

## CHAPTER 6 – TOWN CENTRES

### TC0: ISSUES AND OBJECTIVES

#### The Objections

|         |                           |
|---------|---------------------------|
| 0943/4  | Somerfield Stores Limited |
| 1584/13 | The Marlow Group          |

#### Summary of Objections

- (a) Clarification is required with regard to local areas and local district centres, as these are not subject to the policies in the Town Centre Chapter, based on the retail hierarchy set out in the Retail Chapter.
- (b) Add an additional criterion in respect of Marlow, in order to secure its role as a sub-regional centre.

#### Inspector’s Reasoning and Conclusions

6.0.1 The preamble to the Town Centres Chapter of the Local Plan (ie paragraphs 6.01-6.11) makes it clear that the Chapter’s policy content and other provisions apply solely to the three defined centres of Wycombe District. This overall context derives from PPG6 (Part 2) and the Buckinghamshire Structure Plan 1991-2011 (Policy S2). The former specifically defines the term ‘town centre’ and the latter further specifies the three centres in Wycombe District which fit this definition and are accordingly categorised as Sub-Regional and District Centres. The content of the Local Plan (paragraph 6.11(i-vii)) sets out the relevant issues and objectives of town centre planning policies. Not only does the PPG definition exclude ‘small parades of shops of purely local significance’ but it would clearly be impossible to devise a single set of policies applicable across the range of all groups of retail outlets. Five local district centres are now identified in Policy S5 and this change to the Local Plan is endorsed earlier in the report. The exclusion of Stokenchurch and Lane End is referred to and considered under Policy CF1.

6.0.2 The categorisation of Marlow as a District Centre (ie the third level in the County Council’s retailing hierarchy) is appropriate, given its relative isolation and limited urban catchment area. To promote it at this stage in the planning process to a second-order retailing centre would not only take the Local Plan out of conformity with its parent structure plan (at mid-point in its currency) but would be perverse and anomalous. All the evidence at the inquiry and in the written representations strongly suggests that Marlow suffers from considerable traffic stress, difficulties of access and parking and inadequacies of public transport. It may be that a perceived recent lack of progress in townscape and environmental improvements, vis a vis High Wycombe, underlies this objection. Such improvements are almost inevitably bound to be, in present circumstances, very largely a by-product of development. Not only does Chapter Objective 6.13(vi) specifically address this issue but the comparative scale of retail and other redevelopment envisaged (Policies M4-M5) offers some promise of early area enhancement.

#### RECOMMENDATION

- TC00/1 No modification.

**TC1: GENERAL TOWN CENTRE POLICY**

**The Objections**

- 0137/5            The High Wycombe Society  
1260/39           The Marlow Society

**PIC 6/15 Objections**

- 2137/4            Waitrose Limited

**Summary of Objections**

- (a)        Policy should refer to the introduction of new residential accommodation.
- (b)        Object to the word ‘major’. Consider that the size of development is irrelevant.
- (c)        Add additional criterion, to the effect that proposals should avoid the proliferation of non-essential street furniture and co-ordinate with the style, scale and colour of existing furniture.
- (d)        Add additional wording ‘where appropriate’ to criterion (iv).

**Inspector’s Reasoning and Conclusions**

6.1.1 Since the Local Plan was prepared, additional advice on housing and the possible conversion of town centre buildings has been published in PPG3 (March 2000). Indeed, the ten Chapter 6 objectives include two that are especially relevant to housing redevelopment (paragraph 6.13 (iii) and (viii)). Moreover, as far as can be judged from recent development control decisions, the LPA have been signally successful in the implementation of these two objectives. Evidence of this is to be found in residential commitments with respect to allocations HW1 (Western Sector) and HW3 (West End Road). The cumulative effect of these commitments would be to add some 207 (145+62) units to the housing stock; in the case of the latter allocation (of small units), this equates to a high density of 230 dw/ha. It is difficult to see how the relevant emergent policies could be more robustly implemented. It is probably more appropriate to pursue housing gain in the town centres, taken as a whole, by means of site-specific policies rather than to by a blanket proviso within Policy TC1 (i-iv). This would call for its mandatory achievement and would be difficult to justify in all centres and in every case.

6.1.2 Policy TC1 is intended to control and influence the design of all major development (and redevelopment) schemes in the three designated town centres. It is implicit in its wording that foot, cycle and public transport mobility and access will be sustained and improved by the detailed design of new development proposals. This implies that the permeability and close-knit qualities of the existing urban fabric will be enhanced as a consequence of whatever form of mixed or other development takes place. Without any doubt, this sort of environment would be highly conducive to car-free residential layouts and so-called ‘home zones’ which are being piloted in cities throughout Great Britain. Their active encouragement or prescription, by means of Policy TC1, would be out of place. Firstly, this is an initiative that should come from the developer and not the LPA, otherwise such an insistence might well inhibit housing action and sterilise sites. Secondly, the matter is more properly addressed in the form of Design Guidance; in the Local Plan it is contained in Appendix 1. Lastly, the function of the Local Plan is to give clear and positive guidance as to probable conformity with its provisions. It is not merely to promote or advocate specific innovative design solutions, however worthy and increasingly common these may be.

6.1.3 The four criteria set out in Policy TC1 are potentially demanding, but not unreasonable. They imply a certain degree of conservation consciousness and the provision of public art, as well as a high standard of architecture and design. They look for the provision of an enhanced public realm and for conspicuous ease of movement by means other than motor vehicles. All this has to be achieved in the context of higher densities and possibly a wider mix of land uses. These urban design objectives can more commonly be met where development takes place on the scale of complete existing street blocks or, at least, a very substantial part of an existing street block or on an otherwise unified site (eg allocation HW3). It would be unrealistic to look for *all* four attributes to be met on *all* town centre sites, however small. It is also important to bear in mind that the three town centres all contain extensive conservation areas within them. It is reasonable to look there for stringent standards of development control and for positive enhancement (under Policies HE8-10) without recourse to the wider application of Policy TC1 to all development proposals, of whatever size, within the town centre areas.

6.1.4 It is difficult to see how the insertion of the words ‘where appropriate’ at any point in criterion (iv) (added by PIC 6/15) would do anything other than to make Policy TC1 less precise and less capable of informing planning judgements. The Policy simply sets out to balance the bulk, extent or density of new town centre development against the prevailing urban or civic design quality of a site’s location and architectural context. If anything, it might itself be criticised for being a little nebulous, imprecise and subjective. To add a proviso that it can only be invoked in a set of further circumstances which are themselves highly imprecise and subjective would be to lose any degree of certainty whatsoever. It would possibly be preferable to lay down specific sets of guidelines for defined allocations (eg HW1-10) by way of overall plot ratio, site coverage or density controls. This has not been the method chosen by the LPA. They rely simply on a site-specific statement of preferred uses or attributes. This seems an inherently flexible way of ensuring adequate development control within the specific allocations; the guidelines for other town centre sites are even more flexible and appear to lay down the minimum criteria for seemingly future development without further qualification.

6.1.5 The suggestion that items of street furniture be more closely controlled and better co-ordinated will find much support in many quarters. However, the multifarious agencies that are responsible for such provision are largely exempt from planning control or the direct intervention of the LPA. Inspection of the three town centres in Wycombe District leads to the conclusion that, within their conservation areas at least, a degree of conscious restraint has been achieved. In the case of High Wycombe, as remarked elsewhere, a very attractive standard of street scene and furniture has been accomplished. In the absence of specific statutory powers, it is difficult to see how any modification of Policy TC1 or the insertion of additional policy guidance would materially assist the urban enhancement process. No doubt a great deal can be done by way of non-statutory exhortation and encouragement. Progress has been made both in Wycombe and elsewhere by means of scaling down traffic direction signs, fixing street lighting to buildings, removing traffic guard rails and so forth. The question of signing and lighting is more appropriate to Chapter 7 of the Local Plan and is dealt with there.

## RECOMMENDATION

- TC01/1 Modify Policy TC1 as proposed by PIC6/15.

**HW1: HIGH WYCOMBE TOWN CENTRE- WESTERN SECTOR**

**The Objections**

0839/19 Grange Action Group (for all other objections to HW1 see Appendix 6A).

**Summary of Objections**

- (a) Object to the premise that there is 'unmet demand for additional retail floorspace'. The reference to increasing retail floorspace in the town (and thus reducing car journeys) is establishing a false corollary.
- (b) Object to the policy in that only 'an element' of residential accommodation is required and that no minimum target for provision is set. Maximum residential accommodation should be provided in the town centre.
- (c) Policy should specify quantity of residential accommodation, including that for affordable housing.
- (d) Policy does not make best use of the site in terms of town centre regeneration. The Western Sector scheme should be reconsidered. It represents enormous cost to taxpayers.
- (e) Object to the location of the new bus interchange.
- (f) Energy efficient schemes (e.g. installation of solar panels) should be encouraged in the development.
- (g) Tesco's should be entitled to retain their existing store (or to have a store of comparable size). The town would lose its viability if there were no such anchor. Add additional criterion to policy 'the provision of a site in High Wycombe to accommodate a new Tesco food store'.
- (h) Policy should be deleted; Western Sector site should be retained for open-air car parking.
- (i) Policy should recognise that retail warehouse development is not acceptable in the Western Sector and there should be explicit flexibility for non-competing retail development elsewhere.
- (j) A more holistic approach should be taken to the links between the Western Sector development and other proposed town centre developments in the Local Plan.
- (k) Proposal should link closely to the objectives in the Buckinghamshire Local Transport Plan.
- (l) The importance of pedestrian access from the town centre to the bus station should be more explicitly acknowledged.
- (m) The interests of students (from Buckinghamshire Chilterns University College) who will pass through the Western Sector should be duly recognised, in particular their safety.
- (n) Proposal does not seek to protect existing and future service access functions. Proposal may have operational, security and legal implications for the Post Office and other town centre uses.
- (o) Library should be sited in the quietest part of the development and not adjacent to the bus station.

- (p) Clarification is required with regard to ‘information point’ reference in the lower case text; Information facility is preferable.
- (q) Reference to the application of Policy S1, in the lower case text, should be amended to provide for the phased completion of development.

### **Inspector’s Reasoning and Conclusions**

6.2.1 The objections which relate to misgivings about the need for additional shopping floorspace in the town centre (and its effect on potentially reducing car journeys) may be answered by reference to PPG6 and subsequent Ministerial statements regarding the sequential test for shopping. Shopping and other employment uses are regarded as primary functions of town centres. The principal reason for this policy is such centres’ centrality and their multi-modal accessibility. If the Western Sector, in particular, were to fall short of reasonable floorspace provision for comparison shopping, two probable adverse effects might follow. Firstly, the LPA might find it difficult to counter allegations of need for additional floorspace. Secondly, the application of the sequential test in the face of future retailing applications, together with evidence of unsatisfied demand (ie need), might result in less generally accessible locations being chosen. That would appear to be the reason why the LPA, acting in accordance with both PPG6 and Policies S2 and S4 of the Structure Plan, have taken competent advice and are now committed to a sizeable increment of comparison floorspace.

6.2.2 There is accordingly no ‘false logic’ in the Local Plan’s retailing strategy as regards High Wycombe Town Centre (in general) or the Western Sector (in particular). In order to reduce dependence on car travel, there is plainly no better location from the point of view of general accessibility. A glance at the public transport network map will show no comparably accessible locations, either within the District or (more pertinently) within High Wycombe itself. Any shortfall of future retail floorspace might, in the scenario set out above, put unwelcome and very probably irresistible expansion pressure on the Asda-John Lewis complex, a decidedly out-of-centre location. This location is very highly accessible only by car and much less so by public transport, to say nothing of other modes of transport. Further retail development would certainly induce added car movements. This seems to be one of the many reasons why the LPA have committed all the comparison floorspace expansion (apart from retail warehousing) to the Western Sector. This policy decision is not only inherently sound but was indeed specifically endorsed, following the 1998 CPO Inquiry, in the Inspector’s Report.

6.2.3 The objections relating to the failure to set specific targets for residential accommodation in any of the relevant policy areas (ie HW1, HW2, HW3, HW5 and HW7) cannot be supported. There is an absence of any detailed economic evaluation of proposals within these allocations. The wording of PPG6 makes it clear that residential uses are complementary to the main functions of town centres. This implies that shopping and other employment uses have a degree of primacy, within the limits set by Policy S1 in particular. It may be noted that none of the HW1-10 series of policies set quantified targets or limits to component floorspace. On the other hand, all the separate policies referred to above make specific (albeit unquantified) provision for residential accommodation. In the absence of any attempt at detailed quantification, by means of plot ratio or density control, it is difficult to see how targets for dwellings, still less affordable or social housing, could be set at this stage. To do so might require wholly unwarranted assumptions as to economic viability. If these assumptions were incorrect, the end result might be to blight scarce urban land and to inhibit future and necessary redevelopment.

6.2.4 In any event, the evidence of the LPA, subsequent planning commitments and current applications (including the HW4 site at Dovecot) combine to suggest that a fair amount of town centre residential accommodation is likely to be forthcoming by detailed negotiation with developers. The best available information therefore suggests that something like 160 or more units of accommodation will be achieved, some of them of admittedly limited size for small

households. This total needs to be seen in the context of its being about 33% of the size of the largest Policy H2 housing allocation in the urban area (H5A: Wycombe Marsh); a capacity of 400 units on a brownfield site. The LPA claim that the probable capacity of the Wycombe Town Centre is of the order of 10-12% of the 2001-2011 housing land requirement for Wycombe District. If this is achieved, it would seem a reasonably proportionate contribution to overall housing development. Moreover, Policy S1(3)(b)(as recommended for modification) would both allow (and secure) housing capacity gains on redevelopment sites within the town centre, outside the actual Policy HW1-10 allocations.

6.2.5 The form and content of the Western Sector redevelopment scheme is illustrated by the terms of the two successive planning permissions. The claim that it represents an excessive financial burden to the public is not supported by any available evidence. The precise terms of the published Committee reports and the subsequent (outline) permissions combine to indicate that the project is self-financing and indeed would secure a substantial amount of planning advantage. This would include the re-siting of the existing bus station, the provision of a site for a new public library and various community and leisure facilities. The evidence of the report suggests widespread public support for the principle of the scheme of redevelopment, if not complete satisfaction with its detailed indicative layout. In particular, it would have the beneficial effect of removing extensive areas of prominent and unsightly open car parking. This loss is also the subject of objection, but it may be defended on urban design grounds. Such a use of valuable central area land is usually unwarranted, except on a purely temporary basis. It is difficult effectively to screen or to landscape and it has the additional disadvantage of making a pedestrian approach to the central area unduly circuitous or markedly difficult to traverse on foot by the physically disabled, heavily laden or elderly shoppers and those with children.

6.2.6 The objection that the bus station is badly sited has some justification. The adopted Local Transport Plan (LTP) for Buckinghamshire is properly concerned with ease of modal interchange. The subject of relocating the existing railway station some 500 m further west (and accordingly much nearer the proposed bus station in the Western Sector) was briefly discussed at the inquiry. The verbal evidence then given by the LPA was to the effect that the matter had been discussed with the former Shadow Strategic Rail Authority (SSRA), Railtrack (now Network Rail) and the relevant train operating companies (TOCs). A possible re-location site for the station would be on the embankment north of the HW4 retail allocation. This site was not favoured by the parties, partly for operational reasons (line curvature and elevation) but also presumably because of the comparative lack of directly associated development potential. Railtrack et al currently favour the improvement of the present station (Policy HW9) which also offers the possibility of restoring the previous 4-track layout and hence operational flexibility by way of accommodating both fast and stopping services on the Chiltern Railways.

6.2.7 Given these impediments to full integration, the choice of bus station site is probably as good as can be devised within the present limits of the Western Sector redevelopment. The choice is the more critical for future patterns of bus services. This is because of the ‘cardinal point’ nature of a future Park-and-Ride (P+R) system for High Wycombe (see T17). The indicative details of this scheme (included in the current LTP) suggest that it will be centred on the new bus station. This will accordingly serve the four or more arms of the P+R system but also the markedly complex radial pattern of bus routes serving the High Wycombe urban area, together with the important very inter-urban connection with Marlow. The emerging pattern of the town centre shopping (ie the combined Policy S1, S3, S4 areas and the HW1, HW4 and HW7 allocations) is westwards. The bus station siting is probably a reasonable compromise between ease of access (by buses) to and from the primary distributor (A40-A404) network and a maximum 300-metre carry distance for shoppers on foot.

6.2.8 The pattern of pedestrian circulation within the enlarged town centre is probably adequate. The agreeable freedom of movement within the now largely pedestrianised High Street, through the Octagon Centre and under the elevated Abbey Way (A40) and the Archway dual carriageway (A4128) is regrettably not to be extended as a result of the Western Sector

redevelopment. This obvious fact probably underlies several of the objections to Policy HW1 and its implementation by way of the present outline permission. However, the safety (if not the freedom) of the pedestrian will be safeguarded to a large extent by controlled crossings of the perimeter roads to the Western Sector. This reflects the added future vehicle traffic on these links. This acceptance of surface crossings on the less important elements of the pedestrian network is in line with contemporary traffic engineering practice. It is probably acceptable in the context of the very high quality of the pedestrian realm within much of the town centre and the enhanced freedom of movement on foot which the probable implementation of allocations HW1 and HW4 represent.

6.2.9 The objections relating to the operational and security arrangements of the General Post Office would not appear to be compromised, either by the content of Policy HW1 or indeed by its probable implementation. Apart from the requisite closure of Temple Street and some minor roads and the altered configuration of the Abbey Way-Oxford Road (A40-A4128) gyratory, there would appear to be no great reduction in frontage access to premises. The local highway authority supports the current Western Sector proposals. No doubt the necessary traffic orders will be the subject of advertisement and objection. The servicing and access functions of activities within the redevelopment area would appear to be adequate. It is difficult to see how the interests of owners and activities which are outside the Policy HW1 allocation could properly or adequately be secured by modification of its wording or indeed by land use planning policy formulation in general.

6.2.10 There would seem to be little point in writing into Policy HW1 any general prohibition on retail warehousing. Apart from anything else, the significantly lower levels of trading turnover per unit area of floorspace would make it commercially unattractive. Moreover, the committed form of development and relatively restricted car parking provision would not be acceptable to most operators. In addition, Policy S2 specifically covers this aspect of retailing. This policy is endorsed, as are the two locations (respectively edge-of-centre and out-of-centre) which have been allocated for this purpose. The Policy HW5 (Gas Works) allocation is probably as close as is reasonable to the Western Sector, consistent with the necessity for multi-purpose trip linkage and the need to provide early siting for retail warehouse development. The available details of the relevant planning application indicate that easy pedestrian access, especially for the students of Buckinghamshire Chilterns University College, will be provided.

6.2.11 The short reference to Policy S1 in the supporting text appears perfectly clear. What is plainly intended is that individual internal changes of use (or other forms of development) within the completed Western Sector redevelopment scheme will be subject to it. This may seem slightly redundant in view of the imposition of conditions 5-8 (inclusive) on the outstanding planning permission. However, it might well be relevant if the present permission were not to be implemented and an alternative successor scheme were to come forward. Although the HW1 site is committed to redevelopment (and the LPA may wish accordingly to amend the Proposals Map notation), Policy HW1 will still apply during the currency of the Local Plan. It would therefore govern any future form of development on the site. It would still be perfectly proper, at this juncture, to modify the policy if good cause were shown. However, a policy requirement for phased development is not necessary. Firstly, the present partnership arrangement suggests that it would not be needed; secondly, any future permission could be conditioned to this effect (if the LPA saw fit) at the stage of the determination of the relevant application.

6.2.12 As far as may be judged from the published indicative proposals for the Western Sector, the detailed siting of Public Library and Bus Station appears to be perfectly satisfactory. Their close positioning is justified by the need, as advised by PPG6, physically to assist linked or multi-purpose trips to town centres for purposes other than shopping. It may be objected that a more central location for the library (and its important ancillary Information Centre) might well be preferable. However, the location of the Bus Station is heavily constrained by the form, capacity and layout of the principal roads through High Wycombe, as has already been noted. Together with the very extensive future pedestrian area, this means that close location of public

transport and public building necessarily requires the latter’s siting towards the west of the extended town centre. There is absolutely no good architectural reason why the internal acoustical climate cannot be reliably controlled. This is a matter for the County Council, as building owner, as is also any decisions regarding energy-efficiency, such as photo-voltaic (PV) solar panels, heat-recovery ventilation (HRV) or indeed any other measure of conservation.

6.2.13 There is a strong feeling, running through the objections to Policies HW1-8, that the town centre is moving inexorably westwards and that that is a bad thing. It is true that the Western Sector both exemplifies and accentuates this trend. It is not enough simply to say that the CPO Inquiry endorsed this principle of western expansion. The purposes of a CPO Inquiry and the present Local Plan Inquiry are quite different. However, it is by no means certain that the gradual erosion of shopping within Crendon and Easton Streets has to do with over-provision of new floorspace elsewhere. Frequent inspection of the town centre suggests that the blighting effect of heavy vehicular traffic, especially one-way traffic, and lack of frequent pedestrian crossing points have much more to do with this trend. The heart of the town centre is effectively bypassed, to its east and south, by both the A40 and A404. The former diversion is of limited impact, being largely on a segregated and elevated alignment. The latter is not, traversing the urban fabric around a lengthy gyratory traffic management scheme that would appear incapable of early modification.

6.2.14 The effect of this evident traffic blight has been to encourage the intensification of Class A2 and A3 uses at the expense of Class A1 shopping. This is unsurprising, since the former uses benefit from exposure to (and accessibility by) vehicular traffic. Policy S4 implicitly recognises the trend and it is noticeable that Easton Street, in particular, has a distinctly inhospitable pedestrian environment for ease of window-shopping, strolling, conversation and casual movement which are the necessary functions of a successful shopping street. Estate agents premises at the corner of Queen Victoria Road and Easton Street were physically demolished by a vehicle, with most regrettable loss of life, during the course of the Inquiry. This is only the most obvious and blatant indication of a lack of pedestrian amenity (to put it no higher) in this part of the town centre. Equally, the overall town centre rate of vacancy of shop premises (less than 10%) is not convincing evidence of over-provision. Rates of vacancy in single percentage figures are common and are indeed necessary in order for a free and flexible market in commercial property to operate.

6.2.15 The essential point made by the Tesco objection (1004/1) is that they wish to retain a large food store within the Western Sector (HW1) allocation. At present, they operate a hybrid convenience and comparison store, the overall trading (net) floorspace of about 4500 sq m being split roughly 50:50 between the two sectors. The store operates at ground and first floor within a building whose upper floors are devoted to multi-storey parking, operated by Wycombe DC and thus not dedicated to Tesco customers. Although the modification to the Local Plan which is sought is nominally an added criterion HW1(vi), making specific provision for a new Tesco Category 3 food store of some 7000 sq m (gfa) and 4500 (nfa), the evidence given at the inquiry demonstrated that both a replacement and an enlargement of the present food store is effectively sought. That would represent a roughly 12.5% global increase in net floorspace in Wycombe District (see Table 6.1) and would make the new food store the largest in High Wycombe.

| (1)       | (2)                | (3)  | (4)   | (5)   | (6) | (7)   | (8)  |
|-----------|--------------------|------|-------|-------|-----|-------|------|
| WAITROSE  | MARLOW             | NK   | 1180  | 170   | 6.9 | 6.9%  | 1972 |
| TESCO     | HIGH WYCOMBE       | NK   | 2535  | 1000* |     | 14.8% | 1980 |
| ASDA      | CRESSEX            | 7975 | 4407  | 690   | 6.4 | 25.8% | 1983 |
| SAINSBURY | DOVECOT            | 5703 | 2485  | 938*  |     | 14.5% | 1986 |
| TESCO     | LOUDWATER          | 4881 | 2712  | 500   | 5.4 | 15.9% | 1990 |
| TESCO     | PRINCES RISBOROUGH | 2028 | 1143  | 121   | 9.4 | 6.7%  | 1996 |
| SAFEWAY   | TEMPLE END         | 5710 | 2620  | 455   | 5.8 | 15.3% | 1998 |
| TOTALS    | (Wycombe District) | NK   | 17082 | 3874  |     | 100%  |      |

NB: Car Parking Capacity marked (\*) is within non-dedicated multi-storey public car parks.  
 (1) Store (2) Location (3-4) Gross-Net Areas (sq m) (5) Parking (6) sq m/car space (8) Opening

TABLE 6.1 LOCATION AND CAPACITY OF FOOD STORES EXCEEDING 1000 SQ M NET

6.2.16 The current situation regarding the implementation of Policy HW1 is that outline planning permissions were granted in March and September 1998 for the development of the Western Sector in accordance with an earlier planning brief. The essential difference between the two successive proposals, apart from indicative layout, was that the later application took in the entire area of the HW1 allocation. The 1998 permission makes provision for some 47 676 sq m of floorspace, of which 25 861 sq m (gfa) would be shopping, mainly comparison and mainly at ground level. A food store of some 1500 sq m (gfa) was proposed and the permission includes conditions (5-6) which require minima of 7000 and 1500 sq m (gfa) for a single department store and a food supermarket, in view of the centrality and accessibility of the proposed development scheme. Evidence was given at the inquiry that both the LPA and development company MAB Limited (who are in partnership) would accept a replacement food store of up to 3700 sq m (gfa) or 2400 (nfa). That would in effect allow Tesco to relocate within the new development area but the LPA do not wish to prescribe Tesco as operator since that would not be appropriate either in the supporting text or the Policy in the Local Plan.

6.2.17 A closely related objection by Tesco (1004/4) is reported earlier (see Chapter 5). Since the relevant recommendation there is to define a Policy S1 application area somewhat wider than the combined Policy S2-3 areas on the various Inset Proposals Maps, it seems appropriate to assess the effect of Tesco food store replacement (or its enlargement) against the criteria of Policy S1(3)(a-d)(in their modified form). The reason for this is that the Western Sector proposals are now a planning commitment and will no doubt be recorded as such in due course on the Inset Map. Short of revocation (which is improbable) the most appropriate way of securing a Tesco food store replacement would be by way of a new planning application for the Western Sector as a whole or by way of submission of details under the terms of the outline permission. Either way, the content of emergent Policy S1 would be a very material planning consideration. The view of the LPA, that prescribing either a precise area or an exclusive agency of operation by Tesco would be inappropriate in Policy HW1, is fully accepted as being inconsistent with the advice of PPG6.

6.2.18 One of the key arguments advanced in favour of the Tesco objection to Policy HW1 is that there will be an imbalance between likely expenditure available for convenience goods in

Wycombe shopping and the retail floorspace open and trading during the Local Plan period. This argument with respect to the *need* for the Tesco food store’s replacement (or expansion) in the Western sector sits a little oddly with the claim that future *need* does not require to be demonstrated within the larger Town Centre definition which is advocated. However, even assuming that the Western Sector allocation is indeed a preferred location under a modified Policy S1, the impact of assigning something like 27% (7000/26 000) of the authorised gross Class A1 retail floorspace in the redevelopment scheme to convenience shopping would appear likely to weaken the future role of High Wycombe as a Sub-Regional Centre. Even making an allowance for the 20% of floorspace to be devoted by Tesco to comparison sales, a Category 3 food store would be likely to undermine the viability of the new shopping centre.

6.2.19 This view is reinforced by the implicit commercial judgement of MAB Limited and the planning judgement of Wycombe DC. The view was expressed at the inquiry that a full single-level Tesco food store with dedicated open car parking would call for a site area of the order of 2.5 ha (the total area of the Western Sector redevelopment is about 6.4 ha). This is almost certainly an over-statement but the scale of car parking ideally sought by Tesco (see under Chapter 7) calls for a dedicated provision of 350-400 spaces. This requirement should be seen in the context of a possible global provision of 1250 spaces in the Western Sector. This suggests a degree of pressure being placed upon the pool of parking available to the general retailing function of the new shopping complex. On the other hand, a replacement food store of 3700 sq m (gfa) would generate a PPG13 (Annex D) requirement of some 260 spaces. Indeed, at that level, the accepted split as between food and non-food floorspace would throw up a demand (at PPG13 maxima) for about 250 and 1000 spaces, more or less as the permission provides. This is not in itself conclusive but tends to confirm MAB’s commercial judgement.

6.2.20 The LPA accordingly regard the insertion of an exactly equivalent replacement food store as being perfectly consistent with the new form and important function of the Western Sector redevelopment scheme. It would be seen as a hybrid ‘basket, top-up and main shopping’ food store as befits its high multi-modal accessibility at the centre of the High Wycombe catchment and main shopping area. It is difficult to escape the conclusion that Tesco’s commercial motivation is to increase their market penetration within Wycombe District as a whole. This is perfectly understandable but it should not be achieved at the expense of the overall viability of High Wycombe Town Centre and would appear directly to conflict with Policy S1 of the Local Plan, which the objectors themselves have specifically prayed in aid. In any event, should Tesco be successful in future negotiations with MAB, their overall sectoral representation would be nearly 40% in terms of net floorspace within the larger food stores in the District, a by no means unreasonable figure.

6.2.21 A good deal of conflicting evidence is available regarding the relative growth of convenience expenditure within Wycombe District, its leakage to other centres outside the District and the percentage share of retained expenditure enjoyed by High Wycombe. This expenditure in the main comes from its immediate hinterland. However, a significant element of available spend comes from sizeable settlements both inside and adjacent to Wycombe District. The objectors’ case is, essentially, that High Wycombe will gain market share from its immediate hinterland but that other key sectors (eg Marlow) will remain relatively static as regards expenditure inflow. The case is made that, over the Plan period, the available convenience spend will exceed the capacity of existing and currently projected major food stores. Two adverse effects are identified; either the available outlets will progressively over-trade to the detriment of customers’ convenience or, alternatively, that need for additional floorspace will result in unfortunate ad hoc planning decisions in less than ideal locations.

6.2.22 The gist of the Tesco objection to Policy HW1 is that the *loss* of the present food store in the Western Sector development area would lead to both quantitative and qualitative deficiencies in High Wycombe within the present Plan period. They argue that the LPA have taken a district-wide perspective and assessment in their plan allocations. This approach masks some locational deficiencies and does not accurately reflect expenditure flows within the District.

They believe that the projected Sainsbury store in sector HW4 will not expand convenience sales to the extent anticipated. They also argue that the Western Sector CPO report and decision recognised the need for an additional town centre food store and that both Sainsburys and Safeways are not in preferred locations relative to the advice of PPG6. Moreover, the effect of the Marlow Waitrose being seriously delayed or deferred will lead to an added inflow of expenditure from its catchment to High Wycombe from 30% to 35%. Additionally, the share of expenditure from the immediate High Wycombe catchment will probably increase from 80% to 85% as a result of the Western Sector’s centrality and high multi-modal accessibility.

6.2.23 The LPA consider that their Local Plan allocations (ie HW1, HW4 and M4 (or M5)) will adequately address the relatively marginally enhanced demand for convenience shopping floorspace during the Plan period. They point to the availability of some 2500 sq m net floorspace within the Western Sector redevelopment scheme, now proceeding to implementation (nb evidence was produced at the close of the inquiry that this may be delayed). Combined with the HW4 allocation, the subject of a current planning application by Sainsbury, this would result in a 1200 sq m (50%) increase in net floorspace available in what will be a town centre location. The opening of the Safeway food store, following the 1995 inquiry, not only provides a valuable additional 15% increment to the District’s net floorspace, but is now much better located relative to the town centre (given its westwards shift). The prospect of the Waitrose food store at Marlow either expanding or relocating is a good deal better than the objectors accept, notwithstanding their own objection to the particular allocation. Finally, if need is established, Policy S1 of the Local Plan provides for an ad hoc decision during its currency if serious over-trading is indeed experienced.

6.2.24 Of the Policy S1(2) criteria, the loss of capacity within the overall allocation with respect to either residential or employment would appear to be negligible. No evidence is available as regards employment opportunity in convenience or comparison shopping. No firm conclusions may be drawn and the relevant Committee Report on the 1998 planning application is silent on the subject since at that time only a limited amount of convenience floorspace (1500 sq m gfa) was envisaged. The latest planning permission envisages some 39 dwelling units on a peripheral site. This represents a significant increase since the earlier permission (but is still regarded as inadequate by other objectors). However, the effect of introducing a larger food store of some 2500 sq m net would not seem directly to impact upon such provision since such a retail outlet would necessarily require a more central location for commercial reasons. As earlier concluded, the main adverse effect in relation to Policy S1 would be the reduction in comparison floorspace from about 25 000 sq m to about 21 000 sq m (gfa).

6.2.25 There is absolutely no doubt that the Western Sector redevelopment will enjoy excellent accessibility by most, if not all, modes of transport. As noted by the High Wycombe Society, the convenience of access by some pedestrians and all rail passengers will not be significantly enhanced. However, the relocation of the main bus station westwards will encourage interchange and the use of this form of public transport. Although the bus station is being shifted away from the present centre of gravity of the town centre, it will have several advantages. One is the abandonment of the somewhat gloomy and dingy undercroft of the shopping centre. The other is the effective extension of the town centre to encompass both allocations HW1 and HW4. This would have the effect of making the Sainsbury food store occupy a town centre, rather than an edge of centre location. The overall pattern of pedestrian circulation, the lifeblood of retailing, is relatively well connected to the historic core but largely relies on surface crossings to connect the Western Sector and the enlarged Dovecot area.

6.2.26 The accessibility pattern which is emerging is one of easy access by car to the (now) edge of centre Safeway food store at Temple End, adequate access by both car and public transport to the (now) town centre site to be developed by Sainsburys and optimum access by all modes to a future food store (of comparable size to the others) within the essentially pedestrian realm of the Western Sector. Leaving aside considerations of need for floorspace, it would probably not be advisable, from a purely transportation aspect, to increase the area for

convenience trading in the HW1 allocation. The reasons are, firstly, the probable excess of provision by current standards at Temple End suggests that car-based shopping should now be concentrated there. Secondly, the effect of added town centre convenience floorspace, as argued by the LPA, might diminish local trade within the 1800 sq m at present within High Wycombe but outside the town centre. This might well discourage local shopping and induce longer motorised trips. Finally, one beneficial effect of longer term successful introduction of Park-and-Ride (see Policy T17) would be the necessary displacement of some town centre parking which might be resisted as inimical to convenience trading. In other words, the effective export of parking provision from centre to edge of town might not be secured.

6.2.27 In the final analysis, all the evidence regarding the balance of consumer demand and trading provision (ie ‘need’) is inconclusive if not actually flawed. The reason for this is the reliance on ‘benchmark’ figures for annual trading turnover. For reasons of commercial confidentiality, annual turnover in much of the relevant evidential material is quoted at company average levels (eg Tesco is uniformly given as £10 984/sq m regardless of actual performance). This degree of precision is flatly denied by oral evidence that Tesco Loudwater is trading at levels ‘within the top four or five stores nationally’ or that Waitrose Marlow is trading at something like twice the level of the company average (£9020/sq m). This generalised statistical approach may well be justified in broad-brush assessments of future impact. Where the degree of imbalance is very restricted, as it now is, it is unwise to rely on such spurious accuracy. Given the extent and position of the bracket between the LPA and objectors’ estimates of local floorspace provision of convenience floorspace within High Wycombe, it would be unsafe to assign a figure by which Policy HW1 should be modified. Still less would it be appropriate to allocate such an increment to a named operator. In any event, a slightly more flexible application of Policy S1 (as earlier recommended) should take care of future ad hoc decisions if circumstances demonstrably change during the currency of the Local Plan.

## RECOMMENDATIONS

- TC02/1 Modify the supporting text to Policy HW1 as proposed by PIC6/1.
- TC02/2 Modify the supporting text to Policy HW1, generally as proposed by FPIC6/18, but with the words ‘A basket food store’ in paragraph 6.27 replaced with the words ‘a replacement food store not exceeding the existing convenience floorspace’.

## HW2: HIGH WYCOMBE TOWN CENTRE - BROOK STREET & BRIDGE STREET

### The Objections

0829/8 Trevor Fazackerley

### Summary of Objections

- (a) Delete reference to ‘or office purposes’ thus supporting Council’s policy to provide residential premises in the town centre area.

### Inspector's Reasoning and Conclusions

6.3.1 The allocation made by Policy HW2 is one of the smallest in or near the town centre (as earlier suggested in this report for the purposes of applying Policy S1). It is proposed for mixed uses ie office or retail uses on the Bridge Street and Oxford Road frontages and either high density residential or office uses in the backland. Residential use is noted as being potentially

complementary to an adjacent student hall of residence. The objection seeks the deletion of the backland office option. As in the case of the Policy HW1 objections, it is impossible to recommend a precise mix of uses or number of dwellings because this must be left to negotiation at the stage of a planning application. A site such as this suggests non-family and small-unit housing development because of its location, ambient noise levels and probable stringency of parking provision. This being the case, there may well have to be an element of cross-subsidy involved and this can only be determined on the facts of the case and in the knowledge of the detailed economics of development.

### RECOMMENDATION

- TC03/1 No modification.

## HW3: HIGH WYCOMBE TOWN CENTRE- WEST END ROAD & DESBOROUGH ROAD

### The Objections

See Appendix 6B

### Summary of Objections

- (a) Object to the policy in that only 'an element' of residential accommodation is required and no minimum target is set. Maximum residential accommodation should be provided in the town centre.
- (b) Policy does not make best use of the site in terms of town centre regeneration.
- (c) Area should be allocated entirely for affordable housing.
- (d) Area has a number of potentially contaminating activities where redevelopment poses a risk to groundwater quality. Sufficient investigation must be carried out and a high level of remedial treatment achieved.
- (e) Reference to 'minimum on site parking' should be deleted; shortage of car parking spaces causes problems and is short sighted.
- (f) Retail development is permitted by this policy, even though research suggests that the site is not ideal.
- (g) Full account should be taken of the development of home computer and catalogue shopping in assessing retail floorspace requirements.

### Inspector's Reasoning and Conclusions

6.4.1 Any appreciation of Policy HW3 must take into account the fact that a detailed planning application has been made for the site's residential redevelopment (ref: 01/05383/FUL). This suggests that, notwithstanding the previous retail activity on it, the site may not be commercially attractive for shopping development or refurbishment. The existing buildings on the site are of some architectural interest and local prominence, being multi-storeyed and obviously designed for industrial use. They adjoin a listed building, the church of St John the Evangelist, erected in 1901 (Pevsner). The current proposal is for the erection of a 4-storey block of 62 flats with limited (about 75%) on-site parking provision. The allocation envisages some form of mixed development and advocates the possible use of the former industrial premises, which are not without a certain functional simplicity and charm. Although the site is currently the subject of an evidently favoured planning application, it is still necessary to consider the objections to Policy HW3. As noted earlier, the policy will stand for the currency of the Local Plan, regardless of the nature or submission of planning proposals for the site during that period.

6.4.2 Although the HW3 allocation is within the Town Centre Inset Map, it is outside the recommended Policy S1 area definition. Its isolated redevelopment will accordingly have no direct bearing on the regeneration of the Town Centre as a whole. It essentially forms part of the Policy S5 Local District Centre which is presumably why, with some justification, the LPA have specified a retail option for the allocation. As in the case of Policy HW2, it would be inappropriate to specify a precise affordable housing component, especially since the Policy calls for the possible rehabilitation and conversion of the former industrial building. From a townscape perspective and having regard to the proximity of the listed church building, this would seem a welcome course for redevelopment to take. Since the economic balance of such rehabilitation schemes are notoriously difficult to forecast with precision, it might well forestall any such initiative to prescribe any minimum level of housing content, still less social or affordable housing.

6.4.3 The objection relating to decontamination and possible remedial works indeed adds force to this argument. If there are, as claimed, any sources of contamination relating to past industrial processes, these may well complicate the developmental equation. These problems are for prospective developers, in consultation with the Environment Agency, initially to address. The matter is covered by Policy G18 (see earlier) as modified by PIC 2/11. Soil and other surveys may possibly reveal difficulties of excavating sub-surface accommodation or of forming extensive foundations. That may well influence the form and content of development and indeed favour the rehabilitation and conversion option suggested in the Policy’s formulation. It may also influence or determine the extent and nature of on-site parking, the subject of another objection asserting inadequacy. In any event, the high accessibility of the site points to minimal parking provision, an aspect reflected in the current planning application.

6.4.4 The question of the future growth of home computer and catalogue (mail order) shopping is raised in a number of objections, including objections to this particular allocation. No very reliable or conclusive evidence is available, either as a result of appearances at the Inquiry or in the written representations. The best that can be said is that home shopping is growing steadily but accounts for less than 5% (in value) of convenience sales, to take one example. It will presumably have a lesser impact on comparison shopping, although home deliveries may play a growing part in this sector. Nevertheless, even if it burgeons, the direct effect on overall shopping floorspace may be comparatively small. More likely direct effects might well be the reduced demand for ancillary parking provision. Equally, the split between gross and net floorspace may alter in the sense that stockholding and distribution may be of greater relative importance with an increased ‘remote shopping’ turnover. It is certainly not possible to query the overall extent of the Local Plan’s present retail provisions at this stage on the basis of the available evidence.

## RECOMMENDATION

- TC04/1 No modification.

## HW4: HIGH WYCOMBE TOWN CENTRE – DOVECOT & OXFORD ROAD

### The Objections

|         |                                      |
|---------|--------------------------------------|
| 0173/11 | W J Whitehead                        |
| 0872/27 | Government Office for the South East |
| 1196/3  | Post Office Property Holdings        |
| 1210/2  | Sainsbury’s Supermarkets Limited     |

### PIC 6/4 Objections

1210/4 Sainsbury’s Supermarkets Limited

### Summary of Objections

- (a) Revised car parking standards should apply on the site.
- (b) Reduce car parking, which would generate unnecessary car-use.
- (c) Car parking criterion should be amended to delete reference to ‘no net loss of public car parking’ and be replaced with a requirement for an assessment of the transport and parking implications to be submitted in support of any proposal.
- (d) Proposal does not seek to protect existing and future service access functions. Proposal may have operational, security and legal implications for the Post Office and other town centre uses.
- (e) Boundary limits of Policy should be amended to include the whole parcel of land bounded by Archway, Bellfield Road, Oxford Road and the railway line.
- (f) Maintenance of a viable secondary shopping frontage to Oxford Road presents an unduly restrictive requirement and restricts the options for redeveloping the site.
- (g) Identification of Dovehouse Road as part of the Council’s road improvement strategy should be removed.

### Inspector’s Reasoning and Conclusions

6.5.1 The extent of the Policy HW4 allocation very largely equates to the three existing street blocks which include it (these will presumably be united on redevelopment). It seems to be very reasonably defined in that it logically excludes obviously recent office development and the railway embankment to the north. Clearly, the recent development is unlikely to alter in form or function during the Local Plan’s currency. Equally, the high railway embankment will remain as it is since this location for a new Chiltern Line station has been ruled out for the foreseeable future (as noted earlier). Since this significant barrier to easy pedestrian movement and inter-visibility is likely to remain, the town centre for retail purposes under Policy S1 might quite logically be drawn along the railway centreline. This would exclude the Safeway site but include the HW4 allocation, effectively defining the former as edge-of-centre and the latter as town centre for the application of relevant policies in future.

6.5.2 The effect of PIC6/4 would be to remove any separately prescribed policy reference to on-site car parking. This would seem wise and would effectively meet two of the objections. The current Appendix 10 provision for this allocation, with respect to major retail development, would be in the range of 1 space/20-30 sq m (gfa). It should be noted that this is well below the PPG13 *maximum* national standard (Annex D) of 1 space/14 sq m (gfa). However, the parking provision on-site at present is not dedicated to the existing Sainsbury’s supermarket customers, their being subject to the normal public car parking tariff. No doubt this arrangement will be perpetuated on redevelopment, whatever the final level of car parking and parking charges the LPA see fit to authorise in due course. That would seem to accord with best modern practice in both restricting parking in accessible areas and in seeking to make its availability as flexible and market-sensitive as possible. In any event, it would not be proper to specify provision in advance; PIC6/4 is accordingly endorsed.

6.5.3 The safeguarding of vehicular servicing and access functions is largely a matter for road traffic regulation and is not relevant to a statutory development plan (see also paragraph 6.2.9). The definition of the frontage along Oxford Road (A40) as a secondary shopping frontage under Policy S4 appears to be reasonable. This will help to maintain a lively appearance on a major entrance to the town centre (as defined for the purposes of Policy S1). It will complement the retail redevelopment scheme directly opposite, as proposed by Policy HW1. It will also occupy

an extremely favourable trading position, for a range of Class A1-3 uses, relative to a probable centre of pedestrian activity in and around the proposed new bus station and crossing point of the dual carriageway. If the Policy HW4 requirement of rear servicing to the shopping is secured, there will be every reason to achieve either comprehensive or incremental redevelopment. For the last reason alone, the associated access road improvement provided under Policy T20 is justified.

### RECOMMENDATIONS

- TC05/1 Modify Policy HW4 as proposed by PIC6/4.

## HW5: HIGH WYCOMBE TOWN CENTRE- LILY’S WALK (FORMER GAS WORKS)

### The Objections

See Appendix 6C

### PIC 6/2 Objections

|         |   |
|---------|---|
| 0137/19 | The High Wycombe Society                |
| 0509/11 | Lattice Property (Formerly BG Property) |
| 0839/24 | Grange Action Group                     |
| 1042/28 | Mr J D Burnham                          |
| 2409/4  | N A Smith                               |

### Summary of Objections

- (a) Object to the policy in that only ‘an element’ of residential accommodation is required and no minimum target is set. Maximum residential accommodation should be provided in the town centre. Site suitable for housing for senior citizens; for affordable housing; for additional housing for Wycombe College.
- (b) Policy does not make best use of the site in terms of town centre regeneration.
- (c) Full account should be taken of the development of home computer and catalogue shopping in assessing retail floorspace requirements.
- (d) There is adequate commercial property available in the area.
- (e) Gas Works site is not presently easily accessible. Development would result in significant alterations and traffic movements in the area.
- (f) Policy is contrary to national, regional and structure plan policy in terms of location for retail development.
- (g) Retail element of the site should not be restricted to warehousing uses and the sale of bulky goods. A1 uses would be appropriate.
- (h) Retail development on the site could undermine the viability of the Western Sector proposal.
- (i) Object to retail warehousing on site. Consider other uses are more appropriate. Development on the site should complement rather than compete with Western Sector.
- (j) Development of the site is unduly constrained. Range of suitable uses should be extended to offices, restaurant and unrestricted retail development and should exclude bus maintenance facility.
- (k) Retail warehousing will create an inappropriate building form on the site.

- (l) Clear locational preference for Lilly’s Walk site to be supported for retail development, in advance of the Wycombe Marsh site, should be made explicit.
- (m) Area has a number of potentially contaminating activities where redevelopment poses a risk to groundwater quality. Sufficient investigation must be carried out and a high level of remedial treatment achieved.

### Inspector's Reasoning and Conclusions

6.6.1 The objections that are summarised as ((a-d) and (m)) have already been considered in relation to other Town Centre policies (see HW1-3 above). A locational preference for retail warehousing on the Former Gas Works site (as opposed to Wycombe Marsh) is not appropriate for the reasons that are given in section S2 of this report. In the nature of things, it is highly likely that the Gas Works site will in fact come forward for redevelopment before Wycombe Marsh. Undoubtedly, there are problems of process contamination on both but the latter also has the problem of being linked with the relocation of an operational sewage works and its expensive and complicated installation and expansion elsewhere. The Gas Works site is clearly not ideal for its intended purpose; in particular, the difference in levels between one principal frontage and another will make it the more difficult to dispose the large-volume buildings which warehousing involves. Nevertheless, the existence of an outstanding planning application strongly suggests that it is not commercially unattractive.

6.6.2 It is certainly true that the site is not at present especially accessible. However, if seen in the context of the Western Sector redevelopment, this difficulty is significantly lessened. Not only is the prospect of linked comparison shopping trips very much enhanced but the available off-street parking provision of both destinations will be closely related in capacity and proximity. The two proposals are complementary in that retail warehousing would be commercially and spatially unattractive and incongruous on the inevitably expensive and complex new shopping focus but appropriate in the directly adjacent and redundant public utility site. The cross-fall on the latter, although a complication in relation to development, will help to ensure that the bulk of the new buildings will be assimilated in an edge-of-centre situation. Given the restricted size of the area available and its probable development costs, together with a probable requirement for some housing, the added complexity of trying to combine unrestricted Class A1 and retail warehousing would make the site commercially unattractive for the latter use.

### RECOMMENDATIONS

- TC06/1 Modify Policy HW5 as proposed by PIC6/2.

|   |
|---|
| <b>HW6: HIGH WYCOMBE TOWN CENTRE – PEDESTRIAN PRIORITY AREA</b> |
|---|

### The Objections

1042/6                      Mr J D Burnham  
1196/1                      Post Office Property Holdings

### Summary of Objections

- (a) Policy should be improved to contain details on kerb heights, to ensure safety standards are maintained.
- (b) Proposal does not seek to protect existing and future service access functions. Proposal may have operational, security and legal implications for the Post Office and other town centre uses.

### Inspector's Reasoning and Conclusions

6.7.1 A great deal of the existing Town Centre area has been either fully pedestrianised or at least been given a substantial (and welcome) degree of pedestrian priority by traffic regulation and by time-sharing. Policy HW6 envisages that pedestrian amenity and safety will be extended as circumstances permit, initially in the Frogmoor area under Policy HW7. This is also to be welcomed and the evidence of earlier pedestrianisation measures suggests that they have not seriously inhibited or prevented safe, secure and convenient access by motor vehicles to individual premises. In any case, such access is essentially a matter for road traffic regulation, which is governed by other legislation. Similarly, details of traffic engineering such as kerb heights, use of bollards etc have no place in a land use plan. The LPA may wish to adopt a slightly different and less detailed Proposals Map notation in relation to the application of Policy HW6 (as shown on the illustrative Policy S1 extract in this report) but this is not a matter for formal recommendation.

### RECOMMENDATION

- TC07/1 No modification.

## HW7: HIGH WYCOMBE TOWN CENTRE- FROGMOOR & OXFORD STREET

### The Objections

See Appendix 6D

### Summary of Objections

- (a) Object to the policy in that only 'an element' of residential accommodation is required and no minimum target is set. Site suitable for provision of housing for elderly and student accommodation for Wycombe College.
- (b) Policy does not make best use of the town centre area.
- (c) Full account should be taken of the development of home computer and catalogue shopping in assessing retail floorspace requirements.

### Inspector's Reasoning and Conclusions

6.8.1 Most of the above objections are common to other Town Centre policies (HW1-HW3) and are addressed elsewhere in this report. The Frogmoor enclave is clearly important in that it is not only inherently attractive in a townscape sense but also occupies a pivotal position as between the older established central area and the Policy HW4 redevelopment area. With the latter it has a slightly tenuous but segregated pedestrian subway connection and the triangular open expanse of Frogmoor is likely to benefit from the Policy HW6 pedestrian proposals. The application of the present policy will give a degree of priority to Class A3 food and drink outlets. This would seem appropriate in view of the area's slightly peripheral location. It is difficult to see how an alternative policy formulation would do more for the regeneration of the Town Centre as a whole. The difficulties of securing more direct vehicle access and limitations on available off-street parking would seem to favour the relatively low-key nature of the proposals.

### RECOMMENDATIONS

- TC08/1 No modification.

**HW8: HIGH WYCOMBE TOWN CENTRE - RAILWAY STATION**

**The Objections**

|         |  |
|---------|--|
| 0351/5  | John Laing Property  |
| 0376/27 | Axa Equity and Law Life Assurance Society PLC                        |
| 1073/6  | East of Amersham Hill Residents Association                          |
| 1798/6  | <i>Buckinghamshire County Council – Environmental Services Dept.</i> |

**Summary of Objections**

- (a) Policy should be revised to reflect the development potential of the site; to include, commercial offices, retail, hotel or residential uses, as well as allowing for improvements to the existing station and public transport facilities.
- (b) Object to provision of replacement parking at the station, as a proposal to provide a new ‘Park and Ride’ facility at Gomm Valley would better meet sustainable transport objectives.
- (c) Any replacement parking must have the same level of security as the current car park. The option of using Easton Street multi-storey is unacceptable.
- (d) The importance of the pedestrian access from the town centre to the railway centre should be more explicitly acknowledged.

**Inspector's Reasoning and Conclusions**

6.9.1 The area surrounding High Wycombe railway station is at present very poorly laid out and clearly both requires (and would provide) opportunities for redevelopment. It is accordingly and quite properly the subject of a detailed planning brief that is evidently supported by Railtrack, the train operating companies (TOCs) and intending developers. A key part of the allocation site is within a designated conservation area. It will have to recognise this sensitive location and accommodate several important functions, including passenger handling (on a very probably increased service frequency), and a bus-rail interchange. There are also considerations of future linkage between two of the possible P+R bus services, ease of pedestrian access from the residential hinterland and towards the town centre and existing and future public car parking. The latter is a critical design component. It will not only have to serve rail commuters but also accommodate the needs of employees within the on-site enabling office development and, in addition, short-stay parking for town centre activities.

6.9.2 The situation is further complicated by the proposal to safeguard a bus-only link (under Policies T11-12) along the disused formation of the High Wycombe-Bourne End branch railway (closed in 1970). This is a key transport proposal since it would not only offer excellent change of mode facilities and bus priority to and through the station but also a means of bypassing the congested A40 corridor. This latter effect would be enhanced if, as seems feasible, the bus-only link were to be extended across the A40 and through Wycombe Marsh on redevelopment. This would provide a roughly 2-kilometre long and largely segregated channel for both normal bus services and P+R limited-stop provision and might greatly improve public future transport accessibility in the eastern half of High Wycombe. For this reason, the busway, passenger interchange, pedestrian and cycleway access ought perhaps to be more explicitly prioritised in the precise formulation of Policy HW8.

6.9.3 Such prioritisation is clearly regarded with some misgivings by objectors, notably by local residents who are concerned about the effects of all-day commuter parking overspill. As the supporting text makes clear, the degree of alternative forms of access means that the obvious opportunity exists to ‘minimise the use of the private car’. This will be a difficult solution to reach

because commercial pressure will exist from both developers of the office floorspace and indeed Railtrack and the TOCs to maximise commuter parking provision and (in particular) its primacy of location within the overall site. Against this must be placed, according to PPG13 advice, the clear utility of displacing at least an element of the present parking capacity in the direction of the more remote P+R locations, to be determined in future under (modified) Policy T17. The balancing of long-term versus short-term parking supply (including that within the nearby public car parks) and future demand will be a matter for economic judgement, pricing policy and on-street traffic regulation.

6.9.4 Without seeking to comment on either existing or future planning briefs for the site, it is doubtful whether the extent of redevelopment or the complexity of physically integrating offices, a new bus link, car parking and passenger interchange would leave a great deal of scope for hotel or other development. It is a little anomalous that the Policy HW8 allocation *includes* the present open car park to the north-east but *excludes* the Easton Street multi-storey car park to the south. Both are operated by Wycombe DC but the latter is actually better integrated with both the main road network and the railway station booking hall. It is conceivable that longer-term redevelopment might secure a greater mix of uses if the allocation were extended. For this reason, it is recommended that the multi-storey car park be included in the policy allocation. Apart from anything else, the provisions of Policies T5, T9 and T19 would combine to point to the latter’s inclusion in order to at least offer the prospect of better pedestrian access, improved inter-modal movement and the overall control of car parking provision.

6.9.5 The objection that relates to P+R provision to the east at Gomm Valley cannot be supported on the available evidence. Firstly, this proposal is not included in the LTP and it is difficult to see how it would effectively function without a railway station or halt. If it were to act as an intercepting car park for car-rail interchange, it would need such a facility. Otherwise, such trips would involve a 3-stage car-bus-rail trip on both outward and return legs of a rail commuter journey. This would seem to be of extremely doubtful attractiveness and do little to encourage modal shift. The possibility of establishing P+R facilities at both Gomm Valley and Grange Farm will be discussed later under Policy T17. For the time being it is enough to note the improbability of either a Gomm Valley or Gomm Road halt on the Chiltern Railway line, in view of the operational difficulties earlier reviewed (see under HW1). The future displacement of station commuter parking is certainly a long-term possibility but the T17(i-ii) P+R locations at Hazlemere or Wooburn Moor would be preferable locations for this and more in tune with PPG13 advice.

## RECOMMENDATIONS

- TC09/1 Modify Policy HW8 to read:

### POLICY HW8

THE SITE, AS DEFINED ON THE PROPOSALS MAP, SHOULD BE COMPREHENSIVELY REDEVELOPED SO AS TO INCLUDE:

- (1) IMPROVED RAILWAY AND BUS PASSENGER FACILITIES IN A NEW OR EXTENDED STATION BUILDING;
- (2) INTEGRATED PUBLIC TRANSPORT INTERCHANGE PROVIDING FOR SAFE AND EASY TRANSFER BETWEEN RAIL, BUS, CAR, TAXI AND CYCLE TRAVEL MODES;
- (3) FOOTPATH AND CYCLEWAY ACCESS POINTS AND CONNECTIONS FROM ALL DIRECTIONS, INCLUDING IMPROVEMENTS TO BIRDCAGE WALK;
- (4) A BUS-ONLY LINK THROUGH THE SITE TO LINK CRENDON STREET WITH THE FORMER HIGH WYCOMBE-BOURNE END BRANCH RAILWAY [POLICIES T10-11];

(5) USE CLASS B1 OFFICE DEVELOPMENT ON THE EXISTING CAR PARK SITE; AND

(6) CAR PARKING FOR FUTURE RAIL USERS AND THE OPERATIONAL NEEDS OF THE NEW DEVELOPMENT TO BE ASSESSED ON THE BASIS OF UNIFORM CONTROL OF ALL SUCH PROVISION WITHIN THE HW8 POLICY ALLOCATION.

- TC09/2 Include Easton Street multi-storey car park within the site allocated for comprehensive development under Policy HW8.

## HW9: HIGH WYCOMBE TOWN CENTRE - SWAN FRONTAGE

### The Objections

0158/28 High Wycombe and Marlow Green Party

### Summary of Objections

- (a) Question the cost of improvements to the theatre and surrounding buildings.

### Inspector's Reasoning and Conclusions

6.10.1 The question of the likely cost of either re-locating the Fire Station or improving the forecourt arrangements at the Swan Theatre is not one that the Local Plan can address, nor does it do so. As the supporting text correctly states, the two uses are badly related in an urban design sense, although both functions clearly demand accessible and prominent sites. All that the policy sets out to do, presumably with the approval of Bucks CC as major landowner, is to embargo any other development proposals that might complicate or even inhibit the future (unspecified) improvement of the setting of the Civic Theatre or prevent the re-location of the Fire Station. The objection cannot therefore be supported since the costs of future public investment are not directly involved and might conceivably be reduced by the policy’s implementation.

### RECOMMENDATION

- TC10/1 No modification.

## HW10: HIGH WYCOMBE TOWN CENTRE WEST WYCOMBE RD & DESBOROUGH AVE

### The Objections

0872/28 *Government Office for the South East*  
1376/1 Mr J Herring Risk Management Services  
1378/1 Mr Sharma  
1383/1 Mr R G Pearson

### Summary of Objections

- (a) Policy could be easily misinterpreted; the new parking standards are maxima not minima. Delete word ‘minimum’.

- (b) Policy should only relate to the development potential of the site (in view of the fact that there is no prospect of the road widening scheme taking place and the fact that the emphasis of transport policy has changed). Land should be made available for a wider range of uses than at present with an emphasis on public transport.

### Inspector's Reasoning and Conclusions

6.11.1 As the supporting text makes clear, the implementation of Policy HW10 depends on the possible bringing forward of junction improvements by the local highway authority. In view of the apparent uncertainty surrounding the site’s redevelopment, it is probably better to delete the policy until the future of road widening or junction improvement is clear and committed in a future LTP. The existence of the policy implies that non-residential development would be acceptable, given certain urban design requirements. There exists the clear danger that a future form of development might conform to a highway improvement scheme which is not implemented. Alternatively, it might prevent its implementation in the optimum form required for the safety and free flow of all forms of traffic, including pedestrians and public service vehicles. In other words, the policy does not provide, for development control purposes, the requisite reasonable degree of precision and certainty that PPG12 advocates.

### RECOMMENDATION

- TC11/1 Delete paragraphs 6.56-6.57 and Policy HW10.

## HW11: HIGH WYCOMBE TOWN CENTRE – ADDITIONAL POLICIES

### The Objections

0816/5                      Invensys PLC  
0834/12                     Prudential Assurance Company Ltd

### Summary of Objections

- (a) Recommend a new general policy for High Wycombe, to deal with the effect on the existing town centre of new development expected during the plan period; a phasing strategy for development proposed in Policies HW1 – HW10. The Plan does not provide for transitional arrangements to cover the period of adjustments as new development schemes are occupied. There is no policy that seeks to protect and enhance retailing in the existing town centres.
- (b) Propose a new policy relating to land that is surplus to Compar’s operational requirements at the Hughenden Avenue site. Policy should allocate a mix of uses, the balance to depend upon the operational and employment requirements of Compar.

### Inspector's Reasoning and Conclusions

6.12.1 As will be evident from the consideration of objections to Policy HW1, the LPA have quite properly allocated increases in both comparison and convenience retail floorspace on the basis of competent advice and in accordance with national guidance. There is accordingly no need for the phasing of development in the sense which is intended by paragraphs 6.9-6.13 of PPG12. In this case, ‘and overall assessment of development requirements....for retail’ would appear to be in order. Any additional needs for retailing may be accommodated within the town centre, as defined by Policy S1, having regard to the effect of such development upon viability and vitality of the centre, among other things. The safeguarding of existing retail premises and monitoring of change will be the subject of Policies S3 and S4 within all three centres specified by the Local Plan. Given the range of available policies, an additional policy would seem to be

unnecessary. Any policy relating to Hughenden Avenue is outside the ambit of High Wycombe Town Centre and is dealt with under Policy E2 (0186/1).

### RECOMMENDATION

- TC12/1 No modification.

## M0: MARLOW TOWN CENTRE – TRAFFIC AND TRANSPORT

### The Objections

|         |   |
|---------|---|
| 0158/29 | High Wycombe and Marlow Green Party         |
| 0059/2  | Mr A P H Bamford                            |
| 0402/7  | Mrs B K Wallis                              |
| 0872/29 | <i>Government Office for the South East</i> |
| 1260/18 | <i>The Marlow Society</i>                   |
| 1584/14 | The Marlow Group                            |
| 1584/15 | The Marlow Group                            |
| 1584/16 | The Marlow Group                            |
| 1260/48 | The Marlow Society                          |
| 1584/18 | The Marlow Group                            |

### PIC 6/7 Objections

|         |   |
|---------|---|
| 0840/59 | Marlow and District Chamber of Trade & Commerce |
| 1260/46 | The Marlow Society                              |
| 1279/13 | Mr David Coe                                    |
| 1281/13 | Great Marlow Parish Council                     |
| 2137/5  | Waitrose  |

### Summary of Objections

- (a) Paragraph contradicts policies that wish to maintain and develop viability and vitality. No reference made to repair works.
- (b) No reference to alternative measures to aid traffic at peak times.
- (c) No obvious means for general input into the proposed Transport Study.
- (d) Cycling into Marlow is dangerous and needs to be improved; suggest new routes.
- (e) Reference should be made to the Local Transport Plan and its relationship with the transport strategy for Marlow.
- (f) Respondent awaiting results of Halcrow Fox Marlow Transport Study, prior to suggesting any recommendations or solutions.
- (g) Greater emphasis should be paid to seasonal factors and the influx of visitors on weekends.
- (h) Marlow Bridge should be preserved in its present state (or strengthened).
- (i) Oppose the design of the ‘link road’.
- (j) Long term park and ride or similar, to the east of the bypass should be included.

- (k) Reference in paragraph 6.66 to ‘widespread environmental or non-safety traffic calming’ should be deleted.
- (l) Reference to the development of Portlands should be explicit in paragraph 6.67.
- (m) Until convenient alternative public transport is provided for, no prejudicial restrictions or expense should be applied to residents.
- (n) Parking and Transport Strategy and Local Transport Plan must be monitored and reviewed on a regular basis. Parking and Transport Strategy does not form part of draft Plan and represents Supplementary Planning Guidance. New or experimental traffic management regimes are undesirable.
- (o) Object to pedestrianisation of High Street.

### **Inspector's Reasoning and Conclusions**

6.13.1 Many of the above objections refer to policy matters that are the province of the adopted Buckinghamshire Local Transport Plan (LTP). There is a clear need for co-ordination between land use and transport plans and indeed their provisions sometimes overlap (eg Policy T17). However, it is essential to draw a clear distinction between purely land use planning policies and exclusively transport planning policies. There is absolutely no point in including the latter in a planning document concerned with the use and development of land and buildings. In any event, the legal bases (and procedures) for controlling land use and regulating traffic are contained in separate statutes. Moreover, the funding and budgeting of such activities is quite often split between the private sector (in the case of development) and the public sector (in the case of road traffic engineering and control). It is necessary to lay stress on this point in connection with Marlow Town Centre policies, in particular, since many of the objections appear to overlook or to be unconscious of this basic distinction.

6.13.2 It is noticeable that, although the recently completed Marlow Parking and Transportation Study has now, according to the LPA (WDC/M2/1), ‘been integrated into the LTP’ (CD/M/18(e)) it is fairly obvious, from the latter document, that this principally means policy integration and some selective re-wording. This has mainly been done by means of PICs 6/6-6/13 (inclusive), to some of which objection has duly been made. The nature of these objections, both to the Deposit Local Plan and the subsequently proposed changes (including FPIC 6/17) strongly suggest that local public opinion is distinctly polarised. This polarisation even extends to divergent views within the same submissions. The degree of controversy has evidently resulted in the Local Plan’s containing few proposals for new road construction, junction improvements and detailed traffic management. Certain objections against detailed policies are not so much against the policies themselves. They are rather against the future effect that these policies might have in relation to real or imagined or wished-for elements of the previous Transportation Study’s tentative proposals.

6.13.3 Among the more contentious aspects of transport planning is the future care and traffic function of the handsome 1831 suspension bridge across the Thames, designed by a pupil of Thomas Telford and rebuilt in 1964-1966 (Pevsner: Buildings of England (1994)). Reference to the bridge in paragraph 6.66 of the Local Plan is proposed for deletion by PIC 6/7 as being too detailed. Various objections are raised in connection with its future maintenance, its closure to vehicle traffic or to the control of traffic across it, including tidal flow working. These are not, in the main, land use planning matters. The bridge is a grade I listed structure in the possession of the local highway authority. This means that its future is well assured but that its precise future traffic function is inevitably limited, as at present, by speed, weight and width restrictions. It may be that further restrictions may be placed upon it. That is primarily a matter for the relevant authorities, including the DTLR. PIC 6/7 is endorsed since no planning purpose is served by retaining the original paragraph 6.66.

6.13.4 The question of the control of peak-hour or seasonal traffic is not directly a planning

matter. Primary control over the hours of movement of traffic may, to an extent, be secured by parking pricing mechanisms; these are for the highway authority to impose. Some indirect control is possible by means of time-limiting conditions imposed on individual planning consents (eg opening hours for retail trading) but this is too detailed a matter for the Local Plan. The question of additional cycling facilities and routes are essentially for the LTP. Since no additional cycleways are proposed in the LTP, it is not possible for the Local Plan to initiate them, except to the limited extent that provision may be required on individual development sites (see Policies T7-8). The pedestrianisation of the High Street is not currently a proposal of the Local Plan. Its need and future feasibility is very much bound up with the provision of the equally controversial Portlands Link Road. This is considered in relation to Policy M4-M5.

6.13.5 There are no firm proposals for Park and Ride (P+R) proposals for Marlow. This omission is the subject of objection. The subject is touched on in paragraph 6.74 but is without specific policy backing. Any such ad hoc provision would be subject to permissive Policy T17 (if modified as proposed). The matter is dealt with later in this report (see Policies T17 and RT19). All that can be reliably concluded at this stage is that the ambitious proposals by the Marlow Group appear unlikely to be adopted. It is doubtful whether a fairly small market town of about 15 000 population and of limited overall size could indeed support the multi-route and terminal system envisaged and proposed by the Group. Moreover, the requirement to locate several car parks within the Green Belt or AONB surrounding Marlow would be a difficult exercise. In addition, these car parks would need to absorb displaced central area parking if PPG13 advice is to be followed. Such displacement would be resisted by some residents and most traders and might accordingly run counter to Policy M2.

6.13.6 The objections to certain of the (revised) paragraph 6.66 bullet-point objectives (1-6) cannot be supported. These objectives derive from the agreed Parking and Transportation Study and also appear to be broadly consistent with national and strategic planning guidance. They seem accurately to reflect the objectives of the LTP, as far as these are directly applicable to land use planning. Environmental traffic-calming would be particularly appropriate in Central Marlow, virtually all of which (ie the Inset Map defined area) is within a designated conservation area. To the very limited extent that traffic-calming is already in force (eg within the High Street) it would seem singularly successful and indeed necessary if the second above objective is to be achieved. In no sense can it be regarded as the imposition of unfair restrictions or unnecessary expense as far as residents or car users are concerned. The submitted views of the Marlow Group and the Marlow Society appear to diverge somewhat on this aspect of policy but it is fair to comment that the former are more in tune with the spirit of advice contained in PPGs13 and 15 and in companion planning guidance.

## RECOMMENDATIONS

- ❑ TC13/1 Modify Chapter 6 in accordance with PIC6/6-6/8 inclusive.
- ❑ TC13/2 Letter the bullet points under paragraph 6.66 (as revised by PIC6/6) as (a)-(e).

## M1: MARLOW TOWN CENTRE - PEDESTRIAN AND CYCLIST PRIORITY

### The Objections

|         |   |
|---------|---|
| 0281/1  | John Marsden Barraclough                        |
| 0840/20 | Marlow and District Chamber of Trade & Commerce |
| 1042/20 | Mr J D Burnham                                  |
| 1260/26 | <i>The Marlow Society</i>                       |
| 1568/1  | Miss Daphne H Roberts                           |

## PIC 6/9 Objections

0840/60 Marlow and District Chamber of Trade & Commerce

### Summary of Objections

- (a) Insufficient thought given to the present and future traffic situation on A4155, between Oxford Road and Chapel Street. Re-examination of 'north-east relief road' should be included in Marlow Transport Study.
- (b) Policy should include provision for secure and convenient cycle parking.
- (c) Oppose pedestrianisation of High Street.
- (d) Policy should not be restricted to named streets; reference to High Street, West Street and Spital Street should be deleted.
- (e) Delete word 'significant' in policy wording 'do not result in significant'.
- (f) Chapel Street should not be excluded from any improvements to cyclist and pedestrian conditions.
- (g) Object to the pre inquiry change to remove the names of specific streets where the most difficulties lie.

### Inspector's Reasoning and Conclusions

6.14.1 The objection which relates to the inclusion of proposals for a north-eastern relief road (ie between Riley Road and Dean Street) in order to connect routes A4155 and B482 cannot be supported. The main reason is that this proposal does not figure in the LTP and accordingly should not be included in the Local Plan. The LPA's assessment is that such a scheme is out of place in the Marlow Conservation Area and paragraph 5.4 of PPG15 certainly endorses this view. A roughly parallel proposal (by some of the Marlow Group) is to introduce one-way traffic working around the circuit of Cambridge Road (or Queens Road)-Dean Street-Spittal Street-West Street-Oxford Road to substantially the same effect. The LPA oppose this and their opposition is supported. Not only is the proposal not contained in the LTP but such an imposition on purely residential streets was roundly condemned as unwise, intrusive and socially divisive by the Buchanan Report (Traffic in Towns) as long ago as 1963. This general view is most recently reflected in paragraph 5.18 of PPG15. Paragraph 6.67 (as amended) makes it clear that High Street pedestrianisation is not a live option within the Local Plan period.

6.14.2 A requirement for cycle parking, the subject of objection (b) above, is out of place since it is adequately covered in Policy T8 and Appendix 10. The naming of specific streets for pedestrian and cycle improvements is proposed for deletion in PIC6/9 and this is endorsed as adding flexibility to what is essentially a land use policy directed at development control. For this reason, the addition of Chapel Street would be inappropriate and illogical. Conversely, the inclusion of the names of the main traffic routes within the conservation area is necessary. The reason is that individual development control decisions may well be based on traffic assessments and the imposition of planning conditions may need specific policy backing. The reasons will become clear when allocations M4 and M5 are later considered. Chapel Street does not need specific mention since the street names clearly indicate the entire length of the A4155 through Central Marlow. The retention of the word 'significant' is needed since development control decisions have to be based on significant (and not merely marginal) future increases in traffic generation.

### RECOMMENDATIONS

- ❑ TC14/1 Modify Chapter 6 in accordance with PIC6/9.
- ❑ TC14/2 Letter the criteria of Policy M1 (a)-(c).

**M2: MARLOW TOWN CENTRE - CAR PARKING**

**The Objections**

|         |   |
|---------|---|
| 0158/33 | High Wycombe and Marlow Green Party             |
| 1042/21 | Mr J D Burnham                                  |
| 1584/22 | The Marlow Group                                |
| 0158/34 | High Wycombe and Marlow Green Party             |
| 0840/21 | Marlow and District Chamber of Trade & Commerce |
| 0872/30 | <i>Government Office for the South East</i>     |
| 1584/10 | The Marlow Group                                |

**PIC 6/10 Objections**

|         |   |
|---------|---|
| 0840/61 | Marlow and District Chamber of Trade & Commerce |
|---------|---|

**PIC 6/11 Objections**

|         |   |
|---------|---|
| 0840/62 | Marlow and District Chamber of Trade & Commerce |
| 1260/47 | The Marlow Society                              |
| 1279/14 | Mr David Coe                                    |
| 1281/14 | Great Marlow Parish Council                     |
| 2137/3  | Waitrose Limited                                |

**Summary of Objections**

- (a) Safeguards, together with management and enforcement, should be put in place to prevent visitors by-passing and abusing parking measures in the town’s residential areas.
- (b) An integrated transport system for Marlow should be given the highest priority. Small car parks and outer car park should be provided, linked by subsidised shuttle buses, footpaths and cycle-ways to the town.
- (c) Railway station suffers from limited parking.
- (d) The wording ‘promotes’ park and ride should be amended to read much more positively, to actually enable park and ride. Disagree with the aim to maintain overall number of parking spaces; this is not conducive to a national integrated transport policy that would offer alternative modes of transport, resulting in few car parking spaces being required.
- (e) Policies required that restrict the central area parking to shoppers and visitors (short stay), but which create workers parking (long stay) and which are consistent with DETR guidance, requiring an integrated transport policy which seeks to reduce traffic movements.
- (f) Policy implies a haphazard approach to parking rather than a co-ordinated strategy for the town. Difficult to see how this type of approach can lead to reduced car use.
- (g) Existing car parks should be extended both underground and up to a maximum of 2 storeys above ground.
- (h) Additional wording, as amended by Pre Inquiry Change, is ambiguous, imprecise, and should be deleted. No certainty as to what ‘other measures’ would be acceptable.

- (i) Any reduction in town centre car parks is unacceptable. Amend wording by adding ‘such as the inconvenience or expense to residents living outside the town boundaries but within its orbit, who have not been offered a convenient alternative public transport service.’

### Inspector's Reasoning and Conclusions

6.15.1 The matters referred to in objections (a-b), (e-f) and (i) above are essentially to do with the regulation of traffic, the imposition of car parking charges and the co-ordination of public transport. These problems must be addressed within the context of the LTP, which being non-statutory, is inherently more responsive to public opinion and budgetary opportunity than a development plan. As earlier explained, the function of the Local Plan is to control and bring forward proposals for the use and development of land and buildings so as to support (or at the very least not to conflict with) the complementary functions of the LTP. For example, if the present railway station were to be rebuilt or relocated or be supplemented by an additional halt on the branch line, parking provision might be specified by the LPA in accordance with the Local Plan. The loss of parking spaces, following any future development, will be resisted unless concurrent LTP proposals (eg P+R provision in specific locations conforming with Policy T17) are either implemented or firmly programmed. In such situations, PPG13 advice is to avoid an *overall* increase in public parking provision. The specific example of P+R is cited to show what the expression ‘*other measures*’ presumably means in the context of this policy. The relevant objection to this wording is accordingly not supported.

6.15.2 The objection which relates to the general adoption of multi-level off-street car parking is not supported for a variety of reasons. Firstly, as the LPA point out, such provision is inherently expensive and may well be difficult or impossible to put underground owing to the nearness of the water table to the local land surface. An examination of the Proposals Map and the application of Policies G20 and G21 graphically illustrates this risk. Equally (or more) importantly, the extent of the conservation area, the number, proximity and intimate scale of listed buildings and the general quality of Marlow’s townscape combine to suggest that most elevated car parks would be supremely out of place. Moreover, the fact that elevated parking decks and structures are physically difficult to permanently plant or landscape points to their general intrusiveness in Central Marlow, which is still reasonably well endowed with trees. The matter is of direct relevance to the M4 and M5 allocations and will be further considered there.

6.15.3 This question of unobtrusiveness is at the heart of urban design policies relating to Marlow Town Centre. The objection that alleges that Policy M2 is haphazard, piecemeal or lacking in co-ordination is difficult to understand. Examination of the siting of the five or so car parks in or around the central area suggests that a dispersed policy is more sensitive and appropriate. The objections (by the Marlow Group) in 1994 to previous food-store proposals for the Brewery-Portlands site were as much to do with the extent and intrusiveness of the car park as anything else. The intention of the present policy is perfectly coherent. An overall reduction in off-street parking will be resisted (by the land use planning process) unless and until balancing measures such as P+R operation, other local public transport services, cycleways and better pedestrian provision are achieved (by the combined land use and transport planning processes). So far from lacking in overall co-ordination, this would seem to be an admirably integrated approach.

### RECOMMENDATION

- TC15/1 Modify Chapter 6 of the Plan in accordance with PICs 6/10 and 6/11.

**M3: MARLOW TOWN CENTRE - REAR SERVICING**

**The Objections**

1832/3            B Drage  
1584/25        The Marlow Group

**Summary of Objections**

- (a)        The area used by delivery vehicles in Spittal Street, between the Crown and the Cross Keys, should be served from the service road, south of this road.
- (b)        There should be more effective enforcement of the policy for the use of rear servicing facilities, where these are provided. An independent study should be undertaken to identify problems and propose solutions.

**Inspector's Reasoning and Conclusions**

6.16.1 The objections relating to rear servicing within areas allocated under Policy M3 are not directed against the policy or its area of application but rather against enforcement. This is not a matter that can be addressed in the Local Plan and the objections are accordingly not supported. The LPA’s approach to rear servicing is interesting and worthy of support. Access to frontage shops is generally available to the east and south of Spittal Street and High Street; all that Policy M3 essentially prescribes is the retention (and by implication the continued use) of this facility. On the other hand, rear servicing is not so widely available elsewhere in the central shopping area. However, provision is made in Policies M4 and M5 for the safeguarding of provision in these area allocations. This is germane to both Riley Road and Portlands sites and will be considered under these headings.

**RECOMMENDATIONS**

- TC16/1    No modification.

**M4: MARLOW TOWN CENTRE - RILEY ROAD**

**The Objections**

0158/35        High Wycombe and Marlow Green Party  
0158/26        High Wycombe and Marlow Green Party  
0558/2        Retail and Foodstore Co-ordination Limited  
0830/5        Royal and Sun Alliance Property Investments  
0830/6        Royal and Sun Alliance Property Investments(0847)  
0840/33        Marlow and District Chamber of Trade & Commerce  
0847/1        Waitrose Limited  
1260/27        The Marlow Society  
1386/2        Dr Donald Grattan  
1584/51        The Marlow Group

**Summary of Objections**

- (a)        Decked car park not conducive to a national integrated transport policy that would offer alternative modes of transport resulting in fewer car parking spaces being required.

- (b) Concern at loss of car parking spaces.
- (c) Compulsory purchase powers should be included to assist with the regeneration of the site.
- (d) Policy as worded is fairly benign. Object to any Waitrose move to Portlands.
- (e) Concern at limited frontage of site to West Street.
- (f) Amend policy wording to state ‘the following issues need to be addressed’ rather than ‘the following will be required’.
- (g) Amend criterion (iii) to read ‘provision of public parking facilities reflecting present car parking facilities and any increased use of the site, including car parking provision, where feasible.
- (h) Policy is likely to be overtaken by events, e.g. Waitrose acquiring the Portlands site, and should be re-formulated to accord with reality of the situation.
- (i) Comprehensive retail development cannot be satisfactorily carried out on the Riley Road area due to land ownership and practical problems.
- (j) Policy is contrary to national planning guidance, as a better site is available for retail development at Portlands and it does not adopt a sequential approach. Riley Road should be reallocated for mixed residential and commercial uses.
- (k) Amend wording ‘quality active frontage’ to ‘good quality frontage of residential units’.
- (l) Policies M4 and M5 should be ‘switched’.
- (m) Should M4 fail to provide scope for additional food or other retailing, additional food retailing could be provided at Liston Road Car Park.

**M5: MARLOW TOWN CENTRE – PORTLANDS**

**The Objections**

|         |   |
|---------|---|
| 0158/37 | High Wycombe and Marlow Green Party             |
| 0371/5  | Marlow Town Council                             |
| 0709/8  | Bryant Homes Technical Services Ltd             |
| 0790/1  | J B Thomas                                      |
| 0830/7  | Royal and Sun alliance Property Investments     |
| 0840/23 | Marlow and District Chamber of Trade & Commerce |
| 0847/3  | Waitrose Ltd                                    |
| 1042/13 | Mr J D Burnham                                  |
| 1160/1  | Mrs S Moon                                      |
| 1260/28 | The Marlow Society                              |
| 1584/28 | The Marlow Group                                |
| 1866/2  | Mr R Cary                                       |

**PIC 6/12 Objections**

|         |   |
|---------|---|
| 0840/63 | Marlow and District Chamber of Trade & Commerce |
| 1260/44 | The Marlow Society                              |

**PIC 6/13 Objections**

0840/64 Marlow and District Chamber of Trade & Commerce  
1260/43 The Marlow Society

### Summary of Objections

- (a) Link road should not separate the residential western edge of the town from the town centre. Care must be taken to ensure that the road is not divisive in any way.
- (b) Design of junction at West Street should have regard to historic and attractive nature of street scene and for safety of pupils at nearby school.
- (c) Further clarification required on 'financial contribution to a wider package of accessibility measures'.
- (d) Object to criteria (iii); replenishment of lost car parking is not conducive to national transport objectives.
- (e) Object to word 'predominantly' residential use, as it is considered that the site could contain mixed use, including retail.
- (f) Delete residential allocation in favour of retailing or leisure, which is more appropriate in a town centre location. A large supermarket would be more sustainable on the site. Site is only one available and suitable for a comprehensive retail development in town centre. A sequential approach would support this site as more suitable than Riley Road.
- (g) Propose additional criterion; 'other land uses ancillary to the predominant residential use should be small scale, well related to its surroundings and should be close to the retail areas of West Street and High Street'.
- (h) Link road should be entirely funded by the developers.
- (i) Policy is likely to be overtaken by events, e.g. Waitrose acquiring the Portlands site, and should be re-formulated to accord with reality of the situation.
- (j) The location of the four terraced houses should be made clearer.
- (k) Pre Inquiry Change to paragraph 6.88, removing the words 'traffic impact' now renders the wording ambiguous.
- (l) Rear servicing needs to be provided to the rear of High Street and West Street.
- (m) Object to Pre Inquiry Change to criterion (viii); change is ambiguous and opens up the possibility of a significant reduction in car parking in the town. At least 64 car parking spaces must be provided in the town centre.

### Inspector's Reasoning and Conclusions

6.17.1 The allocations made under Policies M4 and M5 and the various objections made to them and to the wording of the policies and their supporting text are all considered together. The reason for this is that the most comprehensive and detailed objections, by Waitrose Limited (0847), in fact propose the substantial reversal of land use policies for the two sites. The objector's comparative proposals for the two sites' future redevelopment were presented at the inquiry and were then examined in some detail. Since the main purpose of the relevant appearances at the inquiry (and subsequently of this report) is directly to compare and contrast the planning merits of the two allocations, it is most appropriate to consider them together. This will be done by setting out the key site-specific issues and reaching conclusions upon them. An overall conclusion will then be made on the basis of the several issues raised. The report will then consider all the other objections which do not seek to oppose the policies in principle and recommendations will then follow.

6.17.2 The over-riding consideration governing the allocation of land in this development plan,

its relevant policies and their subsequent implementation by way of development control (and possibly by the compulsory purchase of property) must be the fact that both sites are located within the Marlow Conservation Area. It is necessary to bear in mind the paramount need to pay ‘special attention to...the [acknowledged] desirability of preserving or enhancing the character of the area’ (which has been determined to be of special architectural or historic interest (sections 69(1) and 72(1) of the Planning (LBCA) Act 1990)). The key issues which need to be considered within this overall and statutorily-determined policy context are:

- (1) the physical integration of the proposed development and its relationship with the pattern of surrounding land uses (which may be assumed to be largely unchanging);
- (2) the precise extent to which the intended pattern of development would either preserve the existing character of the conservation area or improve its future appearance;
- (3) the way in which the probable scale, form and layout of the future buildings would adequately reflect the urban grain and historic townscape of Marlow Town Centre;
- (4) the manner in which the retail component of the sites’ allocations would link with the existing shopping area and serve to maintain its functional status, vitality and viability;
- (5) the likely effects of the probable circulation of pedestrian, vehicular and servicing traffic upon both the environmental and physical capacity of the future highway network.

#### Relationship to Existing Patterns of Land Use in Marlow Town Centre

6.17.3 Central Marlow retains much of its historic pattern and the main street pictures are largely composed of statutorily and locally listed frontage buildings. The main streets, West Street, Spittal Street and High Street are laid out in a T-shaped pattern, centred on the fine Obelisk Milepost and the former Town Hall which mark their 3arm junction. The junction widens out to form a triangular open space (Market Square) within which gyratory traffic circulates. The carriageways and footways of all the streets are narrow by modern standards; those of the High Street have been adjusted in width at intervals to favour pedestrian traffic, to slow down moving vehicles and to provide embayed kerbside parking. The hinterland of all three streets is predominantly residential; to the north-west and north-east most buildings are relatively old. To the south-west there is much recent redevelopment, especially on the erstwhile Brewery site, either in the form of conversion or of fairly extensive new building around Malthouse Way to the south.

6.17.4 The main street frontages are dominated by retail and related uses, including a noticeable concentration of restaurants and other catering establishments. The pattern of shopping very much reflects the policy provisions of the Local Plan as regards primary and secondary frontages (Policies S3 and S4). All of the High Street (apart from the immediate bridgehead) and parts of the other two streets are defined as primary shopping. The entire area is potentially conducive to movement on foot, being nearly level at about 30-33 m AOD, and ease of access is helped by there being six perimeter car parks roughly within the range of 100-300 m from the centre, as defined by the Market Square. The Riley Road site (Policy M4) is slightly nearer this central space than the Portlands site (Policy M5) but both are at present slightly awkward of access on foot on account of the lack of permeability of the urban fabric and street frontages. The Policy M4 site is an amorphous and unsightly area largely devoted to open parking whilst the Policy M5 site is somewhat inaccessible and hidden and mainly consists of backland housing and garden ground with well-established (and protected) tree cover.

6.17.5 Both sites are similar to the limited extent that they are of roughly equivalent size and are both interposed between established shopping frontages and fairly extensive residential areas to the north-west or south-west of the town centre. There the comparison ends; the Policy M4 site has an open aspect to the north-west over public open space (subject to Policy L3) and is accordingly easy of pedestrian access from this direction. The Policy M5 site adjoins the former Marlow Brewery site and is potentially accessible from this direction but is very largely divorced (as far as future public access on foot is concerned) by an extensive gated and

walled residential enclave built on the Remnantz site. The imposition of this barrier to movement means that west-east passage on foot is largely impossible between West Street to the north and Pound Lane to the south, a distance of nearly 250 m. This lack of permeability is the subject of adverse comment by both the Marlow Society and the Marlow Group, the latter being anxious that it be forestalled in future development schemes by policy protection. Both sites are potentially easily accessible, by car, from the main road network.

#### Existing Character and Future Appearance of the Area

6.17.6 Of the two, it is fair to conclude that site M4 is most acutely in need of redevelopment and hence of potential enhancement on account of its present dismal condition. Site M5 would benefit from sympathetic development to the more limited extent that this would provide useful land for housing and might thereby facilitate pedestrian movement to and through it from both Portlands Alley and the Brewery site. It also might provide very badly-needed rear servicing facilities to the frontage shopping. In short, the *redevelopment* of site M4 might well greatly enhance the future appearance of the area whereas the *additional development* of site M5 might serve largely to protect its existing character. In both cases, a great deal would depend on the extent, scale and height of new buildings, site M5 being the more vulnerable in this respect since it is well endowed with trees at present and is also closely surrounded by either listed building groups or attractive modern residential development.

6.17.7 From the respective aspects of enhancement and preservation (ie the component features of conservation) it is difficult to fault the Local Plan’s allocations M4 and M5. A modern food-store and its attendant open parking and servicing areas are inevitably bound to be somewhat intrusive and invasive in an historic townscape such as Marlow. Given sensitivity of design and careful massing, such a building group might integrate well with the street scene of West Street (as does the existing Waitrose establishment). It could scarcely fail to improve the urban desolation of the existing public car park and surroundings and (again assuming careful design) its inevitable mass might relate well to the roughly 150x150 m expanse of the recreation ground to the north-west, a point reflected in criterion (ii) of Policy M4 in the Local Plan. Existing car parking provision could be retained but not necessarily the dedicated parking provision evidently sought by Waitrose Limited. Their indicative plans suggest that Riley Road might be realigned and rear servicing made available to properties in West Street.

6.17.8 Conversely, the intrusive impact of equivalent food-store development on the M5 site could scarcely be successfully mitigated. There is no extensive open parking provision here at present; any such provision would thus be additional and hence detrimental to both the area’s character and appearance. The requisite scale of building would overtop and dominate both adjacent frontage buildings and the hinterland of mainly recent residential development and conversion. There is no direct road access capable of accepting HGV or other substantial vehicle movement associated with food-store servicing. This would have to be contrived from both West Street and Malthouse Way, to the detriment of recently-established residential amenity in relation to freedom from noise and disturbance in the latter case. In both cases, the extensive manoeuvring needs of large goods vehicles would call for intrusive gyratory junctions on West Street. The effect may be gauged by the intrusively large 30-m external diameter roundabout laid out at the Pound Lane-Malthouse Way junction, presumably in anticipation of the Portlands Link Road.

#### Form and Layout of Future Buildings on the Alternative Sites

6.17.9 The essential feature of modern food-store layout and planning is an extensive, rectilinear and largely unobstructed retail sales area. In the case of the indicative Waitrose proposals this amounts to some 2100 sq m net sales area. This would equate to a gross floor area of about 2600 sq m which, at PPG13 (Annex D) maximum rates of parking provision would require some 185 spaces (or roughly 4600 sq m of surface parking). However, the indicative proposals for site M5 (Portlands) suggest that between 200-250 spaces would be sought in order to replace those lost on site M4 (Riley Road). Given that space for some additional

housing must be found and a 7.2 m wide single carriageway must be accommodated (Policy M5(vii)), this means that parking would have to be on two levels. These levels are conceived as ground level and underground (with ramp access). The effect of this form of development would be literally to marginalise the siting of the 10 new dwellings and the retained 6 houses at Portland Villas. In addition, the new link road would cut a broad swathe through the site and intersect Portlands Alley at an awkward scissors angle of about 40 degrees.

6.17.10 The above trading and parking provision requirements have been indicatively translated to the M4 site. The footprint of the existing Waitrose food-store on West Street is left partly untouched, 276 sq m (nfa) of which is evidently to be let to another retailer. Riley Road is realigned, to a comparable width as on site M5, with 15 m diameter gyratory circulation at the Oxford Road junction and also adjacent to the service yard. This yard is provided with a 25 m diameter clear manoeuvring area for articulated and rigid wheelbase HGV deliveries (the equivalent M4 site service area offers no such facility but calls for to-and-fro reversing movements). There would be provision for somewhat indirect rear servicing of shops and other premises on West Street. About 210 parking spaces would be provided, partly on the surface but mainly underground with passenger lift access to the main pedestrian access on the south front of the food-store. Other than from West Street, access on foot is somewhat tortuous and requires surface crossings of Riley Road to get to the main entrance.

6.17.11 The notional housing allocation of site M5 (50 dwellings on 16 000 sq m overall) is contrived, in the Waitrose indicative scheme, by dint of placing 10 terraced houses (or 5 houses and 21x2-bedroom flats) in the perimeter positions already noted. The balance of the required provision would be made in the form of a barrier single-aspect block of flats located between the recreation ground and the retained Riley Road car park. No alternative LPA scheme of residential redevelopment of the M5 Portlands site allocation is at present available. It has to be said however that this site might well offer an opportunity for high quality low-rise medium-density housing, given its mainly regular shape, ease of potential access and level nature. It is conceivable that the site might sustain more dwellings than at present allocated. The only obvious planning constraints are the protected trees, the need to contrive some form of new road and footpath links and the provision of rear servicing for the High Street and West Street. The probability that a skilled designer would achieve attractive housing on this site is obvious when the residential enclave on the adjacent old Brewery site is inspected.

#### Vitality and Viability of the Existing Shopping Centre

6.17.12 There is very broad agreement, certainly as between Waitrose Limited and Wycombe DC, that there is a pressing need to secure both qualitative and quantitative improvements to convenience shopping in Marlow. The existing food-store dates from 1972 and is cramped, undersized and of unquestionably awkward layout. Over the past 20 years or so, various proposals for both sites M4 and M5 have come forward. The choice of siting has been inevitably narrowed by the successful redevelopment of the southern half of the so-called Brewery-Portlands site. Other peripheral sites have come under later scrutiny but it is mainly common ground that these would fail the PPG6 sequential test, given the seeming availability of sites M4 and M5 so close to the historic centre of retailing activity and street frontages. There is accordingly little to choose between the two as regards the bolstering of the retail functioning of Central Marlow. From this perspective, it may be reasonably concluded that site M4 has a very slight edge in that it has a wider frontage to West Street and, as the LPA claim, would serve to consolidate the land use pattern by providing an anchor outlet slightly nearer the centre.

#### Pedestrian, Vehicular and Servicing Traffic Access and Circulation

6.17.13 Probably the essential issue governing the choice of future food-store siting on either site is accessibility and environmental capacity. This joint concept was given the name ‘traffic architecture’ in the 1963 Buchanan Report ‘Traffic in Towns’. It is worth quoting from Appendix 3 of the Report to illustrate the concept: ‘Traffic Architecture’: A term...coined to convey the idea of buildings and the circulation systems which immediately serve them being

designed together as a single comprehensive process’. The concept is thus not now novel but has been reflected in more recent DoE and DETR advisory publications, most notably in ‘PPG13: A Guide to Better Practice’ (pp 22-25) and in ‘Places, Streets and Movement: A Companion Guide to Design Bulletin 32’ (pp 22-31). The advice points to the need to site major land uses (in this case two large areas of significant housing and shopping development) very carefully in relation to the existing and proposed movement networks, most especially if much car and lorry traffic is to be generated. It is also necessary to examine the way in which a variety of access modes are accorded equal priority and the way in which they will interact.

6.17.14 Although Marlow Town Centre is the subject of comparatively few definitive traffic schemes or transport proposals, enough can be gleaned from the 1999 Halcrow Fox Report (CD/M/8) and the subsequent Local Transport Plan 2001 (CD/M/18) to draw some broad conclusions as to the short to medium-term situation in and around Marlow. The first is that proposals to close the Thames Bridge to vehicles and to pedestrianise the High Street are most unlikely to be implemented. The evidence is that public opinion on both is polarised in roughly equal proportions. The direct corollary of this is that the Portlands Link Road need not now be built to secondary distributor standard and that car shopper traffic will continue to approach the town centre from all points of the compass. The first assumption is based on the absence of need to duplicate the High Street and the second derives from the size and shape of Marlow’s catchment area south of the Thames. It seems reasonable also to conclude that any new major shopping floorspace ought to be located as close to the available primary and secondary distributor road network (A404 and A4155) as is physically possible.

6.17.15 The second basic assumption is that, although off-street public parking provision is not to be *reduced* on redevelopment (Policy M2) unless and until alternative transportation measures (eg P+R) are in place, it should not be *increased*. At present, available public off-street parking sites in the town centre (as defined by the Inset Map) are disposed in a rough circle, centred on the northern part of the High Street. This spatial arrangement has several virtues from a conservation aspect. It means that the available capacity of about 750-800 cars is dispersed as between the 6 car parks. Concentration is avoided and their peripheral location means that they perform an intercepting function that will encourage final approaches on foot to the town centre and thereby inhibit vehicle movement. In the nature of things their ‘all comer’ availability will ensure maximum flexibility of use in relation to type of trip, especially linked trips, and final destination in the central area. The effect of food-store siting on site M5 would be to increase overall provision to nearly 1000 spaces, unbalance this even distribution and to introduce dedicated parking much closer to the town centre. Very much the same objection would apply to leisure development as an alternative to the residential use of the site.

6.17.16 The most critical aspect of access to the two sites is that of physical capacity for servicing vehicles. It is a commonplace that modern food-stores need frequent deliveries by articulated heavy goods vehicles (HGVs). That is why, among many other reasons, their most favoured locations have been, until quite recently, out of town. Such vehicles need swept turning circles of about 25 m outside diameter freely to manoeuvre. For this reason, it is difficult or impossible to accommodate large food-stores in a tightly-knit and enclosed historic environment such as Central Marlow. The M4 site is mainly level and largely open with a wide frontage to Oxford Road. For these reasons, it would be possible to accommodate a vehicle circulation layout based on frequent HGV traffic. This could be done in association with the realignment of Riley Road and would not necessitate or facilitate any incursion of frequent or noisy and unwelcome traffic into or through recent or projected residential areas. The use of site M5 for the food-store would absolutely and inevitably require the construction of the Portlands Link Road to secondary distributor standards of width, horizontal alignment and junction design.

6.17.17 By contrast, the residential allocation of site M5 and its subsequent development would allow minimal incursion of new roadspace. This is indeed what the Local Plan prescribes in Policy M5(vi). Notwithstanding the fact that rear access provision needs to be made with

respect to West Street and High Street, the very detailed layout advice of DETR Design Bulletin 32 (DB32) might usefully be adopted and followed. This would allow carriageway widths of between 3000-5500 mm, 4-6 m kerb radii and a design speed of 30 km/h, indeed the entire gamut of DB32 (chapter 3) advice consistent with the accommodation of emergency services and refuse collection vehicles. A combination of these measures should accordingly permit the admission of rigid wheelbase delivery vehicles, optimum permeability of the new housing area by the disabled, pedestrians and cyclists, but also the optimisation of residential density and the provision of new dwellings. From a conservation area standpoint, the grain and texture of the resultant urban fabric might most closely resemble the remainder of the central area, certainly that defined by erstwhile Policy H15 (as now proposed for deletion by FPIC 3/32).

#### Overall Assessment and Conclusions

6.17.18 An overall assessment of the two allocations, made on the basis of the five key issues earlier identified, appears to support the appropriateness of the provisions of the Local Plan. The reasons for this assessment may be made clearer if the above conclusions on key issues are summarised as follows:

##### M4: RILEY ROAD

- Site is physically closer to both existing and defined shopping centre.
- Area to the NW is accessible on foot through public open space.
- Existing land use is unsightly and would greatly benefit from redevelopment.
- Rear access to frontage property on West Street either exists or might be reasonably easily contrived.
- Little or no tree cover on site at present.
- Site is mainly distanced from listed buildings and residential development.
- Existing parking provision forms part of a dispersed pattern of perimeter location.
- Public car parking would be displaced in favour of shopper parking as a consequence of redevelopment.
- HGV access and circulation could be accommodated within the site.
- New dwellings on the site would be tightly sandwiched between parking provision and open space.

##### M5: PORTLANDS

- Site has a very tenuous connection with existing retail frontages.
- Area to SW is effectively impermeable to access on foot.
- Existing land use is consistent with the area and is largely hidden from view.
- There is no rear access to frontage properties but this could be secured on redevelopment.
- A new car park on the site would be an additional facility and would break the pattern of existing peripheral provision with respect to the town centre.
- Extensive protected tree cover on site.
- Site is backland surrounded by listed building groups and residential areas.
- There is no public parking provision on the site at present.
- HGV access would require the completion of the Portlands Link Road to secondary distributor standards.
- Residential allocation of the site would allow a very largely autonomous layout

6.17.19 The preservation and enhancement of the historic character and future appearance of the Marlow Conservation Area would be best served by adopting the Local Plan allocations under Policies M4 and M5. It is hard to escape the conclusion that the recent acquisition of the Portlands site by Waitrose Limited and their somewhat recently-conceived opposition to the allocations were influenced very largely by retail operational considerations. In other words, it would be manifestly much more expedient to have the new building up and running before the old one is closed. However, this limited and largely short-term advantage to the retail operator must be balanced against the long-term interests of the local population and

indeed the wider (and even longer-term) interests of the conservation of part of the recognised national heritage. The evidence available at the inquiry regarding comparative valuation of the two sites for housing and retailing was only partial and hence highly inconclusive. Equally, the possible disinclination of the LPA to relinquish their key land holding to facilitate Portlands redevelopment is of little moment as compared with the planning merits of the Local Plan’s allocations.

#### Remaining Objections

6.17.20 The other objections to the two Policies may now briefly be considered. Of these, the objections relating to form, function and extent of car parking on site M4 are probably the most difficult to resolve at this stage. Under the other emergent Local Plan policies, it may be necessary to accommodate some increase in off-street parking provision. This will arise on account of the need to retain public parking spaces plus whatever increase the LPA deem necessary to cater for the approximate doubling of food-store size. Whether the LPA decide to make the parking ‘all-comer’ or partly dedicated to the retail operation is a matter for their future discretion in exercising development control. The physical feasibility of incorporating parking cannot be in serious doubt, given the useful studies produced for both sites at the inquiry. It may be objected that below ground parking may be required. Given the levels of the M4 site, its size in relation to the food-store’s likely footprint and the comparative remoteness from the flood plain, this may be a possible solution. The provisions of the Local Plan allow for the future (and conditional) scaling down of on-site parking. It would be unwise to prescribe this in terms of numbers at this stage. It is a matter for the LPA to review, having no doubt close regard to the possible emergence of additional LTP proposals at a later date.

6.17.21 The evidence at the inquiry was that the M4 site is in comparatively few separate ownerships (including the county and district councils). The LPA are evidently disposed to use their statutory powers of compulsory acquisition and site assembly for the purposes of urban regeneration and area enhancement. This is regarded as a last resort and should not therefore be specified in the supporting text to the two relevant Policies. In the case of the suggested words ‘issues....to be addressed’, these are wholly inappropriate to Policy M4. The reason is that criteria (i-v) are germane to the proper use and development of the land in question. It needs to be remembered that the allocation will stand in place for the currency of the Local Plan and will very largely determine the form and function of future redevelopment. This will most probably be mainly under the agency of Waitrose Limited but the general terms of the redevelopment need publicly to be secured now and not left to future negotiation.

6.17.22 The concern that a new retail outlet on site M4 would have a restricted frontage width on West Street appears to be positively advantageous from a conservation aspect. It means that a fairly sizeable food-store may be visually integrated within a degraded backland site without undue impact upon the historic frontage and street picture. This type of integration is very much the case in Marlow and indeed elsewhere (eg as in Wokingham to which reference and subsequent inspection was made during the inquiry). The more open and indeterminate aspect to the north-west would present a design challenge of a quite different sort. There is no obvious reason why an entirely modern and functional architectural expression of the relatively large building would be out of place; certainly an avoidance of historicism or an aping of locally vernacular forms is what the LPA correctly seems to be striving for, even if criterion M4(ii) is a little imprecise in this respect. There would not appear to be an equivalent opportunity of introducing additional convenience floorspace in the somewhat restricted confines of the Liston Road Car Park.

6.17.23 The design of the link road across or within the Portlands site need not be at all intrusive, given its probably reduced importance in the road hierarchy. Equally, this more minor status would simplify (and reduce in impact) its junction at West Street. The reference to parking provision and a ‘financial contribution’ in paragraph 6.90 of the supporting text seems wholly unexceptionable. All it means is that the amount of on-site parking will be determined by the size and number of new dwellings, their layout, likely occupancy and by the nature of future car dependency. This latter will be strongly influenced by the quality and coverage of local

public transport, including P+R operation, to which a developer’s future contribution may be made. The link road will principally function as a local distributor cum residential access road. As such, it may be largely and quite legitimately funded by housing development. The site is likely to be quite difficult to develop, given the constraints already mentioned, and it would thus be unwise to include ‘other land uses’ in Policy M5, however desirable they might prove to be.

6.17.24 The question of rear servicing to West Street and High Street has already been discussed; its achievement is essentially a question of detailed road and housing layout design. The location of the six existing terraced houses on the site is fairly obvious but the tinted policy notation around their curtilage might be omitted to make the point yet clearer. The rewording of paragraph 6.88 clarifies the need to assess development proposals in an overall transport context and is accordingly endorsed. In this connection, the need to secure permeability and free movement on foot needs to be emphasised in the light of adverse comments by objectors. A slight amendment of criterion (1)(e) would achieve this and ensure that east-west movement is not further compromised. It is not necessary to modify criterion (1)(h) specifically to require the replacement of the 64 parking spaces on West Street. It is not certain that this loss is now imperative in the reduced scale of link road construction. In any event, one emphasis of future P+R operation would be (in effect) to shift some parking capacity from town centre to outlying location(s). A Policy M5 directive to pre-empt this would be entirely out of place

### RECOMMENDATIONS

- TC17/1 Modify paragraph 6.88 and Policy M5 in accordance with PICs 6/12 and 6/13.
- TC17/2 Modify Policy M4(2)(b) to read as follows:  
(b) THE ELEVATIONAL DESIGN AND EXTERNAL APPEARANCE OF NEW BUILDING(S) SHOULD EXPRESSLY REFLECT THEIR ESSENTIAL FUNCTION, WITH PARTICULAR ATTENTION TO THE OPEN ASPECT, SIZE AND SYMMETRY OF THE PUBLIC RECREATION GROUND TO THE NORTH, ITS SURROUNDING RESIDENTIAL BUILDINGS AND THE MAIN PEDESTRIAN APPROACH FROM THIS DIRECTION;
- TC17/3 Modify Policy M5(1)(e) to read as follows:  
(e) THE RETENTION OF PORTLANDS ALLEY AS AN IMPORTANT NORTH-SOUTH PEDESTRIAN LINK AND AS A MEANS OF FUTURE ACCESS(ES) ON FOOT TO AND THROUGH THE PROPOSED NEW HOUSING ON PORTLANDS;
- TC17/4 Modify the Marlow Town Centre Inset Map by the deletion of the Policy H2 notation on and around the existing curtilages of Portland Villas, as now proposed for retention as dwellings.

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| <b>M6: MARLOW TOWN CENTRE - QUOITINGS SQUARE - CHRIST CHURCH-OXFORD RD</b> |
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### The Objections

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|---------|---|
| 0558/1  | Retail and Foodstore Co-ordination Limited      |
| 0840/41 | Marlow and District Chamber of Trade & Commerce |
| 1042/12 | Mr J D Burnham                                  |
| 1584/12 | The Marlow Group                                |
| 1660/2  | Paul Orchard                                    |
| 1917/2  | Mrs J G Orchard                                 |

### Summary of Objections

- (a) Object to allocation for mixed use. Site should be allocated as a retail scheme in conjunction with the Policy M4 development. This would benefit the vitality and viability of town centre.
- (b) Area between the church, road and Platts car park should be shown as allocated for residential development.
- (c) Opposed to a ‘one-way central box system’ for Marlow.
- (d) Reconsideration of an East-West relief road is urged. Consideration should be given to a one-way box traffic management system.
- (e) Object to any further development of central Marlow due to increase in traffic problems. Inevitably through traffic has to pass through Spittal Street, there is no viable alternative.

### **Inspector's Reasoning and Conclusions**

6.18.1 The small and potentially very attractive enclave around Quoitings Square certainly would benefit from limited redevelopment and detailed enhancement by way of sensitive urban design and planting. Policy M6 and the important preparation of a development brief under Policy G5 would be the key to this. Its regeneration would be complementary to that envisaged under Policy M4 but it is nevertheless physically detached from that allocation by Oxford Road. For that reason, it is doubtful whether a firm allocation for retailing is appropriate. Depending on how the Policy M5 link road is conceived and detailed, it is possible that some frontage retailing might attract additional pedestrian traffic and also be within acceptable distance of future parking provision or public transport. However, that is a matter initially for the LPA and interested developers, as well as for the active intervention and participation of local interests in the preparation of a Policy G5 development brief.

6.18.2 The restricted area is probably not suitable or viable for independent allocation as housing. Depending on the type and amount of retailing envisaged for the site, it is possible that an element of ancillary or associated housing in the form of flats might be authorised. That is also initially a matter for the LPA and a development brief. The former ‘one-way box traffic management system’ was evidently conceived as a means of carriageway narrowing and partial pedestrianisation of the High Street (in close association with a one-way Portlands Link Road). Such an idea has now been abandoned and does not figure in the LTP. It would render the main shopping streets highly inhospitable for normal pedestrian traffic and for peaceful shopping. It would also make living conditions in the Portlands housing enclave supremely noisy and disturbed, much as the suggested one-way working along Cambridge Road or Queens Road (see Policy M1) would have done. It is exceedingly doubtful whether any such one-way traffic management scheme affecting residential streets has any place within the conservation area or be consistent with PPG15 advice.

6.18.3 The now abandoned east-west relief road has already been covered in this report. Suffice it again to say that such a proposal would run counter to PPG15 advice and accordingly is not contained in the LTP. It is not possible to embargo all future redevelopment within Central Marlow purely and simply on grounds of alleged future traffic congestion. The recent study by Halcrow Fox has resulted in few immediate proposals for transport improvements, largely on account of seemingly divergent public opinion. This opinion is polarised as between a desire for either greatly increased or highly restricted car mobility; a situation which is reflected nationwide as well as more locally. However, it is fair to conclude that development activity is at least a possible key to the resolution of such deadlock. That is to say that new building is at once the generator of movement and also the source of funding for suitable measures of alleviation, whenever and however these may be agreed and approved. The relevant provisions of the Local Plan (eg Policy M4) are careful to provide for the appropriate balancing of land use and transport improvements and are accordingly endorsed.

## RECOMMENDATION

- TC18/1 No modification.

### M7: MARLOW TOWN CENTRE – ADDITIONAL POLICIES

#### The Objections

1260/17            *The Marlow Society*  
1260/37            *The Marlow Society*

#### Summary of Objections

- (a)        Quoitings site, Oxford Road is not covered by policy and would seem to be exposed to possible redevelopment in the absence of listing or other protection.
- (b)        Proposed new policy concerning housing provision in the town centre; ‘To improve housing provision in the town centre, developments which seek to convert existing housing accommodation above shops to other uses will not be permitted. Restoration of previously lost housing accommodation will be encouraged.

#### Inspector's Reasoning and Conclusions

6.19.1 The objections from the Marlow Group appear to have been met by the insertion of Policy M6 with regard to Quoitings Square. As far as the development of new or restored housing in Marlow Town centre is concerned, it should be noted that the restoration of residential flats above shops (in addition to the not insignificant housing gain implicit in Policies M4 and M5) is now supported by the government and may in fact be given fiscal encouragement (see ‘Our Towns and Cities: The Future’ (DETR 2000) paragraphs 4.8-4.10 and Annex paragraph 83). It is also relevant to note and refer to Policies S1, S3 and S4 of the Local Plan and the recommendations of this report as they affect Marlow Town Centre (see S1-S4 earlier). Taken together, the effect of this economic encouragement and the relevant Chapter 5 and 6 policies cited may well be to revitalise and enhance living accommodation in Marlow in much the same way as the Old Brewery and adjacent development has done. An additional policy or policies is not required.

## RECOMMENDATION

- TC19/1 No modification.

### PR0: PRINCES RISBOROUGH TOWN CENTRE - INTRODUCTION

#### The Objections

1205/5            Princes Risborough Town Council

#### Summary of Objections

- (a)        Plan acknowledges a requirement for accessibility in order to maintain viability, but there are no specific proposals to increase car parking, nor proposals for cycle parks.

#### Inspector's Reasoning and Conclusions

6.20.1 The relatively detached position of Princes Risborough within the northern half of

Wycombe District results in its forming a local service centre for shopping and other needs. This means that a good deal of this trade must attract private car traffic. It is understandable that the Town Council are concerned with the availability of parking. However, inspection of the area suggests that the very discreetly sited paying-car parks in the town centre are not conspicuously congested. The only evident parking stress is to be seen at the new edge-of-centre Tesco food-store, this being a free facility. Provision here is made at the highest level for any of the District’s larger convenience outlets (see Table 3.1). Given that there is little developable land within the historic town centre (apart from the Policy PR2-3 allocations) it is hard to see how parking might significantly be increased. The reference to ‘measures to be taken’ in paragraph 6.100 presumably includes on-street parking control and increased parking charges. These are primarily LTP matters and it is difficult to see how the Local Plan can usefully comment further at this stage. Individual planning applications will need to accord with Policies T3-8 as far as operational and cycle parking provision is concerned.

### RECOMMENDATION

- TC20/1 No modification.

## PR1: PRINCES RISBOROUGH TOWN CENTRE - ENVIRONMENTAL ENHANCEMENTS

### The Objections

0139/7 Mr J S Mason  
1817/1 Mr Alan Frank Kirby

### Summary of Objections

- (a) Additional car parking is required in the town. The existing car parking is inadequate. There will be a need for adequate and effective pedestrian and public transport links to Park Mill Farm. Out of town parking and public transport solutions cannot be expected to solve the problem of currently inadequate parking provision.

### Inspector's Reasoning and Conclusions

6.21.1 There is no detailed statistical evidence to support a conclusion that town centre parking is inadequate. Inspection would suggest that off-street parking is reasonably well located and reasonably available, bearing in mind the nature of the historic settlement and the fact that the bulk of the centre is within the Princes Risborough Conservation Area (which itself is entirely inside the Town Centre Inset Map). As already suggested, the key to balancing parking supply and demand is probably that of combined control, charging and effective enforcement (see PPG13 paragraphs 57-58) however initially unpalatable this may be to some local interests. As regards Park Mill Farm, the housing allocation here seems to be particularly well-chosen from a local transport planning aspect. At its closest point, it is about 400 m from the Market Square. Given a degree of careful layout design, footpath and cycleway linkages, this might introduce a substantial time and distance advantage for foot and cycle modes over motor vehicle travel, especially in the light of the level local land form. This suggests that additional housing development here, at (or even above) the level at present prescribed, need not result in any unsustainable demand for parking provision in the centre.

### RECOMMENDATION

- TC21/1 No modification.

**PR2: PRINCES RISBOROUGH TOWN CENTRE - LAND FRONTING NEW ROAD**

**The Objections**

0843/1 Princes Risborough Chamber of Trade  
0905/4 Kenneth Barnes  
1029/1 Miss H Shrimpton

**Summary of Objections**

- (a) Additional development on New Road should be for housing as opposed to shops, as there are already many empty shops.
- (b) Parking should not be reduced, as there is already insufficient provision.
- (c) Concerned if this were a precursor to eventual pedestrianisation of the town centre.

**Inspector's Reasoning and Conclusions**

6.22.1 The general question of parking provision in the town centre has already been addressed. The essential problem of access and parking, recognised by Policy PR2, is that of reducing the many vehicle entrances on New Road (A4010). This is a primary distributor road, effectively an inner bypass to the historic centre, and frequent accesses and turning movements are to be avoided if possible. There is a fair amount of private non-residential (PNR) parking on site at present. The extent and amount of redevelopment and its precise function will determine how much parking is then to be provided, having regard to the zone 3 accessibility of the area. However, this does not necessarily involve a reduction in spaces. It is entirely possible that parking provision might be increased; the key policy is to provide comprehensive access and parking arrangements (Policy PR2(iv)). By this planning criterion, not only will road safety and conservation enhancement be achieved but the pooling of parking may well result in its control and more effective utilisation.

6.22.2 It is doubtful whether an exclusive allocation for residential use would be either sensible or indeed the best use. There are isolated examples of what appears to be old people’s housing along New Road. However, it is noticeable that these buildings are located to the south where greater plot depths make such development easier to achieve. There is no reason in principle, as in Marlow, why redevelopment of the Policy PR2 allocation should not achieve some flatted accommodation above shopping. This would be for the LPA initially to consider in the form of a planning brief. Additional means of footpath access would be welcome as this would increase permeability, which is somewhat lacking within the town centre area at present. Indeed, Policy PR3 also addresses this point of securing a wider choice of pedestrian movement. There is no obvious evidence, on inspection, of unduly high levels of shop vacancy; the point has already been made that some vacant premises are needed to enable the property market to function. There is no provision in the LTP for the pedestrianisation of the High Street; existing traffic-calming (which allows bus access) appears to strike an admirable balance as between vehicle and pedestrian traffic to the convenience and amenity of both.

**RECOMMENDATIONS**

- TC22/1 No modification.

**PR3: PRINCES RISBOROUGH TOWN CENTRE - TOWN BARN FARMS**

**The Objections**

|         |   |
|---------|---|
| 0878/1  | David Ibell   |
| 0905/5  | Kenneth Barnes  |
| 1158/1  | Mr A Burfield   |
| 1193/30 | <i>Environment Agency</i>                                     |
| 1367/1  | Messrs J & D Wood   |
| 1371/1  | Messrs Chilton & Watson Ltd & RC Clark Trading as Birtchnells |
| 1396/1  | Mr K T Gibbons  |
| 1835/1  | Mrs Mary Williams   |

**Summary of Objections**

- (a) Redevelopment should not occur without provision for adequate parking or public transport for the town centre.
- (b) Redevelopment should retain character and design and scale of new development should not detract from existing. Ridge height should not be higher than existing.
- (c) No additional buildings should be built.
- (d) Retain plot of land containing a Chestnut and Apple tree as open space and to retain privacy of adjacent properties.
- (e) Develop as affordable housing, restricted to first time buyers already resident in the town.
- (f) Cafes and other uses, which may cause disturbance to existing residents should not be allowed.
- (g) Bats and barn owls might be affected by the conversion of non-residential buildings to residential and should be protected.
- (h) Town Farm Yard and its adjacent areas should be considered as separate sites, to be redevelopment separately and maybe for different uses.
- (i) Omit reference to ‘mixed use’. Appropriate future uses should be extended to Class B1 (office) and Class A2 (financial services) and also Class C (residential).

**Inspector's Reasoning and Conclusions**

6.23.1 Inspection reveals that much of the north-western half of the Policy PR3 site has been cleared, to such an extent that recent archaeological investigation has been made possible. The remaining buildings on this and the south-eastern portion are of no very obvious architectural or historic interest. Accordingly, there would seem to be no significant objection to the combined redevelopment of the two sites. No secluded habitats for either bats or barn owls appear to be directly under threat and the existing character of the Princes Risborough Conservation Area would be preserved. Indeed, given careful and sensitive design, its future appearance would be enhanced, not least because of the possible better integration of the Jasmine Crescent enclave on its southern perimeter. The objection that refers to stringent design control has much force but this is a development control matter and cannot be easily prescribed in the Local Plan. In any event, the siting wholly within the conservation area means that proposals will be subject to detailed scrutiny and wide notification and consultation.

6.23.2 Whatever the alleged limitations of available public parking in the Inset Plan area may be, there is no reason for adding to such provision in the Policy PR3 allocation. This is a cramped site that has a substantial amount of recent (and noise-sensitive) residential property

hard by its southern boundary. Moreover, the two present access points are severely height or width-restricted and should not be expected to cater for more than essential deliveries and the passage of refuse collection and emergency services vehicles. The site is very roughly equidistant from the three major car parks on the edge of the town centre (including the Tesco food-store car park for the purpose of this analysis). These are all of the order of 250 m centre-to-centre crowflight distance; a seemingly acceptable closeness for most linked-trip shopping and other visits in an historic urban area. The Policy prescription of operational levels of parking only and internal courtyard servicing (PR3(v-vi)) is not only reasonable but probably essential in view of the limited kerbside space in surrounding streets.

6.23.3 The permitted uses that are specified seem consistent with the site’s character and location. Its redevelopment would (in effect) make it integral with the Policy S3 primary frontage to the High Street and Market Square. It may be noted that Class A1 and A3 uses at ground floor level would then be entirely consistent with wider Policy S3(1)(a-d) (as recommended for modification). Indeed, the objection that calls for explicit mention of Class C residential use has some force and this might well be specified. On the other hand, Classes A2 or B1 would appear to be out of place since they might well lead to residential disturbance within either the new or surrounding dwellings. Class A3 uses would not necessarily create disturbance because of the introverted nature of the new enclave and the fact that hours of operation might more easily be restricted. The insertion of other than Class A1 or A3 uses would tend to break the continuity of the new internal retail frontage. This would be a serious disincentive to pedestrian circulation given the slight detour through the site that would be involved.

6.23.4 The issue of pedestrian permeability and choice of route is fairly important since Policy PR2 aims for such enhancement and it should be complemented in the equivalent allocation on the other side of the High Street. For this reason alone, the objection that the two component sites remain separate cannot be supported because wider freedom of pedestrian circulation will help to create a viable and lively town centre. It is inappropriate for the Policy to prescribe the retention of specific trees on the site (handsome though they are) because this is a matter for detailed development control; the trees are anyway protected by virtue of being in the conservation area. The case studies in the Appendix to the PPG3 companion guide (*Better Places to Live*) would tend to suggest that a density of 100 dw/ha or perhaps 250 hr/ha might be achieved but this is impossible to determine without specific design investigation. A reasonable conclusion might be that, even at this density, the Policy H11 threshold for affordable housing is unlikely to be reached. In view of the geometry of the site and its probable mixed use, such a housing component cannot be prescribed in Policy PR3 although it is conceivable that it may be achieved in practice..

## RECOMMENDATIONS

- TC23/1 Modify Policy PR3(1)(a-f) to read:
  - (a) MIXED USES, INCLUDING SMALL RESIDENTIAL UNITS, IN ORDER TO MAINTAIN THE VITALITY AND INCREASE THE AVAILABLE PRIMARY SHOPPING FRONTAGE WITHIN THE TOWN CENTRE;
  - (b) A RANGE OF CLASS A1 SHOPPING UNITS AND CLASS A3 FOOD AND DRINK OUTLETS AT GROUND FLOOR LEVEL WITH INDEPENDENT ACCESS TO DWELLINGS;
  - (c) SELECTIVE DEMOLITION OR CONVERSION OF ALL THE EXISTING BUILDINGS ON THE SITE IN ACCORDANCE WITH POLICIES HE8 TO HE10 (INCLUSIVE);
  - (d) PEDESTRIAN ROUTE CONTINUITY BETWEEN THE EXISTING ACCESS POINTS TO THE COMPONENT PARTS OF THE SITE AND WITH ITS SURROUNDINGS.

- (e) PARKING PROVISION TO BE LIMITED TO THE RESIDENTIAL UNITS AND TO THE OPERATIONAL NEEDS OF THE NON-RESIDENTIAL FLOORSPACE;
- (f) ALL VEHICULAR SERVICING TO BE CONFINED TO THE GENERAL CIRCULATION SPACE WITHIN THE SITE OR WITHIN THE BUILDING CURTILAGES.