (g) Children's access to open-air play should be spelt out more clearly. Very high densities with more spacious layouts may be achieved. Large sites should have mixed developments.

### **Inspector's Reasoning and conclusions**

3.6.1 I consider that the energy efficiency of new buildings is usually a matter that is most appropriately addressed by reference to Part L of the Building Regulations. However housing layout has a significant effect on energy efficiency and is a matter that can be addressed through the planning system. This approach is supported by paragraph 56 of PPG 3. To mention this explicitly as part of a Policy would involve the UDP in an unnecessary amount of detail, but I consider it would be helpful to refer to the joint DETR/BRE Document *Planning for Passive Solar Design* in Appendix 1 (see also G23 and G28).

3.6.2 Proposed changes to both this Policy and Policy H21 go some way to addressing Sport England's concerns about the circumstances where it would be appropriate for new development to contribute to open space provision. The approach set out by PC 3/16 to Policy H21 allows for a contribution from reasonably small developments in areas of deficiency of open space. For the reasons I have set out in my consideration of Policy H21, I find that would be overly restrictive to expect contributions from smaller developments. I consider the approach set out in both these Policies following proposed changes strikes a reasonable degree of balance between meeting need an identified need whilst not unduly restricting development.

3.6.3 Objectors are concerned that specific cross references to other policies in the Plan are superfluous and unnecessary. The Council consider Policy H6 to be a “key” Policy, and it is therefore important that reference is made to other relevant plan policies. I regard the Policy as having a central role in the implementation of government policy promoting good design. In my view these cross references are not superfluous, as they all relate to topics that are considered to be essential components of good design in PPG3 and its associated companion guides. This provides sufficient justification for the use of relevant cross-references to other related policies (see G3).

3.6.4 I consider that since the introduction of Policy H6A the plan adequately addresses GOSE’s concerns over the importance of density in the design of new housing and therefore adequately reflects PPG3. I note the objector’s concerns over the effect of the policy on the level of employment land. In chapter 4 of my report I found that the Plan policies provide adequate protection for employment land and allocate sufficient new employment land to meet the needs of the District. Whilst government policy encourages the re-use of previously developed land, I consider that both this Policy and the Plan as a whole do not place an undue emphasis on the conversion of business or employment land to residential use.

3.6.5 With regard to concerns about housing density following PIC3/27, I consider that the approach taken in Policies H6 and H6a reflects the emphasis found in PPG3 on the importance of making the best use of land and to take opportunities for increasing housing density wherever this is appropriate. This is further reflected by changes that have been made to Appendix 1. In section 3.2 of my report I considered the likely contribution of all sites towards meeting Structure Plan requirements in the light of the minimum density range put forward in paragraph 58 of PPG3. I found the revised plan proposals accorded with this policy, taking into account the relevant definitions in Annex C. There is nothing in PPG3 to suggest that the density requirements should only apply to development on brownfield land and the Plan policies follow this line accurately.

3.6.6 Whilst the layout of development and the nature of the mix of uses on large developments are broadly addressed by Appendix 1 and certain site specific policies, the detailed consideration of these matters is inappropriate for inclusion in the Plan. I consider that these matters would be most properly addressed when an application is made, although the use of SPG may also be beneficial. Therefore I consider that it would involve the Plan in unnecessary detail to make specific reference to these matters in this policy.

3.6.7 The provision of children’s play space is suitably addressed by revised Policy H21; there is no need to make an additional reference to children’s playspace in this Policy, which would involve the Plan in unnecessary repetition.

## RECOMMENDATION

- H/6/1 No modification

<b>POLICY H6A: APPROPRIATE DEVELOPMENT DENSITIES</b>
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### PIC 3/28 Objections

0571/43	Laing Homes Ltd
0579/32	Michael Lambert
1071/17	Persimmon Homes (TV) LT

### Summary of Objections

- (a) Reference to density criteria in Policy is incompatible with Appendix 1, which, inter-alia, appropriately identifies the particular character of Wycombe.
- (b) No consideration is given to lower densities where there is poor public transport. In such locations, densities should follow that prevailing in the vicinity/adjoining sites.
- (c) Policy is too prescriptive and for identified sites, net residential areas should be included within Development Briefs.

### Inspector's Reasoning and conclusions

3.6.8 I note the objector's concern about how the imposition of density standards may affect the character of the District. As I have already said, the Policy correctly reflects government guidance regarding density as set out in PPG3, both in terms of the minimum acceptable density and by seeking higher densities in appropriate locations. The Council point out that the policy allows for densities to be lower than 30 dwellings per hectare, if there are specific circumstances that justify this. I support their argument that location of new development adjacent to existing development of a lower density may not be sufficient justification for this exception, particularly as PPG3 makes it clear that densities that have been achieved in the past are not acceptable now. I recognise the particular constraints that typify the district but in my view there is no good reason why development in the District should not generally comply with government guidance set out in PPG 3. I recognise the contribution that can be made by SPG to balancing the conflict between increasing densities and maintaining character, but I consider that it would not be appropriate to address density solely by this means. PPG3 sets a national standard that is reflected properly in the Plan. Policy H6a is sufficiently flexible to allow for exceptional circumstances where the protection of residential character would be significantly compromised by a higher density development.

3.6.9 Mr Lambert is concerned that the Policy should allow lower densities in areas not accessible to public transport. Whilst PPG 3 states density should be highest near public transport, it is clear from both PPG3 and PPG13 that housing development should be directed to sites that are well served by public transport. Furthermore, aside from transport considerations, there are other significant benefits that increased density provides, such as reducing the loss of greenfield land. If for exceptional reasons development was allowed on a site that was not particularly well served by public transport, it would not follow that this would justify a reduction in minimum density to below 30 dwellings per hectare.

### RECOMMENDATIONS

- H/6/2 Modify the Plan in accordance with PIC 3/28

POLICY H7: CREATING BALANCED COMMUNITIES
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### The Objections

0101/1	Mrs C Rolph
0137/7	The High Wycombe Society
0218/6	Airways Housing Society
0376/11	Axa Equity and Law Life Assurance Society PLC
0408/4	<i>Ercol Furniture Ltd</i>
0560/17	Mr D H Hughes
0571/17	Laing Homes Ltd
0572/4	Fairview New Homes PLC
0817/23	Croudace Ltd

0872/23	Government Office for the South East
0922/18	House Builders Federation
1073/9	East of Amersham, Hill Residents Association
1201/10	Mr C G Hamilton, Clerk to Downley Parish Council
1201/8	Mr C G Hamilton, Clerk to Downley Parish Council
1414/6	Michael J Overall
1584/70	The Marlow Group
1738/4	Christopher Brookes Oliver

### **PIC 3/8 Objections**

0840/56	Marlow and District Chamber of Trade & Commerce
0872/35	Government Office for the South East

### **PIC 3/29 Objections**

0376/85	Axa Equity and Law Life Assurance Society PLC
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### **Summary of Objections**

- (a) Question whether a lowering of the quality or size in housing stock is the way which Wycombe should be going.
- (b) Lack of consideration given to persons of retirement age who may wish to move to a smaller property. Paragraph 3.38 means that new housing will not be within or close to the majority of a persons local community.
- (c) There should be a moratorium on dwellings with 5 bedrooms or more. Without controls developers will follow market demand, failing to meet local need. Policy does not enable the Council to exercise sufficient control over the sizes of dwellings. The Council needs to have powers to reject development proposals that do not meet the needs of the population.
- (d) A high standard of architectural design is required, even for small units.
- (e) Policy is too restrictive. Text should be amended to take account of market considerations in line with PPG3.
- (f) A mix of accommodation on site may not always be appropriate if justified.
- (g) Policy lacks criteria against which a prospective developer can evaluate its significance in relation to a particular site.
- (h) There is incongruity between the aspirations of this policy and reliance elsewhere in the plan on unidentified sites. Impact of policy may fall disproportionately on allocated sites.
- (i) There is no indication that suitability to provide a range of accommodation has been a factor influencing the selection of the housing allocations in Policy H2.
- (j) The term 'resisted' is imprecise. The circumstances under which planning permission would or would not be granted, should be set out. (GOSE)
- (k) Policy wording is in conflict with paragraph 3.30.

In response to proposed Pre Inquiry Changes:

- (l) Object to the over-prescriptive approach to housing mix that is implied by the Policy, which could preclude the proper operation of the housing market.
- (m) A definition is required of what is 'appropriate' to create diversity of local communities.
- (n) Policy does not allow for any degree of flexibility in the implementation of the policy, to take into account the merits of individual cases. Propose deletion of last line of policy, or,

alternatively, state more positively, that proposals which provide a range of accommodation would be favourably considered.

### **Inspector's Reasoning and conclusions**

3.7.1 Paragraphs 911 in PPG3, RPG 9 and the Structure Plan recognise that in many instances there can be a significant difference between the variety of housing that is being provided by the market and the type of housing that is required to meet local housing needs. PPG 3 states that local authorities should take these local needs into account when planning for new housing. The Council state that there is a demand in the district for smaller households which is recognised by the ONS Household Projections for Buckinghamshire. The importance of these issues is further reflected in PIC 3/29.

3.7.2 I consider that this Policy to secure a range of new housing to meet local needs is broadly in agreement with PPG 3. This recognises that market and site conditions play an important role in determining the suitability of sites for a particular type or types of housing, but this must be balanced by the government's clear commitment to the creation of balanced communities. There is a clearly an identified local need for smaller households; in the absence of any significant evidence to the contrary, I consider that it is reasonable that PIC 3/29 emphasises their importance. I do not think that this change increases the inflexibility of the Policy or makes it overly subjective. I consider that the Policy achieves the right balance between the need to take market and site conditions into account, but is sufficiently forceful to reflect government policy.

3.7.3 I note objectors' worries about the criteria for determining an "appropriate range of housing", a "significant number" of smaller dwellings and the definition of an "appropriate" mix. In my view the precise mix of dwellings on each site is most appropriately addressed in negotiations between developers and the Council. I consider that it would be overly detailed and cumbersome for the plan to precisely specify the types of dwellings that would be required. Whilst I accept the Council's point that SPG based on the Housing Needs Survey, might be helpful in this instances, I consider that to make the Policy more detailed would not be necessary.

3.7.4 Downley Parish Council considered that the deposit draft policy placed undue emphasis on large scale housing by exempting small sites, which could disproportionately effect elderly persons in rural areas. I consider PIC3/29 meets the objector's concerns regarding this issue. It also addressed the concerns of the GOSE regarding the use of the term "resisted" in the Policy. Following these proposed changes the Policy does not in any way contradict any of its supporting text.

3.7.5 While the policy would apply with benefit to allocated sites, it could also be used to secure a range of housing on windfall sites. The amendments to the lower case text (paragraph 3.28) in PIC 3/29 clarify this. As I have previously explained in my considerations of objections to the allocation of these sites, I find that they are all capable of accommodating a range of dwellings.

3.7.6 Turning to more specific objections, I find that the Policy does not in any way require a reduction in the quality of housing locally available, nor does the Policy contradict other plan policies concerning the importance of design. PPG3 stresses the importance of high quality design, which is reflected both in this chapter and in other parts of the plan including the General Development policies. There is no reason to assume that because some housing is designed for smaller households that there will be a reduction in quality. That said I consider that it would be unduly restrictive to place an outright moratorium on the development of large 4 or 5 bedroom houses either in Princes Risborough or other parts of the district. I consider the Policy reflects the aim of government policy to provide a range of housing.

### **RECOMMENDATIONS**

- H/7/1 Modify the Plan in accordance with PIC 3/29.



H8: THE PROTECTION OF EXISTING RESIDENTIAL ACCOMMODATION AND LAND

**The Objections**

0560/1            Mr D H Hughes  
1004/6            Tesco Stores Limited  
1260/34           The Marlow Society

**PIC 3/9 Objections**

1141/53           Beazer Strategic Land  
1935/11           Anthea Hardy

**Summary of Objections**

- (a) Policy gives undesirable draconian powers to the Council and the policy should be deleted.
- (b) Criterion (ii) is unclear and imprecise. It is not clear how the level of under utilisation of residential land will be defined. Delete criterion (ii).
- (c) Policy is too loose and should be rephrased to commence with... 'Planning permission will not be granted which would result in...'

In response to proposed Pre Inquiry Change:

- (d) Remains to be seen how the policy will be applied in practice.
- (e) A piecemeal approach to 'squeezing in' housing is devastating and contrary to the purposes of planning which is to build healthy communities.

**Inspector's Reasoning and conclusions**

3.8.1 Because of environmental constraints, the Structure Plan require the district to meet just 60% of its locally generated housing demand. In these circumstances, it is only reasonable that the current level of housing is maintained. Government policy in PPG3 emphasises the importance of fully utilising residential land. I consider that this Policy, following PIC 3/30, reasonably follows this advice by resisting development that would lead to a net loss in residential accommodation. I do not therefore think that it is in any way draconian.

3.8.2 Tesco Stores consider that Criterion (ii) is unclear and imprecise. I consider that PIC 3/30 addresses objectors concerns over the lack of clarity in criterion (ii) by deleting it. PIC3/30 also removes the word "normally" from the Policy, which I consider meets the Marlow Society's objection that it is loose and poorly worded.

3.8.3 As regards objectors concerns about how the Policy will be applied, I do not consider that speculation on how the Policy may or may not be implemented is sufficient justification for changing it. Following PIC 3/30, I find that the Policy adequately complies with government advice and would in no way encourage the "squeezing in" of housing.

**RECOMMENDATIONS**

- H/8/1            Modify the Plan in accordance with PIC 3/30.

POLICY H10: SPECIAL NEEDS HOUSING

**The Objections**

0218/7 Airways House Society Ltd  
0506/6 Bassetsbury Area Protection Group

**Summary of Objections**

- (a) Question why the 'proximity of car parking within the overall layout and design of development' should be specifically highlighted in view of the low car ownership levels associated with special needs housing.
- (b) Policy requires greater justification. 'Care in the Community' is constantly under review.

**Inspector's Reasoning and conclusions**

3.10.1 As regards objectors concerns about car parking, I consider that it is reasonable to highlight the importance of car parking in the provision of special needs housing. Whilst I appreciate that occupiers of special needs housing are often not car users, there are certain instances, such as the provision for housing for the mobility impaired, where this aspect of the site's design is crucial (see GA). Therefore I consider that it is a reasonable requirement that this is taken into consideration in the provision of this type of housing.

3.10.2 The Council argue that whilst this Policy can apply to the provision of accommodation for "Care in the Community" purposes, it is more aimed at the provision of housing for the elderly. I agree that the Policy can reasonably apply to a number of types of special needs housing. Whilst I recognise that the provision of "Care in the Community" housing can be contentious, I consider that the Policy is sufficiently robust to address the relevant planning issues that the provision of this type of housing may raise. I do not believe that a greater level of justification for the Policy is therefore necessary.

**RECOMMENDATIONS**

- H/10/1 No modification

POLICY H11: AFFORDABLE HOUSING

**The Objections**

See Appendix 3J

**PIC 3/10 Objections**

0218/19 Airways Housing Society Ltd  
0579/26 Michael Lambert

**PIC 3/11 Objections**

0345/13 Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd  
0524/25 Thames Valley Chamber

0808/10	Linden Homes South East Ltd
0817/42	Croudace Ltd
0840/57	Marlow and District Chamber of Trade & Commerce
0872/36	Government Office for the South East
0922/28	House Builders Federation
1141/48	Beazer Strategic Land
1595/9	Berkeley Homes (Chiltern) Ltd

### **PIC 3/12 Objections**

0345/14	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0509/8	Lattice Property (Formerly BG Property)
0524/26	Thames Valley Chamber
0817/43	Croudace Ltd
0872/37	Government Office for the South East
1141/52	Beazer Strategic Land
1595/10	Berkeley Homes (Chiltern) Ltd

### **PIC 3/31 Objections**

0408/43	Ercol Furniture Ltd
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### **Summary of Objections**

- (a) The proportion and location of affordable housing on any development should be set only after consultation and agreement with existing residents in an area.
- (b) A more detailed and robust local definition of affordable housing should be incorporated.
- (c) Propose deletion of first sentence of paragraph 3.46 and amalgamation with paragraph 3.45.
- (d) Social housing is unnecessary. People should be given the chance to purchase their own homes.
- (e) Percentage of affordable housing (30%) is too high which will limit developers in their ability to bring forward wider improvements. Percentage should be reduced to take account of contribution from low cost market housing. Affordable housing should be provided on an ascending scale. Doubt that the Council will achieve 570 affordable units. 30% target is too low. Propose that all new development should be allocated 33% starter homes and Housing Association to rent or buy; 33% retirement accommodation; 33% larger 3/4 bedroom homes.
- (f) 30% bedspaces amounts to an arbitrary quota and is therefore contrary to Government guidance. Policy should be flexibly applied in relation to site specific considerations, negotiation, related market conditions etc. Should set overall affordable housing target for the plan period based on District's housing needs.
- (g) Definition of affordable housing should follow government guidance and include an element of low cost housing. Policy does not recognise low cost market housing as affordable. Definition unacceptable as it relates only to that provided or managed through a Registered Social Landlord (RSL). Definition should be expanded to include houses with maximum floor area and ones that could be sold at a discount of their market value.
- (h) Policy should allow for commuted payments in lieu of affordable housing provision.
- (i) No evidence that the concentration of affordable housing at Princes Risborough is consistent with the distribution of need, the town already has two large Council estates.

- (j) More information required on current and forecast need; in particular, distinctive local housing need.
- (k) Housing should be affordable, not social. Use of the term 'affordable' is misleading. Some parts of the District are not suitable for affordable housing.
- (l) Policy too verbose and unclear.
- (m) Circumstances may not always warrant an element of affordable housing on sites greater than 25 units.
- (n) People who need affordable housing should be located close to high frequency public transport routes, shops and other community facilities.
- (o) Delete section 'subject to the physical circumstances of the site, and the prevailing and anticipated market conditions' as it could nullify policy M5.
- (p) Policies must be included allowing for increased density and reduced parking for affordable housing.
- (q) Propose a lower limit for affordable housing in Marlow. Policy should provide framework to enable Housing Associations to produce units in high land cost areas.
- (r) Sheltered accommodation for the elderly is a separate, specialist need. Concern that the policy may require affordable housing on small private sheltered schemes. Amend text to allow more flexibility.
- (s) Amend policy to allow an annual re-assessment of need and withdraw benefits if the household no longer qualifies.
- (t) Policy should be linked to housing strategy as part of a corporate approach.
- (u) Policy should state that affordable housing will be weighed as a positive material consideration which may override other policy considerations.

In response to proposed Pre Inquiry Changes:

- (v) No justification for the deletion of the annual target/range for affordable housing. Council is being over optimistic in its assessment of windfall sites coming forward. Affordable housing target should be amended to include all affordable housing units to be built in the District with the Plan period, including windfall.
- (w) Lower case text has not been amended to take account of the latest housing needs survey.
- (x) The Council has not justified the lower threshold. Exceptional local circumstances must be identified.
- (y) The requirement for implementing affordable housing schemes, where no registered social landlord is involved, is unduly restrictive.
- (z) Object to the inflexibility afforded by policy and the Council's approach to affordable housing.
- (aa) Whilst supporting the reduction in threshold, submit that the benefit of the change is diluted by the wording 'where it would be reasonable'. Suggest deleting this wording. An additional provision should be inserted that 'should a site not be appropriate for affordable housing that the developer has to provide an alternative site for the affordable housing'.
- (bb) Object to the words 'at least' in paragraph 3.41.

## Inspector's Reasoning and conclusions

### General

3.11.1 The key issues concerning affordable housing provision and affordable rural housing in the District were discussed at the Affordable Housing Round Table Session (RTS) on 9 January 2001. The notes of this meeting, agreed by all participants as accurate, are attached as Annex 3.2. I will refer to these notes as useful summaries of the views of the main participants at appropriate stages in my discussion of this matter. Along with their rebuttal proofs to specific written representations about this subject the Council have produced two supporting documents "Topic Paper 3 - Affordable Housing" and "WDC/H11/1", their position statement on the subject for the Round Table Session. Fordham Research produced on behalf of the Council a full Housing Needs Survey (HNS) in 1996 and a more limited survey in 1999. It is my intention to initially deal with the overall level of affordable housing need. I will then address what I consider to be the remaining broad areas of objection, before turning to more detailed matters.

### Level of Need

3.11.2 The Council consider that the HNS identifies that there is a high level of need for affordable housing in the district. The HNS identifies a need for 4,100 affordable homes by 2005 and 5525 by 2010. The methodology behind this survey was strongly criticised at the Round Table Session by Objectors as being imprecise for a number of reasons. These included objections that the survey had grossly underestimated incomes, had not dealt adequately with concealed households and failed to properly take transfer and in-situ solutions to housing need into account. The Council states that the survey was carried out in line with DETR guidance. The notes of the Round Table Session expand these arguments more fully.

3.11.3 In my view the key question is whether the HNS reasonably accords with government advice as, set out in *Local Housing Needs Assessment: A Guide to Good Practice*, so as to be considered robust. It must be remembered that as this is a guide to best practice, it is reasonable to allow for some flexibility in its operation and the Guide allows for tailoring to local circumstances, at paragraph 2.6. I consider that as a starting point, the survey correctly identifies affordable housing need as households living in unsuitable accommodation, where they cannot afford to rent or buy more suitable accommodation. Housing need was assessed by a points system concerning the suitability of the dwelling and a means test was then applied to assess if the household was able to afford suitable private sector housing. I consider that this methodology, the frequency of survey and the size of sample were sufficient to accord with paragraph 3.4 of the Guide.

3.11.4 Objectors are concerned that the HNS grossly over estimates household income by ignoring benefits, under reporting higher incomes and by the high non-contact rate of the survey. In particular they consider that the high level of non-response would lead to bias and this is supported by the Guide. Similarly they criticise the HNS income data figures, which they believe should have been cross-checked, with the sources listed in the Guide. In response to this the Council state that the Guide suggests that benefits should not be taken into consideration, although the Council concedes that there might be some under reporting of higher incomes. Whilst cross checking of incomes levels has occurred, it is considered that to do this against national census data is not particularly helpful. Furthermore Objectors question if some of the households identified as being in need, towards the top end of income level, could afford private market housing. The Council disputes this given the high level of housing cost in the district. Objectors are also concerned that the number of concealed households are overestimated by the HNS and that some double counting has taken place, which again the Council disputes. Objectors are also concerned that the HNS is not clear enough on how the predictions regarding future need were made and that any distinctive future housing need should be clearly identified in the Policy.

3.11.5 Broadly speaking I am satisfied that the HNS follows the Guide sufficiently closely, particularly at paragraph 2.2, to be considered as robust enough to justify the number of affordable houses required by the plan. As regards information on benefits, the Guide suggests that this information should be collected in the survey. However the Guide does not explicitly state that benefits should be considered as part of household income. I understand the logic in not considering benefits as part of household income as how this income will be taken into account by mortgage lenders and private landlords is not always clear. By using the head of household approach suggested by the Guide there is the possibility of mis-reporting and a degree of double counting may occur, but I do not consider that this would be significant with respect to the broad approach laid out in the Guide.

3.11.6 Similarly whilst it is likely that the relatively high non-response rate would introduce a degree of bias, I do not consider that this rate is sufficiently high to completely discount the HNS. I find that the Council's arguments regarding the suitability of sources for cross checking are reasonable, although they do depart somewhat from best practice guidance. The HNS predicts that affordable housing need will grow from 3899 households at the time of the survey to 6431 by 2005 and 8778 by 2011. This translates as 4,100 extra households in need by 2005 and 5525 by 2011. I consider that the Council's methodology is reasonably clear regarding the prediction of this future need, and how this translates in housing numbers, although given my slight reservations about the accuracy of the HNS this may amount to a small over estimate.

3.11.7 Whilst national trends would indicate changes in the pattern of household make up, I consider that the Plan is sufficiently flexible to address any need that becomes apparent during the Plan period. Following proposed changes the plan sets a figure of 420 affordable homes over the plan period for designated sites and a 30% contribution from windfall sites that fall within the Policy threshold. This contribution from windfall sites is likely to be comparatively small. Whilst I consider that it is possible that there has been some degree of over estimation in the HNS, there is still clearly a high level of need in the district and this is set to rise throughout the Plan period. I therefore consider the requirement set by the Plan to be a very modest and reasonable level when compared to this need. Given the Policy's modest target, I do not consider that any of the weaknesses identified by objectors in the HNS would justify reducing this plan target.

#### Percentage Contribution

3.11.8 Objectors are concerned that setting a level of contribution at 'at least 30 %' for all sites that fall within the Policy's threshold will restrict housing development for both social and market housing. The approach taken does not reasonably follow the advice given in Circular 6/98, that suggests a numerical target should be set. Applying a 30 % contribution to all sites within the threshold is an arbitrary way of achieving affordable housing targets that does not take site or market conditions into account as advised by Circular 6/98. Furthermore the Policy does not recognise that certain sites are likely to produce 100 % affordable housing and the percentage of contribution that can be achieved is also related to the amount of available grant funding. It would be more reasonable for the policy to have a numerical target and for the Council to negotiate affordable housing contribution on a site by site basis.

3.11.9 Circular 6/98 states that in preparing affordable housing policies in local plans, authorities should identify the total number of affordable housing units that should be achieved and how that contribution is expected to come forward for each identified site. The Council consider that the Circular does not state if this should be expressed either as a percentage or as a numerical target for each identified site. Whilst the Council recognise that their approach does not entirely follow other authorities interpretation of Circular 6/98, they consider that it is a reasonable approach to take, given particular local circumstances. Following this approach would allow for negotiations with developers to take account of possible changes in market and site conditions on each specific site. It would also allow the Council to take contributions from larger windfall sites into account, which would help to meet the high level of need in the area.

Given the nature of many of the sites, particularly large greenfield sites that are unlikely to be phased in until the next plan period, setting the affordable housing target as a numerical target would not be reasonable under current market conditions. The Council regard the approach taken by the Policy as one that provides developers with guidance as to the level of expected contribution, whilst having the degree of flexibility required by Circular 6/98 to take site and market conditions into account. In negotiations with developers although 30% is a target figure, contributions could exceed or be less than this figure. This is reflected in the Policy's wording.

3.11.10 The Council refers to the findings of the HNS to justify setting this level of contribution. They consider that 30 % from Windfall is a very reasonable level of contribution given the high level of need identified in the HNS. The difficulty of meeting this high level of need is exacerbated by the high house and land prices in the area. They believe that they would be entirely justified in setting a 100 % contribution if the numerical advice found in the DETR Document *Housing Needs Assessment: a Guide To Good practice* was followed. As regard to objectors concerns that this approach fails to take 100 % contributions on particular sites into account, the Council point out that this is rarely achieved and this would only occur on sites that are owned by an RSL or the Council. This would not make a significant contribution to meeting affordable housing need.

3.11.11 I find that the approach taken by the Council does not precisely follow the advice in Circular 6/98. However I do not consider that this deviation is significant enough to justify changing the Policy. It is clear from the Policy that the Council still intends to negotiate on each site and the Policy's wording allows for site and market conditions to be taken into account, which provides the necessary degree of flexibility to accord with the Circular. The Plan is very clear on the overall level of affordable housing need that has been identified. PPG 12 allows authorities to depart from national planning guidance providing that this is justified by particular local circumstances. I consider that these particular local circumstances exist, as there is a high level of need and environmental constraints concerning land supply. I accept that there are additional difficulties in setting figures for particular sites in the Plan, and so I consider that the Council's approach is justified.

3.11.12 As regards arguments over the level of contribution, I find that there is a clear need for affordable housing in the Plan area. The level of contribution that should be sought in a plan policy is not prescribed by Circular 6/98. Given the high local need identified in the HNS, it is reasonable that the Policy takes account of provision from windfall sites. Therefore setting a level of 30% contribution is reasonable. It is true that sites may come forward with high levels of affordable housing contribution, possibly as much as 100%. However I regard it as unlikely that a significant number of sites would come forward where such high levels of affordable housing were provided. As such a high level of affordable housing need is identified, I am satisfied that these sites would not make a particularly significant contribution to affordable housing need and I do not consider that this would justify the use of a numerical target in the Policy.

#### Bedspaces

3.11.13 The Council suggests that the percentage of affordable housing contribution should be calculated by using bedspaces rather than housing units as the basis for this calculation. They consider that this helps to ensure that there is a mix of development on sites. Furthermore housing with a higher numbers of bedspaces occupies more land. If the contribution was calculated as a percentage of the number of houses on site then less affordable housing would be provided by sites that were predominately occupied with larger houses. Objectors consider that calculating the requirement by this method is unreasonable and contrary to Circular 6/98. I find that Circular 6/98 does not refer to how the contribution from specific sites should be calculated. I consider that the approach taken by the Policy is justified by the current emphasis on reducing social exclusion and producing balanced communities in national planning guidance. As development consisting of houses with a large number of bedrooms (4 plus) is relatively prevalent locally, I consider that it is reasonable that this is taken into account by the

Policy. Overall I consider that this approach, whilst slightly unorthodox, is appropriate given the specific local circumstances.

#### Definition of Affordable Housing.

3.11.14 I now turn to the question of whether the definition of "affordable housing" in the Policy is reasonable. Circular 6/98 states that local plan policies should define what the authority mean by affordable housing but this should include both low cost market housing and subsidised housing. Objectors consider that current definition in the Policy only recognises social housing controlled by a registered social landlord and have not taken low cost market housing into account. Objectors have produced examples of low cost market housing that has been offered on developments, allowing people to be given the opportunity to purchase their own home. Objectors believe that the Council's approach reduces housing choice and would lead to a lack of keyworker accommodation. The Council argues that although there is a strong emphasis on the RSL, this is justified by specific local circumstances. The HNS identified a low average income for households in housing need (£11,000) and the level of discount needed to reduce new market housing to an affordable level would be so great as to be impractical. Housing for sale with some sort of subsidy would not qualify as low cost market housing. The level of discount provided by low cost market housing would not be enough to enable households in housing need to occupy these properties. The Council considers that their Policy would still allow a mix of housing to be developed. The issue of key worker housing is one that is addressed by other policies, as it is not always directly relevant to affordable housing. As regards the issue of keyworkers, the Council believes that whilst this is an important issue in the District it should not be confused with affordable housing as these are separate issues.

3.11.15 Although I have previously stated that I have some reservations concerning the figures provided by the HNS, I am satisfied that it provides a reasonable overview of the income of those in housing need and the level of local house prices. The Policy as worded when read in conjunction with Appendix 5 does allow for other methods of affordable housing to be used as well as RSL, but it is clear from the evidence presented in the HNS that in order to meet real affordable housing need the use of RSLs will be highly significant. As regards low cost market housing, the examples quoted by objectors illustrate that although discounted from the standard market price, these discounts would be in no way sufficient to justify their consideration as being part of an affordable housing contribution. I therefore consider that the policy's definition of affordable housing is sufficiently robust. The importance of keyworker housing has been stressed by recent government policy. However I consider that the Council are correct in stating that this is a separate issue to affordable housing and I find that the other housing policies of the Plan are sufficiently flexible to address this issue.

#### Contribution from Sheltered Housing

3.11.16 McCarthy and Stone are concerned that the Policy does not allow for reduced levels of contribution from sheltered accommodation. They do not expect sheltered accommodation to be completely exempt but believe that this Policy does not follow paragraph 10 of Circular 6/98. They consider that the prime factor in the Policy for deciding if a site is suitable for affordable housing is if it falls within the threshold for contribution, whereas they believe that site conditions should be the main factor in determining the level of contribution. The Council do not agree with McCarthy and Stone's interpretation of the policy and consider that meeting the threshold is only an initial step in deciding if the site is suitable for affordable housing. Site conditions would be one of the prime considerations in deciding if a site is appropriate. I can find nothing in the Policy that is contrary to Circular 6/98 as regards this objection. The first sentence of the policy of the site refers to the importance of taking the physical circumstances of the site into account, before mentioning the level of threshold. Certainly sheltered housing provision is an important element in providing mixed communities, but I do not consider that there is anything in this policy that would prevent the development of this type of housing.



### Commuted Payments

3.11.17 Objectors are concerned that the Policy does not allow for the use of commuted payments instead of on site provision of affordable housing, which is contrary to government policy. The Council acknowledge that the Policy takes this position and justify their position by stating that to seek commuted sums would not foster an approach that leads to the provision of balanced communities. There is no requirement in Circular 06/98 that a policy should allow for commuted sums. However the Council would consider exceptional circumstances that might allow for the use of commuted sums, but believe that to include this approach in the Policy would encourage the use of commuted sums. Both PPG 3 and Circular 06/98 stress the importance of the creation of balanced communities with a mix of housing. The use of commuted payments to provide off site affordable housing provision would not assist this. There is nothing in Circular 06/98 that requires this type of provision to be included in an affordable housing policy. I accept that the Council's view that to include such a provision in the Policy would encourage the use of commuted payments. If circumstances were such that commuted payments were the only feasible way of providing affordable housing provision then this would be most appropriately addressed in negotiations between developers and the Council.

### Threshold

3.11.18 PIC 3/11 changes the level of threshold from 25 dwelling (or 1 ha) to 15 dwellings (or 0.5 ha). Objectors are concerned there is no justification for this change and it goes against Paragraph 10 of the Circular. Circular 6/98 suggests a threshold for contribution of 25 dwellings per hectare for sites outside Inner London and 15 dwellings per hectare for sites within Inner London. The Circular does allow for authorities outside Inner London to reduce the level of threshold, if they can demonstrate exceptional circumstances. Objectors contend that the Council have not demonstrated that particular local circumstances exist apart from a disputed large local housing need. Furthermore the area has a higher than average amount of affordable housing stock, the housing land supply is mainly located on larger sites and the Council may be able to make nomination arrangements with neighbouring councils.

3.11.19 The Council consider that there is clear justification in the Circular for this reduced threshold as there is an exceptional local need, there are housing land supply issues and there is a low level of social housing in the district. The district is not typical of the country as a whole and the approach of lowering thresholds is supported by draft revised RPG9. It is clear that the district must maximise its opportunities to provide social housing and by lowering the threshold a potential 20% increase could be achieved in social housing numbers.

3.11.20 Circular 06/98 requires that the constraints that would justify an exception to this Policy are clearly demonstrated. I accept that the District has demonstrated a high level of need and that because of environmental constraints there is to some extent a lower level of housing land supply than some other nearby authorities. However whilst these conditions present difficulties in meeting affordable housing need they are not truly exceptional in the regional context of similar areas close to the M25 around London, as the Council admitted at the RTS. I consider that to allow an exception to the Circular, the authority must demonstrate local conditions that present them with similar difficulties to authorities located in Inner London. On the available evidence I do not believe a sufficiently strong case has been made to justify a lower threshold and I recommend against the proposed change PIC 3/11.

### Distribution

3.11.21 Other objectors are concerned about the distribution of affordable housing in the district, particularly with respect to Princes Risborough and Marlow. Furthermore objectors consider that the overall approach taken by the Council would not allow them to target areas of affordable housing need. The HBF consider that more reliance on greenfield sites would help to overcome this difficulty. Furthermore objectors consider that affordable housing should be located in areas with good access to public transport and services. The Council believes that

the distribution of new affordable housing is based on the findings of the HNS and will also be achieved through windfall. They consider that the balanced approach to housing provision will ensure that affordable housing will be achieved in all parts of the district. As I have previously stated in my consideration of the Plan's overall housing strategy, the distribution of housing in the district is broadly acceptable in relation to Structure Plan guidance in Policy H2. I consider that given the overall level of need demonstrated in the HNS, it is not unreasonable to provide affordable housing throughout the district, which is achieved by the use of contributions from both strategic sites and windfall. Whilst targeting specific sites for affordable housing might help to meet certain local needs, it may not help to achieve the government's aim of encouraging balanced communities. As regards objectors' concern about the location of affordable housing in relation to access to public transport and services, I consider that the Plan's Policies for the location of housing would ensure that this would be the case. Therefore I do not consider that the Policy should be modified in respect of these concerns.

#### Other Issues

3.11.22 Objectors have also stated that there is no need for social or affordable housing and this housing should be available on the open market so that people can buy their own homes. The Council disagrees, as the HNS clearly demonstrates a need for affordable housing in the district. I accept the Council's argument, as the HNS demonstrates that there is a clear need for affordable housing, cannot be met by open market housing. Conversely other objectors consider that there should be a check on occupants of affordable housing future earnings, to allow for real need to be met. The Council considers that this would be unreasonable for the planning system to remove someone from their home because their financial circumstances have improved. I consider to restrict tenure of affordable housing in the manner suggested by objectors would be very unreasonable and outside the remit of planning control.

3.11.23 Objectors have suggested that the Policy's wording regarding site and market conditions should be removed as it could nullify Policy M5. I consider that the Policies wording should remain in order for it to comply with Circular 6/98. This wording would not necessarily restrict the provision of affordable housing at the Portlands Site in Marlow. Objectors are also concerned that the Policy should allow for reductions in parking and increased density for affordable housing. Whilst in some instances this may be appropriate for all new housing development, I do not consider that to introduce different design criteria to the Policy for affordable housing would comply with the government's policy aim of creating mixed communities.

3.11.24 Objectors are concerned that the Policy should be linked to housing strategy as part of a corporate approach. Whilst I understand the importance of the relationship between the Policy and the Council's Housing Strategy, it would be unnecessary to formally link the Policy with the Council's Housing Strategy. Other objectors consider that affordable housing will be weighed as a positive material consideration which may override other policy considerations. Whilst this may be the case, the degree to which the need for affordable housing would outweigh other Plan Policies would vary according to the particular circumstances of the development. Therefore it would be unreasonable to make this change.

#### RECOMMENDATIONS

- H/11/1 I recommend that the Plan be modified as set out in Proposed Changes 3/10 and 3/31 but otherwise no modification should be made to the Plan.

POLICY H12: LOW COST RURAL HOUSING

**The Objections**

0218/10	Airways Housing Society Ltd
0218/12	Airways Housing Society Ltd
0218/13	Airways Housing Society Ltd
0560/12	Mr D H Hughes
0593/1	David L Davies
0593/2	David L Davies
1695/2	Mr A Rush

**PIC 3/13 Objections**

0840/58	Marlow and District Chamber of Trade & Commerce
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**Summary of Objections**

- (a) The implication in paragraph 3.47 that rural housing need may not be 'real' is unhelpful.
- (b) Paragraph 3.49 should be amended to permit the restriction on occupancy to be realised either by a Registered Social Landlord or through a planning obligation.
- (c) The wording 'great caution' in paragraph 3.52 is unhelpful.
- (d) Delete Policy; it is unreasonably restrictive to possible developments in the rural parts of the District. The survey referred to is not a practical requirement and would be difficult to verify or dispute. Small rural housing sites would help reduce housing needs.
- (e) 'Low cost' is used in a different context to Circular 6/98.
- (f) Clause (v) should be amended to take account of 'other material planning considerations'.
- (g) The incorporation of the word 'strong' in criterion (v)(a) is not necessary.
- (h) Criterion (v) should be amended to permit the restriction of occupancy on Low Cost Rural Housing to be realised by a Registered Social Landlord or through a planning obligation.
- (i) Supporting text should make it clear that mortgagee in possession clauses are acceptable.
- (j) A Housing Needs Survey should be carried out with the Housing Authority.
- (k) In response to proposed Pre Inquiry Change 3/13, object to the lack of a definition of 'affordable'; defining what it means in terms of the relationship between local (community) income levels and house prices.

**Inspector's Reasoning and conclusions**

**Occupancy and Tenure**

3.12.1 I consider that the restrictive nature of the policy, including the criteria for occupation and management by an RSL, follows the thrust of guidance in Circular 6/98. This recognises the exceptional nature of affordable rural housing schemes, which should provide low cost housing for local needs in perpetuity. I accept that the use of obligations and similar methods can be used in more normal affordable housing schemes when an RSL is not involved. However, given the importance of maintaining a permanent affordable housing stock for these rural communities, I find that these methods are not acceptable for rural exception sites. The Council is not aware of any rural exception schemes that have come forward without the use of an RSL. They point to Circular 6/98 which makes it clear that mortgagee in possession clauses are unacceptable for rural exception schemes. I cannot envisage how these sites could be

developed so that they accord with the Circular without the use of an RSL and I consider this aspect of the policy to be reasonable. I also endorse the need to show a strong link to the community in order to occupy this type of housing; if it is intended to meet local needs then it is only reasonable that a local connection is shown.

3.12.2 Airways Housing Association is concerned over the Policy's requirement for a local survey and suggest that this should be carried out in line with guidance provided by the Housing Authority. Marlow Town Council is concerned that affordable housing for these exception sites should be defined in terms of the relationship between local (community) income levels and house prices. I consider that as these surveys would be designed to address a specific local need then it is reasonable that the composition of these surveys might change between communities. I do not find that it is necessary to include more information on what would be required in a survey in the Policy or to restrict the survey to a particular body. It would be open for communities to seek guidance from the Housing Authority as to what should be included. As regards Marlow Town Council's concern, the Council have referred to their definition of affordable housing contained in Policy H11. This is a useful broad definition for the whole District, and could be expanded in a local needs survey.

3.12.3 Turning to other concerns about the overly restrictive nature of the policy, I consider the use of phrases such as "real need" and "great caution" are entirely appropriate in a District where many of the rural areas are subject to restrictive designations. As I explained above this type of policy is by its nature exceptional and it should only apply in very special circumstances and to meet a particular need; otherwise development would not be permitted. To relax the Policy further would compromise other objectives of the Plan.

3.12.4 The Council accepted that the title used in the deposit draft version of the policy may have been confusing and introduced PIC 3/13 to address objectors' concerns over this matter. Material considerations must always be taken into account when making decisions as set out in The Planning Act, I consider that the Policy's wording does not need any further amendment.

## RECOMMENDATIONS

- H/12/1 Modify the Plan in accordance with PIC 3/13

## POLICY H13: HOUSES IN MULTIPLE OCCUPATION

### The Objections

0714/1	Wycombe & District Landlords Association
0714/2	Wycombe & District Landlords Association
0714/3	Wycombe & District Landlords Association
1581/1	Kelly Green, Buckinghamshire College Students Union

### Summary of Objections

- (a) Object, as there are no supporting arguments set out for the parking standard applied. In view of parking standards now being maxima, it appears inconsistent to maintain a wording that states 'may be acceptable' in this context. Appendix 10 is ambiguous as to whether to round up or down the parking standard for Houses in Multiple Occupation (HMO's).
- (b) Object to revised minimum standard for room sizes. The change to minimum size will lead to a removal of a substantial proportion of stock. The Housing Act sets a minimum room size; question on what basis this has been increased.

- (c) No allowance is made for cases where there is no demand for amenity space.
- (d) Policy does not define what is necessary in terms of sound insulation between separately occupied rooms and neighbouring properties.
- (e) Concern about implications of licensing system for HMO's. Costs of changes to room sizes, sound insulation and provision of amenity space would have an adverse impact on landlords, resulting in less stock.

### **Inspector's Reasoning and conclusions**

3.13.1 Wycombe and District Landlords Association (WDLA) outlined a fundamental general objection that the policy would be used by the Council to apply rigidly revised licensing criteria that would inhibit the availability of accommodation in HMOs that was greatly needed. I consider that it is useful for the policy's supporting text to provide information on the type of considerations that need to be addressed in the conversion of houses to multiple occupancy. I recognise that some of these issues may also be addressed by other legislation. However, these licensing arrangements do not form part of the Plan, nor are they supplementary guidance. This report is not an appropriate forum to address concerns over the council's interpretation of this non-planning legislation. I have restricted my discussion to the merits of the policy itself, and accompanying supporting text and relevant Appendices.

3.13.2 I do not share objectors' concerns regarding the application of parking standards, including the unacceptability of tandem parking, contained in Appendix 10. I consider that the basis by which these standards were derived is clear from both the introduction to this Appendix and the associated transport chapter. The introductory text states that the standards are to be treated as maxima, in accordance with government guidance. This enables the Council to take the particular circumstances of a development into account when assessing the level of parking required. Tandem parking is discouraged for general residential amenity reasons but the policy could be flexibly applied if justified in certain cases.

3.13.3 The policy refers to a requirement for adequate internal living space. WDLA argued that the recommended minimum room size of 9 sqm specified in paragraph 3.58 was an unacceptable increase above the 6.5 sqm guideline in the previous Local Plan. The Council said that this dates from the mid 1930s and argued for improved standards to meet modern living needs. I must state for the sake of clarity that development plan policies can only be applied to new changes of use requiring planning permission and should not affect existing lawful HMOs. WDLA argued that the potential effect on the supply of HMOs would be very serious if this were introduced, since the loss of many rooms would force up the rents for others that met the standard. I have some sympathy with this point but the impact on future provision is speculative at this stage. I consider that it is appropriate to encourage a better quality of life through a minimum of 9 sqm as the main living area for one person in modern circumstances. The guideline is not a mandatory upper-case text policy and could be applied flexibly and revised if monitoring showed a severely adverse effect on supply.

3.13.4 The provisions of the policy with regard to amenity space are unchanged from the previous plan. Whilst I find it hard to envisage an instance where there would be absolutely no necessity for amenity space, where it can be shown that there is clearly no demand for amenity space a decision maker may take this into consideration when considering the suitability of a development. The relevant section of Appendix 1 regarding amenity space is also worded to allow flexibility, which I support.

3.13.5 With regard to sound insulation, the objectors accepted at the inquiry that the wording of the policy was virtually the same as the adopted plan. This matter can be highly relevant to planning, with respect to the protection of amenity, both for occupiers of the house and surrounding residents. Again the wording of the policy allows flexible interpretation to meet different circumstances.

## RECOMMENDATIONS

- H/13/1 No modification

POLICY H14: ESTABLISHED RESIDENTIAL ZONE
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### The Objections

0379/26	<i>Sport England</i>
0506/16	Bassetsbury Area Protection Group
0572/7	Fairview New Homes PLC
0841/9	Lance Adlam
0922/21	House Builders Federation
1001/3	Neil Richardson
1125/5	Buckinghamshire Chilterns University College
1260/36	<i>The Marlow Society</i>
1293/17	Naphill & Walter's Ash Residents Association
1584/72	The Marlow Group

### PIC 3/32 Objections

- 0579/33 Michael Lambert

### Summary of Objections

- (a) Policy should take into account adequacy of existing sports and recreation provision in different parts of the District based on a thorough local assessment of deficiencies and needs. New development should contribute to the provision of additional sports and recreation facilities in areas of deficiency.
- (b) The distinction between Policies H6 and H14 is confusing. The criteria are very similar.
- (c) Criterion (ii) and (vii) are too prescriptive and should be reworded to 'have regard to'.
- (d) Question the validity of Appendices 1 and 7 in respect of this Policy.
- (e) Policy is too restrictive in making efficient use of land already in residential use. A significant amount of backland could be released for small housing developments.
- (f) Part (i) refers to privacy 'standards' whilst Appendix 1 refers to 'guidelines'
- (g) Parts (ii) and (iii) should be deleted as they duplicate other policies in the Plan.
- (h) Part (v) requires a clearer explanation.
- (i) The Policy is weak, compared with the Adopted Policy RC1; RC1(i) has been deleted. H14 (vii) no longer offers protection to large gardens that are important to the character of the area.
- (j) Difficulties arise on the edge of zones in particular.
- (k) The Policy provides for soft landscape frontages to new development, whereas Appendix 1 states that parking will generally be in courtyards or on frontages.
- (l) In response to proposed Pre Inquiry Change 3/32, object on the grounds that policies H14 to H16 highlight the quality of residential areas in the District and the Plan should be

concerned with the character of the District as exemplified in these areas. Recognition of the quality of existing residential areas is necessary.

### **Inspector's Reasoning and conclusions**

3.14.1 The Council propose to delete this Policy by PIC 3/32, which meets the concerns of many objectors who thought that the control placed on development in these zones is overly restrictive and not justified by government policy. I deal here with objections that more protection should be applied to these zones and with the single objection to the PICs that the policy should be reinstated. Similar arguments apply to the deletion of Policies H15 and H16.

3.14.2 PPG3 places a strong emphasis on making the best use of urban land. Policies that place a restrictive ceiling on the number of houses that can be accommodated and restrictions on the type of housing envisaged should be avoided. PPG3 recognises that this new emphasis could have a potentially detrimental effect on the character of an area. However, together with its recently published companion guides, By Design- Urban Design in the Planning System and By Design - Better Places to Live it stresses the way in which good design can best utilise land without compromising local character and distinctiveness. In the light of this national planning guidance I support the deletion of the policy, which could have been used to prevent development at the density levels now required by paragraph 58 of PPG3. I consider that the character and amenity of the areas previously identified as Established Residential Zones can be sufficiently guaranteed by other Plan policies, particularly G4, G6, G9, and the remaining sections of Appendix 1. I consider that these policies, in combination with Policy H6A, strike the correct balance between making best use of available land, whilst ensuring that high standards of design are met. The plan now accords with the broad thrust of national planning guidance and Policy H14 should not be reinstated.

### **RECOMMENDATIONS**

- H/14/1 Modify the Plan in accordance with PIC 3/32.

<b>POLICY H15: SPECIAL RESIDENTIAL CHARACTER ZONES</b>
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### **The Objections**

0560/15 Mr D H Hughes

### **Summary of Objections**

- (a) Delete Policy; the protection afforded Conservation Areas is adequate, and there is no need for a Special Residential Character Zone as well.

### **Inspector's Reasoning and conclusions**

3.15.1 Similar arguments apply to the status of this policy as to Policy H14. Most of the area within these zones is also covered by Conservation Area designation. Where new housing is proposed in such areas, a balance has to be struck between Conservation Area objectives and the policy in PPG3 to maximise the use of urban land. Wherever possible, good design should ensure that new development is built at the highest density possible without compromising the special character of these areas. I consider that Conservation Area Policies found in Chapter 11, together with more broad Conservation Area Legislation, would adequately ensure that the special character and distinctiveness of these areas is maintained. Any further protection for these areas would either involve unnecessary duplication of Conservation Area Policies or would be so restrictive as not to comply with government planning guidance, particularly PPG

3. As regards the remaining 10% of Special Residential Character Zones, I find that if the Council do not consider that they are of sufficiently special character to justify their inclusion in Conservation Areas, then they would be adequately protected by Policies G4 and G9. Therefore I cannot see any need for additional designations to ensure the protection of their character and support deletion of the policy.

### RECOMMENDATIONS

- H/15/1      Modify the Plan in accordance with PIC 3/32.

POLICY H16: SPACIOUS RESIDENTIAL ZONE
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### The Objections

0142/4	Mr & Mrs I Green
0506/8	Bassetsbury Area Protection Group
0560/16	Mr D H Hughes

### Summary of Objections

- (a) Propose that Bassetsbury Lane, Kingsmead Lane and Dean Garden Rise should be classified spacious residential zones.
- (b) Policy should be deleted; the protection afforded by Conservation Areas is adequate that there is no need for a Spacious Residential Zone as well.

### Inspector's Reasoning and conclusions

3.16.1 Again, the objection that Conservation Areas provide adequate protection for residential areas with spacious character is not accurate as there is not the level of duplication between Conservation Areas and Spacious Residential Zones that applied with regard to Policy H15. However, the policy does not comply with PPG3, given the importance placed on making the best use of land. I consider that the emphasis placed on maintaining generous spaces between buildings and their settings is completely at odds with this aspect of national planning guidance. I recognise that the character and appearance of these spacious residential zones can be particularly vulnerable to insensitive development. However PPG 3 and its associated companion guides stress the importance of good design in overcoming these obstacles and I can see no good reason why a well designed scheme could not make the best use of available land, whilst not detrimentally effecting the character of these areas. I find that as the Plan's General Development Chapter and Appendix 1 would ensure that this character is maintained. These policies would apply in the areas suggested by Bassetsbury Area Protection Group, and the environmental impact of any scheme would have to be balanced against the need for efficient development densities. There would be no necessity for a specific policy to protect these areas and I support the proposed deletion.

### RECOMMENDATIONS

- H/16/1      Modify the Plan in accordance with PIC 3/32.



POLICY H17: RESIDENTIAL ENHANCEMENT ZONES

**The Objections**

0224/6                      John Howard Spanner  
0560/3                      Mr D H Hughes

**Summary of Objections**

- (a) Restrict the parking of commercial vehicles on the road where resident's views are spoilt.
- (b) No need for Policy; redevelopment of mixed use areas should always enhance them.

**Inspector's Reasoning and conclusions**

3.17.1 With regard to the concern about the restriction of commercial vehicle parking, where this lies within the remit of planning control it is adequately addressed by relevant Policies in the Transport Chapter. Given the importance placed on the regeneration of urban environments by government policy, I consider it is reasonable that the Plan contains a policy to facilitate the beneficial redevelopment of identified areas.

**RECOMMENDATIONS**

- H/17/1      No modification

POLICY H19: CONVERSIONS

**The Objections**

0224/7                      John Howard Spanner  
1193/29                      *Environment Agency*  
1294/12                      *Environmental Records Officer, Bucks County Museum*

**Summary of Objections**

- (a) Tree heights should be lowered to secure residential amenity.
- (b) Criterion (iv) should make specific reference to species such as bats and barn owls, which might be affected by the conversion of non-residential buildings to residential.

**Inspector's Reasoning and conclusions**

3.19.1 Making specific reference to the height of trees is an unnecessarily detailed consideration for a Local Plan policy. I consider that if landscaping were necessary following the conversion of a building, the acceptability of any landscaping scheme, including tree heights, would be most appropriately controlled by the use of conditions.

3.19.2 With respect to The Environment Agency and Bucks County Museums concerns over the conversion of buildings that may be wildlife habitats, I consider that the preservation of particular species' habitats is adequately addressed by the Plan's nature conservation policies and separate wildlife legislation. It would therefore involve unnecessary duplication to include

additional reference to these matters in the Policy.

## RECOMMENDATIONS

- H/19/1 No modification

POLICY H21: PROVISION OF PUBLIC OPEN SPACE
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### The Objections

0379/7	Sport England
0560/9	Mr D H Hughes
0572/10	Fairview New Homes PLC
0828/4	<i>Mcarthy &amp; Stone (Developments) Limited</i>

### PIC 3/16 Objections

0376/46	Axa Equity and Law life Assurance Society PLC
0379/48	Sport England
0572/16	Fairview New Homes PLC
0817/44	Croudace Ltd
1141/49	Beazer Strategic Land

### Summary of Objections

- (a) The distinction between outdoor sports provision and open space provision requires clarification as it has significant implications for the interpretation of Policies H21 and RT3. The contribution of new development to built sporting facilities should also be addresses in the policy.
- (b) Object to the fact that the Policy only relates to new developments over 40 units. Many sites being developed have less than this. Suggest amendment to require appropriate developer contribution towards enhanced or new open space and sport facilities from all new residential development and where appropriate contributions to the maintenance of amenities or facilities.
- (c) Policies H21 and H22 should be amalgamated.
- (d) The requirement 'must be provided' should be reworded to 'may be provided' as some developments could be located near to a surplus of existing open space.
- (e) Concerned that existing sheltered accommodation for the elderly will be required to provide public open space. Elderly often require 'views' rather than large areas of open space, which would also compromise security. Propose amendment to text to state that 'only residents amenity space, and not public open space, need be provided as part of a sheltered or other specialised housing scheme'.

In response to proposed Pre Inquiry Change 3/16:

- (f) Propose that the Plan should explain the approach to the allocation for housing development of surplus schools sites, which will require existing green space to be retained in full as public open space. The commitment to retaining green space (see paragraph 13.24) should be echoed in Policy H21.

- (g) The 40 and 15 dwelling figures are arbitrary thresholds.
- (h) Appropriate developer contributions towards open space provision should be sought from all new residential development in areas of existing open space deficiency.
- (i) Object to the inclusion of Policy H22 with Policy H21. Policy should be reworded to take account of the size of private gardens provided in any particular development.
- (j) Object to word 'exceptional' in Policy and paragraph 3.86. This places too great a constraint on the full and proper consideration of development proposals at the application stage. More flexibility is required. Replace 'exceptional' with 'appropriate' and delete 'where provision cannot be met on site'.

### **Inspector's Reasoning and conclusions**

3.21.1 I consider that PICs 3/16 and 3/17, which amalgamate Policies H21 and H22 help to clarify the policy, meet some of the objectors' concerns. Built sporting provision is addressed in the Recreation and Tourism Chapter of the Plan, particularly by Policy RT2. Whilst Appendix 7 refers to the provision of open space for recreation, and it is clear that these are not standards for total recreation provision, I consider that there is nothing in PPG17 that sets standards for the provision of built sporting facilities. It would not be reasonable for the policy to introduce thresholds for where these contributions should be made. As Policy RT2 adequately addresses the role of developer contributions to built sporting facilities, I consider that it would involve unnecessary repetition to include this matter in the policy. Following the amalgamation of Policies H21 and H22 the policy allows for maintenance payments to be requested where appropriate.

3.21.2 I find that the policy seeks a balanced approach in seeking contributions from developers. The setting of thresholds for developer contributions to the provision of all types of open space is a reasonable approach as it has been based on the recent 'open space study', that identified areas of particular need. Whilst objectors have stated that the threshold levels of 15 and 40 dwellings are arbitrary figures, I find that there is no firm policy guidance to the size of development that should contribute. I consider that these thresholds are not unreasonable, as they are justified by local circumstances, which has been demonstrated by the use of the open space survey. This study will shortly be further supplemented by the Technical Note referred to in PIC A7/1. However I consider that in many instances it would be unduly onerous to have a lower threshold than 15 dwellings. I do not consider that a way of fairly assessing contributions could be achieved for developments smaller than this, as I can envisage practical difficulties in assessing the additional demand created. As the individual circumstances of each site must be taken into account when assessing contributions, I do not regard the use of a sliding scale of contributions or stating that the policy should only be thought of as a guideline would be helpful. Therefore following the proposed changes I consider that no amendment to the policy is necessary.

3.21.3 I do not consider that the policy's wording is overly restrictive as changing the phrase "must be provided" to "may be provided" in the third line would cause an unacceptable weakening of the policy. I regard the overall policy requirements as being reasonable and by using thresholds and identified areas of deficiency in open space relate the policy fairly to the degree of local need. Where it is argued that there is little or no local need, this consideration can be raised at the application stage. Therefore I consider that the policy adequately complies with PPG 17 on this issue. Similarly I consider that the policy is not over restrictive in only allowing off site provision to be made in exceptional circumstances. Whilst in certain circumstances there may be good reasons for providing offsite provision, it would be more appropriate to provide these facilities on site in most cases. I consider that the Policy as worded allows for any particular circumstances to be taken into consideration, but to change the wording may lead to the policy being misinterpreted as condoning payments for off site provision in all cases.

3.21.4 I consider that as Policies H21 and H22 have been amalgamated this meets objectors concerns about the level of duplication between the two policies. It is reasonable for both the issue of open space and children's play space to be addressed by one policy and can find nothing in the amalgamated policy that weakens it in relation to government policy. I do not consider that private garden size should be taken into account in this policy. Gardens, regardless of their size, are private space. The policy is quite clearly concerned solely with public open space and there is nothing in PPG17 that justifies the reduction of open space contributions because of the presence of large gardens.

3.21.5 Whilst I consider that it is may be perverse to expect accommodation for the elderly to contribute to the provision of certain types of sporting provision, to completely exempt these developments from any contribution to recreational space would also not necessarily be justified. It is clear from Circular 1/97 that it is only acceptable for the Council to seek an obligation where the nature of the proposed contribution is reasonably related to the nature of development. Therefore I consider it would be an unnecessary duplication of national planning guidance to make a specific reference to this possible exception to the policy as Circular 1/97 ensures that any proposed contribution would be reasonable.

3.21.6 I consider that both general and site specific plan policies ensure the protection of green space in the redevelopment of former schools. In terms of individual sites, this matter would be most appropriately addressed by site-specific proposals and to make a specific reference to this issue in this Policy would involve the Plan in unnecessary duplication.

## RECOMMENDATIONS

- H/21/1      Modify the Plan in accordance with PIC 3/16

<b>POLICY H22: CHILDREN'S PLAY SPACE WITHIN FAMILY HOUSING DEVELOPMENTS</b>
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### The Objections

0378/1	George Wimpey PLC
0379/28	Sport England
0560/10	Mr D H Hughes
0572/11	Fairview New Homes PLC
1320/3	Banner Homes

### Summary of Objections

- (a) The NPFA reference is incorrect; the criteria upon which the policy and supplementary guidance should be based are the November 1992 edition.
- (b) Policy H21 and H22 should be merged in the interests of clarity.
- (c) Policy should be deleted. The Council should determine when part of public open space is to be allocated as a children's playspace.
- (d) Policy should be reworded to take account of the size of private gardens in any particular development.
- (e) Suggest a sliding scale is devised, where at the lower end the developer is simply required to make a contribution in the matter set out in Policy H21, to meet the needs off site. On site provision should be related only to the need for children's playspace at a rate of 1.5 – 2 hectares per thousand population.

### Inspector's Reasoning and conclusions

3.22.1 The standards referred to in the policy are only used as a broad base to determine the proportion of open space that should be allocated for Children's Play Space. I am satisfied that these reflect the most recent NPFA standards, which are used to form the standards contained in Appendix 7.

3.22.2 As regards objectors remaining concerns, I consider that I have fully examined these issues in my considerations of objections to Policy H21 above. For the reasons given there I consider that the Policies should be amalgamated for greater clarity, but otherwise no further changes are necessary.

### RECOMMENDATIONS

- H/21/1 Modify the Plan in accordance with PIC 3/16

POLICY H23: RESIDENTIAL ACCOMMODATION IN TOWN CENTRES
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### The Objections

0137/6 The High Wycombe Society

### Summary of Objections

- (a) Propose change to the wording 'permitted' to 'encourage'; there should be more scope for increasing residential accommodation in town centres.

### Inspector's Reasoning and conclusions

3.23.1. I recognise that the Objector's intention is in line with government policy promoting the residential use of town centres. I consider that the suggested PIC 3/18 fully meets objectors concerns.

### RECOMMENDATIONS

- H/23/1 Modify the Plan in accordance with PIC 3/18

POLICY H24: VACANT PROPERTIES
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### The Objections

0738/2 H M Prison Service  
0927/2 Mr and Mrs T Cotton

### Summary of Objections

- (a) Policy does not refer to the opportunity for non-residential buildings to be converted to residential use; this could make a valuable contribution. Suggest rewording, reflecting this and referring to compulsory purchase.
- (b) Policy is weak and could be strengthened.

### Inspector's Reasoning and conclusions

3.24.1 Whilst it is true that the policy does not recognise the contribution that can be made from non-residential buildings and is concerned only with the utilisation of vacant residential properties, I consider that the conversion of non-residential vacant buildings is adequately addressed in Policy H19. It would involve the Plan in unnecessary repetition to make further reference to this matter in this policy.

3.24.2 Whilst I find that the policy's wording may not necessarily be weak, it is doubtful whether it falls within the true definition of a local plan policy. That is to say, whether it is entirely realistic to envisage its being applied to the determination of a specific application or appeal. The policy as worded only spells out the Council's intentions for vacant properties. I have amended the policy so that it is now more positively worded.

### RECOMMENDATIONS

- H/24/1 Delete Policy H 24 and replace with the following wording:

'WHERE THE REDEVELOPMENT OF VACANT RESIDENTIAL PROPERTIES REQUIRES PLANNING PERMISSION THIS WILL BE GRANTED FOR RESIDENTIAL USE SUBJECT TO OTHER RELEVANT POLICIES IN THIS LOCAL PLAN. THE DISTRICT COUNCIL MAY SECURE THE MORE EFFECTIVE OR RESUMED OCCUPATION OF VACANT OR UNDERUSED RESIDENTIAL PROPERTY OR FLOORSPACE BY THE USE OF COMPULSORY PURCHASE POWERS PROVIDED BY PLANNING OR OTHER ALLIED LEGISLATION.'

## POLICY H26: CARAVANS AND MOBILE HOMES

### The Objections

0483/21            *Wooburn Parish Council*  
0560/11            Mr D H Hughes

### Summary of Objections

- (a) Seek clarification of final sentence. Question whether this means that the Council will not allow new mobile homes sites that include an element of permanent residential development or does it mean that mobile homes site will not be allowed next to permanent residential dwellings.
- (b) Propose deletion of final sentence. Residential static homes represent a good form of 'affordable' housing and should be encouraged.

### Inspector's Reasoning and conclusions

3.26.1 I consider that PIC 3/19 adequately addresses objectors concern as regards the ambiguity of the policy's final sentence. Furthermore, PIC 3/19 makes it clear that the policy does not specifically resist the development of static caravans and therefore I do not consider that there is any necessity to delete the final sentence.

### RECOMMENDATIONS

- H/26/1        Modify the Plan in accordance with PIC 3/19

POLICY H28: GYPSY ACCOMMODATION

**Objections**

0158/12	High Wycombe and Marlow Green Party
0577/1	Berkhamstead Gypsy Support Group
1798/22	Buckinghamshire County Council – Environmental Services Dept
1798/23	Buckinghamshire County Council – Environmental Services Dept

**Summary of Objections**

- (a) Any provision would be subject to so many caveats that any such development is unlikely; sites are unlikely to come forward.
- (b) Object to the fact that the words 'very special circumstances' are excluded from this policy. There have been a number of occasions when the need for a gypsy site has overridden Green Belt policy.
- (c) Request confirmation that applications for Gypsy transit site development will be judged against Policy RT9 and not Policy H28. Policy may be discriminatory if applications are judged against Policy H28.

**Inspector's Reasoning and conclusions**

3.28.1 I consider that the approach taken in the policy, of not identifying specific sites, is a reasonable one given that there is no firm evidence of the need for additional sites in the District. In these circumstances it is reasonable to use a criteria-based policy to evaluate the acceptability of any sites that may come forward. I recognise that this type of development is often highly contentious but in my view the policy should be flexible enough to allow for the development of gypsy sites where there is a proven need, whilst ensuring the protection of amenity and the environment. Generally the policy achieves this balance but I consider that the wording of Criteria (iii) and (v) are unnecessarily inflexible and would stifle otherwise acceptable development. I have suggested new wording for these policies below.

3.28.2 Whilst I am aware that needs of gypsies have been considered as very special circumstances that has allowed development in the green belt, Circular 1/94 is clear that the development of gypsy Sites is not normally appropriate in the green belt. Clearly development in the green belt may be permitted provided there are very special circumstances. What constitutes these circumstances would be most appropriately assessed when deciding the merits of a particular site. Therefore I do not consider there is any necessity to make reference to the issue of very special circumstances in this policy.

3.28.3 Following PC 3/20 it is clear that Policy H28 and not RT9 applies to gypsy transit camps. Judging all application for gypsy sites be they permanent or transit sites, under Policy H28 fully accords with the advice given in Circular 1/94. Gypsies have a specific identity in planning law. It is perfectly reasonable to judge the development of transit sites for them under their own particular criteria as the development of these sites raises a series of clearly different issues to that of recreational caravan sites. It is not therefore in any way discriminatory to use this policy to assess the suitability of transit sites. I note that Buckinghamshire County Council has withdrawn one of their objections.

**RECOMMENDATIONS**

- H/28/1 Modify the Plan in accordance with PIC3/20
- H/28/2 Delete Criterion (iii) and replace with the following wording:

(iii) IS LOCATED SO AS NOT TO CAUSE DISTURBANCE TO NEIGHBOURING LAND USERS;

and delete Criterion (v) and replace it with the following:

(v) HAS STRONG EXISTING NATURAL BOUNDARIES THAT WITH REASONABLE ENHANCEMENT COULD CONTAIN THE SITE BOTH VISUALLY AND PHYSICALLY;

## POLICY OMISSIONS

### The Objections

0837/17	<i>Hazlemere Parish Council</i>
0839/15	Grange Action Group
1337/16	Gordon Hooper

### Summary of Objections

(a) Consideration should be given to building flats over existing street level car parks.

### Inspector's Reasoning and conclusions

3.29.1 Whilst I accept that development of this nature may in certain circumstances be suitable, I consider that it would involve the Plan in an unnecessary level of detail to include this specific consideration as either a whole or part of a policy related to off-street parking provision.

### RECOMMENDATIONS

- H/POM/1 No modification

## POLICY OMISSION

### The Objections

0841/11	Lance Adlam
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### Summary of Objections

(a) Object to the lack of a policy similar to the Adopted Local Plan policy H6 re encouraging the use of vacant space above shops/offices to be converted to residential use.

### Inspector's Reasoning and conclusions

3.30.1 Government policy supports the increased use of vacant flats over shops. However I consider that this issue is addressed in the Plan by Policies H23 and H24 and I consider that it would involve the Plan in an unnecessary degree of duplication to include a separate policy on this matter.

### RECOMMENDATIONS

- H/POM/2 No modification



POLICY OMISSION
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### **The Objections**

1001/5            Neil Richardson

### **Summary of Objections**

(a) Need a specific statement / policy explaining that policies will be applied flexibly in light of changing conditions during the Plan period.

### **Inspector's Reasoning and conclusions**

3.31.1 I do not consider that there is any necessity to make a statement in the Plan that the policies would be applied flexibly in the light of changing conditions. There is sufficient flexibility built into the Plan's policies and where objectors have identified a degree of undue rigidity I have addressed their concerns and where appropriate amended these Policies. It is of course possible that there may be material considerations that may override a particular plan policy, but these are by their own nature exceptional and should be addressed on a case by case basis.

### **RECOMMENDATIONS**

□ H/POM/2 No modification