

SUMMARY OF MAIN CONCLUSIONS

Introduction

1. This summary sets out the main conclusions of my report under the relevant chapter headings of the Plan. It is intended as a guide to show the direction of my findings on the general strategy for each topic, rather than summarise detailed recommendations on specific sites. However, the summary does include a brief analysis of housing provision with reference to allocated sites and also refers to 2 other key sites proposed in the Plan: mixed-use proposals at Wycombe Marsh and High Wycombe western sector.

Housing

2. To meet government guidance in PPG3, the Plan should ensure that it conforms to the Structure Plan by providing as a minimum 7,200 net additional dwellings in the period from 1991 to 2011, as set out in SP Policy H1. The Plan, Monitor and Manage approach outlined in PPG3 does not revise this basic requirement, as paragraphs 2 and 28 indicate quite clearly.
3. At the Housing RTS, there was broad agreement about many of the figures that contribute to the overall housing supply. These included the number of completions to March 2000, windfall allowances for small and medium sites and conversions. I accepted that the allowances were based on detailed evidence of past rates that were unlikely to show significant changes over the remaining Plan period. I have made a small allowance for large sites and accepted the Council's suggested flexibility rate of 5%; bearing in mind the suggested density figures put forward in PPG3, I consider this to be realistic.
4. Taking account of all the above points, I set out my own version of Table 2 of the Plan below:

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

5. I share the concern of many objectors about the failure of the Council's housing proposals in the Pre Inquiry Changes (PICs) to meet the Structure Plan requirement in full. The Council's interpretation of the 'Plan, Monitor and Manage' approach is that extra sites can be included within the Plan at review stage, following a full urban capacity study. I accept that the disadvantages of delaying the Plan for such a study would have been considerable. The Council's interim capacity assessments enabled more urban sites to be brought forward into the Plan to address the policy direction of PPG3, and the sequential test in particular. However, paragraphs 2 and 28 of PPG3 indicate quite clearly that the Plan should show how the full requirement of Structure Plan provision for Wycombe District is to be met. The failure of the Plan to do this is a fundamental deficiency which needs to be corrected. That said, effective monitoring is essential to ensure that reserve 'greenfield' sites are not released before developers have been given the chance to provide new housing on previously developed land within urban areas.
6. Policy H2 of the Structure Plan indicates that of the 2,400 dwellings expected to be built on new strategic sites, some 1,500-1,700 (62%-70%) should be located within the High Wycombe urban area. I accept that these dwellings need not be provided on strategic sites if the overall requirement can be met in a more sustainable way. To accord with the broad thrust of the policy, however, it seems reasonable that of the 1850 or so dwellings that need to be allocated at least 60% (about 1110) should be concentrated in the High Wycombe area. In general I have concluded that the sites within High Wycombe put forward by the Council in the Plan (as proposed to be changed) accord with government and regional policy to make the best use of urban land, and would provide housing at an appropriate density.
7. The most important site in the plan is at Wycombe Marsh, which was subject to a number of objections concerning its sustainability, practicality, viability, prospective timing and the environmental impact of associated measures. In summary, I have concluded that this key site would be capable of providing about 400 dwellings. My reservations concerned the likely phasing of development, which I consider unlikely to take place until the middle of the second half of the Plan period, for the reasons summarised below.
8. I acknowledge that, in the main, the High Wycombe area sites are generally in sustainable locations. I share some of objectors' misgivings about loss of employment sites, particularly those on flat land in major route corridors. High Wycombe is not an area with significant over-allocations of employment land with little prospect of development, of the type referred to in paragraph 42 of PPG3. After the PICs, the Plan now provides less employment land than the deposit version, and I have not therefore recommended the allocation for housing of any other major employment sites other than Ercol, which is already underway, and Bucks Free Press.
9. From the evidence relating to a number of other sites I consider that Abbey Barn North (ABN) should be deleted from the Plan and Terriers Farm added to the list of housing allocations. In my view Terriers Farm is the best 'greenfield' site in the High Wycombe urban area; in comparison to Abbey Barn North (ABN), it is more accessible by public transport (falling within zone 3 of index compared with zone 4 for ABN) and has less ecological interest. The site is visually well related to the existing urban form and is level enough to be developed at a relatively high density. Adequate access can be achieved, and the site does not suffer from any other constraints, such as the need to safeguard substantial areas for new highways. I consider similar sustainability and highway arguments apply to the comparison with Abbey Barn South, which I recommend for retention as an area of safeguarded land (ASL) to meet future development needs.
10. Of the other safeguarded land sites around High Wycombe, two fall within the AONB; Lane End Road and Grange Farm. In comparison with other sites, the high value of these landscapes, afforded the highest level of protection by government policy in PPG7, is a

critical constraint to the type of major housing development proposed. Similarly, I consider the very attractive and prominent landscape of the Gomm Valley to be an overriding argument against development in comparison with other safeguarded land and the absence of further housing need.

11. I have endorsed the largest greenfield housing allocation at Park Mill Farm, Princes Risborough, a relatively well-performing site with good accessibility. At the revised minimum density of 30 per ha required by PPG3, the site is large enough to provide more than the number of dwellings required at the town during the life of the Plan. However, if development were to start soon after 2006 during a revised Phase 2 between 2006-11, the remaining capacity could be taken up during the life of the next Plan, as the Council agreed. I consider that this site is better located in general sustainability terms than the adjoining Oak Tree Farm site put forward in the Deposit plan, and other objection sites on the edge of Princes Risborough and at Longwick. Providing more housing outside the High Wycombe area would result in a lack of balance across the District in conflict with Structure Plan policy.
12. There is no real scope to provide substantially more housing at Marlow due to green belt, AONB and flood plain constraints. However, I have endorsed the provision of 50 dwellings at Portlands and found no strong objection to the re-instatement of the site at Great Marlow School, which can accommodate 50 dwellings. I consider that Slate Meadow, Bourne End, is also a high performing site, but does not have the advantages of such easy access to wide range of retail employment and community facilities as other sites in the High Wycombe urban area. I recommend confirmation of the safeguarded land designation.
13. I summarise my findings in the form of a new table below:

Housing allocations

Site	Area (ha)	Capacity
HIGH WYCOMBE URBAN AREA		
Bucks Free Press	1.8	80
Downley Middle School/Turner's Field	2.5	50
Ercol	5.9	265
Garratts Way	3.0	100
Heights County First School, Downley	1.1	40
Terriers First School	1.6	60
Wycombe Marsh	19.9	400
Terriers Farm	23.1	400
Sub total	58.9	1395
REMAINDER OF DISTRICT		
Portlands	1.6	50
Great Marlow School	1.6	50
Park Mill Farm	26.2	350
Sub total	29.4	450
TOTAL	88.3	1845

Wycombe Marsh

14. In broad land use terms, the Wycombe Marsh site meets a number of significant policy objectives for providing much needed retail, employment and housing development on previously developed land in a sustainable location. I believe many of the objectors' concerns about the practicality of the proposal to relocate the sewage treatment works to an expanded facility at Little Marlow have been met. Tunnel maintenance can be achieved without the need for ventilation shafts, removing any potential impact on the AONB landscape. The tunnel would have considerable storage capacity if Little Marlow broke down. The risk of aquifer pollution appears to be minimal, given the proportion of tunnel below the water table, and construction and monitoring safeguards. There is no evidence of flooding at the made-up ground levels currently pertaining at the Wycombe Marsh site, which does not lie within the draft 1 in 100 year flood risk map prepared by the Environment Agency (EA). The proposals to redevelop the Little Marlow works would not add to the volume of buildings, tanks and other structures within the Thames floodplain; the footprint would be reduced. Sufficient treated effluent could be pumped back into the River Wye to ensure that the general ecology of the riverside environs would be protected.
15. With regard to costs and the overall viability of the scheme, I have some misgivings that the partial redevelopment option has not been fully explored. Taking into account the existing planning permission for the Paper Mill part of the site, Thames Water (TW) may have been unrealistic in their predictions of the value attributable to a combined site. From the engineering and valuation evidence, which showed very wide variations, I concluded that the revised Plan proposals are on the margin of viability. Nevertheless, it seems clear that TW have given every indication that they intend to proceed with the scheme. There may be operational benefits with regard to running costs, safety, water quality, nuisance to nearby residents which are hard to quantify accurately in conventional viability analysis. Even if the transfer option proved to be unviable after further detailed analysis, there is sufficient scope to release a substantial area of the site after consolidation of the existing works. Together with the Paper Mill site, this would provide for a substantial amount of residential and commercial development such that the employment and housing strategies of the Plan would not be fundamentally undermined.
16. I consider it reasonable to annotate the Little Marlow works as a major developed site, where redevelopment would not conflict with green belt policy subject to limitations on the footprint and volume of new structures. In any event, the benefits of the total package of measures needed to release a suitable 'brownfield' site for development would outweigh any policy objections to the consolidation of operational works in the green belt. None of the other more limited objections raised, concerning matters such as highway planning and the very limited loss of ecological features at Wycombe Marsh, are of sufficient emphasis to counter the strong arguments in favour of the allocation.
17. My main reservations about the Plan proposals are concerning the implementation programme, particularly with respect to the housing element. I agree with the Council that a call-in inquiry for the proposals for Little Marlow works is unlikely in the context of my report findings, depending on the time of adoption of the Plan with respect to any planning application for redevelopment of the site. However, a number of uncertainties remain; this is unsurprising given the scale of the project. Therefore I consider the Council's estimates were somewhat optimistic. Housing completions are therefore more likely to come on stream towards the middle of the second half of the Plan period, which I have recommended as housing development phase 2.

Employment policy

18. The fluid nature of the local economy, with a switch from manufacturing to business and research activity, changing employment densities, site utilisation and commuting patterns, made firm predictions about the impact of land use policies on the number of jobs in the District difficult. Given the quite substantial losses of industrial land that occurred during the 1990s, identified in the Employment Topic Paper, I sympathise with the Council's caution about releasing further sites for other uses. This view is reinforced by the nature of the topography in High Wycombe itself, where large flat sites along the Wye valley floor are at a premium. I accept the Council's point that further employment land releases might upset the delicate balance between promoting and overheating the local economy. At the time of the inquiry indicators such as unemployment rates, rental levels for good quality offices and industrial property, and a shortage of vacant sites, gave some credence to the Council's argument that Wycombe was becoming a 'hotspot'. Taking into account all the written evidence and the conflicting views at the Round Table Session on Employment, I agree with the Council that the plan provides roughly the right balance between protecting existing sites and the designation of new areas for general employment use. However, I consider the Plan should provide additional flexibility to allow redevelopment of sustainable employment sites in High Wycombe town centre.
19. I share some of the Council's concern that meeting a need for high quality business premises might in turn generate further economic activity, contrary to regional and county policy objectives. Nevertheless, continued re-structuring of the local economy would provide further protection against any future downturn, and could help to meet wider employment objectives. I support the provision of 2 ha of Class B1 uses at Wycombe Marsh, as part of a mixed development at a sustainable location in accordance with the strong thrust of government policy. Some existing employment sites may be suitable for re-development with modern premises aimed at new technology businesses, in attractive locations not far from a variety of transport facilities. On balance I support the Council's position that economic circumstances no longer justify the allocation of any free-standing business park allocations. I consider there is no strong need for a greenfield campus-style business park at Abbey Barn South, where employees and other visitors are likely to be heavily dependent on car travel, in the absence of need for substantial housing at that location. However, there is a clear need for continued monitoring of economic data, as advised by the County Council, to ensure that the High Wycombe area in particular is able to carry on meeting the diverse employment needs of its residents.
20. At Princes Risborough, the relocation of Ercol to the Princes Estate is underway and some additional land for new business premises is available. Other employment sites in sustainable locations near the station may become available for redevelopment and should be retained for employment use. Despite the projected increase in the population of the town, I consider that there is no strong case for any further allocations of greenfield sites on grounds of local employment need.

High Wycombe Western Sector

21. I fully endorse the significant expansion of High Wycombe Central Area for retail purposes, especially for comparison shopping. I note that the outstanding planning permission for the plan allocation would include the benefit of some 40 dwellings, about 25% of the expected provision in the whole central area. The permission would also enable the relocation and rebuilding of the existing bus station and the provision of new community and leisure facilities. I regard the probable consolidation of shopping floorspace towards the western end of the town centre as beneficial considering the shape and form of the local road network and the extent of pedestrianisation that has already been achieved. The inclusion of a replacement foodstore of about 2500 sq m net floorspace would be adequate in the light of the overall allocation of space between convenience and durable sales and the

prioritisation of the latter. I consider any policy statement favouring or nominating occupation by Tesco Stores Limited would be inappropriate in a development plan and directly contrary to PPG6 advice.

Marlow Town Centre – Riley Road and Portlands

22. I have recommended in favour of the Riley Road allocation for significant foodstore development in preference to the alternative proposal by Waitrose Limited for the allocation to be transferred to their recently acquired site at Portlands. I found urban design and conservation area considerations of over-riding importance in this regard. There are also distinct road traffic generation and impact reasons, such as the comparative ease or difficulty of accommodating heavy goods vehicles in and around the confines of the alternative sites, located as they both are in the long-established Marlow Conservation Area. The dispersed pattern of open access public car parks in and around Marlow Town Centre strongly suggests that it be perpetuated, rather than inserting a large additional amount of dedicated car parking (contrary to Policy M2 of the Plan) on the Portlands site. I consider the latter to be eminently well suited to high density residential development, from housing land supply, conservation area and sustainability points of view.

Bourne End to High Wycombe Disused Railway Line - New Busway and Safeguarding

23. I fully support the concept of using the western end of the abandoned branch railway as a future busway through the Wycombe Marsh development area. The busway would serve as a significant link and might segregate public transport along the key A40 corridor from the east. The former railway line's continuity has been breached by development, in conflict with later PPG13 advice, and is unlikely to form any part of a heavy or light rail link in future. The independent (ultra light rail) proposal is interesting but I think it unlikely to obtain commercial funding and hence inclusion in future local transport plans. However, the old railway formation should be safeguarded as a likely recreational facility, such as a footpath, especially in its Green Belt setting. Such safeguarding would also ensure that any future local transport option would equally be kept open. In my view local residential amenity and privacy considerations are matters for detailed consultation and examination as and when specific linear leisure proposals are mooted.

Park and Ride (P+R)

24. I recommend in favour of deleting the site-specific allocations for P+R terminals. Policy T17 should be entirely revised in the recent light of modified advice in PPG13. Notwithstanding this, I have made informal comments on the individual merits of the allocations. I recommend adopting a systemic approach, whereby P+R proposals, given assured funding and demonstrable need, should be more fully detailed as regards terminal (and intermediate) loading points, bus priorities and allied traffic management and means of interchange with other transport operations. Any P+R system in Wycombe District must enjoy both transport and development plan support and be better integrated with allied arrangements in adjacent counties and districts. I acknowledge the need to consider bus:coach interchange along the M40 corridor, including so-called 'coachway' stops on the high-frequency London-Oxford express service. The criterion-based T17 policy could also be applied to any future P+R proposals elsewhere in Wycombe District.

Green Belt policy: Safeguarded Land

25. There were a very large number of objections to the retention of former Areas of Special Restraint (ASRs) as Safeguarded Land outside the green belt. High Wycombe is very constrained by green belt and AONB designations which reach right up to the built up area in many locations. The main thrust of my reasoning on this issue is that the permanence of green belts is of fundamental policy importance. PPG2 advises that boundaries should only be changed exceptionally, as part of a review of strategic policy. I therefore recommend against any changes of significance; I recommend in favour of one minor alteration at Princes Risborough School.
26. Given my recommendation to release Terriers Farm for primarily housing development towards the end of the Plan period, the number of sites for potential expansion is limited to 5, plus the Slate Meadow site at Bourne End. As my comparative site assessment indicates, the latter is a highly performing site that may be needed to provide for expansion in the southern part of the District at some future date and its status should be retained. The Abbey Barn sites have some drawbacks but with investment in infrastructure and in the case of Abbey Barn South, substantial support for improved public transport, could provide acceptable locations to meet housing and/or other needs in the long-term. I appreciate the Council's arguments that the Gomm Valley should be one of the last sites to be developed, and certainly not in preference to other sites during the life of the Plan. I conclude that the very high quality of the landscape, the need to protect parts of the site of high wildlife interest, are critical constraints to set against its moderate level of accessibility and some benefits for ecological management. Nevertheless, even though I consider the quality of the landscape to be at least comparable with many parts of the AONB around High Wycombe, I consider it would be inconsistent to designate the site as an area of attractive local landscape without a full review of the need for ASLs at strategic level.
27. Finally, both remaining ASLs at Lane End Road and Grange Farm lie within the AONB. Government policy for the AONB, clarified by Ministerial statement in June 2000, states that major development should not take place in the AONB unless it is demonstrated to be in the public interest, by reference to the criteria of national need, cost of and scope for developing elsewhere, and the effect on the landscape, and the extent to which that could be moderated. I consider there is some inconsistency between this policy and the designation as an ASL, which implies acceptability for development in the long term. I note that Policy E3 of RPG9 states that there is no case for reviewing green belt boundaries on regional policy grounds. I suggest that this dilemma should be resolved at the next review of sub-regional strategic policy.

Little Marlow Gravel Pits

28. This particular allocation is one of the largest in the local plan. I concur with the concept of using of the land as a future country park. This proposal is regarded as especially appropriate for the land, given its Green Belt location and proximity to Marlow and Bourne End. However, the scheme has only reached a preliminary stage of public consultation, jointly organised by the district and county councils. Several objections relate to the question of possible 'enabling development'. This has been suggested in order to fund loss-making or non-profitable elements of a possible package of future leisure facilities. No judgment can be made on any such proposals in the absence of any adopted or definitive scheme of leisure development or any detailed knowledge of future funding. I have noted the completion of a large hotel close to the development area in connection with possible improvements to site access, which is somewhat inadequate at present. However, its improvement cannot be properly assessed in the absence of relevant provisions in the Bucks Local Transport Plan. The future country park will be prominent in views from across the River Thames and any development will consequently engage the interest of the adjoining local planning authority to the south.