

CHAPTER 12 - RECREATION AND TOURISM

RT0: POLICY FRAMEWORK

The Objections

0379/13 *Sport England*

Summary of Objections

- (a) Chapter 12 fails to take a strategic approach to the provision of sport and recreation. Seek a strategic approach to provision based on sound assessments of current and future needs for strategic and local sport and recreation, taking account of deficiencies. A more specific link is required between the Local Plan policies and the requirements and priorities set out in 'Leisure 21'
- (b) Increased emphasis required on principles of equity and participation.

Inspector's Reasoning and Conclusions

12.0.1 The Local Plan has obviously had regard to published guidance set out in PPG17 (1991) and its most recent draft revision. The changes to the supporting text and the six Chapter 12 Objectives have evidently met the objections raised by Sport England. The approach taken by the LPA towards leisure and recreation planning is a distinctively corporate one. That is to say, the policies for the implementation of indoor and outdoor facilities of all kinds are set out in the emergent documents 'Leisure 21' and a 'Local Cultural Strategy' for Wycombe District. The latter is not due finally to be adopted until the middle of 2002. It alone will now precisely define both the locational and statistical deficiencies of 'publicly accessible open space'. Such spatial standards were hitherto to be identified in development plans (see Table B in PPG17). The LPA have taken the course of specifying these and other deficiencies in its corporate plan and has kept the protective land use policies to a minimum (effectively RT1-RT5). To the extent that this approach has satisfied the objectors, it is accordingly endorsed.

RECOMMENDATION

- RT00/1 Modify paras 12.02, 12.03 and 12.07 in accordance with PICs 12/1 and 12/15.

RT1: PROTECTION OF EXISTING RECREATIONAL AND LEISURE FACILITIES

The Objections

0379/5 *Sport England*
1584/1 The Marlow Group

Summary of Objections

- (a) Criterion (ii) should be clarified; appropriate alternative provision should comprise like for like replacement. This should be equivalent in terms of quantity, quality and

accessibility, and be made available prior to the development of the original site, or a financial contribution should be sought to enable the Council to make such provision.

- (b) It should be made clear that sites for recreational and leisure proposals include allotments.

Inspector's Reasoning and Conclusions

12.1.1 The LPA's response to the objection by Sport England has been substantially to augment Policy RT1(1)(b) (nb: if renumbered using the conventions earlier advocated). This would seem to meet the main thrust of the objection. It is therefore supported. The Policy relies on emergent planning guidance but this is acceptable given the long-standing resistance to loss of accessible leisure provision. However, this raises the key question of accessibility. As it stands, RT1 is slightly ill-defined in its scope; it implies but does not specifically state that accessible land (or buildings) may well be functionally redundant for their present use or function but nevertheless fully capable of serving another community use *in that particular location*. This is important from the point of view of both sustainability and the need for ease of local access. A slight modification to the wording is accordingly recommended. Proposals that affect statutory (or other) allotments would certainly be covered by Policies L3, RT1 and RT18.

RECOMMENDATIONS

- ❑ RT01/1 Modify Policy RT1(1)(b) in accordance with PICs 12/2.
- ❑ RT01/2 Modify Policy RT1(1)(a) to read as follows:
 - (a) IT CAN CLEARLY BE DEMONSTRATED THAT THERE IS NOT ANY LONGER A CURRENT LOCAL DEMAND FOR THE FACILITY IN EITHER A RECREATIONAL, LEISURE OR OTHER COMMUNITY USE, THAT THERE IS NO REAL PROSPECT OF ANY SUCH DEMAND ARISING WITHIN A REALISTIC TIMESCALE OR THAT AN ACCEPTABLE ALTERNATIVE MEANS OF MEETING SUCH A DEMAND IS OR WILL BECOME AVAILABLE; OR.....

RT2: FUTURE LEISURE PROVISION

The Objections

0153/38	High Wycombe and Marlow Green Party
0379/11	Sport England
0872/1	Government Office for the South East
1205/2	Princes Risborough Town Council
2063/4	Wycombe Summit Ltd / Wycombe Option Ltd

PIC 12/3 Objections

1739/11	Lord Carrington's Grandchildren's Settlement
2063/17	Wycombe Summit Limited and Wycombe Option Limited

Summary of Objections

- (a) Policy irrelevant; if population remains static and extra houses are only required for those families who have 'split-up', then there are no more people to provide for.

- (b) Policy not clear as to whether applied to all development which will generate demand for new indoor and or outdoor recreational facilities, or only strategic housing allocations; all new developments can potentially generate demand for more places for sport. RT2 appears to relate to new residential developments of 40 dwellings or more. Amend to require appropriate developer contributions towards enhanced or new open space and sport and recreational facilities from all new development likely to generate additional pressure on existing facilities, taking account of a thorough local assessment of existing provision and need.
- (c) RT2 states that provision on strategic sites should be in accordance with Appendix 2, however, no reference in Appendix 2 to new indoor facilities; it may be appropriate to require new provision off site or a contribution towards existing local facilities.
- (d) Circular 1/97 makes it clear that there should not be an attempt to impose commuted maintenance sums, however specific exception to this rule is made for small areas of open space, recreational facilities and children's play space. RT2 should be amended to reflect this opportunity to secure proper future maintenance arrangements.
- (e) Policy is contrary to Government policy Circular 1/97. RT2 does not allow for negotiation on proper and appropriate planning obligations on their merits in relation to individual planning proposals.
- (f) Insufficient proposals to address lack of recreational facilities in Princes Risborough.
- (g) New and future provision should be provided adjacent to existing leisure facilities to assist complementary functioning and the best use of existing land e.g. Wycombe Summit site off Abbey Barn Lane.
- (h) In response to PIC 12/3, object, as replacement wording suggests that housing proposals would be premature pending the Council's investigation of shortfall in sport and recreational facilities within the District. The study should be completed and form part of the review process, influencing policy at the right stage of the review. Future leisure provision to address shortfalls would therefore be encouraged on specific sites identified in the Plan.

Inspector's Reasoning and Conclusions

12.2.1 Policy RT2 is not invalidated merely because the population size of Wycombe District is relatively static and because much of the additional housing capacity is required as a result of increased space standards and demographic change (eg the trend to smaller and more numerous separate households). As the LPA point out, there are certain deficiency areas in the District and certain forms of recreation that are not adequately provided for at present. Moreover, national participation rates in sport show consistently rising levels and certain new or (newly popular) forms of sporting activity require additional provision. The latter may include such facilities as mini-soccer pitches, artificial ski slopes and golf driving ranges. Policy RT2 is accordingly supported since it is necessary, in present circumstances, to include a Policy to require private sector development to accommodate or provide additional recreational facilities in accordance with the advice of C1/97 and the terms of the Local Plan's Chapter 2 Policies.

12.2.2 The objection of Sport England has been met by PIC 12/3. This is supported since Policy RT2 is meant to be of wide application; not merely restricted to the potential contribution of strategic housing site development. It is recognised by the LPA that its 'Local Cultural Strategy' will be needed to justify and specify individual development contributions to be sought under Policy RT2. The further change proposed by PIC 12/3, the deletion of references to the Appendix 2 Development Principles, is also supported in the interests of clarity. PIC 12/3 also recognises that it is consistent with C1/97 guidance that developer contribution may be sought towards recurrent maintenance costs as well as the initial provision of recreational open space or other facilities. The GOSE objection relating to the use of the less prescriptive word 'may' rather than 'will' in the wording of the Policy is supported as being more in line with current

official guidance. On the other hand, the insertion of the word 'new' before 'development' is both confusing and unnecessary in its particular context.

12.2.3 The objection relating to Princes Risborough is slightly misplaced in that Policy RT2 is directed against additional recreational facilities that may be required as a consequence of development and is not intended to address existing local deficiencies. In this sense, the Policy is designed to be long-term and district-wide and it would be wrong to modify it to refer to site-specific leisure development such as that which has taken place at Wycombe Summit on Abbey Barn Lane. The extension or diversification of what is at present a dry-ski slope and ancillary meeting accommodation is properly the subject of consideration under Policy RT4. It would also be inappropriate to defer the adoption of Policy RT2 until such time as the 'Local Cultural Strategy' is finalised. Firstly, an enabling policy is needed now to deal with recreational provision in parallel with the other Local Plan Policies. Secondly, the probable date of publication of the LPA document is the middle of 2002. It may therefore quite confidently be expected to be available at roughly the same time as this report and hence in advance of the Local Plan's adoption.

RECOMMENDATIONS

- RT02/1 Modify Policy RT2 and paragraphs 12.10-12.11 in accordance with PICs 12/3 and 12/16.
- RT02/2 Modify Policy RT2 by the deletion of the word 'NEW' before the word 'DEVELOPMENT'.

RT3: PLAYING PITCH PROVISION

The Objections

0158/39 High Wycombe and Marlow Green Party
0379/6 Sport England
1260/2 The Marlow Society

Summary of Objections

- (a) Retention of playing pitches is important. Object to Section (b) of the policy which allows for 'convenient swaps' of playing pitches to take place, e.g. Great Marlow School.
- (b) Object as policy seeks to maintain current level of pitches; no additional allocations of land for recreational land have been made in the Plan. This makes Section (b) difficult to implement, as no alternative sites have been formally allocated. A playing pitch assessment is required. Where a deficiency is recognised, consideration should be given to the allocation of additional sites.
- (c) The distinction between 'recreational purposes' and 'outdoor sports provision' requires clarification. Paragraph 12.12 states that the requirement for outdoor sports provision is independent of the requirement for open space provision as outlined in Policy H21. However, paragraph 10.15 states that provision of public open space for recreational purposes is addressed by Policy H21. Furthermore, paragraph 12.12 states that the standards for outdoor sport and children's play space are assessed against the NPFA guidelines and refers the reader to Appendix 7.
- (d) All playing fields should be identified on the Proposals Map.

- (e) Concern at the loss of grassed playing pitches. Once converted, they are unlikely to be recovered. Propose additional wording to policy: 'grassed playing areas will be maintained unless it can be clearly demonstrated that there is a need to convert them to a more appropriate, more durable or more weatherproof surface'.

Inspector's Reasoning and Conclusions

12.3.1 Policy RT3 is fully consistent with existing and emergent PPG17 advice in that it resists any loss of playing fields unless equivalent or better provision is secured. This provision may take the form of replacement indoor facilities or alternative or more extensive sports pitches in a possibly better and more accessible location. It is essential that the Policy be flexibly applied in site-specific cases. Whether land exchanges are 'convenient' or not will depend on the view taken by the LPA in response to individual circumstances and representations made at the appropriate time and place. This is a matter for individual planning judgement. It is significant that the wording employed in the existing (1991) and draft (2001) versions of PPG17 is somewhat more emphatic in the latter case. Accordingly, the wording of Policy RT3 might well be modified to reflect the relatively firmer presumption against the future loss of playing fields in Wycombe District.

12.3.2 The evidence of the LPA is that there is overall adequacy and in some cases a surplus of playing field and pitch provision in Wycombe District. The supporting text is proposed for revision (PIC 12/4) to reflect the recent research and survey carried out. The thrust of Policy RT3 is to safeguard existing provision and not to specify additional sites to offset established deficiencies. If the Policy is strengthened, as suggested above, by the deletion of the words 'seek to', it would seem to reflect the advice of PPG17 and to be adequate to resist unwelcome and unreasonable development pressures. The methodology chosen for estimating local deficiencies is much more detailed than the long-standing one advocated by the NPFA. This is reflected in the revised wording of paragraph 12.13 and is accordingly supported. Criterion (b) of the Policy would thus appear to be adequate to evaluate individual proposals and the prior phrasing of any alternative provision is noted as especially appropriate.

12.3.3 Paragraph 12.12 is the subject of objection by Sport England and the LPA has responded with alternative wording set out in PIC 12/4. This is seemingly acceptable to Sport England and is accordingly endorsed as reflecting the overall assessment made against NPFA standards and also the need to have regard to more local considerations. The objection that all playing fields should be indicated on the Proposals Map is not supported, for a variety of reasons. Firstly, it is established PPG17 policy to safeguard the integrity and availability of all open playing fields, regardless of ownership or pattern of use. Secondly, their function as local open space is recognised but this is secondary to their continued active use for recreation. In other words, most open space enjoys protection under Policy L3 (or L4) purely for amenity reasons, regardless of use. The openness and current use of playing fields, which may well be within Policy L3 or GB2 protected areas in any case, are protected both by virtue of Policy RT3 and of PPG17 advice. An additional Proposals Map notation would be both confusing and redundant.

12.3.4 The question of whether grassed playing fields or pitches, as such, should be specifically safeguarded as a matter of planning policy is difficult to determine. Such replacement might or might not need planning permission. It is certainly a fact that recent advances in artificial surfaces have resulted in wider use of so-called 'all-weather' pitches and may extend their effective availability. However much this may be regretted aesthetically, it is doubtful whether it is an appropriate matter for an overall Local Plan policy. What may lie behind the objection is hostility to the partial loss of playing fields in the past by the more intensive use of the smaller part that is retained and provided with an all-weather surface. Equally, the objection may be directed at the use of both artificial lighting and artificial surfaces to extend hours of play. It is fair to point out that both these contingencies are recognised in the Local Plan, as witness the instant Policy RT3 and the earlier Policy G16. No modification to

any of the Chapter 12 Policies is needed to meet this particular objection.

RECOMMENDATIONS

- RT03/1 Modify paragraphs 12.12-12.13 in accordance with PIC12/4.
- RT03/2 Modify Policy RT3(1) by the deletion of the words 'SEEK TO'.

RT4: COMMERCIAL LEISURE

The Objections

2063/5 Wycombe Summit Limited and Wycombe Option Limited

Summary of Objections

- (a) Existing leisure uses, for example Wycombe Summit, should be identified as suitable for further commercial leisure uses. Policy should refer to the acceptability of expanding and intensifying commercial leisure uses on or adjacent to existing commercial leisure sites as a further criterion.

Inspector's Reasoning and Conclusions

12.4.1 Policy RT4 and its supporting text are the subjects of substantial proposed change. This has been suggested by the LPA in order to bring the Policy fully into line with the sequential approach adopted by PPG6. In this context, commercial leisure facilities are regarded as prime town centre uses. The Policy and its detailed criteria have been revised to steer commercial development towards the town centres of Wycombe District, mainly in the interests of accessibility by a variety of modes and hence overall sustainability. This approach is endorsed as being in line with both PPG6 and PPG13 advice. The main reservation is that of the policy definition of the town centres' physical extent (see also Policy S1 and earlier recommendations). Given the very varied nature of commercial leisure activities, it would be wise to allow them as much space as possible and not to confine their preferred location to what are essentially shopping frontages. The LPA may, as elsewhere, wish to assign Arabic numerals to paragraphs and small letters to criteria in Policy RT4. Otherwise, a reference to Policy RT4(i) would be needlessly ambiguous and might equally apply to a first or second preference commercial leisure location.

12.4.2 The objection by Wycombe Summit Limited is clearly related to their leisure activities on Abbey Barn Lane. These comprise dry-ski slopes and purpose-built ancillary accommodation that is now used for a variety of purposes. Leaving aside the propriety of modifying a district-wide policy to reflect wholly site-specific aspirations, the objection is not sustained precisely because of its possible weakening of the emergent Policy RT4 itself. No doubt the existing facility might well be looked on as acceptable, within the terms of emergent Policy RT4(2), purely and simply because of the precise siting requirements of artificial ski slopes (gradients of between 5% and 6%). In other words, leisure development needs to be judged on a case by case basis and not mainly on arguments of the benefits of incremental provision, relevant though these may be. The essential point of the Policy is to facilitate multi-modal access for all members of the public. The Wycombe Summit site is conspicuously awkward of access on foot and by public transport. There may be excellent reasons for establishing a ski slope there but they would not necessarily apply to the majority of leisure activities needing a wider variety of travel modes.

RECOMMENDATIONS

- RT04/1 Modify Policy RT4 and paragraphs 12.18 and 12.18a in accordance with PIC 12/14.
- RT04/2 Modify Policy RT4(1)(a) to read as follows:
 - (a) THEIR LOCATION DOES NOT CONFLICT WITH POLICIES S1, S3 AND S4.

RT5: RECREATIONAL USES IN THE COUNTRYSIDE
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The Objections

0379/14 Sport England

PIC 12/5 Objections

0379/64 Sport England
1739/12 Lord Carrington's Grandchildren's Settlement
2063/18 Wycombe Summit Limited and Wycombe Option Limited

Summary of Objections

- (a) No justification given for the restriction that recreational development in the countryside must be compatible with the quiet enjoyment of the rural area.
- (b) Where there is a clear demand for noisy sports activities, planning authorities should seek to identify sites which minimise conflicts with other uses.
- (c) Policy is too lengthy and overly restrictive. Criterion (i) is open to different interpretations; no definition is given as to how the value of environmental characteristics and resources of the area will be assessed.
- (d) Criterion (ii) is overly restrictive (noise and light can be effectively controlled by conditions).
- (e) Criterion (iii) (b) and (viii) should be amalgamated. Criterion (viii) and the term 'environmentally accommodated' is ambiguous and needs clarification.
- (f) Criterion (iv) is worded in an unnecessarily negative way. Landforming works and landscaping can often enhance visual amenity. Policy as worded, assumes that landscaping is only for car parking.
- (g) Criterion (vii) is a general principles, applied to all development. Question why reiterated here.
- (h) In response to PIC 12/5, support changes, but maintain objection to criterion (iii), (iv) and (v), as above.
- (i) In response to PIC 12/5, object, as recreation development including outdoor sport may well enhance the character and quality of the rural area by ensuring its long term viability by identifying a valid future use; it may bring land into beneficial use in a time where agriculture cannot be depended on to do so. This diversification should be supported.

Inspector's Reasoning and Conclusions

12.5.1 Policy RT5 is proposed for substantial change, largely on account of many detailed objections by Sport England. The effect of PIC 12/5 would be to accommodate these detailed points but somewhat at the expense of clarity and coherence. A balance must also be struck between the understandable desire of Sport England to encourage the widest public use of rural areas as a valuable resource and the undoubted fact of the Green Belt and AONB status of much of Wycombe District. Moreover, the Policy as drafted and as proposed for change very slightly tends to dwell on possible harm rather than seeking to encourage the enhancement of the rural scene; one of the objectives of AONB designation. The Policy also includes too much by way of cross-referencing in its formulation; this is better confined to the lower case supporting text. It is therefore recommended that the Policy be simplified and condensed to set out (a) the basic acceptability of rural recreation relative both to its quantifiable aspects of character and to local landscape quality (b) the key criteria (the subject of other Local Plan Policies) to be assessed during consideration of individual proposals and (c) guidance as to the form that operational development should take in a countryside setting.

RECOMMENDATIONS

- RT05/1 Modify Policy RT5 to read as follows:

POLICY RT5

(1) RECREATIONAL DEVELOPMENT IN THE COUNTRYSIDE, WHETHER FOR LOCAL OR GENERAL USE, WILL BE ACCEPTABLE IN PRINCIPLE, PROVIDED THAT THE RURAL CHARACTER, QUALITY AND AMENITY OF THE PARTICULAR AREA IS RESPECTED AND THAT THE PROPOSED RECREATIONAL ACTIVITIES, BY THEIR NATURE, EXTENT, INTENSITY, FREQUENCY OR TIMING HAVE REGARD TO THE FOLLOWING CONSIDERATIONS:

- (a) NOISE LEVELS LIKELY TO BE GENERATED BY THE PROPOSED ACTIVITIES;
- (b) THE IMPACT OF VEHICULAR OR OTHER TRAFFIC MOVEMENTS TO, FROM AND WITHIN THE DEVELOPMENT SITE;
- (c) ANY ADVERSE EFFECTS CREATED BY THE ARTIFICIAL LIGHTING OF THE AREA.
- (d) THE EXTENT AND VISUAL IMPACT OF LANDFORMING WORKS INCLUDING THE FORMATION OF PLAYING SURFACES, TERRACING OR MOUNDING OR THE PLANTING OF TREES AND OTHER FORMS OF LANDSCAPING;
- (e) EASE OF ACCESS BY ALL FORMS OF MOVEMENT, INCLUDING WALKING AND CYCLING AND THE EXISTENCE OR CREATION OF PUBLIC RIGHTS OF WAY;
- (f) THE EXTENT AND VISUAL IMPACT OF THE SITING AND LAYOUT OF PARKING;

(2) RECREATIONAL DEVELOPMENT SHOULD, AS FAR AS POSSIBLE, USE (OR SUITABLY CONVERT FOR USE) ANY EXISTING BUILDINGS AND ENSURE THAT NEW BUILDING IS LOCALLY UNOBTRUSIVE AND WOULD SERVE TO MAINTAIN THE OPEN CHARACTER OF THE RURAL SURROUNDINGS AS REGARDS OVERALL EXTENT, HEIGHT, EXTERNAL APPEARANCE AND USE OF FACING AND ROOFING MATERIALS.

- RT05/2 Modify the supporting text, generally in accordance with PIC 12/5.

POLICY RT6: HOTEL SITES

The Objections

0158/40	High Wycombe and Marlow Green Party
0211/4	K P Hale
1031/1	Harleyford Leisure Enterprises
1205/1	Princes Risborough Town Council
1414/16	Michael J Overall

Summary of Objections

- (a) Object to 'policy impact matrix' of hotel sites which shows many negative marks against two of the sites, with the third escaping any. Marking appears subjective.
- (b) Question location of hotels on urban fringe and conformity with Government guidance.
- (c) To ensure appropriate provision of hotel accommodation, there should not be a rigid allocation without any flexibility. There is a need to take account of possible opportunities elsewhere to provide an appropriate scale of hotel development compatible with the requirements of other relevant policies. Amend policy to state that 'elsewhere, proposals will be considered for hotel accommodation in appropriate locations where association with compatible existing development. Proposals should be of a scale and character so as not to conflict with other relevant policies.'
- (d) Wish to see provision of a site to accommodate a small hotel unit in the North of the District, to satisfy the needs of people visiting this part of the Chiltern's, where there is at present a lack of hotel rooms available.
- (e) Suggest a town centre location for an hotel, which would be consistent with the Plan's sustainability objectives, rather than an edge of town site.

Inspector's Reasoning and Conclusions

12.6.1 Policy RT6 follows PPG21 advice and allocates three (or two if PIC 12/6 is adopted) sites for hotel development. This reflects 1996 survey findings (CD/R/1-2) that suggested a shortfall of 210 bed-spaces in the 2000-2011 period. There is no permissive or criterion-based policy to judge ad hoc proposals since the LPA do not recognise extra demand and point to the constraints imposed by Green Belt and AONB restrictions. The RT6(1)(a) and (b) allocations will comfortably meet the survey recommendations. Indeed one site at Marlow Sewage Works is under construction and it will provide 168 bedrooms (300+ bed-spaces) or substantially more than the indicative level. The second allocation at Wycombe Marsh is of unspecified size but will certainly augment the overall accommodation, probably in the period 2006-2011 (this assumption is based on conclusions reached relative to implementation of Policies H5A and S2). There is accordingly no very obvious case for a more flexible policy although the absence of a site in the northern part of Wycombe District should perhaps be viewed with some concern.

12.6.2 It is doubtful whether the policy impact matrix has a great deal of relevance to hotel site selection. Such selection is made difficult on account of the inherently conflicting requirements of hotel operators, their resident clientele and the public at large. Hotels need to be easily accessible by visitors, staff and servicing vehicles. Commercial operation requires, or at least commonly demands, car parking on a scale which may conflict with emergent planning policies. Successful operation is often held to require prominence and easy access from principal traffic routes which may not sit easily with strategies of countryside conservation and reduction of traffic congestion (see also later consideration of objections to Policy RT19). Undue emphasis is in many cases placed on ease of access by private cars, to the neglect of adequate mobility

on foot or by scheduled public transport. In short, the considerable difficulties of siting are such as to make any Sustainability Appraisal of limited relevance to selection. In any case, the two allocated sites seem acceptably sustainable, being close to or within urban areas and at least potentially accessible by a variety of modes.

12.6.3 As the LPA points out, town centre siting may be highly desirable from an overall accessibility point of view but is unlikely to be achieved because of other developmental pressures. It is noticeable that the two most recent large hotels to be developed in the area are the Travel Inn and Post House establishments in High Wycombe. They exemplify operators' wishes for high visibility and very extensive car parking areas but nevertheless are (or might be) tolerably well served by frequent public transport. Such favoured sites will be relatively few and future development proposals will no doubt be assessed against a broad range of Local Plan Policies, such as G9 and T1. To attempt to formulate another Chapter 12 Policy to control, rather than to specify, hotel development would risk merely restating a number of other policies. It would not be justified in the light of apparent adequacy of short to medium term provision. There is little doubt that the third urban area, Princes Risborough, is at present conspicuously lacking in adequate hotel accommodation. Notwithstanding its situation in areas of planning policy constraint, the town's distinctly nodal character suggests that the LPA might wish to look again for a suitable hotel location in or very near to it.

RECOMMENDATIONS

- RT06/1 Modify paragraphs 12.27, 12.28 and 12.30 in accordance with PIC 12/6.
- RT06/2 Modify the Policy RT6 allocations (1-3) as (1-2) in accordance with PIC 12/6.

RT6(1) : HOTEL SITE – LITTLE MARLOW FORMER SEWAGE WORKS

The Objections

0366/4	Royal Borough of Windsor and Maidenhead
0840/1	Marlow and District Chamber of Trade & Commerce
0872/2	Government Office for the South East
1144/2	Mr R and Mr A Mash
1260/3	The Marlow Society
1584/2	The Marlow Group
1597/1	The National Trust, Thames & Chiltern Region
1798/1	Buckinghamshire County Council – Environmental Services Dept

Summary of Objections

- (a) Proposal contrary to PPG2 'Green Belt'. An hotel would represent inappropriate development and conflict with National, Regional and Structure Plan policy. Question the exceptional circumstances which warrant identification of this site for an hotel.
- (b) Site is in a very prominent and sensitive location which can be viewed from Winter Hill in Cookham (National Trust land) and which is a very much enjoyed beauty spot. The area is sensitive in environmental terms, an area of special landscape importance and an important setting of the Thames.
- (c) Proposal has already been in the Development Plan for 15 years and has not been built on. Site can not be built on quickly.
- (d) Site has access constraints; poor access to the town centre. Proposed site is far removed from the town centre and unrelated to the existing built up area of Marlow. Site is not sustainable.

- (e) Object that proposal concentrates on recreational and tourism requirements for an hotel, when no mention is made of an hotel for business users and the general needs of Marlow.
- (f) If an hotel is built, then there should be provision for Park and Ride.
- (g) Site is entirely within the River Thames flood plain, therefore constrained by Local Plan policy (G20).
- (h) Propose that the best use of the site is for leisure related purposes with Green Belt designation in line with Policy RT19 'Little Marlow Gravel Pits' as outdoor recreation.
- (i) Object to the word 'identified' in the policy, and suggest that 'preferred' is more appropriate as the word identified suggests the exclusion of other uses.

Inspector's Reasoning and Conclusions

12.6.1.1 Notwithstanding the number and substantial nature of the objections to this Policy, they have been overtaken by events in that the hotel in question is now under construction. Site preparation was well under way before the inquiry closed in October 2001. This construction was authorised by the renewal of a long-standing planning permission for this Green Belt site. Any comment on the validity of the objectors' arguments would accordingly be unhelpful and probably irrelevant. However, the establishment of a significant traffic generator in this particular location to the east of Marlow has considerable relevance with respect to other but related objections (see RT6(6), RT6(7), RT6(8) and RT6(10)). It also impinges on the wider proposals set out in Policy RT19 and therefore will be considered under these various headings later in the report.

RECOMMENDATION

- RT06.1/1 Modify Policy RT6 by the inclusion of Little Marlow Sewage Works as allocation RT6(1)(a).

RT6(2) : HOTEL SITE – WYCOMBE MARSH ALLOCATION

PIC 12/6 Objections

See Appendix 12B

Summary of Objections

- (a) No guidance has been issued on the size, style or need for an hotel on the site.
- (b) As part of the proposal to reinstate the Abbey Barn South allocation, feel that the Abbey Barn area is appropriate for the provision of an hotel, but that a new, alternative site is preferable to either a reinstated Abbey Barn South hotel allocation, or the proposed Wycombe Marsh allocation. Alternative site suggested.

Inspector's Reasoning and Conclusions

12.6.2.1 The proposal to locate a new hotel within the Policy H5A Wycombe Marsh allocation derives from Proposed Changes which removed the various Abbey Barn South allocations for housing, employment and other activities. In that sense, the more recent allocation of an hotel site in the Wycombe Marsh area invites a direct comparison between the two locations. Given the prominence of Wycombe Marsh and its relative centrality in High Wycombe, it is probable that an hotel site thereabouts would be more immediately attractive to

commercial developers and operators. An hotel site would be a relatively economical use of land within an extensive Policy H5A allocation of some 20.2 ha although it would presumably have to occupy a visible and prominent position. This might be either on or near the main A40 London Road or fronting any spine road serving the development area (or ideally on both from an operator's point of view). Beyond these reasonable assumptions, it would be unwise for the Local Plan to make any more detailed or prescriptive requirements.

12.6.2.2 At all events, siting, site area, parking provision, inclusion of leisure facilities and overall size must be a matter for a detailed Planning Brief, as the LPA suggest. The Local Plan should go no further than specify the need for a site at this stage. The 1996 survey figures (see RT6) may need to be updated but the fact that the Little Marlow enterprise will be in business well within the 2000-2011 timescale suggests that an hotel completion at Wycombe Marsh within the 2006-2011 period would be both timely and eminently capable of implementation. By comparison, a site within the now discarded Abbey Barn South allocation could not be authorised independently and its development would rely on the progress of major investment on the site which is far from assured. Moreover, an Abbey Barn hotel site would not appear to enjoy the prominence or the direct access that most developers might reasonably look for. In addition (and this is also a matter that particularly affects the various objection sites in or near Marlow) the site is at present poorly served by public transport and hence might generate unduly high levels of guest and employee travel by car.

RECOMMENDATION

- R06.2/1 Modify Policy RT6 by the inclusion of Wycombe Marsh Site as allocation RT6(1)(b).

RT6(3) : HOTEL SITE – ABBEY BARN SOUTH

The Objections

See Appendix 12A

PIC 12/6 Objections

1579/33	Oxford Land Limited
1739/17	Lord Carrington's Grandchildren's Settlement
2063/23	Wycombe Summit Ltd / Wycombe Option Ltd

Summary of Objections

- (a) Site is unsuitable; proposal will lead to loss of open rural land that should be left for future generations; will affect public rights of way; should be designated as a Local Landscape Area and as Green Belt.
- (b) An hotel would generate additional traffic, adding to existing congestion.
- (c) Object on grounds of prematurity, until such time as the results of a study to consider the proposed development and traffic impact of the four eastern sector sites (Abbey Barn North, Abbey Barn South, Wycombe Marsh and the Paper Mill) are available.
- (d) Proposal would lead to loss and impact on local landscape and natural habitats. Loss of amenity. Proposal would be visually intrusive; attractive valley sides would be

- obliterated. Infringement of skyline. Impact on Thames Valley Rural Ridge and landscape. Loss of woodland which acts as a buffer.
- (e) Development of Abbey Barn South site would lead to amalgamation of Flackwell Heath and High Wycombe, losing one of the few remaining 'green' areas. Lead to over-intensification without consideration of established communities.
 - (f) Inappropriate use of best and most versatile agricultural land.
 - (g) Poor access for an hotel; not on a main route or near rail. Would have no benefit to commercial users in High Wycombe or from M40. Inappropriate location for hotel on urban fringe. Unacceptable to mix housing, industry and an hotel. Proposal too highly dependent on developer contributions.
 - (h) Development of Abbey Barn South would lead to commercialisation of peaceful community; lead to increased crime, unemployment; set a precedent for infill development.
 - (i) Concern that existing ski centre will increase to a full blown leisure service. Hotel will include a restaurant, late night opening etc leading to increased disturbance in otherwise quiet area.
 - (j) No requirement for an hotel; refer to existing hotels at Thanstead Farm, nearby Travel Lodge and proposals in Marlow for 168 bedroom hotel. Existing over capacity in numerous hotels in High Wycombe. High Wycombe is not a tourist destination.
[In response to PIC 12/6 to delete the hotel allocation]:
 - (k) Object, as the site provides a sustainable location for the development of employment and housing.
 - (l) As part of the proposal to reinstate the Abbey Barn South allocation, feel that the Abbey Barn area is appropriate for the provision of an hotel, but that a new, alternative site is preferable to either a reinstated Abbey Barn South hotel allocation, or the proposed Wycombe Marsh allocation. Alternative site suggested.

Inspector's Reasoning and Conclusions

12.6.3.1 Most of the objections effectively relate to the large-scale allocation of land under Policies H2 and E2 for housing and employment uses. In view of the earlier recommendation in the report not to restore this allocation (which is currently proposed for deletion by PIC 12/6) no further comment is necessary. Whether or not an hotel might independently be established on any part of the former allocation and the possible objections to this are not matters that need to be considered at this juncture. The clear inadequacies of multi-modal access, the existing rural use and character of the land and its topographical prominence would all seem to argue against isolated hotel development. On the other hand, an hotel would be a complementary use to the established ski slope. It might therefore be examined as a possible component of future mixed use development if this were to be reconsidered in a later review of the Local Plan. Such a review would naturally benefit from a more detailed hotel needs and capacity survey and from information on the progress made on the two sites now allocated.

RECOMMENDATION

- RT6.3/1 Modify Policy RT6 by exclusion of Abbey Barn South as allocation RT6(1)(a).

RT6(4): HOTEL SITE – BELLFIELD HOUSE, OXFORD ROAD

The Objections

0481/4 Berkeley Eastoak Investments Limited

Summary of Objections

- (a) Site is currently the subject of current proposals to build a commercial development. Unlikely that an hotel will be provided as part of these proposals.

Inspector's Reasoning and Conclusions

12.6.4.1 The evidence of the LPA is that the allocated site has been given planning permission for Class B1 office development and the objectors confirm that it is unlikely that an hotel or any form of residential accommodation will be provided as part of the authorised development. The deletion of the allocation from the Local Plan is accordingly supported. It is conceivable that future trends in property development and marketing might lead to a subsequent proposal for a change of use from Class B1 to Class C1 but this would be entirely a matter for a future development control decision. Certainly the fact that this extremely accessible and very prominent edge-of-centre frontage site is being developed for a high-density employment use tends to substantiate the LPA's claim (reported earlier) that hotels sites are unlikely to become easily available in or adjacent to the major town centres of Wycombe District.

RECOMMENDATION

- RT06.4/1 Modify Policy RT6 by exclusion of Bellfield House as allocation RT6(1)(c).

RT6(5) : HOTEL SITE - ABBEY BARN FARM

The Objections

2063/7 Wycombe Summit Ltd and Wycombe Option Limited.

Summary of Objections

- (a) Support Abbey Barn South allocation, particularly the case, assuming that the hotel is to be adjacent to the existing Wycombe Summit site as this will provide substantial complementarity between the hotel and existing site uses. Alternatively, in order to optimise land use at the allocated site, believe that the existing Abbey Barn Farm complex could appropriately be converted to an hotel.

Inspector's Reasoning and Conclusions

12.6.5.1 The essential difference between the previous allocation of an hotel site at Abbey Barn South and that suggested at Abbey Barn Farm is that the former is located in land safeguarded for possible urbanisation whilst the latter is within the defined Green Belt. Moreover, the Green Belt site is further protected as a Policy L2 Local Landscape Area and much of the farmstead group that would form the nucleus of the proposed development are statutorily listed buildings. The last two policy considerations are not critical to a possible Local Plan allocation but the Green Belt siting is an over-riding matter. Even if the Abbey Barn South

allocation were to be revived in a Review Local Plan, the clear and present defensibility and intended permanence of the Green Belt boundary along Abbey Barn Lane argue against the conversion or significant extension of this very fine listed group of buildings. There is no obvious shortfall of hotel bed-spaces in Wycombe District to 2011 and accordingly no very special circumstances to set aside long-standing policies regarding the safeguarding of the openness of the defined Green Belt.

RECOMMENDATION

- RT06.5/1 No modification.

RT6(6) : HOTEL SITE - JUNCTION OF MARLOW BYPASS AND BOURNE END ROAD

The Objections

0840/2 Marlow and District Chamber of Trade & Commerce

Summary of Objections

- (a) There is a requirement in Marlow for mid-priced hotel accommodation for business use and visitors. Proposals in the Plan concentrate on recreational and tourism requirements; this is an omission. Propose land at the junction of by-pass and Bourne End Road to be developed for an hotel in association with improvements to the junction, car park (for long stay) and shuttle bus.

Inspector's Reasoning and Conclusions

12.6.6.1 This objection cannot be supported for a variety of reasons. Like the others that are proposed around the A404-A4155 junction, the land is included within the defined Green Belt and no very special reasons have been given to allocate land for such an inappropriate use. In addition, the site is within the Policy RT19 proposal for a future country park. Although hotel development might be complementary to such a proposal, the fact remains that an hotel is currently being developed under Policy RT6(1)(a) some little way to the south. It is doubtful whether another hotel could be justified for Policy RT19 reasons in this very sensitive area of Green Belt. If it were, it would have to await the preparation and future publication of the Supplementary Planning Guidance by which Policy RT19 is to be implemented. There are additional traffic objections; one is that access to the future Country Park might be needlessly complicated by multiple side road construction so close to the major intersection. The other is that the siting of a P+R operation (consistent with Policy T17 as recommended for modification) might be largely prevented by the allocation of an hotel site in this particular location. It would be difficult to argue for a grouping of functions on account of Policy T17(2)(f) (see T17).

RECOMMENDATION

- RT06.6/1 No modification.

RT6(7) : HOTEL SITE - JUNCTION OF THE A404 AND PUMP LANE SOUTH

The Objections

1144/1 Mr R and Mr A Mash

Summary of Objections

- (a) Propose site between A404 and Pump Lane South (to the north of Marlow Road) as a more suitable site for an hotel than the former Marlow Sewage Works site. This proposed site is on a junction; all services are readily available on site; site can be developed quickly; good road connections; close to town centre and Globe Park. To aid Globe Park parking problems, site could also provide Park and Ride facilities, or long term contract parking.

Inspector's Reasoning and Conclusions

12.6.7.1 Like the proposed alternative hotel site at Abbey Barn Lane, this objection site is located within the defined Green Belt. In addition, it is also within the Chilterns AONB, the subject of Policy L1. There is no doubt that it is eminently developable, being located on level land in the angle of the A404 and A4155 roads at their grade-separated intersection to the east of Marlow. However, the site is very visible and prominent, a clear commercial advantage but highly undesirable on both AONB and Green Belt grounds. There are no very obvious special circumstances that would justify an allocation for such inappropriate development in the Green Belt whose urban appearance, unlike the adjacent garden centre, would also be inimical to the high landscape quality of the AONB. Moreover, it is not capable of easy access by existing scheduled public transport and the necessary highway improvements for access might well needlessly complicate those that may be required for safe and easy access to the Policy RT19 area to the south of the A4155.

RECOMMENDATION

- RT06.7/1 No modification.

RT6(8) : HOTEL SITE - LAND TO THE NORTH-WEST OF MARLOW BYPASS (A404)

The Objections

0840/48 Marlow and District Chamber of Trade & Commerce.

Summary of Objections

- (a) Propose area of land between existing housing (in the North East of Marlow) and the by-pass. Whilst the area is designated as AONB and Green Belt, the reality is that it contributes very little to these areas and the site should be allocated for either residential or an hotel.

Inspector's Reasoning and Conclusions

12.6.8.1 This site cannot be recommended for allocation as an hotel site under Policy RT6 for many of the same Green Belt reasons as apply to the Pump Lane and Abbey Barn Lane sites. The suggested site is in many ways even less suitable than the former, being wholly amorphous and ill-defined. There is no nucleus of existing buildings to mitigate its visual

impact as there is on the latter. Although it is technically capable of being served by scheduled public transport, it has the distinct disadvantage of being adjacent to an established residential area on the north-east urban fringe of Marlow. An hotel located here would be a poor neighbour for such a relatively sensitive area and its probable access point and traffic generation would be such as to unduly and unfairly induce increased vehicle traffic flows along a residential distributor road at possibly unsocial hours. Neither this site nor the Pump Lane site would have such easy or obvious physical liaison with the Globe Park Estate as to argue for any useful synergetic function as might well be established by the nearby authorised hotel development, the subject of Policy RT6(1)(a).

RECOMMENDATION

- TR06.8/1 No modification.

RT6(9) : HOTEL SITE – PORTLANDS

The Objections

0840/3 Marlow and District Chamber of Trade & Commerce

Summary of Objections

- (a) Preferable for an hotel in the town centre; the Portlands site would provide one in the central area (above a new Waitrose store). Policies in the Plan should enable an hotel in association with other development in the town centre.

Inspector's Reasoning and Conclusions

12.6.9.1 The objection proposes the dual use of the Policy M5 allocation for retail Class A1 retail and Class C1 hotel development. The first thing that needs to be said is that this proposal does not seemingly have the support of the main objectors to Policy M5 and the intending retail operators, Waitrose Limited. The second thing is that such a hybrid form of development would be uncommon (if not unprecedented) and the juxtaposition of uses might possibly give rise to severe conflicts at certain times. Moreover, the earlier recommendation in this report was to support the LPA's residential allocation of all the land and to reject the counter-proposal by Waitrose. In other words, retail development of the site will probably not take place and thus no hybrid building form is likely to be considered. As for a possible partial or total Class C1 allocation, this cannot be supported. The reasons are that an hotel would require substantial and dedicated car parking and this would be objectionable for the very reasons given in relation to the Waitrose proposal. In addition, the loss of the land for housing would be doubly unfortunate. Firstly because private residential redevelopment would be to the benefit of the character and appearance of the Marlow Conservation Area. Secondly, because the consequential loss of housing potential would significantly upset the Policy H2 land availability calculations.

RECOMMENDATION

- RT06.9/1 No modification.

RT6(10) : HOTEL SITE - WESTHORPE HOUSE, LITTLE MARLOW

The Objections

0481/12 Berkeley Eastoak Investments Limited

PIC 12/6 Objections

0481/10 Berkeley Eastoak Investments Limited

Summary of Objections

- (a) Propose land at Westhorpe House on basis of the benefits of proposed location. Although in the Green Belt, the requirement for such a use constitutes very special circumstances that warrant setting aside the presumption against inappropriate development in the Green Belt. Hotel could be developed in a manner that would not affect the setting of Westhorpe House and in a manner that is sensitive to the landscape setting of the site. Proposed site is brownfield, having been previously developed. Site could use the existing spur off the main roundabout. Site would have advantage of consolidating development adjacent to existing offices, avoiding a spread of development within the gravel works area.
- (b) Policy RT6 makes insufficient provision for hotel sites in the District. It is unusual for such a policy to be site specific with regard to hotel sites. Policy should be reworded to provide for flexibility with the hotel industry. Policy should list location criteria for hotel sites.
- (c) In response to PIC 12/6, object that the policy does not adequately address the need for hotel accommodation in Marlow. The former Marlow Sewage Works site has never been implemented and there is no current prospect of implementation. The policy therefore gives an insufficient choice of readily available sites to meet the needs of the District. Propose that allocation at Former Marlow Sewage Works be deleted and replaced with land at Westhorpe House.

Inspector's Reasoning and Conclusions

12.6.10.1 To an extent, the above objections have been addressed in relation to Policy RT6. That is to say, the LPA's decision not to propose a criterion-based policy but to nominate hotel sites to satisfy apparent demand during the plan period is supported. This policy does not preclude other sites coming forward and their being duly considered. The LPA merely takes the view that the two sites are preferred, the one because of an outstanding planning commitment and the other for reasons of regenerating an accepted brownfield site in an accessible location. It is very doubtful whether any criterion-based policy for hotel development could do other than apply a presumption against new hotel building (as distinct from conversion) in the Green Belt or the AONB. Such exceptions to firm local and national planning policies can only be made on a case by case basis and in the light of special local circumstances. Such decisions would not usefully be informed by a criterion-based Policy RT6; (a direct comparison with Policy T17 in this context is both obvious and relevant).

12.6.10.2 The objection relating to the improbability of the Policy RT6(1)(a) site's being developed is simply answered by the obvious fact of the hotel's current construction there. As for further development near Westhorpe House, the LPA draw attention to the erection of an office block close to the listed building. This was seemingly permitted in the Green Belt as

'enabling development' which was only justified by the continuing preservation and related use of the main listed building. Site inspection revealed the development to have taken place and the listed building to be occupied and in apparently very sound condition. A reasonable conclusion would be that no further enabling development needs to be sanctioned. There are accordingly no very special circumstances to justify an hotel in this very prominent part of the Green Belt, roughly equidistant from the Policy RT6(1)(a) allocation and the Policy GB8 major established site at the Marlow Sewage Works. Moreover, the objection site is within the Policy RT19 allocation for the establishment of a future country park. Any decision now on a possible additional hotel site allocation would accordingly be premature.

RECOMMENDATION

- RT06.10/1 No modification.

RT9: CAMPING AND CARAVANNING

The Objections

1260/1 The Marlow Society
1798/21 *Buckinghamshire County Council – Environmental Services Department*

Summary of Objections

- (a) The term 'small scale' is too loose; amend to read 'up to six spaces' as a definition.
- (b) Require confirmation that applications for gypsy transit site development will be judged against RT9 and not H28. Applications may be discriminated against if judged against H28.

Inspector's Reasoning and Conclusions

12.9.1 The objection by Bucks CC has been met by PIC 3/20 which amends the supporting text to Policy H28 at paragraph 3.99. The objection that 'small scale' is ill-defined has some weight but it is difficult to see how the Policy might be sharpened in this respect. As the LPA fairly point out, the sensitivity of the AONB in particular makes it difficult to set a district-wide threshold. It is quite possible that even six pitches on a small or steeply sloping site might be objectionable. It is accordingly better to apply the Policy selectively, using 'small scale' as an admittedly relative term which applies to Policy L1 and L2 areas only. It may be, for example, that Policy RT9 will be applied to control site occupancy levels in order to reduce or limit the density of pitches on particularly sensitive sites. What the objectors may have in mind is the statutory limit set for site licensing purposes. However, this is a limit set by central government and it relates essentially to public health matters. It is not appropriate to adopt it for land use planning purposes where local visual amenity is one of the prime considerations.

RECOMMENDATION

- RT09/1 No modification.

RT10: STORAGE OF CARAVANS

The Objections

1260/6 *The Marlow Society*

Summary of Objections

- (a) Policy should be more restrictive, with the addition of the word 'only' when referring to 'will only be permitted'.

Inspector's Reasoning and Conclusions

12.10.1 The wording of Policy RT10 succinctly sets out the situations where out-of-season touring caravan storage will be permitted. Such open storage may be allowed on permanently screened parts of established or authorised camping and caravan sites or within redundant buildings, presumably wherever the latter may be located. This seems an adequately permissive policy, bearing in mind the continuing and pressing need to keep vacant caravans discreetly stored away from residential areas whenever they are not in use for active recreational purposes. The insertion of the objectors' word 'only' would not only add nothing to the precision of the Policy and its reasonable application, it would merely put a very slightly negative gloss on wording that is positively intended to preserve the rural landscape and protect the public environment at large,

RECOMMENDATION

- RT10/1 No modification.

RT11: MOORING AND BOATING FACILITIES ON THE RIVER THAMES

The Objections

0379/8 *Sport England*
1193/3 *Environment Agency*
1260/7 *The Marlow Society*

Summary of Objections

- (a) Recreational potential of river should be recognised and enhanced. Policy should be amended to include a clause that seeks to resist development that would have an adverse effect on the sport and recreational potential of the river.
- (b) Policy should make provision for adequate car parking at reasonable distance from water edge to enable potential of river to be maximised.
- (c) Reference should be made to Thames Recreation Strategy (1995), that can be used as a source and reference document when determining any recreational development alongside the Thames.
- (d) Policy precludes additions to the existing rowing and sailing clubs or the starting of new ones. Last paragraph of policy is too onerous on sporting activities as it places additional restrictions on organised, non-commercial boating activities. Amend policy to read 'existing riverside facilities and services for boaters will be protected and the provision of additional services supported in appropriate areas'.

- (e) Policy precludes installation of additional visitor moorings. Suggest the word 'or' (no new or permanent) should be removed.
- (f) Question whether the policy is needed. Whilst the River seems crowded at peak periods, the reaches between locks are much less so. Paragraph 12.38 should be amended to reflect that traffic has markedly reduced, and congestion in general is not an issue.
- (g) No mention is made of the need to relocate the launching slip in St Peter's Street, or to improve the Higginson Park visitor moorings.

Inspector's Reasoning and Conclusions

12.11.1 The LPA's argument that Policy RT13 is a more appropriate place than Policy RT11 to insert a reference (by means of PIC 12/9) to the general encouragement of the development of water-related recreation is supported. The reason is that the latter specifically refers to riparian boating facilities along the Thames. Given the possibly conflicting interests of both land and river-based recreational users and of local residents (these categories may indeed overlap) in such a popular and sometimes crowded location, Policy RT11 is bound to be somewhat restrictive in tone and content. Policy RT13(2)(a) as amended already covers added facilities for visitors and it is quite unnecessary to include a reference to car parking that may be difficult or undesirable to accommodate. Reference to the 1995 'Recreational Strategy' is now included by PIC 12/7 which is accordingly endorsed. The objection by the Environment Agency is also met by PIC 12/7 which amends Policy RT11(3) to safeguard existing riverside facilities and is obviously to be welcomed.

12.11.2 The remaining objections (e-g above) have been largely covered by PIC 12/7. These relate to the added provision of visitor moorings where these are clearly demanded and where they will have no adverse impact on wildlife or the river environment. Policy RT11(1-2) sets out clear limitations on these additional facilities and there is a distinct policy preference for 'off-river' moorings as environmentally preferable but presumably more expensive and difficult to accommodate. A reference is made in the supporting text to the marked reduction in river traffic which suggests that additional provision for moorings is not as pressing as once it was. These policy and text changes are supported by the Marlow Society and the Environment Agency. They appear to unexceptionable and are endorsed. The detailed site-specific slipway and mooring facilities in Marlow are too detailed for inclusion in a Local Plan and, moreover, they would be out of place in what is essentially a criterion-based Policy RT11(1-3).

RECOMMENDATION

- RT11/1 Modify Policy RT11(1) & (3) and paras 12.38-12.39 in accordance with PIC 12/7.

RT12: BOURNE END MARINA

The Objections

0065/2	K C & B A Harris
0475/2	Upper Thames Sailing Club
0730/1	Mrs Dinnie Hawthorne
1632/1	G R Curtis

Summary of Objections

- (a) Suggest addition of wording; 'the area of public open space fronting the River Thames must have an unobstructed view'.
- (b) Reference to Abbotsbrook should read Abbotsbrook Stream.
- (c) Amend (line 19, after properties) to read 'along the reach on both banks'.
- (d) Reference to the need to set an area of land aside as public open space for local use should be made. Amenity value would however, be diminished, if any boats were able to tie up on the river frontage during daylight, and obscure the view. Policy could be last opportunity to rectify the deficit of publicly owned riverside land in Bourne End; there are no riverside amenities which non-riparian owners can enjoy.

Inspector's Reasoning and Conclusions

6.12.1 The Policy RT12 allocation was the site of a planning application during the time that the public inquiry was in progress and it is understood that the development in question was not authorised. The decision presumably was made in the light of the emergent policy. Regard was had to the details of the application when the site was inspected in the course of considering the policy objections. The omission to paragraph 12.40 is made good by PIC 12/8 and is endorsed as being factually correct. The effect of Policy RT14 (which is later confirmed in its post-PIC form) will be to keep largely open the views obtained from the public realm along the riverside. Additional local policy protection is not necessary. It is not necessary to specifically mention the setting or outlook of the dwellings on the opposite side of this reach; these are in the adjacent LPA's area and will no doubt be the subject of consultation in the event of future planning applications. The allocated land is evidently to be the subject of a development brief and this would be the appropriate way of safeguarding public open space. It is not at all clear how it would be possible to embargo the riverside mooring of vessels within the marina since this would seem very largely to negate the purpose for which the facility is designed.

RECOMMENDATION

- RT12/1 Modify Policy RT12 and paragraph 12.40 in accordance with PIC 12/8.

RT13: RECREATION AND THE RIVER THAMES AND ITS TRIBUTARIES

The Objections

0158/41 High Wycombe and Marlow Green Party
0379/9 Sport England
1193/1 Environment Agency

Summary of Objections

- (a) The old towpath between Marlow Bridge and the parkland to the east should be reintroduced and returned to public access.
- (b) Propose additional sub-clause concerning public access; 'development proposals should take every opportunity to increase public access to rivers and riverbanks. This is particularly important in relation to improved access to the Thames (e.g. slipways etc).
- (c) Wording of policy not consistent with lower case text (paragraphs 12.41 and 12.42), this advocates increased access to the towpath and river edge and which seeks to

encourage the provision of visitor facilities. Wish to see the recreational potential of the river recognised and where possible enhanced. Policy should be amended to be more positive.

Inspector's Reasoning and Conclusions

12.13.1 The objections raised by Sport England and the Environment Agency have been met by PIC 12/9 which amends the supporting text and adds another criterion (RT13(2)(b)) which requires development to increase, where possible, public access to (and along) the riverside. These changes are supported, the more so because the added criterion has some direct relevance to the objection by the Green Party. Whilst the general stance of the LPA is supported in rejecting any detailed proposals for riverside footpath realignment, the specific case mentioned by the objectors does seem worthy of closer examination. Inspection reveals that the riverside footpath east of Marlow Bridge is excessively circuitous. Whereas the existence of private property immediately east of the bridge probably permanently prevents a more direct footpath connection (the properties in question are all in the Marlow Conservation Area) this is not the case to the east of Lock Island (the subject of Policy H25). Here there is a clear possibility of bridging the water gap (for pedestrians only) between the island and the public open space immediately to the east. No specific recommendation is appropriate but the case very clearly and usefully illustrates the possible future application of Policy RT13 as currently proposed.

RECOMMENDATION

- RT13/1 Modify Policy RT13 and paras 12.41 and 12.42 in accordance with PIC 12/9.

RT14: THAMES PATH NATIONAL TRAIL

The Objections

0065/1	<i>K C & B A Harris</i>
0311/1	Richard J L Boas
0475/1	Upper Thames Sailing Club
1260/8	<i>The Marlow Society</i>
1632/3	G R Curtis

Summary of Objections

- (a) Wherever possible, the trails should not be dominated on the land site of the path. The trail should have same buffer zone, similar to the river. Amend paragraph 4 criterion (i) after band, add 'no new building with 8 metres of this band'. Criterion (i), add 'no new buildings will be permitted close to the Thames Trail'.
- (b) Propose additional criterion; 'fences of hedges bordering the development between the path and the river should be of a height which does not impede views of the river'. There are stretches of the path where an uninterrupted view of the river is denied to the walked due to fences of approximately 2 m in height.
- (c) Signage is inadequate on the path in places; suggest amendment to policy with additional wording: 'adequately signed' between the extant text of 'high quality' and 'public right of way'.

Inspector's Reasoning and Conclusions

12.14.1 There is no doubt that the Thames Path National Trail is one of the most important and strategic elements in the overall footpath network in Wycombe District. Along with the (connecting) Ridgeway Path (Policy RT15) it forms part of the national long-distance footpath system. Its importance is increased by its potential further integration with the safeguarded High Wycombe-Bourne End railway formation and the Beeches Way (see T11). There is also a possible linkage with National Cycle Network (NCN) Route 4 (see T7). Having said all that, it is doubtful whether either its local transport or its wider recreational functions call for specific limits on new building for development control purposes. As the LPA fairly point out, it is the physical continuity, accessibility and integrity of the footpath which are at issue and which the Policy seeks to protect. Indeed, given the fact that long and open views of the river predominate along the length of the Thames Trail (and are reliably certain of being preserved in perpetuity), limited and local enclosure by buildings might be a welcome contrast from a purely urban design point of view. PIC 12/10 is a minor textual change that meets the relevant objection and is accordingly supported.

RECOMMENDATION

- RT14/1 Modify paragraph 12.43 in accordance with PIC 12/10.

RT16: GOLF COURSES AND DRIVING RANGES
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The Objections

0158/44 High Wycombe and Marlow Green Party
0379/10 Sport England
0872/3 Government Office for the South East

Summary of Objections

- (a) The desire to convert land into golf courses is a short-term measure. The long-term objective of growing organic crops on more land rather than highly fertilised crops on little land will eventually prevail. Lost land will not be easily converted back.
- (b) The term 'resisted' is imprecise. Policy should set out circumstances under which planning permission would be granted.
- (c) Policy effectively imposes a presumption against any additional floodlit facilities.
- (d) Policy only allows for the use of existing buildings.
- (e) Provision of new golf courses and driving ranges should be allowed to meet identified need. Advocate a planned approach to facility provision based on an assessment of supply of existing facilities and their catchment, and existing and future demand. Sites should either be allocated or criteria identified against which proposed new facilities can be assessed.

Inspector's Reasoning and Conclusions

12.16.1 The objection that (in effect) golf course development or expansion should be subordinated to the future growth of organic farming is not a matter that can be resolved in a statutory land use plan. The nature of the objection is clearly understood; that British agriculture should be less intensive and more extensive. This view enjoys substantial support but is not easily translated into development plan policies for a number of reasons. Firstly, use of land for agriculture is not at present defined as development. Secondly, there is no explicit

policy guidance in PPGs 7 or 17 regarding a change of use from agriculture to recreation, apart from the need to avoid the loss of the best land in grades 1, 2 and 3a (this is reflected in Policy C1 of the Local Plan). Thirdly, there is no clear evidence that golf course layout and development is in fact irreversible. Indeed, the fairly strict criteria laid down in Policy RT16 would suggest that additional golf courses in Wycombe District will only be allowed in cases where environmental and ecological impacts are absolutely minimal. Reversion to arable farming would seem possible. The objection is therefore not supported.

12.16.2 The objection to the words 'will be resisted' is met by PIC 12/11, which is endorsed. Floodlighting (presumably mainly of driving ranges in this context) is actually not ruled out in the wording or supporting text of Policy RT16. Nor should it be; certain relatively new sporting facilities such as golf driving ranges and dry ski slopes are expensive to construct and Sport England's evident desire to encourage such innovative forms of physical recreation is understandable. Such facilities need often to be fairly intensively used to justify their capital and running costs. That is not to say that they should be widely or uncritically located or accepted. Floodlighting is an aspect of development proposals that can be brought within strict control by conditions restricting hours of operation, levels of illumination and the design and performance of luminaires. The matter has already been considered in this report (see G16). The combination of that Policy and the content of paragraph 12.50 of the supporting text should be adequate for development control purposes.

12.16.3 The re-use of existing buildings in the countryside is actively and strongly advocated in Policy RT16(2). This policy preference is consistent with PPG 7 and the related policies of the Local Plan. Given the rural character of much of Wycombe District, the extent of Green Belt and AONB, this is a wholly realistic and reasonable requirement. A minor change in the wording might indicate that both the existence and suitability of existing buildings will need to be considered when any golf-related development is being planned and approved. If such buildings do not exist, no doubt the LPA will take a view on new construction on a case by case basis. There would seem to be no great purpose in trying to assess demand or allocate sites for new courses. As the LPA points out, not many such requests, enquiries or applications have recently been made and this rather reflects the national situation, particularly where courses in AONBs are concerned. Policy RT16(1)(a-d) would appear to be an admirably detailed yet flexible criterion-based policy and would seem an adequate basis for determining any future applications.

RECOMMENDATION

- RT16/1 Modify Policy RT16 in accordance with PIC 12/11.
- RT16/2 Modify Policy RT16(2) to read as follows:

(2) PROPOSALS IN THE COUNTRYSIDE SHOULD USE EXISTING BUILDINGS FOR CLUBHOUSES AND OTHER ESSENTIAL FACILITIES WHERE THESE ARE AVAILABLE AND SUITABLE FOR CONVERSION, HAVING APPROPRIATE REGARD TO POLICIES GB2, C11 AND L1 OF THE LOCAL PLAN. BUILDINGS THAT ARE NOT ESSENTIAL AND ANCILLARY TO GOLF-PLAYING, PRACTICE OR TUITION WILL NOT BE PERMITTED.

RT17: HORSE RELATED FACILITIES

The Objections

1319/2 Ministry of Agriculture, Fisheries and Food (now DEFRA)

PIC 12/12 Objections

1281/1 Great Marlow Parish Council

Summary of Objections

- (a) Criterion (iii) adds a restriction that may not always apply; access to bridleways will depend upon the precise nature of the horse-related facility proposed. Many horse-related activities involve horses leaving and returning by horse-box with no riding out. Amend criterion (iii) to start 'in the case of facilities involving riding out into the countryside...'
- (b) In response to PIC 12/12, object and propose amended wording; 'there are adequate off site bridleway facilities leading from and to the site, or if not, adequate transport (horse boxes) are used, without exception, to convey horses and rider to such bridleways'. This will provide a workable alternative consistent with the policy intentions.

Inspector's Reasoning and Conclusions

12.17.1 The two objections clearly regard proximity to the bridleway network as being desirable for establishments such as riding schools and livery stables where riding out is involved. This is an important point since there may be a tendency for smaller riding establishments in particular to locate where premises happen to be available without too much regard for the existence of safe, secure and segregated access to bridleways or suitable byways open to all traffic (BOATs). It is not possible to apply conditions to planning permissions such that riding-out on to other public highways (open to frequent or fast vehicle traffic) is prohibited. All that feasibly may be done is to refuse planning permission where equestrian access is not entirely satisfactory for reasons of traffic safety. Accordingly, although there may well be some cases where the exclusive use of horse-box transport is intended for animal movements, it is necessary to have policy backing in other cases where planning permission is judged to be inappropriate for reasons of access. Chapter 7 Policies do not adequately cover this contingency. The Policy RT17 criterion (c) accordingly needs strengthening but perhaps not precisely as sought by the Great Marlow Parish Council.

RECOMMENDATION

- RT17/1 Modify Policy RT17(1)(c) to read as follows:
 - (c) THERE IS ADEQUATE AND ADJACENT ACCESS TO EXISTING OFF-SITE BRIDLEWAYS (OR SUITABLE BYWAYS OPEN TO ALL TRAFFIC) LEADING TO AND FROM THE SITE IN THE CASE OF ALL EQUESTRIAN FACILITIES WHICH INVOLVE RIDING OUT INTO THE COUNTRYSIDE.

RT18: ALLOTMENTS

The Objections

0158/45 High Wycombe and Marlow Green Party
1075/4 Little Marlow Parish Council
1260/5 The Marlow Society

Summary of Objections

- (a) Replace the word 'several' with 'many', as a more accurate word in paragraph 12.56.
- (b) Policy should be deleted; there is a tendency (within modern housing) towards smaller gardens and allotments should be made available to satisfy increasing interest in organic production. Most allotments in the District are owned and administered by Parish Councils, who should determine their future.
- (c) Policy should be amended; add 'current' after (line 7) and word 'meet'; add 'or any real prospect of a demand arising with a realistic timescale' (after 'local demand'); in order to combat short term fluctuations in demand which could lead to closure.

Inspector's Reasoning and Conclusions

12.18.1 The latest advice to LPAs on allotment provision is set out in Annex 3 to the March 2001 draft revision of PPG17. Since this advice is most likely to be issued in definitive form by the time that this report is submitted and the Local Plan adopted, some weight is accordingly attached to it. The key words in the PPG are 'authorities should undertake an assessment of the likely demand for allotments and their existing allotment provision and [should] prepare policies which aim to meet the needs in their area'. As noted earlier (see RT0) Wycombe DC is taking an overall corporate view of all leisure facilities provision and demand and in the main is restricting land use planning policies to the protection of existing facilities. This is not inconsistent with the latest PPG advice but the objection relating to phenomenon of decreasing garden size has some force. It is certainly the case that higher residential densities are envisaged by PPG3. This may well result in housing layout designs that will make it difficult to grow vegetables within individual private gardens.

12.18.2 It is probably not enough to rely exclusively on district-wide monitoring to balance future supply and demand for allotment provision. There may well be cases where the extent of new residential development permits integral allotment provision to be set aside without any loss of overall housing density. The analogy with incidental open space provision is obvious. The LPA will have to take a view as to whether local demand for allotments and the size of private gardens in new housing would justify a Policy RT2 requirement. A simple addition to the wording of Policy RT18 would cover this sort of situation. The replacement of the word 'several' with 'many' would be a fairly meaningless and purely semantic change to the supporting text with no very direct policy implications. The obvious desire to see that longer-term allotment needs are met can also be met by a Policy RT18 wording modification. Most of the allotment land may well be administered by Parish Councils but the Policy will have to be implemented by the LPA, no doubt in consultation with the latter.

RECOMMENDATION

- RT18/1 Modify Policy RT18 to read as follows:
POLICY RT18

PLANNING PERMISSION WILL NOT BE GRANTED FOR THE REDEVELOPMENT OF PART OR ALL OF ANY ALLOTMENTS SITE UNLESS AN EQUIVALENT OR BETTER REPLACEMENT SITE IS AVAILABLE OR IT CAN BE DEMONSTRATED THAT A REDUCED AREA OF ALLOTMENTS WOULD BE SUITABLE TO MEET PROJECTED LOCAL DEMAND INCLUDING ANY DEMAND ARISING FROM INCREASED RESIDENTIAL POPULATION, MAKING DUE ALLOWANCE FOR ADDITIONAL FACILITIES SECURED UNDER POLICY RT2.

RT19: LITTLE MARLOW GRAVEL PITS

The Objections

0481/1	Berkeley Eastoak Investments Limited
0840/51	Marlow and District Chamber of Trade & Commerce
1075/3	Little Marlow Parish Council
1260/4	The Marlow Society
2037/1	Harleyford Holdings

Summary of Objections

- (a) Propose preferable location for hotel site at the junction of the by-pass and Bourne End Road, as a gateway to the Country Park. Location is the only opportunity to resolve many problems in an integrated way.
- (b) Object to reference to a Country Park; suggests much more formalised leisure activities than are considered desirable. Request official definition of Country Park. Commercial leisure activities should be restricted to the Westhorpe area.
- (c) Question why the reference to Policy RT6 has disappeared from the preamble to paragraph 12.61.
- (d) Identified area should be extended to include Well End Pit, Marlow Road. This site is suitable for sustainable recreation.
- (e) Policy should be revised to provide for additional hotel facilities.

Inspector's Reasoning and Conclusions

Introduction

12.19.1 The Policy RT19 land allocation is one of the largest (at about 3.3 sq km) in Wycombe District but as yet there are no definitive published details of its component uses or their means of access. The Policy has not attracted many objections, considering its scale and likely impact. No doubt this is a reflection of the fact that the county and district authorities have chosen to embark on a lengthy and detailed consultative exercise (see WDC/RT19/1 Appendix 3). This involves a large number of local, regional and national bodies as well as local residents and the landowners whose property is affected by the proposed development. This is no doubt commendable but the timing of the consultations (December 2000 to March 2001) has so far resulted in only a very broad indication of what the overall patterns of activity and access arrangements might be. The end result is that a significant number of very critical planning decisions were left open-ended by the time that the public inquiry closed. There is accordingly a wealth of inconclusive evidence and no formal mechanism of taking into account later decisions of the LPA, short of re-opening the Local Plan Inquiry

12.19.2 An additional problem in reporting is that only one relevant appearance was

made at the inquiry (1023/1/12.61 Pelhamcrest Limited) and that by a nominal supporter of the Policy by way of an informal hearing on 11 April 2001. Subsequent written representations were made by objectors (0481/1/RT19 Berkeley Eastoak Investments Limited) and received by the LPA on 1 October 2001, shortly before the formal close of the inquiry on 3 October. These representations refer to a consultation document entitled 'A Vision for Little Marlow Lakes Country Park' published in September 2001 and the subject of a public exhibition in Marlow from 14 September to 12 October 2001. This adds little to the evidence since the LPA are content to rely on their submitted rebuttal (reference as above) but it is helpful in that at least a name has been attached to the proposal. However, very little weight can be attached to the otherwise informative 'Draft Masterplan', illustrating which of the consultative development scenarios (1-3) is likely to be adopted. Additionally, it includes schematic diagrams that show the likely pattern of access, parking and circulation by all modes of transport, predominantly on foot and by cycle. This section of this report can only have regard to what is contained in the representations and what is visible on site inspection. However, it will take a synoptic view of the various objections in relation to the proper planning of the area, falling short of seeming to involve the Inspector in the consultation process itself.

Green Belt and Landscape

12.9.3 The salient feature of the Policy RT19 area is that it is entirely located within the defined Metropolitan Green Belt. Not only that, but this particular part of the Green Belt performs the vital function of preventing urban coalescence. In this case, it separates the settlement boundaries of Marlow and Bourne End, scarcely 2 kilometres apart. The allocated area has good defensible boundaries, the hard line of the A404 road to the west and the unnamed but extensive water feature to the east. The actual boundaries of the future Country Park are equally firm; the River Thames to the south and the A4155 road to the north. Although the area is just outside the Chilterns AONB, its riverside fringe is rightly protected by Policy L2 as an Area of Attractive Landscape and the remainder is of a character that is quite clearly capable of substantial regeneration. Moreover, the site of the Country Park is extremely prominent in views from National Trust land at Winter Hill, just to the south of the Thames. It may reasonably be concluded that the site and its proposed development are fully in accord with Policy E3 (a-b) of the March 2001 Regional Planning Guidance (RPG9).

Footpath Linkages

12.9.4 The footpath system of the area is fairly limited and rudimentary. The only means of east-west linkage across the site, apart from the Thames Path, is a public footpath linking Marlow, Little Marlow and Bourne End. This is crossed at right angles within the Little Marlow Conservation Area (the focus of existing development in the allocated area) by a north-south footpath. This north-south footpath is potentially of wider than local interest since it leads north through the AONB towards High Wycombe and south to the Thames Path. However, the footpath network is by no means as dense as might be expected in a potential recreational area although no doubt some of the other public and private metalled highways are used informally for access. More importantly, from the point of view of future accessibility, there are no really adequate linkages for segregated cycle and foot movement to the north across the A4145 or to the south across the Thames. The only segregated approaches are on the riverside from east and west, if one excepts a rather gaunt, uninviting and utilitarian footbridge across the A404 which provides linkage with the extensive Globe Park employment area in Marlow.

Road Access

12.9.5 All the available vehicle approaches are effectively dead ends leading from the A4155 Marlow-Bourne End single carriageway road. This road carries a fair amount of daytime traffic and is locally subject only to the national speed limit. The side road junctions are not especially well laid out but suffice for the limited vehicle traffic serving Little Marlow, the Sewage Works and the various active mineral extraction workings. No doubt the development potential of the Country Park would be limited by the available capacity of the side road

junctions and indeed all the consultation scenarios envisage improved access arrangements at only the A404-A4155 junction and the railway bridge at the south-west corner of the site. This bridge also offers access at present over an unsurfaced track as far as the hotel site that is under construction. For this reason, it is reasonable to conclude that most intensive leisure activities, regardless of which development scenario finds expression in Supplementary Planning Guidance (SPG), will be located on the western third of the allocation.

Public Transport

12.19.5 At present, there is effectively no public transport access to the site of the intended Country Park. There is clear scope for improvement since the intermittent bus service from Marlow to Little Marlow could be strengthened, and an intermediate railway halt could be located at or near the new hotel site. A shuttle bus link might be introduced between Marlow and the western part of the Policy RT19 site. All this would require substantial capital investment. The limited evidence available suggests that enquiries of Railtrack and Thames Trains have been unpromising. The question of a local bus service linking the Country Park, the Globe Park Estate and Marlow Town Centre is to be examined in the context of the Marlow Parking and Transportation Study (see M0). However, there appears to be substantial support from a large number of quarters for a future P+R site east of the A404, a location in the south-east angle of the A404-A4155 junction being currently the most favoured. Notwithstanding its being in the Green Belt, the provisions of (modified) Policy T17 might allow of its being established here. An alternative interchange location further south might also be justified, also on the basis of a modified Policy T17(1).

12.19.6 All the foregoing tends to suggest a certain lack of progress in both the statutory and non-statutory processes of land use and transport planning. The question of a so-called 'link road' between Fieldhouse Lane and Marlow Road (A4155) parallel but to the east of the A404 was raised at the inquiry. This proposal was made in the context of P+R and Park + Walk facilities established along it. This discussion was dismissed as speculative by the LPA so that it is slightly odd to find the link road emerging as a feature of the Draft SPG. This is set out in the document published in September 2001 (ie between the end of consultation in March 2001 and the date of its publication and public exhibition in Marlow). Nevertheless, the existence of this link, however funded, would provide the opportunity to improve public transport integration. This is probably not the prime purpose of its construction but it might well bring forward additional funding through the Bucks LTP. In short, a P+R site adjacent to a new railway halt (or a relocated railhead) might provide easy undercover interchange between rail services, a local bus loop within Marlow and an enhanced bus service between High Wycombe and Marlow via the A404 (see T11-12 and T17)

Recreational Facilities

12.19.7 The consultative process of 2000-2001 was based on three recreational development scenarios. These were tabulated in the Stage I consultation exercise and ranged in order of impact on the local environment. For example, walking routes were held to be of low impact, a rowing centre of medium impact and a football stadium of high impact. It was clear that the degree of impact was not only relevant to environmental quality and general sustainability but also raised issues of the capital and revenue costs of the recreational facilities and hence the question of 'enabling development'. The evidence of the various analyses of response to this consultation suggests that, of those actually responding, opinion favoured the low-medium impact activities and development. The ratio in favour appears to be about 3:1. The inference is that the upper limit of development within the area will be characterised by such facilities as a riverside marina, a golf course, P+R terminus, water skiing and a new railway halt or station. Some of these might be appropriate development in the Green Belt but some might need 'very special circumstances' justification (eg conformity with Policy T17).

Enabling Development

12.19.7 The question of 'planning gain' versus 'enabling development' has exercised

developers and LPAs over the past 20 years or more. In the Local Plan, it is broadly covered by Policy G3. National policy is to restrict developer contributions or 'planning gain' to that which is related in scale and substance, directly or indirectly, to the specific development which is proposed on a given site. It is normally the subject of negotiation, case by case, either before or during the submission of a planning application. This is not the case with the proposed Little Marlow Country Park, to give it its probable future title. The problem here is that some of the objectors seek a commitment to certain planning proposals in the expectation that these would provide funding for recreational facilities that have not yet been specified by SPG. This is unreasonable since the calculations involved in the computation of appropriate levels of enabling development are intricate and complicated. It is difficult to assess, on the one hand, the capital value of profitable development and, on the other, both the capital and net running costs of non profit-making sporting and leisure facilities. This computation is contentious enough with the benefit of fully worked-up and costed development; it is nearly impossible in the case of broad development plan land allocations and their need for conformity with national, regional and local policies.

12.19.8 It is therefore not at all coincidental that the current Green Paper on the Future of Planning has introduced a debate on what used to be called 'betterment' (or the recoupment of part of enhanced land values generated by planning permission). In essence, the proposals seek to set tariffs in the case of land allocations for specific development. The general idea is to get away from the direct or indirect linkage of planning gain to the circumstances of individual development sites and proposals. It is not the purpose of this report to comment on the likelihood of such a radical revision of planning procedures or the financial provisions of future primary legislation. It is enough to say that the confirmation of Policy RT19 may now be justified on the evidence of consultative procedures but that any view on the scale and nature of enabling development would be both premature and unwise. It would be difficult enough, on any greenfield site, to strike a coherent balance between, planning gain, sustainability, infrastructure improvements and enabling development. In such a sensitive context as this, it is effectively impossible, certainly without seeking to anticipate or to prejudice the outcome of the lengthy consultative procedures being carried out by the county and district planning and highway authorities.

Overall Conclusions

12.19.9 A number of specific conclusions may be reached in relation to the comparatively few duly-made objections to Policy RT19. The first is that there is no obvious case for additional hotels within the allocation in view of the progress made in constructing one and hence the improbability of justifying such development locally in the Green Belt (see RT6). The reference to a 'Country Park' in the supporting text appears fully justified, not only as a result of parallel consultation, but by its seeming conformity with regional planning guidance and the active collaboration of county and district councils. As has been noted, there is a likelihood of most operational development taking place in the western third of the site, essentially centred on Westhorpe House. It would be premature to specify recreational activities at this stage of SPG consultation. As a matter of fact, reference to Policy RT6 is made in the text. The proposal that Well End Pit be included within the Policy RT19 allocation is not appropriate on account of the area's being outside the firm natural boundaries selected by the LPA and being inside the AONB. The changes proposed by PIC12/13 are purely typographical and are endorsed. The only technical error noted is in paragraph 12.57 that states that the Policy RT19 area 'wraps around' the Policy GB8 area. This is not only at odds with the Proposals Map but contrary to the apparent intentions of the Draft SPG diagram.

RECOMMENDATIONS

- ❑ RT19/1 Modify paragraph 12.57 by the deletion of the last sentence.
- ❑ RT19/2 Modify paragraph 12.59 in accordance with PIC 12/13.

RT20 : POLICY OMISSIONS

The Objections

0379/15	Sport England
0402/1	Mrs B K Wallis
0508/19	Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust.

Summary of Objections

- (a) There is a need for an additional policy to address sport and recreational requirements for rural communities within built-up areas of rural settlements. Local needs recreation will not just be for informal use of the countryside, but will comprise the need for formal and built facilities.
- (b) Propose new policy relating to Sustrans cycle path; there is a need for a policy for the route as it is more likely to be a leisure route than a 'day-to-day' route and should therefore be in the Recreation Chapter rather than the Transport Chapter.
- (c) Refer to the Wycombe Wanderers Football Ground and propose that leisure based uses for the site be considered, e.g. a golf driving range utilising the existing car parking for the football club. The football club are proposing to develop part of the site for a practice pitch.

Inspector's Reasoning and Conclusions

12.20.1 As noted, the LPA has taken a distinctly corporate approach to leisure provision and planning. It refers to work carried out in preparing a Local Cultural Strategy that encompasses both cultural and physical activities. This planning framework will comprise an inventory of resources and an assessment of additional facilities that may be needed in future. This is an exercise that has been traditionally been carried as part of the physical or land use planning process. However, the LPA have restricted their Local Plan policies, in the main, to those that resist the unnecessary loss of existing facilities and to a requirement that new development makes appropriate provision. This is perhaps a narrow approach but does not seem inconsistent with the published PPG17 advice or indeed that contained in the emergent version. It may be noted that the leisure planning framework has not attracted an 'in principle' objection from GOSE. Accordingly, it would be very difficult, if not anomalous, to introduce a specific 'local needs' policy in chapter 12 and this is not recommended.

12.20.2 The LPA's argument that cycling provision policies are equally at home in chapters 7 or 12 has a great deal of force. The preference for a chapter 7 policy has the merit of being better related to the purely practical aspects of implementation. It seems highly likely that enhancement of the cycleway network is going to come about, in the main, either as a by-product of the development of land or as a result of highway layout improvements. These are likely to be ad hoc in nature and only occasionally will they have wider strategic or network implications. In other words, they will assist local movement which is inherently a function of transport and not of leisure, if a distinction has to be made. The work of Sustrans is well-known and widely admired. The wide national network for Great Britain that is being developed is par excellence for use as a recreational facility, although there may well be local transport needs that are served by it. The probability is that network continuity will be prescribed at a strategic level, ie by county structure plans or their future equivalents. Until such requirements are known, it would be difficult to formulate chapter 12 policies with any sort of precision.

12.20.3 The proposed allocation of land as a practice football pitch and golf driving range to the west of the Wycombe Wanderers Football Stadium at Adams Park cannot be supported

for a variety of reasons. The site is within the Green Belt and there would appear to be no very special circumstances to justify either activity, other than simple convenience and proximity in the case of the former and inadequacy of current provision in the case of the latter. Secondly, the site is also within the Chilterns AONB and both the facilities would very probably require significant earth-moving and artificial lighting, given their nature and probable intensity of use. The local topography is too steeply sloping to permit of easy adaptation for either purpose and this would be especially intrusive in this part of the AONB which closely adjoins the Policy HE22 allocation of West Wycombe Park. Finally, the site is not easy of access by means other than private vehicles; this would raise severe doubts as to its sustainability as compared with other fringe urban sites possessing road frontages served by scheduled public transport.

RECOMMENDATION

- RT20/1 No modification.