

CHAPTER 7 - TRANSPORT

T0: POLICY FRAMEWORK

The Objections

0158/92	High Wycombe and Marlow Green Party
1057/1	Lionel Frederick Bernamont
1061/2	Wycombe District Association of Local Councils
1205/14	Princes Risborough Town Council
1475/8	Mr D V Baker
0802/12	D L Morris
0872/14	<i>Government Office for the South East</i>

Summary of Objections

- (a) Reductions in public car parking facilities must go hand in hand with the provision of 'greener' alternatives. More priority should be given to public transport, cycling and walking.
- (b) Public transport cannot replace the convenience of the private car.
- (c) Plan fails to address infrastructure problems which must be solved before plan is introduced. Promotion of public transport is of little use and is inflexible to those living in rural areas.
- (d) More substantial comments relating to specific roads in the Princes Risborough area are needed.
- (e) Additional traffic study is required to investigate sufficiently the issue of 'cross-district' traffic and that of traffic leaving the District.
- (f) There are no specific proposals as to how the Highways Authority will achieve the targets for reducing traffic or rate of traffic growth.
- (g) Paragraph 7.08 should be amended to read 'Local Transport Plans will provide the basis for an integrated approach to transport and land use...'

Inspector's Reasoning and Conclusions

7.0.1 It is legally and administratively difficult for the LPA at present to reduce car parking provision within land which it does not own. The recent publication of PPG13 (Transport) shows that LPAs are now encouraged to impose maximum car parking standards, rather than minima. Paragraphs 49-58 and Annex D of PPG13 make it quite clear that parking pricing and provision can be major determinants of car use and travel. The progressive lowering of on-site provision, through the use of maximum standards (expressed in terms of car spaces relative to total covered floorspace), will tend to slow or even to curb the increase of local movement by car. The Local Plan has the vital functions of allocating land and of controlling development in the interests of transport integration and long-term choices of mode and mobility. It cannot specifically seek to balance parking provision and road traffic reduction (which is the province of the Bucks Local Transport Plan (LTP)) except in the widest sense, such as avoiding a significant increase in overall parking provision when measures such as P+R proposals are implemented, as advised by PPG13. Up to date reference to LTPs in paragraph 7.08 is provided by PIC 7/1 and is accordingly endorsed.

7.0.2 None of the ten Chapter 7 Objectives (paragraph 7.13) are specifically intended to 'replace the convenience of the private car'. The thrust of government policy is to increase effective *choice* of travel so that an absolute dependence on private means of transport is avoided. To the extent that land allocations and the control of development can do this, the Local Plan provides a series of policies that flow from its basic objectives, set out in both Chapters 2 and 7. The extent to which road, railway and other infrastructure improvements can be achieved are listed in the LTP. The functions of the Local Plan is to record these, insofar as they have a spatial or land use dimension, and to align Plan policies and execute development control practices in accord with the provisions of the LTP. It is recognised that public transport coverage is necessarily thin within the rural parts of the District; that is why accessibility has been measured (see Appendix 9) for the purpose of determining variable car parking provision. It is also why there is very stringent control of inappropriate development in rural areas. By these means, new facilities are intended to be located within existing urban areas and thereby to offer users a variety of methods of getting to them.

7.0.3 The extent to which road improvements are included in the LTP are set out in Appendix 11 of the Local Plan (as proposed for change by PICs A11/1-A11/3). Those which affect Princes Risborough, mainly in connection with the Park Mill Farm development (Policy H2(ii)(c)), are there listed and shown on the Proposals Map and Inset. In advance of detailed design, which is essentially for the local highway authority, it would be impossible to be more precise. The way in which these improvements will be implemented will be the subject of public consultation, effectively as part of the development control process, at the proper time. In the case of the New Road (A4010) development proposal, this is the subject of a detailed policy (PR2) to which reference is made elsewhere (see Chapter 6). Some road improvements may well take place in this location, either on-site or off-site (or both), but these will be the subject of a detailed planning brief to be prepared within the terms of Policy G5. Not only will this brief be the subject of consultation but also any scheme of subsequent road improvement will be open to public scrutiny and comment as part of the implementation process.

7.0.4 Traffic studies, in particular those relating to extraneous traffic and movement, are primarily matters for the Bucks County Council as local highway and strategic planning authority. It is not the immediate function of the Local Plan to evaluate and accommodate such movements. That is the proper function of the adopted structure plan, with detailed programming shown in the LTP and with any spatial aspects embodied in future reviews of the Local Plan. Similarly, the way in which any future road traffic reduction is to be effected and monitored in order to meet statutory requirements will be for the local highway authority. That is not to say that such matters are entirely divorced from land use planning. It may well be, for example, that success in road traffic reduction either county-wide or more locally will have an impact upon individual planning decisions. Policy G3 quite properly calls for developer contribution to infrastructure improvements (including road improvements). The implementation of this Policy may involve the production of statistical evidence of road traffic growth (or reduction) which the local highway authority will be able to provide.

RECOMMENDATION

- TR00/1 Modify paragraph 7.08 as proposed by PIC 7/1.

T1: ACCESSIBLE DEVELOPMENT AND SUSTAINABILITY

The Objections

0376/16	Axa Equity and Law Life Assurance Society PLC
0408/20	Ercol Furniture Ltd
0510/6	Mr Anthony J Wright
0522/7	Redrow Homes (Southern) Ltd
0536/4	<i>David T H East</i>
0817/26	Croudace Ltd
0834/1	Prudential Assurance Company Ltd
0922/4	House Builders Federation
0953/1	Tesco Stores Limited
0960/3	Mr & Mrs D Price
1039/16	High Wycombe Society – Transport Group
1141/28	Beazer Strategic Land
1260/23	<i>The Marlow Society</i>
1683/2	Wycombe Area Access for All
1765/1	Mr Frank O'Hare
2035/1	Paul Whiting
2075/3	Mr Joslyn Chambers

Summary of Objections

- (a) Propose amendment to criterion (d) to 'minimise the need for travel by private car, and ensure that the quality of the environment...' in order to complement sustainable transport policies.
- (b) Policy unnecessary as repeated elsewhere; in particular sections (i), (ii), (vi) and (vii) which should be deleted. Criterion (iii) is superfluous and should be deleted. Policy should be cross-referenced with Policy T4.
- (c) Policy does not make sense and requires re-drafting. Policy is vague and imprecise in relation to its application; it does not refer to the scale of development. Policy too general and does not take into account developments which do not require traffic impact assessments. Policy could be made clearer by use of bullet points and shortened with detail in lower case.
- (d) Content of policy illustrates suitability of Terriers Farm for residential development.
- (e) Greater segregation required between footways, cycleways and motor traffic. Wider scope for use of Transport tokens or 'Smart Cards' for use by the disabled and elderly required.
- (f) Omission from the policy regarding CO2 emissions and climate change, Road Traffic Reduction Acts, delivery services and rental clubs.
- (g) Policy too restrictive. It may not be possible to meet requirements in all cases. Amend wording to state 'where possible'.
- (h) Proposed traffic improvement measures will not be able to cope with additional traffic generated by new development in the Plan. Plan is flawed in context of this policy, as the Plan proposes additional traffic in congested areas. Public transport not a viable option.

Inspector's Reasoning and Conclusions

7.1.1 The intention of Policy T1 is that all development within the District and during the currency of the Local Plan must be planned with regard to safe, convenient and adequate means of access to and from the site for all forms of traffic. The needs of pedestrians, riders and cyclists come under this heading; a necessary aspect of 'traffic' which has tended to be overlooked or neglected in the past. Since the Chapter Objectives and indeed current national and regional planning guidance quite rightly lay stress on greater priority for *all* modes of transport (paragraph 7.13 (vi)) it is necessary to cover all foreseeable future aspects of development control. Since the Policy has necessarily to encompass a wide range of forms of development and uses of land, the various objections that call for some qualification in its application are worthy of support. For that reason, Policy T1 needs substantial modification. Criteria (1-2), (3) and (7) (as re-numbered) appear to need to be explicitly related to considerations of scale, appropriateness and feasibility of application.

7.1.2 Since the avoidance of unnecessary car travel is one of the Chapter Objectives, its inclusion as a criterion is out of place and redundant. The provisions of Policy T4 would appear to be implicit in the application of Policy T1. That is to say, if any planning proposal does not satisfy all or any of the Policy T1 detailed criteria (and does not make suitable and proportionate provision under Policy G3) the LPA may very reasonably refuse planning permission, without specific reference to Policy T4. If the application of the Policy T1 criteria appears overly restrictive, having regard to the precise facts of the case, the decision may be appealed. In either case, the provisions of section 54A of the Act will apply in that the criteria of this very general Policy should be satisfied, having regard to all material considerations, including scale, location and physical feasibility. The objection that asserts that no development can be accommodated at all in future, on account of limited highway capacity, cannot be supported. The reason is that such incapacity must be judged case by case; which is precisely the function of Policy T1, modified as recommended.

7.1.3 The objection that refers to the suitability of the Terriers Farm site for residential development is addressed in the appropriate part of the report. The support of such an objection now, in relation to Policy T1 alone, would be to partly usurp the development control function of the LPA. In such a case, as in all others, it is not absolutely necessary for all forms of development to satisfy all the component criteria of the Policy. In the first place, certain criteria may specifically be made subject to considerations of scale and feasibility. Secondly, there may be certain situations where not all the relevant criteria of Policy T1 are met but permission may be suitably conditioned or made subject to legal agreement with respect to remedial works which satisfy Policy G3. In relation to the remaining objections, it may be observed that pedestrian-vehicular segregation will fall to be considered under the recommended modified criteria (1-4), that pollution is dealt with by Policies G13-G14 and that transport ticketing, delivery services, car-sharing and traffic reduction are mainly matters for the LTP and other agencies in future.

RECOMMENDATIONS

- TR01/1 Modify Policy T1 as proposed by PICs 7/2 and 7/19.
- TR01/2 Further modify Policy T1 to read as follows:

POLICY T1

ALL DEVELOPMENT PROPOSALS (HAVING DUE REGARD TO LOCATION, SIZE AND CHARACTER) WILL BE REQUIRED:

[IN RELATION TO WALKING AND CYCLING]

(1) TO PROVIDE, WHERE APPROPRIATE, SAFE, CONVENIENT AND ATTRACTIVE ACCESS(ES) ON FOOT AND BY CYCLE AND MAKE SUITABLE CONNECTIONS WITH EXISTING FOOTWAYS, BRIDLEWAYS, CYCLEWAYS,

LOCAL FACILITIES AND PUBLIC TRANSPORT ROUTES IN THE VICINITY OF DEVELOPMENT SITES AND AREAS (IN ACCORDANCE WITH POLICIES G9A AND T5-T8);

(2) TO ENSURE, WHERE APPLICABLE, THAT THE CONVENIENT USE AND ENJOYMENT OF EXISTING PUBLIC RIGHTS OF WAY SUCH AS FOOTPATHS AND BRIDLEWAYS ARE NOT ADVERSELY AFFECTED BY THE FORM AND LAYOUT OF DEVELOPMENT AND THAT THEIR NECESSARY DIVERSION IS ACCOMMODATED, WHEREVER POSSIBLE, WITHIN THE ACTUAL AREA TO BE DEVELOPED; AND

[IN RELATION TO PUBLIC TRANSPORT]

(3) TO INTEGRATE, WHERE APPROPRIATE, BOTH LOCAL MOVEMENT AND PRIORITY ACCESS FOR PUBLIC TRANSPORT SERVICES AND ALSO PROVIDE INDEPENDENT ROUTES, INTERCHANGE, STOPS AND WAITING AREAS (IN ACCORDANCE WITH POLICIES T9-T14); AND

[IN RELATION TO VEHICULAR TRAFFIC]

(4) TO PROVIDE FOR SATISFACTORY ACCESS(ES) TO AND FROM THE AREA OF DEVELOPMENT SO THAT THE CONVENIENCE, SAFETY AND FREE FLOW OF TRAFFIC USING EXISTING PUBLIC HIGHWAYS (INCLUDING PEDESTRIANS, RIDERS AND CYCLISTS) ARE NOT ADVERSELY AFFECTED;

(5) TO PROVIDE, IF AND WHERE NECESSARY, BOTH OPERATIONAL AND OTHER PARKING PROVISION AND VEHICLE SERVICING ARRANGEMENTS IN ACCORDANCE WITH POLICIES T3 AND T4;

(6) TO ENSURE THAT ALL VEHICULAR TRAFFIC GENERATED BY FUTURE DEVELOPMENT DOES NOT THEREBY MATERIALLY INCREASE LOCAL CONGESTION, TAKING INTO ACCOUNT ON-SITE AND OFF-SITE IMPROVEMENTS SECURED UNDER POLICIES G3 AND T4;

(7) TO SECURE THE PREPARATION AND APPROVAL OF GREEN TRAVEL PLANS WHERE BOTH THE SCALE OF PROPOSED DEVELOPMENT AND THE PLANS' POTENTIAL CONTRIBUTION TO TRAFFIC REDUCTION MAKE THEM APPROPRIATE AND IN ACCORDANCE WITH POLICY T18; AND,

[IN RELATION TO ENVIRONMENTAL PROTECTION]

(8) TO ENSURE THAT LIVING AND WORKING CONDITIONS IN THE LOCALITY OF DEVELOPMENT PROPOSALS ARE NOT DIRECTLY AND ADVERSELY AFFECTED BY THE INTENSITY, TIMING AND CHARACTER OF TRAFFIC WHICH IS NECESSITATED BY THE FORM AND NATURE OF PROPOSED LAND USE(S).

T2: INTEGRATING TRANSPORT MODES

The Objections

0006/4	William O Highley
0367/11	Highways Agency
0376/14	Axa Equity and Law Life Assurance Society PLC
0841/10	Lance Adlam
1039/5	High Wycombe Society (Transport Group)
1141/29	Beazer Strategic Lane
1683/3	Wycombe Area Access for All

PIC 7/3 Objections

1279/15	Mr David Coe
1281/15	Great Marlow Parish Council

Summary of Objections

- (a) The need for parking facilities at stations is accepted but they consume valuable land and generate additional traffic. Minibus taxis should be developed instead of buses.
- (b) An explicit acknowledgement should be made of the needs of rural dwellers with no access to public transport and the disproportionate impact of restrictions on car use for these people.
- (c) Shift to public transport unrealistic. Proposed development in the Plan will add to existing congestion (sites in the London Road corridor are cited).
- (d) More reference required to the need to limit short-term parking and to adopt green commuting practices.
- (e) The Policy should be reworded to support 'interchange between different modes of transport that in turn would promote greater use of bus and rail'.
- (f) T2 is a statement of intent rather than a policy and should be deleted or moved to detailed text.
- (g) Request thought for the less mobile when planning levels of parking and transport restrictions.
- (h) Insufficient parking at Princes Risborough station. Suggest footbridge connection to Princes Estate.

Inspector's Reasoning and Conclusions

7.2.1 Policy T2 is proposed for replacement as paragraph 7.22a by PIC 7/3 in response to objection (f) above. This is appropriate since the Policy is in the nature of an objective that is already covered by paragraph 7.13 (vii) and (viii). Moreover, interchange facilities will usually be the subject of planning proposals that are covered by such Policies as T17 and HW8. The omission of the Policy is accordingly endorsed. Objections (a) to (f) no longer need specifically to be addressed since they propose modifications to the deleted Policy rather than to the supporting text. Objection (g) is more relevant to Chapter 2 and is covered by the additional Policy G9A (formerly Policy T6). This implicitly relates to disabled access to parking and public transport. Objection (h) refers to a purely local interchange proposal; a detailed matter for Railtrack and the Chiltern Railways to consider. Objection (b) would appear to relate to the stated intention to reduce overall reliance on car-based travel. This is not aimed at rural

residents in particular but rather is intended to refer to LPA support for inter-modal interchange; a measure which may well benefit people living in remote locations (eg by the provision of P+R facilities on the urban fringe or at rural railway stations).

RECOMMENDATION

- TR02/1 Delete Policy T2 and insert paragraph 7.22a as proposed by PIC 7/3.

T3: ON-SITE PARKING, SERVICING AND DEVELOPER CONTRIBUTIONS

The Objections

0218/2	Airways Housing Society Ltd
0403/1	British Telecommunications PLC
0506/12	Bassetsbury Area Protection Group
0816/8	Invensys PLC
0834/2	Prudential Assurance Company Ltd
0840/6	Marlow and District Chamber of Trade & Commerce
0872/15	Government Office for the South East
0922/3	House Builders Federation
0953/3	Tesco Stores Limited
1039/19	High Wycombe Society – Transport Group
1042/9	Mr J D Burnham
1260/24	The Marlow Society
1584/53	The Marlow Group
1590/2	David Emmerson
1683/4	Wycombe Area Access for All

PIC 7/20 Objections

0579/36	Michael Lambert
1798/30	Buckinghamshire County Council – Environmental Services Dept
2124/7	Crime Prevention Design Adviser, Thames Valley Police

Summary of Objections

- (a) Any review of standards should be against the framework of the Regional Transport Strategy.
- (b) Policy should not underestimate public reliance on the use of the car. Policy is naïve to think that improved public transport will improve the situation. There is a need to increase parking charges.
- (c) Standards have not been reviewed in accordance with PPG13 and Circular 6/98. Standards should be relaxed pertaining to elderly accommodation and affordable housing provision. Standards have not been justified.
- (d) Reference should be made to the relevance of existing parking. Propose amendment to read 'The level of parking should not exceed the Council's parking standards as set out in Appendix 10, although regard will be given to existing on-site car parking.'

- (e) No research is presented to support the policy of reducing the amount of car travel, nor any strategy set down to show what new provision will be made for greater public transport.
- (f) Policy is vague and imprecise in relation to its application, particularly with regard to commuted payments.
- (g) Redraft sections relating to Marlow to take account of the findings of the Marlow Transport Study and DETR guidance, which requires that an Integrated Transport Policy is included in a Local Plan. Include clear plans illustrating the Accessibility Zones for each major settlement.
- (h) Criterion (i) duplicates Policy T8 and should be deleted.
- (i) In line with 'Draft Guidance on Local Transport Plans' it is considered essential that retailers be allowed some say in car parking levels. The Plan does not allow flexibility for developers to improve existing public transport to development sites and retain levels of parking.
- (j) Object to threshold trigger for development contributions set at 10 trips per day.
- (k) The destructive potential for competitive provision of parking by neighbouring authorities should be referred to in Appendix 9. Conflict may arise with Policy T3, as the lower case text recognises public transport services are inadequate in rural and urban areas.
- (l) Reinstate supporting text for Policy T3 from Draft Plan of 21/09/98 (prior to Deposit), which is less negotiable and reinstate criterion (v) from this original Draft.
- (m) Policy is unduly optimistic. Underground and low decked parking should be required. Payments should be subject to public scrutiny, ring-fenced, donors and amounts named and purposes indicated.
- (n) Full account of the needs of the less mobile should be taken into account where planning levels of parking transport restrictions.
- (o) Object to Pre Inquiry Change as the policy is only sensible if accompanied by restraint of on-street parking.
- (p) Holding objection, pending submission of further comments. Pre Inquiry Change has significant implications for the Highways Authority and the Wycombe Transportation Strategy.
- (q) Concern that reduced parking spaces will place pressure on drivers and will create higher car crime, disputes between motorists and residents and pavement parking.

Inspector's Reasoning and Conclusions

7.3.1 The purpose of Policy T3 is to further the aims of national policy guidance, set out in PPG13 (Transport) and its supplementary advice, such as PPG13: 'Guide to Better Practice' and subsequent publications (referred to later). Since the Local Plan was placed on deposit and during the Inquiry, certain national minimum parking standards were published as Annex D to PPG13. These will be compared with the standards set out in Appendix 10. For the time being, it is concluded that the approach set out in Policy T3 is broadly consistent with national and regional planning guidance (RPG9) and, equally importantly, its content accords with the Chapter 7 Objectives 7.13 (3-6). Many of the objections to Policy T3 are more to do with opposition to current government policy regarding traffic reduction or restriction. In other words, some objectors may well be viewing the Chapter 7 Objectives and Policies in a wholly subjective way and interpreting them in the light of how they might affect their own perceptions and preferences in the use of private car travel to the exclusion of most other modes. It is necessary therefore to distinguish between such special pleading and more substantial

objection to inconsistencies or undue stringency in policy formulation or its likely application.

7.3.2 The general approach to Policy T3 is to shift from maximum to minimum standards of on-site provision by developers. The Policy is given useful added flexibility by the definition of a Public Transport Accessibility Map (Appendix 9) at 1:75 000 scale and covering the whole of Wycombe District. On-site maximum parking provision is cross-referenced with respect to land uses and to Accessibility Zones 1-5 (high to low) as on the map. Welcome added flexibility is introduced by Policy T4 which, in effect, allows developers to opt for a lower level of on-site parking provided that a commuted sum is paid to the LPA for off-site and off-street public spaces. The entire framework seems admirably flexible and the concept of commuted sums for parking is of such long-standing and accepted legality that it seems odd that it is now the subject of objection. It is not necessary to stipulate the precise way in which commuted payments will be made; in practice they will be the subject of a negotiated s106 agreement on a case by case basis. Much will depend on the exact degree of planning gain or advantage to accrue to either (or both) of the parties to such a negotiation and must therefore be for them initially to resolve.

7.3.3 The objection which relates to alleged failure to consider the advice of Regional Transport Strategy cannot be supported. The latest relevant Parking Strategy is contained in Chapter 9 of RPG9 (paragraphs 9.8-9.14). This was published during the sitting period of the inquiry (March 2001). The burden of this advice is that LPAs should adopt maximum, rather than minimum parking standards, consistent with PPG13, apart from those SE England authorities adjacent or close to Outer London. Here they are advised to adopt lower maxima if necessary, having regard to the standards applying to the nearest Outer London Boroughs. In the case of Wycombe DC, it has demonstrably reviewed the emergent or adopted parking standards set out in UDPs of the London Boroughs of Ealing, Harrow, Hillingdon and Hounslow. There would appear to be no inconsistencies between the Local Plan's Appendix 10 standards and those employed by the relevant London Boroughs. It would not be advisable to relax the maximum standards simply because of Wycombe District's largely rural character in view of the generally high accessibility by public transport to the District's town centres.

7.3.4 As far as public reliance on the car is concerned, the Policy does not appear to seek in any way to reduce or discount such reliance for certain members of the public at certain times. The thrust of the Policy is (a) to prevent avoidable and currently growing traffic congestion and (b) to minimise the land take of highways and parking, in relation to land used for general circulation or for the parking of vehicles, both on-street and off-street. These are legitimate, indeed essential, land use planning considerations. The effect of parking stringency may well have the beneficial effects of reducing peak-hour congestion, induce higher occupancy of individual vehicles and encourage people (where practicable) to use public transport for all or part of their journeys to work or to shop. Parking charges, as such, do not come within the scope of land use planning. Rather, it is the supply of parking provision, achieved in the longer term by planning policies and allied to the imposition of parking charges, which will eventually influence the use of vehicles. This is referred to as 'demand management' in PPG13.

7.3.5 The ways in which the contents of PPG13 Annex D and the advice of Chapter 9 of RPG9 should be applied to Appendix 10 of the Local Plan are mainly for the LPA to decide. In any event, the standards set by the Appendix are intended to be subject to monitoring and revision during the currency of the Local Plan. The Annex D and Appendix 10 maximum parking standards are not all directly comparable with each other. However, the range of parking spaces within Zone 1 and Zone 5 of the Local Plan appear generally to lie within the maxima prescribed by PPG13. For example, the range of parking standards for food-stores (depending on zonal location) in the Local Plan is one car space per 25-60 sq m (gfa). The *maximum* in the PPG is one space per 14 sq m. To put it slightly more lucidly, the LPA maximum (in Zone 5) is 4 spaces per 100 sq m of gross floorspace and the national maximum is about 7 spaces per 100 sq m. The only instance of the LPA standards being more generous is for Use Classes B1 and D2 in Zones 5 and 2-5 respectively. These differences are marginal

and the LPA may wish to make appropriate adjustments in due course.

7.3.6 It is not entirely clear from the relevant objection precisely why the Policy should make explicit reference to existing on-site provision. Obviously, if existing provision is to be found on any development site (and it is not to be lost on redevelopment) it will be added to whatever new provision may be made. The aggregate floorspace will be reckoned against the combined parking accommodation in order to test conformity with the Local Plan. If the retained on-site provision, even after redevelopment, still exceeds the permitted maximum it would be open to the parties to negotiate an agreed reduction. However, there is no obvious way in which a developer would be obliged to relinquish existing spaces in the course of negotiating a planning permission or agreement and the wording of the Policy should make this clear by a reference to 'new provision'. At the other end of the scale, sheltered, affordable and old people's housing accommodation are special cases. To an extent, they are covered by the Appendix 10 standards which is consistent with the advice of PPG3 (paragraphs 59-62).

7.3.7 There would appear to be no pressing reason why original research is necessary to support a local policy of firm restraint of car travel or the promotion of multi-modal choice. Both these aspects of Chapter 7 Objectives derive from what is now fairly long-standing government policy, dating back to the publication of the earlier version (1994) of PPG13. The aspects of the Marlow Transportation Study that *specifically* concern that town are reflected, to the extent which is possible, in Chapter 6. Reference to aspects of transport and land use planning integration have already been made earlier in the report. It is probably fair to say that an 'integrated transport policy' effectively comprises the Local Plan and LTP, when read together. It is inappropriate to look for such an overall statement within a land use planning document; its function is primarily to reflect and implement both LTP policies and spatial planning provisions. It is a moot point whether the Appendix 9 accessibility map should be shown at a larger scale. The directly relevant diagram (fig 5.5) of 'Development Plans' (DoE 1992) suggests that a relatively small-scale outline diagram is quite adequate for most Local Plan purposes. In any case, larger scale diagrams are available as Supplementary Planning Guidance.

7.3.8 The objection relating to the Policy's alleged vagueness and lack of precision with regard to commuted payments and developer contributions perhaps derives from a minor matter of the Plan's editing. The topic heading 'On-site Parking, Servicing and Developer Contributions' relates to both Policies T3 and T4. It might be clearer if separate topic headings were used for the individual Policies and the use of sub-headings were dropped. It is clearly not possible to detail all matters concerning developer contributions within Policy T4 and its reasoned justification. Accordingly, the LPA have incorporated such information in Supplementary Planning Guidance (as contained in PIC 7/5) and referred to in paragraph 7.38 of the text. As far as consultation on parking provision with local retailing interests is concerned, it must be assumed (in the absence of evidence to the contrary) that the advice of 'Draft Guidance on Local Transport Plans' was followed by Buckinghamshire County Council. Certainly, some objections to the Local Plan might better have been addressed initially to the County Council, notwithstanding the fact that LTP preparation is non-statutory with no formal provision for such objections.

7.3.9 Policy T3 is intended to provide transitional guidance between Policy T1 (which covers all aspects of *access* to individual development areas) and Policy T8 (which seeks to improve cycling *facilities* on-site in specified cases). Accordingly, Policy T3 need not dwell on particular arrangements for individual modes of travel to and from a given location. Suitable provision for the future use of bicycles will be required by the terms of Policy T1(1)(2) and (4) (if re-numbered as recommended) and Policies T7 and T8. Specific mention of individual travel modes in Policy T3 seems unnecessarily confusing; the purpose of the Policy is essentially to cover most aspects of on-site parking provision and servicing arrangements. There is equally no need to specify an elaboration of Policy T3 with respect to disabled access. Firstly, Appendix 10 adequately covers the proportion and dimensions of parking spaces for the disabled. Secondly, the disabled are invariably given special privileges in on-street parking

control schemes. Their introduction is governed by other legislation and is not appropriate for a land use planning document or specific policy.

7.3.10 The precise form which off-street and on-site parking should take cannot be generally prescribed in a local plan. Situations will differ widely, both as between one development proposal and another and as between different parts of Wycombe District. These factors are recognised in Appendix 10, where the relevant standards usefully take a matrix form, dependent on land use, scale of development and degree of accessibility. It will be obvious from the many permutations there set out that a universal policy preference for either underground or multi-level parking provision would be singularly unhelpful and probably impossible to implement. Moreover, given that much of the District is covered by either AONB or conservation area designations, it is likely that such provision may be the exception in future. There may be certain situations (eg Policy M4 development in the Marlow Conservation Area) where underground parking may be appropriate. However, it is doubtful whether an area or site-specific policy should prescribe it; still less should a district-wide policy call for such elaborate provision.

7.3.11 The question of commuted payments for off-site parking has already been covered to an extent. Aside from the enabling Policy T4, it is doubtful whether the Local Plan need be specific as to charges, hypothecation ('ring-fencing') or publicity for such negotiations. The reason is that negotiations will very much depend on what is reasonable and practicable in any given situation. That will be for applicant and authority initially to discuss and determine. If negotiations are successful, the outcome will be the subject of planning conditions, agreements or unilateral undertakings. If not, they will be open to the normal appeals procedure. In any event, the extent and nature of on-site parking provision or an equivalent commuted sum will routinely be reported to the LPA Committee and hence enter the public domain. Members of the public and other interested bodies can comment on these arrangements before planning decisions are made. In the case of disputes going to appeal, equivalent representations may be made to the DTLR at the appropriate time.

7.3.12 Neither the 'Draft Guidance on Local Transport Plans' or indeed the later 'Guidance on Full Local Transport Plans' (DETR 2000) is of direct relevance to local plan preparation as regards levels of car parking provision and the need for close consultation with retailing interests. It is noticeable that the maximum levels of car parking for retail land uses were revised *upwards* as between earlier draft and later definitive versions of PPG13 (Annex D). From this it may reasonably be inferred that consultation was carried out and that the relevant interests were fully consulted, at that level of involvement. It is not entirely clear why or whether further representations should be taken into account here and now, especially since the national standards are not generally the subject of possible revision upwards by the LPA. It would be open to the latter to make a special case for more generous provision locally if circumstances suggested this. No such adequate evidence is to hand and it is accordingly not appropriate to make any revision to the Appendix 10 standards at this juncture.

7.3.13 Broadly speaking, the amount, location and provision of off-street parking not only requires express planning permission but is also a highly material planning consideration. On the other hand, on-street parking control is certainly not the subject of planning control, being a highways matter. Its extent, hours of operation and charging regime may on occasion be material to a development control decision (and it may be that future development plans will contain spatial aspects of parking control schemes as a requirement of integrated land use-transport planning). However, on-street parking control is relatively flexible and subject to variable imposition and control over time. Off-street parking, by and large, may only be increased or varied as a consequence of specific development or redevelopment and its statutory authorisation. It is accordingly a largely fruitless exercise to try and closely co-ordinate on and off-street parking provision. By the same token, incidence of 'road rage' and control of dangerous and highly anti-social practices like pavement parking can only properly be controlled by legal sanctions and not by the provision of an undesirably generous scale of

parking provision related to future development proposals.

RECOMMENDATIONS

- TR03/1 Modify paragraphs 7.23-24 as proposed by PIC 7/20
- TR03/2 Modify Policy T3 as proposed by PIC 7/20.
- TR03/3 Further modify Policy T3 to read as follows:

POLICY T3

DEVELOPMENT PROPOSALS WILL BE REQUIRED TO MAKE PROVISION FOR ON-SITE PARKING. THE OVERALL SCALE OF NEW PROVISION SHALL NOT EXCEED AND MAY BE BELOW THAT SET OUT IN THE ADOPTED MAXIMUM STANDARDS CONTAINED IN APPENDIX 10 OF THE LOCAL PLAN. SERVICING VEHICLE PROVISION SHALL, IF POSSIBLE, BE MADE ON-SITE AND BE ADEQUATE FOR THE INTENDED LAND USE, THE ACCESS ARRANGEMENTS AND THE LOCATION. CENTRALISED RESIDENTIAL PARKING PROVISION SHALL BE CLOSE TO THE DWELLINGS THAT IT WOULD SERVE AND SHOULD BE SECURE, CONVENIENT AND BE DESIGNED AND LAID OUT IN SUCH A WAY AS TO BE PHYSICALLY AND VISUALLY INTEGRATED WITH THE OVERALL SCHEME OF DEVELOPMENT.

T4: ON SITE PARKING AND DEVELOPER CONTRIBUTIONS

The Objections

0345/7	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/15	Axa Equity and Law Life Assurance Society PLC
0406/1	Warrant Investments Ltd
0509/6	Lattice Property (Formerly BG Property)
0524/2	Thames Valley Chamber
0608/2	G W Deeley Ltd
0802/6	D L Morris
0834/3	Prudential Assurance Company Ltd
0953/4	Tesco Stores Limited
1071/5	Persimmon Homes (TV) Ltd
1141/30	Beazer Strategic Land
1205/15	Princes Risborough Town Council.
1414/12	Michael J Overall
1579/16	Oxford Land Limited

PIC 7/5 Objections

0345/15	Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnerships Ltd
0376/51	Axa Equity and Law Life Assurance Society PLC
0424/1	Marks & Spencer PLC
0524/31	Thames Valley Chamber
2137/1	Waitrose Limited

Summary of Objections

- (a) Concern at the practical consequences of the operation of the policy. Clarification required as to how Policy is expected to work in practice. Policy is impractical, unrealistic and unfair. Contributions required may preclude some desirable development, e.g. the re-use of vacant buildings.
- (b) Object to the intention to secure a capital payment towards a general fund for transport infrastructure improvements, when strategic site development already requires specific funding through development principles.
- (c) Propose deletion of first paragraph of policy; circumstances envisaged would be contrary to TCPA 1990, Circular 1/97 and PPG1.
- (d) Policy encourages developers to seek out-of-centre locations, contrary to Government guidance. The approach is inconsistent with Government guidance and does not pay sufficient regard to specific circumstances.
- (e) Threshold set at 10 vehicle movements a day is too low. Threshold is unreasonable and not equitable in respect of planning issues or expectations.
- (f) Concern that policy may be used to secure contributions in excess of Circular 1/97.
- (g) Level of contribution must be assessed in relation to each individually identified development site and not by means of broad formula as set out in Appendix 11 and the Accessibility Zones – Technical Guide.
- (h) Paragraph 7.38 and Policy T4 should be redrafted to reflect the 'tests' in Circular 1/97; that the Council will seek provision of financial contribution or infrastructure where need is proven and infrastructure is fairly and reasonably related to development.
- (i) Council should indicate preferred phasing of sites for strategic development. Site development should not be allowed prior to protective measures being implemented.
- (j) Disagree that housing development should not be prevented for the simple reason that local transport network is inadequate.
- (k) Contributions to off site infrastructure should be related to individual means and not the formula as set out in Appendix 11.
- (l) Suggest a clause insertion 'that a developer contribution has to be made to provide for a bus service passing though the proposed new development at Park Mill Farm, linking to the railway station and town centre.

Inspector's Reasoning and Conclusions

7.4.1 The essence of Policy T4 is to secure necessary overall transport improvements in conjunction with development (or redevelopment) proposals. These matters are also addressed in Policy T1 but the main emphasis there is upon the configuration of development proposals within the confines of an application site. Inadequacies of layout or provision may be covered in such situations by the imposition of conditions or by planning agreements. Policy T4 seeks to achieve *off-site* improvements or arrangements and to require proportionate contributions by intending developers. The legality of restricting development unless and until such off-site works or requirements were carried out was established some time ago by a case brought by the former Grampian Regional Council against Aberdeen DC and is accordingly referred to as a 'Grampian' condition. The concept of a developer's contributing financially to such improvements is merely a logical alternative to deferring development until they have been carried out. Provided that the works are wholly or incrementally required for the development to proceed, there would seem to be no objection to a developer's proportionate contribution.

7.4.2 Policy T4 seeks to extend the concept of developers' contributions beyond the confines or the close proximity of individual sites or premises and to widen its scope to provide for multi-modal accessibility and mobility. The basis of calculation is the budgeting of the LTP strategy, currently confined to High Wycombe. The intention is to extend such calculations to Marlow and elsewhere, as and when a strategy is approved. Meanwhile, the Policy is exceptionally intended to apply to all major development proposals within the District that generate significant traffic or mobility demands. The LPA point to the apparent success of the emergent Policy in High Wycombe alone since 1988. A sum of £2 086 000 has been paid or undertaken to be paid with respect to authorised development proposals. This would seem to represent some 52% of the global sum of development contributions expected within the 2001-2006 period (CD/M/15) or about 15% of the overall expenditure (£14 168 000) for the Wycombe Transport Strategy. The inference is that substantial progress has been made in implementing this particular Policy and that it has been very largely accepted by intending developers.

7.4.3 Whatever view is taken of the appropriateness of Policy T4 relative to PPG1 or C1/97, it can scarcely be claimed that it is unworkable, given the above evidence. Nevertheless, the wording of the Policy is a trifle obscure, especially in comparison with the lucidity of the June 2000 Supplementary Planning Guidance (SPG). The working of the Policy in practice would not seem to encourage out-of-centre locations; the way in which the LPA intend to calculate future developers' contributions (ie a simple function of parking spaces, vehicle movements and unit multiplier) suggests that such generally less accessible locations would attract much heavier contributions. In relation to the 10 movements/day threshold, it is significant that this is calculated on a *net* increase in traffic generation. The Policy will thus bear more heavily on greenfield development and this would appear consistent with PPG3 advice. However, the threshold would seem to be set low (eg it would appear to apply to residential development in excess of 2-3 dwellings). Since the level is laid down by SPG, a recommendation is not made but the LPA might well wish to consider a revision upwards to 20-30 movements/day.

7.4.4 The LPA's rebuttal suggests that the Policy T4 contribution may be required of relevant development in advance of the formulation and costing of detailed transport strategies. Clearly, these cannot be based on an SPG formula or assessment since the budgeted cost of traffic or transport measures will not then be known or demonstrated. This situation may well be exceptional but the Policy needs to be expressed in terms of 'either (a) or (b)' since the proportionate contribution can only then be calculated on an agreed and identified package of infrastructure improvements. The entire thrust of the Policy is to widen the scope of such improvements. Rather than a narrow focus on such things as road widening, traffic calming or junction improvements, the emphasis will now be on making access easier by a range of travel options. It may also be appropriate to contribute to the funding of public parking provision, rather in the way that commuted parking payments have been made in the past. No doubt the LPA expect to see area strategies in place within the next 5 years. Until they are, it is necessary to have alternative ways of determining developers' contributions.

7.4.5 The objections raise questions of how the Policy should operate in practice, as well as whether or not it is soundly based in principle. The above conclusion is that it is appropriate, always provided that the advice of C1/97 (or successor policies) is taken into account. However, the way in which it is initially triggered is effectively set out in Policy T1. It is thus not necessary and indeed potentially confusing to attempt to paraphrase that Policy's requirements; a simple cross-reference is all that is required. Similarly, whether individual development proposals need wholly or partially to fund specific highway or traffic management (or other) improvements will also be influenced by Policy G3 (as modified). The C1/97 test of proportionality will determine whether a scheme of improvement is justified by reference to a single development site or area; if it is not, the proportionate cost of such improvement may be met by one or more areas of development. Accordingly, this may allow individual schemes to proceed without awaiting overall implementation of the accepted off-site improvements.

7.4.6 It will thus be appreciated that the Policy may indeed operate in the interests of

development since this may be authorised directly after a contribution has been both negotiated and secured. The alternative might be to defer a number of otherwise acceptable schemes (by means of Grampian conditions) until the cumulative total of financial contributions had adequately funded the highway or other off-site works. It is preferable, in the absence of an agreed transport strategy, to relate developer contributions to specific rather than to generalised improvement schemes. The reason for this is that it would be impossible to assess proportionality without reference to known or projected costs of highway works, overall development potential, traffic generation and growth factors. That is not to say that all highway or transport schemes must be prepared and costed in advance; it may be that such associated schemes may have to be prepared ad hoc. Whether or not such preparation is carried out by the local authorities or by the intending developer(s) will depend on individual circumstances; the direct analogy of development briefs under Policy G5 is obvious.

7.4.7 The objection that refers to preferred phasing of strategic development appears to have very limited relevance to a Policy that requires proportionate contribution to infrastructure improvement. Equally, the Appendix 2 requirements do not invalidate either the SPG or the calculations made on the Appendices 9 and 10 basis. The contribution to the relevant Transport Strategy is referred to in the Development Principles. However, this is merely a cross-reference and is not intended to quantify or prescribe the infrastructure contribution in any detail. The objections that refer to a specific housing allocation (Park Mill Farm) in Princes Risborough are too detailed in relation to a district-wide Policy. To attempt to determine the level of contribution to be made in respect of any (or any additional) transport improvements would be effectively to intervene in matters best left to the LPA and the development control process. If otherwise justifiable strategic housing allocations can be made acceptable by external infrastructure improvements, it is long-standing planning policy to do so by means of imposing conditions or by accepting proportionate contributions to their funding.

RECOMMENDATIONS

- TR04/1 Modify paragraphs 7.35 and 7.38 and insert 7.38a as proposed by PIC 7/4-7/5.
- TR04/2 Modify Policy T4 to read as follows:

POLICY T4

IN THE EVENT OF DEMONSTRABLE CONFLICT WITH POLICY T1, DEVELOPMENT PROPOSALS MAY NEVERTHELESS BE AUTHORISED IF A PROPORTIONATE CONTRIBUTION IS MADE, EITHER [A] TO AN APPLICABLE TRANSPORT STRATEGY OR [B] TO SPECIFIC LOCALLY PRE-DETERMINED SCHEMES WHICH ARE DESIGNED TO RELIEVE TRAFFIC CONGESTION OR TO IMPROVE MULTI-MODAL ACCESS OR TO PROVIDE OFF-STREET PUBLIC PARKING (OR TO SECURE ALL OR ANY OF THESE BENEFITS), HAVING REGARD TO THE PROVISIONS OF POLICIES G3 AND G5 AND TO THE CONTENTS OF PUBLISHED SUPPLEMENTARY PLANNING GUIDANCE.

T5: PEDESTRIAN AND PUBLIC RIGHTS OF WAY AND DISABLED ACCESS

The Objections

0065/7	KC & BA Harris
0173/16	W J Whitehead
0536/3	David T H East
0831/9	Miss M B Messenger
0953/5	Tesco Stores Limited
1143/31	Beazer Strategic Land
1584/57	The Marlow Group
1584/58	The Marlow Group
1683/1	Wycombe Area Access For All

PIC 7/6 Objections

2133/1 Mrs Patrica Price

Summary of Objections

- (a) Development proposals should respect public rights of way. Propose amendment to wording to state that these 'should be retained unless exceptional circumstances necessitate considering an alternative'.
- (b) Kerb heights should be consistent; particularly important for the elderly and partially sighted.
- (c) Add text to ensure that footpaths on the fringes of towns are linked to public footpaths in the open countryside.
- (d) Criterion (iii) should omit 'ramps and dropped kerbs' as this encourages intrusion of vehicles, or be protected by bollards to discourage vehicles.
- (e) Need a section seeking the separation of pedestrian routes from vehicles, as cyclists are intruding on pavements and footpaths.
- (f) Where a cycle route is in place, then a developer should accord with the policy, but if not, the developer should not be expected to pay for the whole route.
- (g) Statement of intent rather than a policy; Policy T5 should be deleted or removed to the general text.
- (h) Traffic free zones should not restrict access by orange badge holders.
- (i) Lack of commitment to seek safe, direct, convenient and attractive conditions for pedestrians on existing roads, particularly in Stokenchurch.
- (j) Object to pre inquiry change in paragraph 7.45 re exceptional circumstances, as bus lanes and priority corridors cannot be considered exceptional and would make existing footpaths unacceptably dangerous.

Inspector's Reasoning and Conclusions

7.5.1 The sub-heading to paragraphs 7.39-7.48 is entitled 'Pedestrian and Public Rights of Way and Access for People with Disabilities'. The effect of PIC7/8 would be to shift paragraphs 7.46-7.48 and the whole of Policy T6 to Chapter 2. Objections to the policy for disabled access (now Policy G9A) and its supporting text are considered earlier in this report. Accordingly, the wording of the sub-heading should be modified. Moreover, since Policy T1(2) already covers the matter of rights of way diversion, it is not necessary to include it in the sub-heading since it

is merely referred to in the supporting text. PIC7/6 refers to 'exceptional circumstances' necessitating footpath and bridleway diversion. This seeming extra requirement is not backed up within the succeeding Policy formulation. This is illogical and also inappropriate. The reason is that rights of way may be diverted using powers other than planning powers. The imposition of such a stringent requirement would introduce confusingly variable tests for authorisation. In any event, the merits of diversion are inseparable from the overall merits of the development and its layout; these fall to be considered under Policy T1.

7.5.2 The essential difference between Policies T1 and T5 is that the former is concerned with accesses to and from the existing external highway system whilst the latter seeks to ensure that adequate provision for people on foot is made within land which is to be developed. This policy requirement has not always received the attention due to it in the past; its growing relevance to the success of multi-modal movement is emphasised in recent planning guidance. Among this guidance is included 'Places, Streets & Movement' (DETR 1998) which is part of a suite of publications concerned with integrated transport. The section of the publication (p68) that deals with walking, as a locally important form of movement, advises LPAs that 'a movement strategy for walking, cycling and public transport should be the *starting point* for designing accessible neighbourhoods' (Inspector's emphasis). So far from being merely a 'statement of intent' it will be seen that the inclusion and formulation of Policy T5 is supported by recent planning policy guidance and that it accordingly merits priority inclusion within Chapter 7 of the Local Plan. Since the Policy is directed primarily at those proposals that require specific planning authorisation, a slight modification of its wording is recommended.

7.5.3 Since the Policy is concerned with the future control of development, rather than the improvement of conditions for pedestrians using the existing highway network, it would be wrong to expand its application. No doubt both local planning and highway authorities are very well aware of the pressing need for much better pedestrian facilities. Indeed, within all the town centres of the District there is clear and welcome evidence of recent road improvements to assist people who choose to move on foot for all or part of their journeys. Such improvement is for local initiative and possible inclusion in transport planning strategies. Development control has its proper place only where there are proposals that call for express planning authorisation. The specific objection to the PIC at paragraph 7.45, according to evidence given at the inquiry, relates to possible footway narrowing as a result of traffic management necessitated by P+R operations. This is not a matter that would be addressed by Policy T5 in any event and is better considered later in the report (see T17). Similarly, the admission of disabled badge holders to pedestrian areas is entirely a matter for traffic regulation and not for planning control.

7.5.4 The effect of PIC7/7 would be to delete the three criteria relating to pedestrian provision. This is endorsed since matters such as kerb heights, insertion of bollards and design of footway crossings are too detailed for inclusion in the Local Plan. The question of linking urban and rural footpaths may be covered by the inclusion of suitable words in Policy T5. It is a worthy aim and is reflected in the supporting text, mainly with reference to the more strategic (eg long distance) footpaths in the District. It is not possible, at present, to indicate public rights of way on the Proposals Map or Inset Maps. However, Definitive Maps prepared by the County Council are referred to in the text; it would be for intending developers to note the presence of rights of way or for the LPA to direct their attention to them. Valuable advice on the partial segregation of pedestrian traffic is given in the DETR publication already cited (esp p32) but it would be altogether too inflexible to specify this as a district-wide planning requirement (see also Policy G25). Cycle routes are likely to be affected by development to the extent that cyclists are allowed to use defined bridleways (but not footpaths) as of right. Diversion of such rights of way would be considered under Policy T1; new provision is a matter for Policy T7.

RECOMMENDATIONS

- TR05/1 Modify the sub-heading before paragraph 7.39 to read '**Pedestrian Movement and Provision**'.

- TR05/2 Modify paragraph 7.45 to read:

'The District Council will safeguard the interests and amenity of pedestrian movement within future development. In accordance with Policy T1, existing public footpaths and other rights of way should be safeguarded and retained. Where detailed development proposals make diversions necessary, these should be at least (if not more) safe, direct and convenient as those being replaced. They should, as far as possible, be provided within the development site or area in question and also be fully capable of being adopted by the local highway authority. The Council also wishes to promote new access opportunities by future footpath linkages within areas of development. Particular attention will be paid to connections with the long-distance National Trails within the District, namely the Thames Path and the Ridgeway Path, which are the subject of Policies RT14 and RT15.'
- TR05/3 Modify Policy T5 in accordance with PIC7/7.
- TR05/4 Further modify Policy T5 to read:

POLICY T5

ALL DEVELOPMENT AND ASSOCIATED HIGHWAY PROPOSALS SHOULD PROVIDE FOR SAFE, DIRECT, CONVENIENT AND ATTRACTIVE MEANS OF MOVEMENT ON FOOT, INCLUDING (WHERE APPROPRIATE) ANY EXISTING RIGHTS OF WAY AND SUITABLE FUTURE CONNECTIONS WITH THE LOCAL AND STRATEGIC FOOTPATH NETWORK OF THE DISTRICT.
- TR05/6 Delete paragraphs 7.46-7.48 and Policy T6 in accordance with PIC7/8.

T6: ACCESS FOR PEOPLE WITH DISABILITIES

(SEE CHAPTER 2: POLICY G9A)

T7: CYCLING

The Objections

0402/2	Mrs B K Wallis
0402/4	Mrs B K Wallis
0510/5	Mr Anthony J Wright
0536/6	David T H East
1039/14	High Wycombe Society – Transport Group
1386/3	Dr Donald Grattan
1584/66	The Marlow Group
1646/6	John Dalton

Summary of Objections

- (a) Need a separate policy for Sustrans route in the Recreation & Tourism Chapter, not Transport.
- (b) Greater instruction required for cyclists in the Highway Code and safe cycling.
- (c) Bus companies should be urged to provide facilities for carrying cycles.
- (d) Disused railway line – Bourne End to High Wycombe - should be made into a cycleway and footway to provide a safer alternative for school children.

- (e) Cycling is not safe due to road traffic.
- (f) Need to differentiate between necessity cycling (work, school, shopping) and leisure trips.
- (g) Policy does not recognise Wycombe's topography.
- (h) Cycle routes need to be well lit.
- (i) With regard to criterion (i) Local Plan should emphasise importance of safety for pedestrians as well as cyclists. Policy should be amended to make the point that unrestricted cycling brings its own share of hazards.

Inspector's Reasoning and Conclusions

7.7.1 It is probably not necessary to include a separate policy on long-distance cycle routes in Chapter 12 of the Local Plan. The reason is that the Sustrans national cycle network, as currently envisaged, only marginally affects Wycombe District. This situation contrasts sharply with that of long-distance footpaths, like the Ridgeway, which are both long standing and have a significant part to play for recreational purposes (see Policy RT15 etc). Policy T7 is needed in the Transport Chapter because, as the LPA point out, cycling is an important aspect of local transport. It is also government policy to improve cycling facilities and much may be done by way of development activity to further this objective. The actual demarcation of cycleways within the public highway itself is very largely a matter for the local highway authority and the LTP but the present existence of such facilities is correctly shown on the Proposals Map. To what extent significant segregated cycleways can be secured in or through development areas is not certain. To the extent that it is possible, it is appropriate to include this intention in the Local Plan because this may affect the physical standard to which the facility may be designed.

7.7.2 As the LPA correctly point out, cyclists' safety and Highway Code instruction are not land use planning matters. Neither is the question of carriage of bicycles by bus, although this is a matter that may arise in the design of future P+R schemes where the alternative provision of cycle parking (see Policy T8) may offer a suitable alternative. The use of the Bourne End to High Wycombe as a cycleway is site-specific; it is covered by Policy T12 and is not appropriate for inclusion in Policy T7 since this addresses more general district-wide opportunities. As far as cycling safety is concerned, this is largely for the local highway authority to determine in their design of on-street traffic management schemes. However, the subject does impinge on planning control since the form and layout of development areas may affect cyclist safety, segregation and ease of movement (together with that of pedestrians). This is reflected in Policy T7(1) (as recommended for modification). The LPA fairly point out that, although some parts of High Wycombe are too hilly for easy cycling, much of Wycombe District is relatively flat; this includes the town centres of Marlow and Princes Risborough.

7.7.3 The objection that relates to pedestrian safety is presumably directed at currently anti-social cycling practices such as riding on footways. There is no need to make reference to this since it is essentially a matter of law enforcement. Moreover, it may fairly be argued that the better and wider provision of safer cycle facilities will result in far fewer incentives to encroach on the purely pedestrian realm. The lighting of cycleways will be for the local highway authority to consider when adopting the highway system within development areas. It is probably not helpful to try to distinguish between cycleways for mainly leisure or local movement purposes. As earlier noted, national or long-distance cycleways may in future achieve mainly recreational status (and thus merit a Chapter 12 policy). However, during the present Local Plan period cycleways will remain predominantly of local interest only. In the interests of avoiding duplication, it would be best to delete the fourth paragraph of Policy T7; the question of cycleway (usually bridleway) diversion is addressed in Policy T1(2) (as modified).

RECOMMENDATIONS

- TR07/1 Modify Policy T7 to read:

POLICY T7

(1) WHEN ASSESSING DEVELOPMENT AND ASSOCIATED HIGHWAY PROPOSALS, SAFE, DIRECT, CONVENIENT AND ATTRACTIVE PROVISION FOR CYCLISTS WILL BE SOUGHT, AND MAY INCLUDE;

(a) DETAILED TRAFFIC MANAGEMENT AND TRAFFIC CALMING SCHEMES TO ENSURE BOTH CYCLISTS' SAFETY AND PRIORITY MOVEMENT; AND

(b) PROVISION OF EFFECTIVE AND CONVENIENTLY LOCATED CYCLIST (AND PEDESTRIAN) CROSSING POINTS OF VEHICULAR TRAFFIC ROUTES;

(2) ACTIVE SUPPORT WILL BE GIVEN, WHERE DEVELOPMENT OR OTHER OPPORTUNITIES OCCUR, TO THE CREATION OF AN INTEGRATED NETWORK OF NEW AND IMPROVED CYCLE ROUTES (BOTH ON AND BEYOND EXISTING PUBLIC HIGHWAYS);

(3) THE INCORPORATION, WHEREVER POSSIBLE, OF CYCLEWAYS WITHIN DEVELOPMENT PROPOSALS (ESPECIALLY WHERE CONNECTIONS CAN BE MADE TO THE WIDER NETWORK OF CYCLE ROUTES) OF A STANDARD SUITABLE FOR ADOPTION BY THE LOCAL HIGHWAY AUTHORITY.

- TR07/2 Modify Appendix 10 in accordance with PIC7/19.

T8: CYCLE PARKING PROVISION

The Objections

0173/17 W J Whitehead
0402/3 Mrs B K Wallis
1039/15 High Wycombe Society – Transport Group

Summary of Objections

- (a) Cycle parking should not be included unless access for cyclists would not be to the detriment of pedestrians or public transport users and the disabled.
- (b) Secure parking must be vandal proof. Cycle racks must be in a lockable shed etc.
- (c) Criterion (iv) of Policy T8 should state 'railway stations and bus termini' as opposed to 'transport interchanges'.

Inspector's Reasoning and Conclusions

7.8.1 It is obvious from the tenor of Policies T1, T4, T5 and T7 that it is the intention of the LPA, through the Local Plan and the process of development control, to secure optimum mobility by users of all modes of transport. If the Policies imply a degree of prioritisation for pedestrians and cyclists, this merely reflects a relative paucity of provision in the past. The requirement for cycle parking correctly seeks to redress this past degree of imbalance. No doubt, in practice, developers will be rightly required to make priority mobility provision for the physically disabled, the blind and partially sighted, older people and pedestrians, public transport users, riders and cyclists. This will be done in different ways in different locations. It would be difficult, to the point of outright impossibility, to lay down priorities district-wide for on-site arrangements. All that need be done with regard to cycle parking is to stipulate that

adequate provision be made and to indicate certain priorities in relation to future major land uses and generators of cyclist traffic. Cycle security is not a land use planning matter. Category T8(1)(d) is appropriately defined since innovative forms of transport interchange (eg P+R terminals and M40 coachway stops (see Policy T17)) may very well be introduced.

RECOMMENDATIONS

- TR08/1 Modify Policy T8 to read:

POLICY T8

(1) SUITABLE CYCLE PARKING PROVISION WILL BE REQUIRED AT MAJOR FUTURE GENERATORS OF CYCLIST TRAFFIC AND, WHERE APPROPRIATE, WITHIN ALL PROPOSED DEVELOPMENT AT LOCATIONS SUCH AS:

- (a) EMPLOYMENT AREAS.
- (b) EDUCATIONAL ESTABLISHMENTS
- (c) RETAIL CENTRES.
- (d) TRANSPORT INTERCHANGES.
- (e) LEISURE FACILITIES.
- (f) PUBLIC BUILDINGS

(2) DEVELOPERS SHOULD PROVIDE ADEQUATE CYCLE PARKING, IN ACCORDANCE WITH APPENDIX 10, AT SUCH PLACES AND AS PART OF FUTURE HOUSING, SHOPPING, OFFICE, WAREHOUSING AND PUBLIC BUILDING DEVELOPMENT.

T9: PUBLIC TRANSPORT

The Objections

0228/3	Thames Valley Chamber of Commerce & Industry
0408/26	<i>Ercol Furniture Ltd</i>
0953/7	Tesco Stores Limited
1039/4	High Wycombe Society – Transport Group
1039/20	High Wycombe Society – Transport Group
1141/32	Beazer Strategic Land
1145/6	C Livesey
1145/7	C Livesey
1058/4	G A Hunt
1166/2	Miss L Wootton
1167/3	Miss N J Heath
1167/4	Miss N J Heath

Summary of Objections

- (a) Car use cannot be reduced if more houses are built.
- (b) Do not believe that there will be a trend to start catching buses; many residents work 15-30 miles away, so car use will not reduce.
- (c) The 'improvements' on the London Road have not worked. The problems here should be sorted out, before any more problems are added by new development.

- (d) People will not use public transport, due to its expense and inadequate provision.
- (e) More action and investment is required from the Council, Buckinghamshire County Council and the Government.
- (f) Improved bus services required to employment areas, in particular to Cressex Business Park and to the railway station.
- (g) Policy lacks guidance for development control and should be amended to read '....should be located with appropriate access to public transport in order to maximise...'
- (h) Policy may force developments to move outside the area, with result that shoppers will have further to travel.
- (i) The Policy does not define 'significant' new travel demands.
- (j) Instead of Park & Ride, more 'green commuting' is required.
- (k) Targets set need to be more ambitious. Suggest a Sustainable Transport Audit to obtain accurate data on local trips.
- (l) Achievement of 'high quality access by public transport' will be difficult to prove or disprove. Intentions and purpose requires clarification.
- (m) Object to development at Abbey Barn South, as this conflicts with aims of Policy T9.

Inspector's Reasoning and Conclusions

7.9.1 As with many of the policies in Chapter 7, many of the above objections are directed not so much at the policies themselves but at underlying national policy guidance that some objectors either do not fully appreciate or evidently do not favour. At the other extreme, some objectors clearly support more sustainable policy objectives but fail to appreciate the inherent limitations of land use planning and development control in securing changes in transport provision. As the LPA correctly claim, land use planning has an indirect but none the less vital part to play in making sure that accessibility standards are improved in a sustainable way. Essentially, what it can do is to ensure that all major new development areas are located where high-density public transport is (or may be) available. This is defined by means of the district-wide Accessibility Map whose compilation itself follows planning policy guidance to the letter. The other arm of planning policy is to require new development partly or wholly to fund physical measures to give priority to public transport movement and interchange or to improve access to it. This is especially so in places where higher density (or diverted) bus services can be more economically supported by its increased use by residents, shoppers and employees. This is the case, for example, at Wycombe Marsh where significant redevelopment is proposed.

7.9.2 The Local Plan contains relatively few proposals for land allocations related to transport. These are covered by Policies T11, T17, T20 and T21 as well as the site-specific policy for the redevelopment of High Wycombe railway station (HW8). The function of the Local Plan is primarily to make land use planning provision for assured LTP proposals. To a large extent, objections that claim inadequacy of public transport provision should be directed at the contents of this parallel plan. It is not the function of the Local Plan (or indeed of the LPA) to adopt an advocacy or lobbying role with respect to public transport. No doubt when the LTP process is longer established, sophisticated techniques such as 'sustainable transport auditing' will be developed and may result in better-directed investment. It is a matter for regret that certain complementary planning functions, such as P+R development, have not progressed further and that the LPA now propose to replace firm land allocations with a criterion-based permissive policy (see T17). However, the opportunity will no doubt be taken to work up such initiatives in the short term, especially when, as here, funding is in place and has been allocated in the LTP.

7.9.3 The LPA rightly point out that additional housing provision cannot be constrained by simple considerations of overall highway capacity. The adopted structure plan requires such

additional provision to be made. The Local Plan has the task of allocating it to areas of high accessibility, of restraining on-site parking provision, of adopting generally higher densities and by preferring urban brownfield to rural greenfield locations. All these legitimate planning policies can have the cumulative and combined effect of favouring greater use of alternative modes of transport, especially for peak hour travel. Increasingly, restricted road space will need to be allocated for priority public transport, taxi and cyclist use and it would be wholly premature to rush to judgement over the alleged failure or inadequacies of recently established priority measures, such as along London Road (A40). The evaluation of such improvements to public transport levels of service are primarily for the LTP. However, the combined policies of Chapter 7 of the Local Plan establish a framework whereby partial funding may be obtained from development proposals, including housebuilding.

7.9.4 In response to an objection, the LPA offer PIC 7/9. This reflects the obvious fact that some development areas may not be 'near to public transport nodes or corridors' as advised by PPG13 and its supplementary guidance. This change is welcome as far as it goes and certainly appears to meet the objection. However, it is slightly inconsistent with other Policies, notably T1 and T4. A cross-reference to these Policies would certainly be helpful. It is also necessary to make quite clear that all major development must be accessible by public transport (as well as other modes) either when it is proposed or at the time it is brought into active use. That is why base Policy T1 is bolstered by Policy T4. Accordingly, the re-wording of the Policy should stress that if good public transport access does not at present exist, the developer(s) or development agencies should have a clear intention or a ready willingness to fund physical or other measures to secure its early improvement. This reflects the twin-track approach of land use planning; either to site significant development near to transport or to help to ensure that the overall network is enhanced to achieve the same result.

7.9.5 It is certainly the case that Policy T9 uses some terms that lack precise definition. Examples are 'significant travel demands', 'good access' and 'maximise public transport use'. As the LPA point out, it is necessary to look at proposed development on a case by case basis. This is certainly preferable to trying to lay down more or less arbitrary thresholds. Problems may arise with such benchmarking; one is that it might encourage undesirably small-scale or incremental forms of development. The other is that accessibility standards and modal choice may change (or be changed) by such external forces as technical development or fiscal policy during the period to 2011. Nevertheless, certain objective guidelines exist. The Local Plan's Accessibility Map will influence the location of new development. The explicit county-wide targets in the ITS (quoted in paragraph 7.55) may be relevant. Finally, the science of traffic engineering has provided, for some time past, reliable estimates of generation, modal split and destination as well as calculations of crude and environmental capacity. All these will no doubt be cited in individual cases and will undoubtedly be relied on by the LPA in planning decisions.

7.9.6 It is fairly clear, from their choice of words, that certain objectors advocate what might be called an 'all or nothing' approach to transport planning. In other words, they assume that certain defined sections of the public are bound to use a single mode for all journey purposes at all times. This is entirely contrary to the theme of planning policy guidance. The essential point is that choices need to be available to match mode of travel by reference to time of day, journey purpose and distance travelled. Equally important is the possibility of using two modes for a single trip (eg by the provision of easy interchange between private car or cycle and bus or train). Less certain are the effects of home-based working, green travel plans and remote shopping. These may have a significant combined and cumulative effect on travel demand. They will need to be monitored as they may have implications for development control by way of detailed house design or extension, workplace planning agreements and parking standards. However, there is insufficient evidence at present to determine how they all may (or should) influence the provisions of the Local Plan as regards either policies or land use allocations.

RECOMMENDATION

- TR09/1 Modify Policy T9 to read:

POLICY T9

DEVELOPMENT PROPOSALS WHICH GENERATE SIGNIFICANT TRAVEL DEMAND SHOULD BE LOCATED WITH GOOD OR IMPROVED ACCESS TO THE EXISTING OR FUTURE PUBLIC TRANSPORT NETWORK, IN ORDER TO MAXIMISE ITS USE, HAVING REGARD TO POLICIES T1 AND T4. MAJOR DEVELOPMENT MAY ACCORDINGLY REQUIRE NETWORK IMPROVEMENTS, SO AS TO ACHIEVE ADEQUATE ACCESS BY PUBLIC TRANSPORT, TO BE IN PLACE BY THE TIME THAT IT IS COMPLETED.

T10: BUSES

The Objections

0143/1	Mr R Bullock
0228/4	Thames Valley Chamber of Commerce & Industry
0376/17	Axa Equity and Law Life Assurance Society PLC
0450/1	Miss Helen Clark
0953/8	Tesco Stores Limited
1039/12	High Wycombe Society – Transport Group
1141/33	Beazer Strategic Land
1145/3	C Livesey
1166/1	Miss L Wootton
1570/1	Mr J Woolgar & Mrs P Woolgar
2059/1	J Wilks

PIC 7/10 Objections

1279/16	Mr David Coe
1281/16	Great Marlow Parish Council

Summary of Objections

- (a) Bus lane has not eased congestion on London Road. Additional planned housing and buses will increase traffic problems.
- (b) Unrealistic to make people walk or cycle in High Wycombe, especially elderly and disabled.
- (c) The Council should do more to improved bus services to Business Parks and employment areas.
- (d) Propose amendment: 'As between competing developments, the District Council will support that which supports a more sustainable transportation strategy'.
- (e) Object to principle of public transport being paid for by private development.
- (f) Strategic aim should include express bus service along more routes than M40 and A404, with new arrangements at Handy Cross to facilitate interchange.
- (g) First part of policy is a statement of intent rather than a policy and should be deleted.
- (h) Request more bus services, especially on Daws Hill Lane.

- (i) Proposed bus route between Bassetsbury Lane and A40 would result in loss of privacy for residents at rear of properties, destroy established wildlife environment and all at great public expense. Council should seek a full environmental study.
- (j) Propose amendment: 'Proposals which fail to provide a convenient alternative to the use of the private car, particularly for residents living outside, but within the orbit of towns specified in Chapter 6, will not be allowed to prejudice, nor increase expense to these residents over and above that applied to town residents'.

Inspector's Reasoning and Conclusions

7.10.1 The objections that relate to specific measures such as bus priorities along London Road (A40) and the possible conversion of all or part of the Bourne End branch railway are site-specific. They illustrate the possible application of Policy T10 in future situations but cannot be held to provide convincing evidence of its appropriateness or relevance. All such specific measures to improve public transport need to be judged on merit. The A40 bus lane is recent and will no doubt be evaluated, by operators and the highway and public transport authority, in due course before its abandonment or retention or extension is approved. The use of the section of old railway line between Bassetsbury Lane and London Road is the subject of Policies T11 and T12 and is also very much bound up with the future redevelopment of Wycombe Marsh. Such a scheme will fall to be considered under the terms of Policy T10, when adopted. The mere existence of the proposal cannot, in itself, be held to invalidate the inclusion of this district-wide and longer-term Policy.

7.10.2 The Policy is proposed for change by PIC 7/10. There is some force in the objection that the Policy is partly a statement of intent. The phrases 'will support' and 'will be resisted' are inadequately precise for development control purposes. There are three obvious ways in which land use (as distinct from transport) planning can secure public transport improvements. The first is by the firm allocation of land for infrastructure improvements (eg P+R terminals and other interchanges) and the subsequent refusal of planning permission for conflicting forms of development. This may be done by the Local Plan process or ad hoc, in the course of development control. The second is by means of securing bus priority measures, such as bus-only links, bus bays and turning loops, as an integral part of larger development schemes. The third is by refusing planning permission for either operational or change of use development which would have the effect of generating vehicular traffic to or through existing or firmly proposed pedestrian areas. These are all demonstrably land use planning functions and they need to be rather more robustly stated in the Policy T10 formulation.

7.10.3 The Council is evidently pursuing bus service improvements to and from existing large employment areas. This is not strictly a land use planning activity and, moreover, Policy T10 is mainly directed at future development and network enhancement. It would be wholly inappropriate (and possibly ultra vires) to attempt to state a policy preference for alternative planning applications which 'support a more sustainable transportation strategy'. The Policy does not call for public transport to be subsidised by private development. What this and other relevant policies of the Local Plan seek to do is to hold a balance between new development and the need for infrastructure improvement to service it; the alternative being to refuse permission in cases where infrastructure is inadequate. Such action enjoys policy support as long as only proportionate contribution is sought (see T1 and T4). The provision of express bus services is not for the Local Plan to initiate. However, evidence at the inquiry suggested that so-called 'coachway' interchanges may well be needed and the Policy should be worded to cover this future contingency. The proposed amendment (objection (j) above) is an apparent statement of aim that seeks equity of outcome as between rural and urban residents and would be effectively unworkable in practice in the control of individual development proposals.

RECOMMENDATION

- TR10/1 Modify Policy T10 to read:

POLICY T10

OPPORTUNITIES TO INTRODUCE OR TO IMPROVE ACCESSIBILITY, BUS PRIORITY MOVEMENT AND INTERCHANGE FACILITIES ON THE FUTURE BUS AND COACH SERVICE NETWORK WILL BE SOUGHT AND SUPPORTED IN THE COURSE OF AUTHORISING DEVELOPMENT; ANY DEVELOPMENT PROPOSALS WHICH WOULD ADVERSELY AFFECT EITHER EXISTING ACCESS OR FUTURE IMPROVEMENTS TO SUCH FACILITIES WILL BE REFUSED PLANNING PERMISSION.

T11: BOURNE END TO HIGH WYCOMBE DISUSED RAILWAY LINE: NEW BUSWAY

T12: BOURNE END TO HIGH WYCOMBE DISUSED RAILWAY LINE: SAFEGUARDING

The Objections to Policy T11

0143/2	Mr R Bullock
0143/3	Mr R Bullock
0270/2	Mrs Louise Groom
0384/1	Anne Broome
0390/2	Mr B Groom
0496/1	Mrs L Smith
0544/1	Winifred McLaughlin
0547/1	Mr & Mrs Beckford
0578/1	Mrs S D'Arcy
0684/1	Roger Charles New
0794/1	Mr K W Uphill & Mrs S E Stublely
0794/2	Mr K W Uphill & Mrs S E Stublely
0803/1	Alan Perry
0803/2	Alan Perry
0857/1	Mrs A E Dixon
0852/2	Mrs V E Frost & Mrs J Barrows
0885/1	Mr A G Smith
0939/2	Neil Morley
0942/1	Lisa Dodd
0983/1	Susan Coker
0986/1	Mr & Mrs M J Unwin
1002/1	Vicky Steel
1009/1	Mr J E Pickering
1039/2	High Wycombe Society – Transport Group
1039/7	High Wycombe Society – Transport Group
1085/1	Miss Anne Collins
1145/4	C Livesey
1167/1	Miss N J Heath
1188/1	Simon Wingrove
1294/8	<i>Environmental Records Officer, Bucks County Museum</i>
1311/1	David and Sally Smith
1515/1	Neville E Redway
1533/1	Robert Turner
1536/2	Mark Drukker
1659/2	Philip Carter
1679/1	Mr & Mrs Brant, Kingsmead Road Caring Residents

1725/2 E R Foster
1784/2 Mark Leslie Hochman

Summary of Objections to Policy T11

- (a) Wording is misleading. Amend paragraph 7.61 to read: 'from High Wycombe railway station to its intersection with London Road, from where it would follow the A40 to Wycombe Marsh and beyond'.
- (b) Object to lack of information provided on public transport initiatives to be adopted by Council.
- (c) Unrealistic for people to be made to walk or cycle into High Wycombe. Patronage of route likely to be low.
- (d) Strongly object to use of any form of transport (public or private). Will increase congestion and pollution. An unwelcome intrusion to privacy; risk of security to rear properties.
- (e) Object to proposed cycle way; loss of privacy, amenity, security and intrusion of light pollution. Noise, nuisance, property depreciation.
- (f) Land at rear of 42-112 Kingsmead Road should be redesignated as residential curtilage, in line with an approved 1995 planning permission.
- (g) Question expenditure on reinstating railway line given limited use of current bus service.
- (h) Proposal would be detrimental to Wooburn Green Conservation Area.
- (i) Proposed route should be shown in greater detail. Unclear as to the line of the cycle way/footpath.
- (j) Busway would destroy an important local habitat, amenity and would be of little benefit.
- (k) Need to protect Green Belt.
- (l) Object to access route through Red Lion Way; increase in traffic would be problematic.
- (m) Line should be protected so as to permit the reinstatement of light rail and include the replacement of bridges. Council should be more pro-active in developing the track, rather than just protecting it. Suggest high speed rail links, and new station, together with reopening of line between Marlow and Henley.
- (n) Object – proposal will destroy the Conservation Area of Bassetsbury and its bird sanctuary.
- (o) Proposal is contrary to Policy L3 'Green Space'.
- (p) Development must take account of Biological Notification Site designation. An ecological assessment must be undertaken and appropriate measures taken.
- (q) Old rail link is heavily developed and compulsory purchase orders would be necessary to obtain land. Suggest underground link as alternative.
- (r) Cycle way could be incorporated on sewage works development, without interference to established residential areas.

The Objections to Policy T12

0051/1 Thetford
0143/4 Mr R Bullock

0270/3	Mrs Louise Groom
0352/1	Colin Hingston
0390/3	Mr B Groom
496/2	Mrs L Smith
0506/13	<i>Bassetsbury Area Protection Group</i>
0526/26	Chepping Wycombe Parish Council
0544/2	Winifred McLaughlin
0547/2	Mr & Mrs Beckford
0578/2	Mrs S D'Arcy
0684/2	Roger Charles New
0709/9	<i>Bryant Homes Technical Services Ltd</i>
0853/3	Mrs V E Frost & Mrs J Barrows
0885/2	Alan G Smith
0920/1	Miss Caroline Kay
0939/3	Neil Morley
0942/2	Lisa Dodd
0983/2	Susan Coker
1002/2	Vicky Steel
1009/2	Mr J E Pickering
1039/3	High Wycombe Society – Transport Group
1039/8	High Wycombe Society – Transport Group
1066/2	Mrs Carlo-Ann Cafferty
1085/2	Miss Anne Collins
1145/5	C Livesey
1147/1	Heather Webb
1167/2	Miss N J Heath
1188/2	Simon Wingrove
1294/9	<i>Environmental Records Officer – Bucks County Council</i>
1311/2	David and Sally Smith
1313/2	Mary Whitmore
1515/2	Neville E Redway
1533/2	Robert Turner
1536/3	Mark Drukker
1565/2	C J Humphry
1569/2	Tracy Morley
1659/1	Philip Carter
1679/2	Mr & Mrs Brant, Kingsmead Road Caring Residents
1725/3	E R Foster
1996/2	G Harding

PIC 7/11 Objections

0371/12	Marlow Town Council
0376/52	Axa Equity and Law Life Assurance Society PLC
1039/21	High Wycombe Society – Transport Group

Summary of Objections to Policy T12

- (a) Object to use of former railway line, as it is Green Belt and within a Conservation Area; loss of character, impact on bird sanctuary, intrusion of noise and light pollution, loss of security, loss of amenity, privacy, increased vandalism and criminal activity and negative impact of flyovers, underpasses, increased traffic etc. Concern at safety of users of the path. Loss of wildlife habitat, semi-rural character and unique character of Bassetsbury Lane.

- (b) Request that land is redesignated as residential curtilage, as per planning permission.
- (c) Policy is unrealistic. Land is owned by a large number of individuals, route is heavily developed. Proposal to get people to walk / cycle to town is unrealistic. Suggest underground link as an alternative.
- (d) Route is not needed, the demand for buses is limited; money could be put to better use. Question effectiveness of proposed busway; suggest alternative busway up Marlow Hill and along Marlow by-pass.
- (e) Further clarification on 'unspecified public transport facility' required. Route proposals need to be shown in greater detail. Assessment of viability is required and whether it is a leisure amenity or service facility. Request a full environmental appraisal of disused railway.
- (f) Routing of such a scheme should not involved the re-purchasing of any gardens in Dean Garden Rise or routing of bus and/or trains through Bassetsbury Lane or Kingsmead Road and Willow Court. Proposal Map railway notation should be deleted between Bourne End to High Wycombe, where it affects properties at Deangarden, Bassetsbury Lane and Willow Court.
- (g) Concern that Parish land at Treadaway Hill may be required as part of an extension to the busway.
- (h) Council should be more pro-active and seek to develop the trackway and re-open the railway line between High Wycombe and Bourne End, perhaps as a light rail link, including replacement bridges, as opposed to simply protecting the route. Suggest high-speed rail links, and new station, together with the reopening of the line between Marlow and Henley.
- (i) Contravenes Policy L3 'Green Space' and a permitted change of use to residential curtilage.
- (j) Development needs to be aware of the Biological Notification Site designation. An ecological assessment must be undertaken and appropriate mitigation measures to ensure protection of the nature conservation interest.
- (k) Cycle way could be incorporated in the Sewage Works development without interference to an established residential area.
- (l) Provision should be made to improve links or paths to residences adjacent to the path.
- (m) Object to Pre Inquiry Change to delete word 'public'. Deletion is contrary to Draft PPG13. Whilst present circumstances may not favour the creation of a public transport service, the undeveloped stretches should be safeguarded, pending future changes and funding for such projects. Public transport use of the route offers the possibility of replacing many thousands of car journeys every day.

Inspector's Reasoning and Conclusions

7.11.1 It is convenient to consider most of the objections to Policies T11-12 at the same time. The reason is that the Policies have essentially a common aim; that is to make sure that the remaining parts of the abandoned branch railway trackbed, between the former junction stations of Bourne End and High Wycombe, are safeguarded for local transport needs. These Policies rely on advice originally contained in PPG13 (for the purposes of development control) and then repeated in PPG12 (for the purposes of development plans). The burden of this advice is to keep intact any former railway routes against their possible re-use for successor transport functions and to avoid piecemeal obstruction by later development. Decisions on what future transport use(s) might be appropriate are initially for the LTP. On the other hand, it is right to consider a possible range of feasible options now because their relative probability

will influence development control decisions on what does or does not conflict with the provisions of the Local Plan. Indeed, such an analysis is needed purely and simply to determine the precise form that the Policies should now take.

7.11.2 A review of the history and geography of the railway route is necessary, before its possible future function can be determined. The line from Maidenhead to High Wycombe was built in 1854 by the Wycombe Railway on the broad (2.140 m) gauge as a single track which was later extended as far as Princes Risborough. The Great Marlow Railway Company then built a branch line from Bourne End to (Great) Marlow in 1873. The Wycombe Railway had been converted to standard (1.435 m) gauge in 1870; both railways were subsequently taken over by the former Great Western Railway (GWR) and operated by it until nationalisation in 1948. The line from Bourne End to High Wycombe was closed to all traffic by British Railways in 1970 (ie after the 'Beeching Report' closures of 1963-66). Closure of the Marlow branch might have then followed had it not been for evidently strenuous local opposition. There were intermediate stations within Wycombe District at Wooburn Green and Loudwater (Regional History of the Railways of Great Britain (vol 13)(David & Charles: 1981)). Between 1970 and 1990, some redevelopment took place along short sections of the abandoned railway at High Wycombe, Loudwater, Wooburn Green and Bourne End (ie at or near the former stations).

7.11.3 The old railway formation extends over a curved route about 10 km long between High Wycombe and Bourne End. For the most part, it is derelict and unused. Along a substantial part of its length it defines the inner (urban) edge of the Green Belt and also of the Policy L2 Local Landscape Area. Virtually all of the overbridges across public highways have been demolished although some of the bridges across the former railway are still in place and indeed the new M40 motorway viaduct made provision for spanning the railway, then still in place. The development that has taken place consists of blocks of flats in High Wycombe, an industrial estate at Loudwater, mews housing at Wooburn Green and an office park at Bourne End. In addition, many existing houses backing on to the railway along Kingsmead Road have extended their gardens over the former trackbed. All (or most) of this development activity was apparently authorised before the publication of PPG13 in 1994, which indicated that the linear integrity of former railway routes should be retained. The local transport function of the railway has been taken over by a bus service along the parallel A4094 road between Wooburn Green and Bourne End. A rail service between Maidenhead and Marlow still exists, with train reversal being necessary at Bourne End.

7.11.4 The many objections that have been made to the related Policies T11 and T12 are very varied. Although the Policies are linked in the sense that they fundamentally seek to retain the remaining parts of the former railway for either a busway or another (unspecified) transport use, the objections raise a number of key issues. These are set out below and will be considered in turn. An overall conclusion will then be reached and detailed modification of the Policies will follow from that conclusion. The only objections that will not be dealt with at this stage are those which relate to the land behind Kingsmead Road. These objections are local and site specific and will be considered under Chapter 10 and Policy L3, later in the report. The key issues are considered to be as follows:

- (1) The need for, detailed design and timing of the proposed busway link between High Wycombe Station, London Road and an extension to Wycombe Marsh;
- (2) The extent to which the London Road busway and any other public transport initiatives along the line of railway might support mobility in Wycombe District;
- (3) The impact of bringing the whole or part of the former railway into some form of public use and its effects upon residential amenity, security or privacy;
- (4) The way in which the re-use or safeguarding of the former railway route would adversely impact upon the character of the areas through which it passes;
- (5) The detailed design and practical feasibility of converting the disused railway trackbed

into a railway, tramway, roadway, busway, cycleway or footpath;

- (6) The degree to which the probable future initiatives for trackbed conversion would adversely impact upon defined areas of wildlife or associated ecological interest.

London Road Busway

7.11.5 The provision of a reserved busway between the railway station at High Wycombe and the point at which the branch railway formerly crossed London Road (A40) is programmed in the LTP for 2000-2005. It is the Local Plan's primary function to safeguard the line of this public transport initiative by way of land use policies and not to question its need, timing or viability. Moreover, the Local Plan contains complementary policies that provide for a reservation of the route through the station site and for the improvement of bus-rail interchange. In addition, the LTP envisages a future 'cardinal point' P+R operation and the busway would provide segregated priority movement along the inner urban approach of the eastern leg of the system. Inspection of the area reveals that the 'G-Plan' housing development is well advanced and its approach road has made some provision for the construction and operation of the busway. The way in which the crossing of Gordon Road should be made is a technical matter for the local highway authority. However, it would seem quite feasible to arrange traffic light control with possible priority activation by public service vehicles' transponder equipment.

7.11.6 Evidence at the public inquiry and elsewhere suggests that it would be advantageous to extend the busway into (and through) the Wycombe Marsh redevelopment area. This possibility has already been considered and is supported (see S2). The probability is that this extension would have a length of 500 m over the railway embankment and might also require a grade-separated crossing of London Road. A possible design of an elegant bridge is usefully referred to in the evidence of the High Wycombe Society (Transport Group) in their submission regarding LRT construction. In any event, as far as Policies T11 and T12 are concerned, it would seem entirely feasible to combine busway, cycleway and even LRT operation across London Road at this point. No modification is needed to either Policy to safeguard this possibility. However, the Proposals Map is somewhat confusing in adopting a common notation for both Policies. This may have misled certain of the objectors and it would be helpful to differentiate as between Policy T11 and Policy T12 (by dint of a simple change in notation west and east of London Road).

Public Transport Initiatives

7.11.7 As earlier stated, it is not the function of the Local Plan to determine the way in which the former railway should be integrated with the future public transport network serving Wycombe District. However, the converse of this proposition is that the likely nature of the trackbed's future transport use might well influence land use planning decisions. For this reason, the various possibilities will be reviewed, substantially in the light of the various expert studies carried out by the County and District Councils during the 1990s. The key reports are Buchanan (1996) and Maunsell (1997). These would appear to have influenced the relevant Bucks Structure Plan Policies TR14 and TR15 and indeed the provisions of the Bucks LTP (2000). From all this, it may reasonably be inferred that heavy rail or light rail restoration is either physically unlikely or economically unpromising and that extended busway use, whilst feasible, would be costly and hence unattractive to commercial operators and not especially beneficial to future passengers. For these reasons, both Councils favour policies consistent with PPG12 and PPG13 advice; that is to resist any further development so as to keep the line clear for either longer-term recreational or local transport use.

7.11.8 However, the detailed research and efforts of the High Wycombe Society (Transport Group) are both painstaking and very highly commendable. They accordingly call for close scrutiny and careful consideration. In essence, the Group proposes that the entire trackbed from High Wycombe to Bourne End be used for a form of narrow-gauge (600 mm) railway with multiple-unit railcar operation on the 'Parry People Mover' system. The motive power of this system is low voltage electrical propulsion, using kinetic energy storage by flywheel under the

vehicles. The combined traction motors-cum-dynamos would re-charge the flywheel at 500-800 m intervals and these could coincide with frequent request stops along the route. By these means, intrusive tramway-type (700 V) overhead electrification would be avoided. The capacity of the system to take short radius curves and very steep gradients would mean that numerous local diversions could be made at such places as Loudwater. Bridges are suggested at major road crossings (Gordon Road and London Road) and the system might be extended to Marlow and also Beaconsfield (in South Bucks District).

7.11.9 This type of initiative is regrettably but most unlikely to be adopted in the near future. There are a number of reasons for this. Probably the most compelling is economic. The somewhat circuitous route between two of the main town centres in the District, High Wycombe and Marlow, means that it would be an unattractive alternative to much enhanced direct bus linkage. The respective distances are of the order of 7 km and 14 km as between existing highway and future light railway routes. In addition, the intervening settlements within Wycombe District are unlikely to generate much in the way of added passenger traffic, being located in or next to the defined Green Belt. The replacement bus service is relatively low frequency and the existing direct bus service from High Wycombe to Marlow has only a roughly 30-minute interval. This suggests a fairly modest patronage, despite its being part of a longer-distance service to and from Reading. The narrow-gauge rail option would either call for inconvenient passenger transfer at Bourne End to achieve an equivalent level of service or else require the re-gauging of part (or all) of the Maidenhead-Marlow branch line.

7.11.10 Moreover, the history of what might be called sub-metric narrow gauge railways in Great Britain is inauspicious, to say the least. Several 600 mm gauge railways were opened in the first quarter of the last century; virtually all were closed during the ensuing 25 years. Those that survived (or were revived) are mostly in areas of very high tourism potential, mostly in Wales. The 'Parry People Mover' has yet to be introduced for regular passenger service and has so far been recently proposed for only specialised short-distance uses, such as within exhibition grounds or within seaside resorts. Its propulsion system was briefly introduced in so-called 'gyrobuses' over 40 years ago, but was soon abandoned and has not been used since. In short, the likelihood of a narrow-gauge passenger railway being promoted by the LTP may be discounted for the immediate future. This is because of lack of assured revenue support and the use of hitherto unsuccessful technology together with the difficulties of integration with the railway network within Wycombe and surrounding districts. However, the simple safeguarding of the route would serve to accommodate such an interesting initiative in the longer term.

7.11.11 For rather similar reasons, the possibility of any part of the former railway route being used as a busway appears improbable. The developed corridor along which the present bus service operates is limited in extent and is likely to remain so for the foreseeable future because of the defined Green Belt boundary. This boundary indeed coincides with the former railway line for much of its length. The existence of the Policy L2 boundary, roughly filling the gap between the AONB and the urban edge, further constrains the amount and type of future development and, hence, revenue-earning potential. The probable reason why the passenger railway was closed and abandoned was the relative inaccessibility of the service to the markedly linear (and low density) pattern of residential development along it. It would accordingly seem perverse to adopt isolated lengths of the trackbed for what is a relatively infrequent bus service along roads that are not at present conspicuously congested. The effect would be to take buses away from their direct route and their potential users in order to avoid traffic delays that would appear not to exist. This situation contrasts markedly with the much more promising outlook within the proposed High Wycombe and Wycombe Marsh corridor.

Residential Amenity and Security

7.11.12 Much of the former line of railway in or near High Wycombe adjoins the back gardens of mostly long-established housing. From Wycombe Marsh to Wooburn Green, a distance of well over 4 km, the trackbed runs along the urban edge, which consists of mainly

residential development. It also defines the inner edge of the Green Belt and the rising ground to the south-west is of distinct landscape quality. For these reasons, the safeguarding of the line for 'some [unspecified] future form of transport use' has generated many residents' objections. This response is quite understandable since local residents clearly value the open outlook and relative seclusion that they currently enjoy as well as, in several cases, the added extent of garden ground reclaimed from railway use. However, the Bucks Structure Plan and the Local Plan are bound to reflect firm planning guidance that clearly advises the safeguarding of disused former railway routes for a variety of valuable public amenities, including cycleways and long-distance footpaths.

7.11.13 The evidence of the Buchanan and Maunsell reports and an analysis of the more recent LRT proposals by the High Wycombe Society suggest that there is virtually no credible prospect of any form of mechanical transport use, at least in the foreseeable future. The noise and disturbance caused by trains, light rail vehicles or buses may be confidently discounted as an immediate planning issue. The question accordingly narrows to one of the adverse effects that assured access by people on foot, on horseback or riding bicycles would have on residents' overall amenity, security and privacy. In this context it is important to note that substantial sections of the former railway are either crossed by public footpaths or are used de facto as public footpaths. In addition, the old railway adjoins extensive land to which the public either have access as of right or as members of the neighbouring golf club or more informally. In other words, the degree of privacy and security enjoyed by residents is not absolute. It might well be argued that it would not necessarily or unreasonably be compromised by wider public access following its conversion, in whole or in part, to a properly laid-out right of way on foot or other means.

7.11.14 Much would depend on the precise way in which a footpath or cycleway might be designed. Detailed design would include considerations of frequency of access, including access by adjoining residents. The availability of what was originally a broad-gauge single-track formation suggests that a generous width of combined footpath and cycleway together with a broad landscaped reservation might be possible. Whether the entire length of railway or substantial parts of it would be used as either a long-distance footpath and cycleway (eg as part of national networks promoted by Sustrans or the Countryside Agency) or as purely local connections (eg in the implementation of Policies T5 or T7) would be for the local planning and highways authorities initially to decide. Such decisions would be made on a case by case basis and be subject to public consultation before implementation. This consultation would allow considerations of amenity etc to be discussed by both opponents and proponents of individual proposals with all the necessary facts in front of them. For the present, it may be concluded that conversion to a public right of way would not inevitably compromise secure living conditions and that the relevant planning policy guidance should be followed in this instance.

Character of Adjoining Areas

7.11.15 The former trackbed adjoins mainly open and attractive countryside that dominates it because it rises well above the old railway for much of its length. The railway line forms the inner edge of the Green Belt and was presumably chosen for this role on account of its permanence, visibility and its being a barrier to further urban encroachment. It is of little moment whether it is technically inside or outside the defined Green Belt. The use to which it would most likely be put would be almost entirely recreational. This would seem to be 'appropriate development' in the special sense used by PPG2 (paragraph 3.4). More pertinently, it would serve three of the six stated objectives of Green Belts (once they have been defined). It would 'provide opportunities for access to the open countryside'. It would also 'provide opportunities for outdoor sport and....recreation' (in the sense of walking and cycling). Equally importantly but perhaps less obviously, it would 'improve damaged and derelict land around towns' (in the sense of reclaiming the present unsightliness and dereliction of parts of the abandoned railway in cutting). For these reasons, safeguarding by Policy T12 would seem appropriate.

7.11.16 The other designations that are mentioned are the two conservation areas that skirt the line of former railway. These are the High Wycombe Town Centre Conservation Area (referred to as the 'Bassetsbury Conservation Area') and the Wooburn Green Conservation Area. Under the terms of section 72(1) of the Planning (LBCA) Act 1990, it is necessary to pay 'special attention' to the desirability of preserving or enhancing the character or appearance of these areas in the formulation of the two Policies under consideration. It is a fact that the trackbed only very briefly adjoins these two designations and that no significant or imminent operational development is envisaged or implicit in the provisions of either Policy T11 or T12. It may be that the implementation of either Policy may require fencing or security lighting. However, this may or may not be necessary or may be alleviated by planting and landscaping. In the case of lighting, any impact will be considered under Policy G16 in the event of express permission being required. A reasonable conclusion would be that the impact of the Policies would be of limited or neutral effect on the two conservation areas.

Detailed Design and Feasibility

7.11.17 It has already been concluded that the Buchanan and Maunsell reports do not envisage any likelihood of the former single-track and heavily-graded branch railway being brought back into use. They point out that there would be problems of high noise levels and physical severance associated with resumed main line railway operation. This would also require very extensive compulsory acquisition and clearance of fairly new property. Both main-line and standard-gauge light rail operations would probably require substantial capital funding and revenue support. Indeed, these are the very reasons why the alternative (ultra light) rail solution is proposed. The regional connections that the conventional rail operations might offer would be attractive, especially when combined with the projected re-opening by Chiltern Railways of the abandoned Princes Risborough-Oxford link, but the practical and financial problems have been reliably assessed as overwhelming. As one of the objectors very fairly points out, a much more obviously feasible option would be a direct station to station express bus link, possibly using reserved lanes along the A404 between High Wycombe and Marlow.

7.11.18 The one environmental advantage of light rail would be its relative silence in operation. However, like a main line railway, it would need to have the old alignment cleared and recent property demolished. This would have to be authorised under the Transport and Works Act (TWA) 1992 and would undoubtedly generate much opposition. Moreover, light rail would require overhead single catenary electrification. This would not only be highly intrusive in relation to the linear housing backing on to the railway, it would be singularly prominent and out of place in the local designated landscape. A busway would be one public transport option that would be environmentally and visually acceptable. It would also, given the railway formation width, allow a parallel footpath and cycleway (although possibly at the expense of a landscape reservation). It is easy to see how a long-distance footpath along the old railway would integrate with the national network (Thames Path and Beeches Way) and conceivably with National Cycle Network (NCN) Route 4, in the longer term. For this last reason alone, the Policy ought to be directed at safeguarding any necessary diversions from the trackbed.

Wildlife and Ecological Considerations

7.11.19 Like very many other abandoned and now relatively secluded railway routes, the Bourne End-High Wycombe branch has largely become a de facto nature reserve. The LPA point out that 'a stretch of the former trackbed west of Treadaway Hill is designated as an area of biological importance' without offering much more by way of comment. This area adjoins Fennell's Wood that is already traversed by the line of M40 motorway in cutting (excluded from the Policy L2 designation) and is accessible by perimeter footpaths. It is hard to see how the proposed trackbed safeguarding, by itself, would act against nature conservation or ecological interests. The fact that the seclusion of former railway land has encouraged native flora and fauna to migrate and to flourish is admirable. However, this is a commonplace phenomenon and it is the linearity of the trackbed as much as its seclusion that provides good conditions for propagation and breeding. The probability is that only foot and cycle access by the public

needs to be considered in the short-term. In any case, any such form of access will require authorisation and this will amply allow all threats to wildlife to be adequately investigated.

General Conclusions

7.11.20 The safeguarding from further piecemeal and ad hoc development by the combined effect of Policies T11 and T12 precisely follows long-standing planning policy guidance and is to be welcomed. Had it not been for such development over the past 30 years, many more options might have been pursued. As it is, none of the possible alternative uses, including ultra-light rail, are being definitively and conclusively ruled out by the safeguarding. Equally, the reasonable amenity, privacy and security of any lineside residential or other uses are not immediately compromised. Any of the possible uses of the trackbed would require planning or highways authorisation and the requisite funding would be through the LTP. It is probably not necessary to be too specific about the Policy T11 busway through Wycombe Marsh; this matter will no doubt be examined in detail in the context of that area's comprehensive future redevelopment. The word 'public' might be restored to the Policy T12 formulation. The reason is that any fixed track or guided transport system could be authorised by the TWA 1992 in response to a *private* company's application but it is wholly improbable that it would be other than for a *public* transport function. If the TWA Order were sought for any other function, either deemed planning permission would be obtained or it might then be the subject of a concurrent planning application and 'departure' procedure (see PPG13 Annex C).

RECOMMENDATIONS

- TR12/1 No modifications to Policy T11
- TR12/2 Modify the Written Statement by the deletion of the words in brackets in paragraph 7.61.
- TR12/3 Modify Policy T12 to read as follows:
POLICY T12
(1) THAT PART OF THE ABANDONED RAILWAY FROM BOURNE END TO HIGH WYCOMBE, AS INDICATED ON THE PROPOSALS MAP, WILL BE SAFEGUARDED FOR POSSIBLE USE AS A FOOTPATH, CYCLEWAY OR FOR SOME FORM OF PUBLIC TRANSPORT. DEVELOPMENT PROPOSALS WHICH WOULD PREVENT SUCH FUTURE USE OR FUNCTIONS WILL BE REFUSED PLANNING PERMISSION.
(2) ANY FUTURE DEVELOPMENT PROPOSALS WHICH WOULD PREVENT SUITABLE DIVERSIONS BEING CREATED IN THE COURSE OF IMPLEMENTING ANY OF THE ABOVE USES WILL BE REFUSED PLANNING PERMISSION. IN THE EVENT OF MAKING SUCH DIVERSIONS FROM THE FORMER RAILWAY TRACKBED, THE ROUTE CHOSEN WILL NOT BE SIGNIFICANTLY LESS DIRECT OR ATTRACTIVE.
- TR12/4 Modify the Notations on the Proposals Map (Sheets 3-4) to clearly differentiate between Policy T11 and Policy T12.

T13: RAILWAY PROPOSALS

The Objections

0143/4 Mr R Bullock
0266/2 Noreen Banks

0376/18	Axa Equity and Law Life Assurance Society PLC
0526/25	Chepping Wycombe Parish Council
0851/5	B Mahaffey
1141/34	Beazer Strategic Land
1657/4	Oxon and Bucks Rail Action Committee
2036/1	Mrs A C Gravina

Summary of Objections

- (a) Reference should be made in paragraph 7.66 to the Great Western Zone branches to Marlow and Bourne End.
- (b) Lack of initiative shown to railway policy. Emphasis should be placed on London commuting, Park and Go and public transport interchange.
- (c) Add criterion (iv) 'provide for a new rail station on the existing Chiltern Line at Gomm Valley between Gomm Road and Hammersley Lane.
- (d) Increase in number of trains will increase noise, vibration and pollution. Electrification of the line would have a detrimental visual effect.
- (e) Policy T13 is a statement of intent rather than a policy and should be deleted.
- (f) The Council should undertake a review of possible improvements such as new station sites and a link from Milton Keynes and Aylesbury to High Wycombe.
- (g) Rail link between Marlow and Maidenhead should be enhanced to reduce car traffic.

Inspector's Reasoning and Conclusions

7.13.1 A number of the objections betray some confusion between the respective functions of land use and transport planning. As the LPA point out, there are limits to the ways in which land use planning may properly influence transport planning and railway operations. The LPA also point out that certain matters are quite outside the scope of influence of Wycombe DC as a corporate body. On the other hand, Policy T13 is certainly more than a mere 'statement of intent'. The examples of the proposed P+R operation at Saunderton Station and the redevelopment of High Wycombe Station indicate that the LPA are stating clear policy preferences to measures which are well within the land use planning field and which will need express planning consent. A general statement of policy support to future unknown and unforeseen proposals is necessary and may well have the effect of improving future railway services. It is therefore appropriate. A clear example might be where the re-use and possible disposal of Railtrack operational land might be supported (or conceivably opposed) in relation to its actual or potential usefulness in enhancing or maintaining railway services within Wycombe District or beyond.

7.13.2 At present, the situation is that most if not all development within railway operational land is authorised by article 3 of the GPDO 1995 as Second Schedule (Part 17) permitted development. However, the development of new stations and halts, especially if they are associated with car parking facilities, would probably require express authorisation. Various objections refer to suggested station locations but it is quite inappropriate to comment individually on these at this stage. It is for Railtrack and the TOCs to initiate such proposals and for the LTP to co-ordinate such development, especially if any form of public funding is required. Chiltern Railways evidently consider that the need to increase train frequencies and perceived signalling limitations preclude the establishment of new stations at Loudwater or Gomm Road or the re-opening of West Wycombe Station. Whatever view is taken on the matter, it is certainly correct to have a Local Plan Policy in place that could facilitate any future rail service enhancements if the present operational difficulties were somehow overcome.

7.13.3 The establishment of new (or re-laid) railways does not attract GPDO permitted development rights. Such development is now authorised by grant of deemed planning permission under the TWA 1992. Chiltern Railways have in the past announced the possibility of re-opening the Princes Risborough-Thame-Oxford line. Since the LPA would certainly be consulted on such a re-opening, it is proper to have Policies T7 and T13 in place so that a planning balance be struck as between the two potential uses of the abandoned railway formation. The objection to railway electrification in Wycombe District would seem without foundation; in the unlikely event of this happening, the impact of 25 kV overhead electrification on the AONB would be such as to ensure the widest consultation. The objection to increased noise and freight traffic by rail cannot be addressed by planning policy changes since levels of traffic and motive power are entirely for the TOCs and SRA. On the other hand, any additional freight terminals and transshipment facilities would very probably need to have specific authorisation and would be dealt with case by case. In such a situation, Policy T13 support would have to be set against the other (possibly conflicting) provisions of the Local Plan.

7.13.4 The possibility of rail service extension to places like Oxford, Aylesbury, Buckingham and Milton Keynes are not for the Local Plan and are indeed county-wide matters that are to be addressed in the LTP. Rail connections certainly existed to these places (before the 1960s closures) and Chiltern Railways have in the recent past discussed service extensions and the establishment of so-called 'Parkway' (car to train interchange) stations in the M40 corridor. These matters are outside the scope of the Local Plan in its present form. The objection that explicit mention should be made of the Marlow-Maidenhead service does not seem sustainable. The level of service on this line is capable of some improvement as indeed is its better integration with both car and bus travel. This matter will be returned to in connection with P+R operations (see T17) because of the implications of such a facility in the area of Marlow. Some tentative steps have been taken to improve London-bound commuting by the P+R proposal at Saunderton. There may be other future opportunities in Wycombe District for such facilities. However, given the need for active support by Chiltern Railways, this proposal is probably as far as the Local Plan can go for the time being.

RECOMMENDATIONS

- TR13/1 Modify Policy T13 to read:

POLICY T13

ALL DEVELOPMENT PROPOSALS, SUCH AS THE IMPROVED PARKING AND INTERCHANGE ARRANGEMENTS AT HIGH WYCOMBE STATION (POLICY HW8) WILL BE SUPPORTED IN ORDER TO MAINTAIN AND IMPROVE PASSENGER TRAIN SERVICES AND ASSOCIATED FACILITIES ON LINES PASSING THROUGH THE DISTRICT. THE PASSAGE OF FREIGHT BY RAIL WILL BE FACILITATED WHEREVER PLANNING PERMISSION IS REQUIRED, PROVIDED THAT PASSENGER LEVELS OF SERVICE AND GENERAL ENVIRONMENTAL STANDARDS ARE NOT ADVERSELY AFFECTED.

T14: TAXIS AND PRIVATE HIRE VEHICLES

The Objections

0158/83 High Wycombe and Marlow Green Party
0840/8 Marlow and District Chamber of Trade & Commerce

Summary of Objections

- (a) Specific policies should be included to resolve the taxi problem for Marlow; more taxis should be made available.

Inspector's Reasoning and Conclusions

7.14.1 It is not possible for the Local Plan to address problems associated with the shortage of hire car or licensed taxi provision in Marlow or elsewhere in Wycombe District. Policy T14 is appropriately directed towards the provision of physical space for such vehicles within major development. This is effectively an encouragement of multi-modal choice and sustainable use of public transport. It is clearly right to require such provision in the case of major retail shopping destinations and interchange points. The Policy would benefit from rewording in the interests of brevity; no other modification is considered necessary or appropriate.

RECOMMENDATION

- TR14/1 Modify Policy T14 to read:

POLICY T14

LICENSED TAXI RANKS AND (WHERE A DEMAND EXISTS FOR SUCH FACILITIES) HIRE CAR COLLECTION AND RETURN BAYS, WILL BE REQUIRED TO BE PROVIDED IN ALL MAJOR DEVELOPMENT SCHEMES, ESPECIALLY IN CONNECTION WITH FUTURE DISTRICT CENTRE COMPARISON SHOPPING AND IN THE DESIGN AND LAYOUT OF ALL SIGNIFICANT TRANSPORT INTERCHANGE FACILITIES.

T15: TRAFFIC MANAGEMENT AND TRAFFIC CALMING

The Objections

1141/35 Beazer Strategic Land

Summary of Objections

- (a) Unclear how the provisions of the policy are to be met. The subordination of 'the needs of pedestrians and cyclists to the needs of the private motorist' will be difficult to prove or disprove.
- (b) The nature and scale of development contributions are not set out in sufficient detail for the implications to be clear to applicants for planning permission.
- (c) Speed restrictions are a more acceptable remedy than speed humps, which increase vehicle noise caused by braking and gear changing. Greater enforcement of (speed) restrictions is essential.

Inspector's Reasoning and Conclusions

7.15.1 The extent to which pedestrians and cyclists are given a degree of protection and priority within new development is essentially a matter of architectural design skills and the adequate anticipation of likely movement patterns. Hitherto, traffic calming has been introduced selectively in places such as road traffic accident black-spots and within areas of comprehensive housing rehabilitation. The provisions of Policy T15 will best be met if developers and qualified designers have enough (and early) regard to the wealth of planning policy guidance currently available to them. Reference has already been made to the companion guides to PPG13 (Guide to Better Practice (1995)) to DB32 (Places, Streets and Movement (1998)) and now PPG3 (Better Places to Live (2001)), to name but three. The

answer to the relevant objector is that the LPA will no doubt wish to have very close regard to these (and all subsequently published advice) in their evaluation of applications and in framing their conditional consents or drafting their reasons for refusing planning permission.

7.15.2 The Policy is admirably explicit and is particularly helpful in categorising the detailed criteria by which on-site and off-site traffic calming is to be designed and appraised in future. As has already been stated in connection with objections to Policy T5, provision of safe pedestrian movement is the starting point in residential neighbourhood design. Policy T15 addresses a different but complementary aspect of development control. It is concerned with the effects that vehicular traffic generated by development proposals might have on pedestrian (and cyclist) peace of mind, free movement and reasonable safety both within the site under consideration and indeed also within the immediate neighbourhood. It specifically covers, as is explained in the supporting text, not only residential but all other forms of land use. Its implementation will no doubt be achieved by normal development control and by the process of securing planning agreements to await or to contribute to necessary traffic-calming beyond the immediate confines of application sites. In view of the advised primacy of pedestrian safety and amenity, the Policy might be yet more positively worded.

7.15.3 It is quite impossible for the Policy to predict, for all future cases, the extent of developer liability to provide traffic-calming. Much will depend on the size, nature and location of proposed development. Policies T1, T4 and G3 will be of particular relevance and the general rule will be only to require proportionate provision in individual cases. The extent of on-site provision (wholly met by the development) will essentially be a matter of design judgement and technical expertise. As for off-site measures, the advice of the local highway authority will no doubt be sought concerning matters such as prevailing design (and observed) speeds and traffic flows as well as recent accident statistics. Developers will naturally wish to carry out some of the necessary consultations beforehand in order to facilitate speedy decisions. The precise type of traffic-calming will much depend on continuing research and advice from DTLR.

RECOMMENDATION

- TR15/1 Modify Policy T15 to read:

POLICY T15

(1) THE HIGHWAYS LAYOUT OF ALL NEW DEVELOPMENT WILL NEED TO MAKE ADEQUATE PRIORITY PROVISION FOR THE SAFE AND CONVENIENT MOVEMENT OF PEDESTRIANS AND CYCLISTS AS WELL AS FOR PEOPLE IN CARS. DETAILED PROPOSALS WILL ACCORDINGLY NEED, WHERE APPROPRIATE, TO PROVIDE OR SECURE BOTH ON AND OFF-SITE TRAFFIC CONTROL AND SPEED REDUCTION MEASURES IN ORDER TO:

- (a) ENSURE ROAD SAFETY AND TRAFFIC ACCIDENT REDUCTION;
- (b) ENHANCE THE ENVIRONMENTAL QUALITY OF THE AREA;
- (c) ENCOURAGE NON-MOTORISED OR PUBLIC TRANSPORT MODES;
- (d) MANAGE THE LOCATION AND DISPOSITION OF PARKING AREAS;
- (e) ASSURE SAFE AND DIRECT ACCESS FOR EMERGENCY VEHICLES;
- (f) INTEGRATE SUCH MEASURES WITH THE STREET SCENE.

T16: TRAFFIC MANAGEMENT IN RURAL AREAS

The Objections

0922/7	House Builders Federation
1039/18	High Wycombe Society (Transport Group)
1141/36	Beazer Strategic Land

Summary of Objections

- (a) Object to first paragraph of policy, unless it can be confirmed that the local highway authority is prepared to accept such measures for formal adoption.
- (b) First part of Policy T16 is too detailed for a development plan and should be deleted.
- (c) Policies based on allowing rural traffic levels to rise disproportionately are in compatible with the maintenance of rural character. Demand management measures are needed.

Inspector's Reasoning and Conclusions

7.16.1 It may reasonably be assumed that the local highway authority is satisfied with the wording of Policy T16 because no consequential objection has been made by it. Moreover, if that authority is not satisfied with the application of the Policy in individual cases, it will no doubt so state in consultation on planning applications. The LPA may not then wish to invoke the Policy to support an adverse decision. In the nature of things, development in the rural parts of Wycombe District is likely to be small-scale and isolated. Accordingly, the thrust of the Policy is to ensure that more obviously urban and intrusive forms of traffic management are avoided. The objection related to the detailed nature of the Policy has some weight; it is not necessary to be too precise since the choice of materials and detailing is better set out in design guidance (eg chapter 3 of the Chilterns Conference 'Buildings Design Guide'). The Policy is directed against the *environmental impact* of traffic; it is not intended to induce or encourage added traffic flow and the LPA are correct in saying that 'demand management' is out of place in a rural context. This is because the scale of development and the limited flexibility of its layout are both likely to preclude management of generation rates by site layout or parking disposition.

RECOMMENDATION

- TR16/1 Modify Policy T16 to read:

POLICY T16

WHERE TRAFFIC MANAGEMENT OR CALMING MEASURES ARE INTRODUCED IN ASSOCIATION WITH RURAL DEVELOPMENT, THEY SHOULD EMPLOY MATERIALS AND DETAILING WHICH REFLECT THEIR LOCATION AND ANY INTRUSIVE RAMPING, KERBING, FENCING AND WALLING SHOULD BE AVOIDED. ROAD ACCESSSES TO RURAL DEVELOPMENT SHOULD NOT BE DESIGNED IN SUCH A WAY AS TO BE DETRIMENTAL TO THE PREVAILING CHARACTER OF THE AREA; ANY TRAFFIC ENGINEERING AND SIGNING REQUIREMENTS SHOULD BE THE LEAST NECESSARY TO ENSURE THE SAFETY AND FREE FLOW OF EXISTING AND PROJECTED TRAFFIC

T17: PARK AND RIDE (P+R)

The Objections

0088/2	Phillip Barrett
0173/7	W J Whitehead
0323/6	Arthur E Hawkswell
0376/19	Axa Equity & Law Life Assurance PLC
0376/22	Axa Equity & Law Life Assurance PLC
0506/14	Bassetsbury Area Protection Group
0508/2	Sir Francis Dashwood, Mr E Dashwood and the Dshwood Wycombe Trust
0712/1	South Oxfordshire District Council
0831/12	Miss M B Messenger
0840/4	Marlow and District Chamber of Trade & Commerce
0872/17	<i>Government Office for the South East</i>
0872/18	<i>Government Office for the South East</i>
1023/2	Pelhamcrest Ltd
1039/1	High Wycombe Society (Transport Group)
1039/6	High Wycombe Society
1141/20	Beazer Strategic Land
1144/3	Mr R and Mr A Mash
1260/20	The Marlow Society
1366/2	<i>Mr L H Rashbrook</i>
1413/2	Mr and Mrs D Lindsell
1414/5	Michael J Overall
1584/3	The Marlow Group

PIC 7/12 Objections

0368/10	Chiltern District Council – Planning Department
0374/22	The Countryside Agency
0376/53	Axa Equity and Law Life Assurance Society PLC
0974/6	Chiltern Society
1039/22	High Wycombe Society – Transport Group
1075/23	Little Marlow Parish Council
1115/6	Chilterns Conference
1141/51	Beazer Strategic Land
1260/45	The Marlow Society
1279/17	<i>Mr David Coe</i>
1281/17	<i>Great Marlow Parish Council</i>
2124/6	Crime Prevention Design Adviser, Thames Valley Police
2133/2	Mrs Patricia Price

PIC 7/21 Objections

1798/31	Buckinghamshire County Council – Environmental Services Dept
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Summary of Objections

- (a) Paragraph 7.81 should be amended to read; ‘A Study for the junction is underway, the purpose of which is to identify sustainable measures and actions which reduce congestion and delay at Handy Cross and support the Government’s objectives for investment in the trunk road network’.

- (b) Park and Ride not viable or necessary; concept is fundamentally unsound in planning and transportation terms as it encourages car use. Strategic case for Park and Ride facilities is inadequately justified with developed forecasts.
- (c) The Council should realise that it is current fare costs charged by local bus companies which prohibits the use of public transport.
- (d) Request evidence of research undertaken to understand the issues which will encourage the public to utilise such a facility; and evidence of successful schemes.
- (e) Three of the Park and Ride sites are in the Green Belt and constitute inappropriate development, contrary to PPG2.
- (f) Principle of Park and Ride does not induce people to use other means of transport. More 'Green Commuting' is required such as better transport to and from stations etc.
- (g) Suggest alternative site; Gomm Valley would be a better site than Wooburn Moor. In the absence of any funding, there is merit in securing Park & Ride on currently available sites. If promoted as part of an employment and strategic housing allocation, proposals are more likely to be achieved through developer contributions.
- (h) Suggest alternative site in vicinity of Saunderton Station; larger than West's Yard and able to be provided more effectively and efficiently.
- (i) Proposed Pre Inquiry change does not reflect PPG2, in as far as it refers to potential inappropriate development in the Green Belt. Park and Ride should not be provided in the Green Belt or AONB. Proposed Pre Inquiry change does not give sufficient weight to the importance of protecting the Chilterns AONB. Any exceptions require particularly strong justification and should be made explicit in the text Exceptions should not be allowed.
- (j) Proposed Pre Inquiry change refers to 'expected to' and 'where appropriate'; these terms are vague and fail to give guidance.
- (k) Proposed Pre Inquiry change should recognise the need for alternative sites.
- (l) Object to the deletion of the original policy and its substitution by a new criteria-based approach. Policy is drafted negatively
- (m) Amend Pre Inquiry change to state that 'the Council is seeking to implement the measures' and that 'the Council will produce policies to enable town centre traffic reduction and increase public transport'.
- (n) Proposed Pre Inquiry change does not offer any suggestions for genuine demand management arrangements.
- (o) Amend Pre Inquiry change; after the words 'town centre' add wording 'and industrial or business parks'.
- (p) Add to Pre Inquiry change criterion (ii) 'including rail access where possible'.
- (q) Holding objection; changes that significant implications for the Highways Authority and the Wycombe Transportation Strategy.
- (r) Proposed Pre Inquiry change does not indicate the need to make Park and Ride safe to use.

Inspector's Reasoning and Conclusions

Introduction

7.17.1 Policy T17 is one of the most contentious provisions of Chapter 7 of the Local Plan. A proper consideration of it is complicated by several factors. Firstly, the relevant guidance in PPG13 was subject to significant revisions in March 2001. Secondly, the Policy itself was the

subject of proposed changes (PCs 7/12 and 7/21), approved by the LPA in January and June 2000 respectively (ie before the revised PPG13 guidance was issued). Thirdly, the Bucks LTP now contains overall budgetary and anticipated phasing provisions (based on the original Policy T17 allocations). The LTP (CD/M/18) was adopted by the County Council in July 2000. The effect of this is that the broad principle of the introduction of the Wycombe P+R system has been established. The function of the Local Plan is now to propose either land allocations or land use policies (preferably both) to support an implementation of the LTP programme. However, it should also be noted and must be emphasised that ancillary traffic management measures for P+R operations may well come within the ambit of development plan policies. The 'use of land...including such measures as...the management of traffic' (s36(1)(a)TCPA 1990) was first included in the scope of local plans by the Act of 1968.

7.17.2 Shortly after the enactment of the 1968 legislation, the then Ministry of Housing and Local Government issued guidance on development plan preparation ('Development Plans' (1970)). The need fully to integrate land use and transport planning was stressed in the following words (paragraph 1.6): 'the new development plan system will be concerned not only with the use of land but also with the many other matters which are vital to the proper planning of an area. In particular, the new system provides a means for the full integration of land use and transport planning throughout the process. The new plans will be concerned not merely with the way in which parcels of land shall be used but with the problems of movement and communications which arise because people live, work or play on the land. Nor will the plans look at these problems solely from the aspect of the land requirements implicit in them – the provision of land for roads, car parks, bus stations and so on. They will be concerned to relate the provisions of the plan as a whole to policies for the movement of people and goods which will include proposals for the management and control of road traffic and for maintaining a balance between public and private means of transport'. These words accordingly set out a policy position which subsequent government statements have confirmed.

7.17.3 The reaction of the LPA to the many site-specific objections to the Policy has been to replace the original Policy T17 (i-iv), which specified four sites around High Wycombe and included some design criteria, with a largely criterion-based Policy. The effect of this has been to disarm many of the site-specific objections but a significant number of 'in principle' objections remain. In addition, there are certain objections to the omission of policy coverage, notably in and around Marlow and at Stokenchurch. The last-named objection introduces a further complication in policy formulation; that of the question of so-called 'coachway' stops and interchange facilities between private cars, short-stage bus services and express inter-city coaches. The LTP makes only oblique reference to such a facility, in connection with the Handy Cross improvement (which was discussed at the Inquiry). In view of the very limited number of appearance objections (by Oxfordshire CC (0432) Pelhamcrest Limited (1023) and Mrs Price (2133)), it was decided to hold a Round Table Session (RTS) during the Inquiry. The RTS proceedings are set out in a Note appended to this section of the report (Appendix 7A).

7.17.4 The original Policy T17 and its two proposed changes will be considered in the light of all the relevant objections, the altered PPG13 (Annex E) advice and the nature and timing of the proposals in the LTP. Bearing in mind all these considerations, the key issues which arise are as follows:

- (1) Whether the Policy ought now to be substantially altered in the light of the latest PPG13 advice, the sensitivity of the proposed sites and the recent adoption of the Bucks LTP.
- (2) The probable form, function and operation of P+R services within High Wycombe and the way in which they should relate to other land use and transport planning provisions.
- (3) The extent to which provision could or should be made for easy interchange between P+R operation, local bus routes, express motorway coach and railway services.
- (4) The degree to which a future P+R network would serve to induce modal split in accordance with the other Local Plan policies and might influence land use decisions.

- (5) The manner in which the Policy ought to be worded in the light of the changes in PPG13 advice, the adopted LTP and the possible extension to P+R routes and terminal points.
- (6) Whether or not the finally recommended form of Policy T17 would adequately serve to control the implementation of separate P+R operations elsewhere in Wycombe District.

The above issues will be examined in turn and overall conclusions drawn. Consideration of certain of the objections that relate to matters outside the immediate scope of land use planning control and development plan policies then follow. No attempt will be made, at this juncture, to examine the site-specific objections. They are considered separately (see T17(1-4)).

General Policy Guidance

7.17.5 The specific question of P+R within defined Green Belts is addressed in Annex E of PPG13 (which also amends the contents of PPG2 (Green Belts)). Previously, P+R terminals and car parking had been regarded as 'inappropriate development' within Green Belts. The two ways of securing them had been either to establish 'very special circumstances' to justify them or else to modify the boundaries of defined Green Belts in order to accommodate them. The former would involve a case by case consideration of individual proposals. The latter could only be arranged by the local plan adoption, alteration or review procedures. Neither of these is entirely satisfactory. Apart from anything else, the modification of Green Belt boundaries (which are intended to be long-term and permanent) would introduce a degree of inflexibility. Evidence at the Inquiry (and subsequent inspection) indicated that one of the Oxford City P+R terminals was in the course of considerable improvement and expansion. The purpose of this is to allow car-bus-coach interchange, among other things. Such necessary future expansion would benefit from flexible planning policies.

7.17.6 From this point of view, there is something to be said for the LPA's proposed changes. A criterion-based policy would at least require there to have been a 'thorough...assessment of alternative sites', as advised by paragraph 3.17(a) of Annex E to PPG13. This is critical because three of the four previously allocated sites in and around High Wycombe (ignoring in this context the objectors' preferences for Gomm Valley or Terriers) are in the Green Belt and two are in the Chilterns AONB. It is generally accepted that there is a high probability (falling short of certainty) that most, if not all, future P+R sites in Wycombe District will be either Green Belt or AONB or both. Accordingly, if the relevant Policy T17 criteria are consistent with those of Annex E (paragraph 3.17(a-e)) an element of selectivity and flexibility would be built into the Local Plan and into future development control. It also implies an iterative process, whereby the LTP roll-forward process will no doubt accommodate the current legitimate concerns of both the objectors and the LPA. It will need to continue the search for alternative (or re-examine previously rejected) P+R terminal sites. If such a search is fruitless, the earlier-allocated sites may be adopted for implementation, on the assumption that the authorities wish to proceed.

Park and Ride Operations in High Wycombe

7.17.7 The proposed P+R operation set out in the Buckinghamshire Local Transport Plan (2001-2006) is of classic 'cardinal point' configuration, with intercepting terminal points on or near four of the main radial distributors, A4040 (NW) A404 (NE) A40 (SE) and A404 (SW). Three of the terminals are on the urban fringe and one is detached, near Saunderton railway station. The three fringe sites would be served by bus corridors along either a primary distributor (A40) or district distributors through mainly residential areas. The rural detached site would be served by the stopping train service of Chiltern Railways. There is an obvious gap in the system's layout, in that the West Wycombe A40-A4010 corridors have no fringe sites. This is because of the very heavy planning constraints (Policies HE8 and HE22) in addition to the defined Green Belt and AONB. Provision is made for bus-rail interchange at High Wycombe station that would also serve as the fulcrum of the 3-arm P+R bus system. There might be significant outwards-bound passenger destinations at Cressex (T17(3)) and Wooburn Moor (T17(2)) in the form of sizeable edge-of-town food-stores but not at Hazlemere (T17(1)) or Saunderton (T17(4)). The system would naturally serve the Western Sector development and

the new central bus station.

Public Transport Interchange

7.17.8 Various objections are levelled at the hybrid and allegedly incomplete nature of the system. It is pointed out that additional bus-rail interchanges ought to be made at such places as West Wycombe, Gomm Valley and Loudwater in order to provide a fully integrated service. It is also pointed out that 'coachway' stops ought to be provided at either Stokenchurch (M40:Junction 5) or at Handy Cross (M40:Junction 4), partly to replace the unsatisfactory and improvised coach stop at Lewknor in South Oxfordshire District. It is difficult to reach very firm conclusions on these points. Firstly, the views of the P+R bus operator or operators are not known. Secondly, evidence at the inquiry was that additional railway stations are unacceptable to Railtrack and Chiltern Railways for operational and commercial reasons. Thirdly, the arrangements for transforming what is largely a limited-stop coach service from Oxford to London into a shorter-stage service has complex operational, commercial and highways design implications. These would involve the operators, the two county councils and the DTLR, as local highway authority.

7.17.9 From the foregoing, it is clear that wider co-ordination of transport planning policies must *precede* local land use allocations. Indeed, it is fair to comment that both bus-rail and bus-coach interchange has not progressed as far as has the more conventional car-bus transfer in either the proposed High Wycombe P+R system or, indeed, elsewhere. Another gap in national transport integration and planning is in the matter of coachway stops along motorways. It is particularly obvious that such provision is usually made ad hoc, either at motorway service stations or, very much less satisfactorily, at such places as under the M40 overbridge (Junction 6) on the B4009 on the outskirts of Lewknor. This last arrangement gives rise to untidy roadside parking in a very attractive rural location and to distinct road safety hazards. It is clearly the function of the two county councils' LTPs and their future revision to address the need for all these facilities. It is certainly not that of the present Local Plan unilaterally to make provision by way of allocations, at least until the basic details of an integrated coach-bus-rail system for Wycombe District are settled.

Land Use Planning Implications

7.17.10 The main defect of the Local Plan in respect of P+R operation is its failure to address the more systemic aspects of its design. It is probably not enough merely to allocate parcels of fringe urban land. At least one of the objections was directed at the somewhat nebulous traffic management aspects of the future system. Whatever view is taken of the merits of that objection to this particular aspect of the P+R proposals, it is a reasonable request to have the likely adverse impacts, such as noise, disturbance, waiting and on-street parking restrictions to be more fully evaluated. The corridors should (if at all possible) be indicated in the Local Plan's Proposals Map. The P+R operation, if it is progressed, must function as a complete *system*, comprising outer terminals, central area interchange facilities (as between mode and between components of the system itself) and possibly intermediate stopping places. There may also be consequential land use implications. It is possible that the translation of substantial parking provision from town centre to the outskirts (plus the bus operators' commercial desire to minimise 'dead mileage') may generate additional journeys, new patterns of land use and also controversial development proposals.

7.17.11 The Local Plan would do well to consider these in future, if only to frame additional policies to control development in the vicinity of both terminal and intermediate stopping places. No recommendations are made; no doubt the criterion-based Policy T17 will serve until the P+R proposals are worked up (if at all) in somewhat greater detail. It is noteworthy that most of the expenditure on P+R terminals is programmed for the 2005-2011 period in the LTP. This suggests that the comparative joint evaluation of sites and the development of additional planning policies might have been completed and in place by the time the Local Plan is due for either alteration or review. Additional policy constraints on edge-

of-town development are especially important in the light of allegations that P+R will generate a net increase in private car trips. This is largely unsubstantiated and indeed looks a little implausible. The pattern of bus route coverage in most rural parts of Wycombe District is sparse (see Appendix 9) and development sporadic. A reasonable inference would be that P+R may indeed act to intercept car trips and to induce at least a partial modal shift.

Detailed Wording of Policy T17

7.17.12 The wording that the LPA currently proposes was drawn up before the issue of the revised PPG13 advice. The latter lists five criteria for the appropriate siting of P+R related development in the Green Belt. These pertain to an adequate investigation of alternatives, the sustainability of the operation as a whole, the local effect on the Green Belt, the inclusion of the proposal in the adopted LTP and the exclusion of new building not associated with the site's primary function. Since it appears best now to adopt a criterion-based Policy in the light of objections to the present allocations (among other reasons), the criteria in PPG13 Annex E ought to be embodied in the Local Plan. These criteria should accordingly require (a) adequacy of alternative site investigation (b) good accessibility (c) safe entry and circulation arrangements (d) consideration of ancillary traffic management (e) sensitive landscape design and (f) prohibition of non-essential building. Matters of public safety and adverse impacts on the Green Belt or AONB may be covered by cross-references to other Local Plan Policies.

Other P+R Operations in Wycombe District

7.17.13 One considerable advantage of adopting a criterion-based Policy is that, if suitably composed, it might serve to appraise other P+R schemes in future. Although the LTP only covers High Wycombe at present, evidence at the Inquiry (and elsewhere) suggests that Marlow, Stokenchurch and possibly Princes Risborough may provide bases for P+R proposals. Any such schemes will no doubt emerge as and when the LTP comes to be rolled forward on a regular basis. The LTP will also have regard, as advised by PPG13, to the provisions of the longer-term guidance of Regional Transport Strategy. No doubt the questions of wider inter-modal transfer and better co-ordination of LTPs on a sub-regional basis will emerge in the near future. There was evidence before the Inquiry that issues of cross-boundary importance were being actively considered by the Association of Councils for the Thames Valley Region (ACTVaR) and this will no doubt cover the question of M40 coachway provision. At all events, it would seem that a criterion-based Policy T17 would not only cover ad hoc proposals but might also inform and assist further detailed site investigations, if these are to be carried out for the LTP's future revision.

Other Considerations

7.17.14 Since the LPA is anxious to avoid specifying P+R sites in the Local Plan, any mention of the M40 Handy Cross junction and its possible improvement to facilitate such provision would be out of place. The criterion-based Policy T17 ought now to be non-specific as regards sites but of wider and more general application as regards its application district-wide and in relation to unforeseen P+R proposals. For these reasons, references to any destinations other than the three town centres in Wycombe District (eg employment areas) would be entirely speculative and confusing. It is also inappropriate to add a criterion to the Policy which would require the possibility of rail access and interchange. For the reasons already given, this might well be thought to be a desirable transport and land use planning objective. However, unless and until the LTP is revised and adopts wider inter-modal aims for the P+R operation in High Wycombe or elsewhere, this criterion would have limited relevance to development control. It is absolutely not the function of the Local Plan to comment on the effects that local bus fares may have on patronage and any such reference would be irrelevant.

RECOMMENDATIONS

- ❑ TR17/1 Modify Policy T17 and supporting text in accordance with PICs 7/12 and 7/21.
- ❑ TR17/2 Further Modify Policy T17 to read:

(1) ALL PROPOSALS FOR PARK AND RIDE TERMINALS AND ANY INTERMEDIATE STOPPING PLACES AND ASSOCIATED PARKING WILL NOT BE PERMITTED IN THE GREEN BELT OR CHILTERN'S AONB UNLESS IT HAS BEEN DEMONSTRATED THAT NO OTHER SUITABLE SITES EXIST AND THAT THEY ARE THE MOST SUSTAINABLE LOCATIONS FOR THE EFFICIENT PROVISION OF THE SERVICE.

(2) ANY PROPOSALS FOR PARK AND RIDE FACILITIES WILL BE REQUIRED TO CONFORM TO POLICIES G25, GB2 AND L1 OF THE LOCAL PLAN AND TO:

- (a) CONTRIBUTE TO REDUCED TRAFFIC GROWTH WITHIN THE URBAN AREA AND TO ENSURE THE CONTINUING VITALITY OF THE TOWN CENTRES;
- (b) BE LOCATED IN ACCESSIBLE POSITIONS RELATIVE TO THE MAIN ROAD NETWORK AND TO MAXIMISE SITE POTENTIAL IN LAYOUT AND DESIGN;
- (c) PROVIDE SAFE AND CONVENIENT MOVEMENT FOR PRIVATE CAR, BUS, CYCLIST AND PEDESTRIAN ACCESS AND INTERNAL CIRCULATION;
- (d) BE ASSOCIATED WHEREVER POSSIBLE WITH COMPREHENSIVE TRAFFIC MANAGEMENT MEASURES TO PROVIDE BUS PRIORITY MOVEMENT;
- (e) INTEGRATE WITH SURROUNDING RESIDENTIAL AREAS AND LANDSCAPE SETTINGS BY MEANS OF SENSITIVE LAYOUT DESIGN AND DETAILING;
- (f) EXCLUDE PROPOSALS FOR THE ERECTION OF BUILDINGS AND OTHER STRUCTURES WHICH ARE UNRELATED TO PASSENGER INTERCHANGE.

T17(1): PARK AND RIDE TERMINAL (HAZLEMERE)

The Objections

See Appendix 7B

Summary of Objections

- (a) Loss of existing allotments and recreational or amenity land.
- (b) Loss of landscaping, important open space and wildlife.
- (c) Increased highways danger to pedestrians, particularly school children; dangerous access.
- (d) Sufficient parking (in town centre) and bus services exist. A user is not identified.
- (e) Increased access and congestion problems at Hazlemere Crossroads; emergency services would be hindered.
- (f) No demand for Park & Ride; not a viable option. Proposal will have a negligible impact. Money better spent sorting out schools traffic. Facility will not be accessible

to minority groups (young, old, families, disabled etc). Money better spent on the National Health Service and other traffic measures.

- (g) Increased noise and air pollution.
- (h) Site too close to High Wycombe to encourage modal shift; it should be located nearer to Amersham.
- (i) Increase in crime and vandalism.
- (j) Requires bus priority measures, for which there is a lack of possibilities and high costs.
- (k) Site is in AONB and Green Belt; contrary to national policy. Need to demonstrate probable effectiveness of site and measures to mitigate any adverse environmental impact on AONB.
- (l) Loss of residential amenity as parking to avoid parking fees takes place in residential roads.
- (m) Suggest the need for a 'trial run' to assess demand, using existing car parks.
- (n) Object to Park and Ride on the site, when a new golf club house was not approved.
- (o) Suggest alternative sites; along the Amersham straight A404; to north of Inkerman Hill and A404 at Holmer Green, and Lady Verney-Wellesbourne Site, and site past Easter Dene Valley and curves in the road, A404 between Skimmers Orchard and Earl Howe Road.
- (p) Would require an increase in town centre parking charges for long-stay and improved subsidise for bus services. Scheme will not work without other measures.
- (q) Would have an adverse impact on trade in High Wycombe town centre, encouraging shoppers to go elsewhere.
- (r) Commuters from Beaconsfield should be encouraged to use rail or an enhanced bus service.
- (s) Loss of agricultural land.
- (t) Concern that land will be developed for alternative uses once Park & Ride fails.

Inspector's Reasoning and Conclusions

7.17.1.1 Earlier in the report, it was noted that objections to the original and revised Policy T17 would be dealt with first, followed by the numerous site-specific objections to the various allocations originally made (and symbolically indicated) under that Policy. These sites will be covered in the order that they appeared in the Deposit version of the Local Plan. It is fully understood that the LPA no longer wish to pursue these. However, they are all the subject of duly-made objections and accordingly have to be considered. This consideration will be restricted to the an assessment of the sites against the relevant criteria that were earlier recommended to form part of the modified Policy T17(2)(a-f). Although the allocations were not clearly defined on the Proposals Map (being merely identified on it as **P+R** symbols) they were named. It is therefore considered appropriate to assume that they would be broadly similar in size and shape to those earlier identified for the purposes of the 1999 Halcrow Fox Review (HFR)(CD/M/7).

7.17.1.2 Objections to the various sites will be considered against the six criteria recommended for inclusion in Policy T17. They will also be reviewed in the light of the following design aspects which are germane to the safe and proper functioning of all P+R terminal car parks;

- (1) Adequacy of the site relative to regularity of shape, capacity to accommodate the

- specified number of vehicles and space for adequate integral landscape treatment;
- (2) Proximity to either primary or district distributor roads (ie Class I or Class II roads) with availability of adequate sight lines or space for future junction improvements;
 - (3) Prominence of the site relative to its surrounding landscape and the steepness of site gradients relative to pedestrian movement and ease of internal visibility;
 - (4) Pedestrian and cyclist network proximity and accessibility and the sensitivity of directly adjacent land uses such as residential property and recreational open space.

7.17.1.3 As far as can be judged from the available 1:1250 scale layout plans and site inspections, the Hazlemere site [HFR:1A] appears the most promising of the four allocations. It is virtually level, it is regular in shape and a circulation scheme could be arranged with primary and secondary accesses from the A404 and B474 roads. Although within the AONB and Green Belt, its generous planting and landscaping might serve to mitigate its impact on the openness of the area and its development would not lead to further urban coalescence; a primary consideration in Green Belts. Its extent is of the rough order of 25 000 sq m and its initial capacity of 350 spaces would allow for a very adequate amount of landscaping and dispersal of parking. Its positioning on the urban fringe would appear to serve an intercepting function and the site would be readily visible from the main frontage roads. Given adequate boundary treatment, control of lighting levels and hours of operation, it would be an acceptable neighbour to nearby dwellings and the adjacent golf course, clubhouse and private car park.

7.17.1.4 The various objections that refer to the lack of viability or future need for P+R operations have already been dealt with in that the overall concept has been endorsed in the LTP, following public consultation. The LPA takes the view that the best interim solution is to try other restrictive measures first. If such measures as, for example, increases in town centre parking charges and its progressive reduction fail to control traffic flows and congestion, then the introduction of the P+R operations will no doubt be considered. The clear recent advice of PPG13 is that P+R parking must not lead to a net increase in overall provision; this would negate the beneficial effect of moving off-street parking from the town centre to the urban edge. Presumably, over the next five years or so the effects on Wycombe Town Centre shopping will be carefully monitored. The general effect of P+R operation might very well be to enhance the retail attractiveness of the town, in association with the present floorspace expansion proposals, enhanced rail services and bus accessibility and interchange.

7.17.1.5 The variant layout that has been prepared shows that the present allotment area would be substantially unaffected. The loss of open space and of agricultural land is not the subject of sustained opposition from the MAFF (now DEFRA). The site itself, although it is included within the AONB, is of no very great inherent landscape quality and indeed the area might be enhanced by suitable planting. It is not allocated as open space and access to it appears to be informal and not officially sanctioned. There is no evidence that noise, air pollution, crime or vandalism would increase as a result of P+R operation; much will depend on the detailed design, lighting, layout and security arrangements of the site. Access for pedestrians from the immediate hinterland would seem to be more than adequate and no doubt the entrance arrangements would ensure that the main frontage roads could be safely crossed. No indication has been given of junction improvements in the centre of Hazlemere. However, as with bus priority traffic management on the radial routes, this is an obvious gap in the Local Plan's coverage that has been referred to and will presumably be examined in future.

7.17.1.6 The suggested alternative sites have not been inspected since it is assumed that, if known to the local highway authority, they have been discounted and, if not previously proposed, they will be examined by any joint future study. There is no evidence that P+R overspill would lead to on-street parking in the surrounding residential area; indeed, most of the many objections are directed at the probable failure to attract enough users to the Hazlemere P+R site. In any event, it is open to the local highway authority to institute a local controlled parking zone (CPZ) if deemed necessary. It is doubtful whether a trial run would serve a useful

purpose because it would necessarily have to be introduced without any complementary traffic management measures and thus its successful operation could not be accurately or reliably assessed. If the operation were ultimately to fail, the prospect of the site's being put to alternative urban use is improbable; it would remain in the defined Green Belt and ancillary development might be controlled by (recommended) Policy T17(2)(f). The overall conclusion is that a Hazlemere P+R site might very well have been supported but for the previously recommended adoption of a criterion-based Policy T17, as proposed by the LPA.

RECOMMENDATION

- TR17.1/1 Delete allocation T17(1) from the Proposals Map.

T17(2) – PARK AND RIDE TERMINAL (WOOBURN MOOR)

The Objections

0173/2	W J Whitehead
0375/1	<i>South Bucks District Council</i>
0376/21	Axa Equity and Law Life Assurance Society PLC
0992/2	<i>Mrs Monica Stevens</i>
1075/11	Little Marlow Parish Council
1078/1	<i>G L J Stevens</i>
1295/1	Mr Joseph Patrick & Mrs Mary Dwyer
1308/1	Sandra King
1338/1	<i>Pimms Action Group</i>
1413/1	Mr and Mrs D Lindsell
1414/4	Michael J Overall
1441/1	<i>Mr J W Johnson</i>
1707/1	<i>Andrew Green</i>
1780/1	Mr & Mrs A J Garner
2085/1	<i>William T Jeffcock</i>

Summary of Objections

- (a) Site should be allocated for housing.
- (b) Policy should state that the facility is to have 350-600 spaces, in order to ensure potential to encourage use.
- (c) Propose alternative sites; outside of the Green Belt on Gomm Valley; on land to rear of new hotel at Thanestead Farm; at the top of Holtspur Hill (existing car boot sale site).
- (d) Not viable, the site would be better served by a new Loudwater Station rather than buses.
- (e) Site is in Green Belt; loss of valuable land, open space, affects on adjoining AONB, impact on nature conservation and historic landscape.
- (f) Would not benefit the proposed housing development at Pimms Close. Does not divert traffic away from Flackwell Heath.
- (g) Loss of agricultural land.
- (h) Affects on residential amenity; increased noise, pollution, disturbance and congestion.

- (i) Loss of safety; lead to an increase in accidents, access unsuitable, existing traffic heavy.
- (j) Concern at ever narrowing gap between Beaconsfield, Wooburn and High Wycombe.
- (k) Park and Ride will have little impact, unless bus services are increased.

Inspector's Reasoning and Conclusions

7.17.2.1 As far as can be judged from the available 1:1250 scale layout plans and site inspections, the Wooburn Green site [HFR:4B] appears the least promising of the four allocations. It is of the rough order of 20 000 sq m in size, indeterminate in shape and suffers from the marked defect of being mainly steeply sloping ground and hence very highly visible on the edge of the AONB. Its slope varies but parts of the site may well be of the order of 10% up to the NE. This is not only a visible topographical disadvantage (in the Policy L2 Local Landscape Area) but would also be functionally awkward. That is to say that users of the P+R site would be severely disinclined to walk any substantial distance up or down a steep slope from car to bus or vice versa. This is likely to restrict its possible patronage. Moreover, access on the A40 frontage would be awkward to arrange, being on the inside of a tight bend where the falling road gradient restricts sight lines as well as encouraging fairly high vehicle speeds. The most objectionable single feature of the site is that its development would markedly contribute to settlement coalescence as between Beaconsfield and Loudwater; a very significant disadvantage for a Green Belt P+R site.

7.17.2.2 In the light of these many disadvantages, the site-specific objections may briefly be dealt with. Several of them have effectively been addressed in connection with Hazlemere (see T17(1)). There is much force in those that refer to landscape impact and the effect on the Green Belt. A railway station at Loudwater would not seem a practical possibility on account of the line's relative remoteness and degree of elevation above the local settlement. The possible existence of alternative sites has been noted; in the light of the probable importance of P+R to the Eastern Corridor, there is no doubt that an alternative will almost certainly have to be considered. The existence and precise location of the Tesco foodstore at Loudwater, together with its finite and limited car parking and acknowledged degree of over-trading, suggests that if means were somehow found substantially to increase its capacity and a degree of shared use were achieved, a possible P+R operation might be based here. The problems of A40 frontage access might also be overcome by such an arrangement. An overall conclusion is that the proposed Wooburn Green P+R site should have been deleted. The previously recommended adoption of a criterion-based Policy T17, as proposed by the LPA, is accordingly further endorsed.

RECOMMENDATION

- TR17.2/1 Delete allocation T17(2) from the Proposals Map.

T17(3): PARK AND RIDE TERMINAL (CRESSEX ISLAND)

The Objections

0173/3	W J Whitehead
0510/3	Mr Anthony J Wright
0992/3	Mrs Monica Stevens
1194/1	Lesley Clarke
1195/1	Martin Clarke
1366/1	Mr L H Rashbrook

Summary of Objections

- (a) Site should be allocated for residential.
- (b) Park & Ride would lead to noise, pollution, congestion, accidents, loss of health and mobility.
- (c) Increased congestion on already congested Handy Cross roundabout and John Hall Way.
- (d) Question viability of Park and Ride.
- (e) Loss of valuable land.
- (f) Results of the DETR (now DTLR) study of Handy Cross junction should be awaited.
- (g) Previous proposal for extension to hotel was rejected on highways grounds; what has changed?
- (h) Propose alternative site south of M40, west of Marlow Bottom Road.

Inspector's Reasoning and Conclusions

7.17.3.1 As far as can be judged from the available 1:1250 scale layout plans and site inspections, the Cressex Island site [HFR:3E] appears one of the more promising of the four nominations. It is of the rough order of 10 000 sq m in size, regular in shape and with a slight fall of about 5% to the west. This last consideration is probably within the range of acceptability in view of the similar slope in the nearby food-store car park. The site is unequivocally brownfield in character and, unlike the other three, is within an urban area and unaffected by any protective designation. Apart from the present degree of peak-hour congestion on the Handy Cross gyratory system (which has been the subject of detailed study) its road access is good and the site might support wholly independent circulation of car and bus traffic. It is reasonably well located relative to its large residential catchment area and safe pedestrian crossing of the frontage A4010 road is at least potentially capable of improvement. It is noted that it is regarded as an 'interim' site; given its apparent suitability and the obvious difficulties of securing a permanent site within the Green Belt and AONB south of the A40 motorway, it may be that it might provide a more acceptable solution.

7.17.2.3 Most of the site-specific objections have already been addressed (see T17(1)). There may be alternative P+R sites on the Southern Corridor but the possible need for a 'coachway' (ie short-stage to express bus interchange) stop probably indicates that Handy Cross (M40 junction 4) is a likely location. The site might support residential redevelopment but that is not a current proposal in the Local Plan. The objection that it was evidently the subject of an unsuccessful hotel expansion proposal is of little weight. The circumstances surrounding that decision are not known and it may be that the traffic generation characteristics of such a proposal weighed against it. In any event, the purpose of a P+R site is primarily to intercept (ie reduce) car traffic and not to increase it. There is very little doubt that the Handy Cross junction is at present severely congested at times. However, it is the subject of close DTLR study and future significant inter-modal shifts (assisted by P+R operation) combined with limited capacity increases may reduce peak-hour pressure. So far from reducing mobility, the entire purpose of P+R and public transport interchange is to increase choice (see comments under T0). An overall conclusion is that the proposed Cressex Island P+R site might have been supported had it not been for the recommended adoption of a criterion-based Policy T17.

RECOMMENDATION

- TR17.3/1 Delete allocation T17(3) from the Proposals Map.

T17(4): PARK AND RIDE TERMINAL (WEST'S YARD, SAUNDERTON)

The Objections

0077/1	<i>Norman J King</i>
0173/4	W J Whitehead
0228/2	Thames Valley Chamber of Commerce & Industry – Wycombe & South Bucks
0240/4	Nigel Coates
0366/1	<i>Royal Borough of Windsor & Maidenhead – Planning Policy Unit</i>
0368/2	Chiltern District Council – Planning Department
0374/2	The Countryside Agency
0508/1	Sir Francis Dashwood, Mr E Dashwood and the Dashwood Wycombe Trust
0543/3	Richard Pushman
0699/2	<i>The Frank West Trust</i>
0905/1	Kenneth Barnes
0992/4	<i>Mrs Monica Stevens</i>
1115/3	Chilterns Conference
1156/1	<i>Richard Nutt</i>
1218/7	<i>R J Newell</i>
1387/2	Bradenham Parish Council

Summary of Objections

- (a) Site is AONB; proposal is incompatible. Detrimental effect on environmental and landscape qualities.
- (b) Increased traffic congestion, pollution, noise, loss of health and mobility. Need to ensure that Slough Lane is protected from generated traffic. Increased accidents, pedestrian and equestrian. Proposal would require a roundabout from the A4010 on current dangerous junction.
- (c) Land should be allocated for housing.
- (d) Loss of existing employment land; displacing long-established employment and revenue generating uses, capable of further commercial development.
- (e) Propose alternative sites; the playing field at junction of A4010 and A40; land in the vicinity of Saunderton Station.
- (f) Contrary to PPG2. Propose deletion of reference to 'very special circumstances'.
- (g) Question viability and future use of the site. More research required. Question commitment of Chilterns Railway, on which Park and Ride appears to depend.
- (h) Site is too small to provide an effective and efficient facility. Site too far from station; poor access. Wholly unsuitable location and incapable of economic implementation.
- (i) Loss of valuable land.
- (j) Need for full public consultation

Inspector's Reasoning and Conclusions

7.17.4.1 As far as can be judged from the available 1:1250 layout plans and site inspection, the Saunderton site [HFR:2K] appears one of the two more promising of the Policy T17 allocations. It is of the order of 13 500 sq m in area, regular in shape with a slight slope of about 3.3% down to the NE. It has a slightly constricted access through the existing railway bridge on to a priority crossroads junction on the A4010 road. The inclusion of the site within

the adopted LTP suggests that it is the only one available within the A40 and A4010 approaches to High Wycombe from the N and NW. It is relatively inconspicuous within the AONB and Green Belt. Its size, relative to its nominal capacity of 350 vehicles, and its valley floor position suggest that its landscaping might make it acceptable within this sensitive area. The vehicle access to the primary distributor road is capable of relatively simple improvement and an independent pedestrian link with the station platforms would appear to be feasible. An overall conclusion is that the proposed Saunderton P+R site might very well have been supported had it not been for the recommended adoption of a criterion-based Policy T17.

RECOMMENDATION

- TR17.4/1 Delete allocation T17(4) from the Proposals Map.

T17(5): PARK AND RIDE TERMINALS (ADDITIONAL SITES)

The Objections

0432/1	Oxfordshire County Council
0432/3	Oxfordshire County Council
0840/65	Marlow and District Chamber of Trade & Commerce

Summary of Objections:

- (a) Object to omission of a Park & Ride facility at Junction 5 on the M40.
- (b) Suggest alternative site between A404 and Pump Lane South, together with hotel site and long term parking, to aid Globe Park parking problems.
- (c) Suggest alternative site south of M40, west of Marlow Bottom Road as opposed to use of Cressex Island for Park and Ride.
- (d) Suggest alternative site at Thanestead Farm; less visible than Wooburn Moor, with established access.
- (e) Propose Park and Ride facilities at Stokenchurch, at Little Marlow Sewage Works site; close to Marlow or Bourne End railway stations, junction of Marlow Bypass & Bourne End Road and at Terriers Farm.

Inspector's Reasoning and Conclusions

7.17.5.1 The earlier recommendation (see T17) was to delete all the symbolically allocated P+R sites (T17(1-4)) in favour of a criterion-based Policy (T17(1-2(a-f))). Having dealt with the substantive Policy and added some informal comments on the four originally allocated sites, there is very little more that may be usefully or judiciously said on the eight or so additional sites proposed by the objectors. The reasons are as follows. Firstly, unlike the previously allocated sites, none of the others have been identified as such in the adopted LTP. Certain of them have indeed featured in various studies, including the Halcrow Fox Study already referred to. Secondly, whereas the allocated sites' identification in the LTP does not necessarily demonstrate their land use planning acceptability, it does at least indicate that the programmed funding for their acquisition, development and operation is in place. Even if any of the additional sites were acceptable from a planning perspective, which is disputed by the LPA, it would not be right to allocate them in the Local Plan unless and until their funding was secured. A speculative allocation might either serve to blight the land in question or, more probably, raise expectations of P+R operations that may be some time in implementation.

7.17.5.2 Some very general comments may be made in relation to the various categories of P+R terminals proposed. No particular point is taken on their location, for the most part, in the AONB or Green Belt (or both). Such locations are accepted by the LPA as possible, if not probable. The problem arises, in the case of the Marlow and Bourne End options (see M0), that no form of P+R operation has yet emerged for this part of the District. There is little point in trying to select terminal points of a system which does not yet exist other than as ideas put forward by local interest groups. In the case of the M40 corridor sites, the plain situation is that a very frequent London-Oxford express bus service operates but no great thought has evidently been devoted to its integration with either short-stage local bus services in the High Wycombe-Marlow area or with the P+R terminal at either Handy Cross or Cressex. In the specific case of Stokenchurch, not only are the possible 'coachway' sites at Junction 5 slightly remote from the centre of the settlement but the A40 approach to High Wycombe is the one which is, by a very long way, the most heavily constrained in an environmental sense. All the evidence points to there being very little prospect indeed of P+R operations extending beyond West Wycombe. Accordingly, Stokenchurch could not adequately serve as a coach-bus-P+R interchange point.

RECOMMENDATION

- TR17.5/1 No modification

T18: CAR-FREE HOUSING AND GREEN TRAVEL PLANS

The Objections

0173/12	W J Whitehead
0339/1	Slough Estates PLC
0408/25	Ercol Furniture Ltd
0524/1	Thames Valley Chamber
0536/5	David T H East
0608/1	G W Deeley Ltd
0816/9	Invensys PLC
0922/6	House Builders Federation
0953/11	Tesco Stores Limited
1039/13	High Wycombe Society – Transport Group
1536/1	Mark Drukker

Summary of Objections

- (a) Policy does not go far enough; a presumption of car-free housing is needed.
- (b) Policy is too prescriptive in setting targets.
- (c) Object to mandatory nature of policy; 'required' should be replaced with 'encouraged'.
- (d) 'Free' parking needs to be approached with caution. Supermarkets should offer home delivery services.
- (e) Clarification required on the 'other situations' referred to in the Policy. How does this affect small extensions to existing stores.
- (f) Reference should be made to cheap school and public transport; supported by rigorous parking policies and encouragement to rental clubs.
- (g) No mention given to the policy of staggered or flexible hours.

Inspector's Reasoning and Conclusions

7.18.1 The specialised subjects of car-free and car-reduced housing layouts are very much bound up with detailed design guidance. Accordingly, the objections which bear on these aspects of demand management will be considered later in this report, under those that relate to Appendix 1. Policy T18, so far from being too prescriptive, would seem to be acceptably fluid in its formulation. The LPA appears to be anticipating two distinct categories of demand management, in accord with an objective of halving the overall growth in traffic within Wycombe District during the early part of the Plan period. One is the situation where major non-residential development (presumably mainly employment land uses) might increase floorspace as against reduced levels of car parking. This would require an agreement regarding the sort of 'green travel plans' envisaged by PPG13. The other situation, commonly occurring at primary or secondary schools, is where local traffic hazards are often created by vehicle traffic. The latter's presence may well lead to a diminution of foot and cycle traffic as a result of the imagined or perceived or actual dangers caused by 'school-run' journeys by car.

7.18.2 The Policy follows the advice of paragraph 89 of PPG13. The thresholds above which it will be advisable to draw up travel plans are already contained in Annex D to the PPG. Since there may well be commercial advantages in agreeing such plans (eg by reduced need to provide space-consuming or otherwise expensive car parking) it may be essentially a matter for developers' voluntarily concluding an agreement with the LPA in many cases. Equally, the on-site arrangements for the access, parking and manoeuvring of vehicles may be the subject of negotiation in the light of such travel plans. Where health and education land uses are concerned, the vulnerability of children, the disabled and the elderly may be reflected in the nature of demand and traffic management arrangements. These the local planning and highway authorities may deem it necessary or possible either to make or to require. It is effectively impossible to specify the circumstances where travel agreements are desirable or essential. For that reason, subject to the reasonable qualification contained in PIC 7/13 ('of a serious nature'), the Policy deserves endorsement. It is consistent with PPG13 and its application will no doubt selectively be made on a case by case basis.

7.18.3 The whole point of Policy T18 is that it is both long-term and district-wide. Its rationale, reflecting equally the LTP targets and PPG13 guidance, is to reduce the overall increase in private road motor traffic. Cumulatively, its effects may be to induce modal change in favour of public transport and non-motorised modes of travel. It may also encourage higher occupancy of private motor vehicles. For all these reasons, it is not directed against specific peak-hour problems of traffic congestion (although in the long term it may well assist in this regard). Accordingly, it would not be consistent with this Policy to attempt to stagger hours of employment or to require flexible working practices or home deliveries of goods or merchandise. Certain of these things may happen spontaneously in any event. The most that land use planning can do by way of spreading the road traffic load is to damp down demand for movement by reducing on-site and non-operational parking provision (see T3 and T4). In certain specific cases, it may be possible to impose conditions or secure agreements relating to hours of opening or operation such that peak hour traffic is restricted. However, these cases are likely to be exceptional and would be covered by other policies of the Local Plan.

RECOMMENDATION

- TR18/1 Modify Policy T18 in accordance with PIC 7/13.

T19: TOWN CENTRE PARKING

The Objections

0129/2	Mr & Mrs B R Simpkin
0129/3	Mr & Mrs B R Simpkin
0351/2	John Laing Property
0367/12	Highways Agency
0376/20	Axa Equity and Law Life Assurance Society PLC
0830/2	Royal Sun Alliance Property Investments
0922/5	House Builders Federation

PIC 7/14 Objections

2133/5	Mrs Patricia Price
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Summary of Objections

- (a) Policy is inflexible. Not practical or appropriate for parking provided for an office development to be used by shoppers; or for all long-term parking to be managed and priced centrally. Propose amendments to text.
- (b) More reference to the need to limit short-term parking should be made.
- (c) Development outside town centres could relieve pressure on town centre parking. Propose amendment to text.
- (d) Policy is unclear and contradictory.
- (e) The wording 'non residential' should be inserted in the policy, so that it is clear that the policy does not apply to residential development.
- (f) Pre Inquiry change serves interest of visitors and customers, not the interests of affected residents. Positive parking in the town centre has diminished custom and affected trade.
- (g) Proposed housing allocation at Princes Risborough will put a strain on already over-stretched infrastructure; insufficient car parking provision in the town centre. Additional car parking should be provided in the town.

Inspector's Reasoning and Conclusions

7.19.1 In considering the objections to Policy T19, it is necessary to bear in mind the essential differences between on-street and off-street parking control. In general, at present, only the latter is subject to direct control by the LPA. On-street provision is the responsibility of the local highway authority, subject of course to consultation with the LPA (in the case of Wycombe DC through the TIPS Parking Strategy Group). Off-street parking is the domain of planning control and the LPA. Whereas on-street control and pricing is inherently flexible and may be periodically reviewed, off-street provision (at present at least) is only controllable through the authorisation of development. That being the case, it is entirely appropriate to set out parking use and control policies in the Local Plan. It will be appreciated that the control regime can generally only be established when development takes place (ie comparatively infrequently). Moreover, although dual use of on-site parking is a perfectly proper land use purpose, it may only be possible through agreements negotiated with or undertakings made by the developer.

7.19.2 The purpose of the Policy is evidently to move away from the concept of parking dedicated to a specific land use. This practice has been modestly but successfully pioneered

by local authorities and others. They have in many cases allowed staff car parking to be used off-peak by the general public. What the Policy now proposes is to widen and extend this practice within the various town centres of the District. This is consistent with PPG6 and PPG13 advice. The concept of isolated land uses tied to discrete parking areas is not always supportive of the idea of single trips being made for linked or multiple purposes. The essence of the Policy is flexibility since not all premises will be suitable for dual use (eg because of security or access considerations). All that is needed to make this clearer is the simple substitution of the word 'WILL' by the word 'MAY' in the Policy's formulation. The added wording of PIC 7/14 is generally endorsed since it is clear that it is shoppers and other visitors to the town centres who are intended to benefit from the Policy and its future implementation.

7.19.3 Short-term parking has the admitted defect of generating more traffic movement per car space than long-term. However, it has the incidental benefit of spreading the traffic load over the working or shopping day. The way in which the County and District Councils will seemingly seek to damp down demand, if undue off-peak congestion takes place, is through the availability and pricing of on-street provision. They may also, as stated in evidence, bring forward strategies such as P+R operation, as noted elsewhere. This last will no doubt, according to PPG13 advice, be associated with the transfer of parking spaces from town centre to the urban edge. At present, it will be impossible to institute any reduction of existing short-stay and off-street parking by planning control. All that Policy T19 sets out to do is to ensure that whatever future on-site provision be made on a specific site, it shall be used as flexibly as possible. It would be wholly inconsistent with PPG6 advice to increase the *overall* provision of parking by encouraging it to be made within out-of-centre or edge-of-centre locations.

7.19.4 Policy T19 is not inherently contradictory. It addresses the question of how future authorised parking provision shall be used. Equally, in its second paragraph, it establishes a policy barrier to the development of off-street parking as a separate and individual land use, unless it is related to overall need and consistency with the Local Transport Strategy. These points might be made clearer in the wording of the Policy. It would also assist if the three aims of the Policy were expressed as such rather than being somewhat confusingly set out as criteria (i-iii), which they are not. The Policy is quite obviously not intended to apply to private residential parking. It is fairly clear that the Policy will be primarily applied to Use Classes A1-3 and possibly B1 but the wording is not explicit and probably need not be so, as far as its effective implementation is concerned. There is no conclusive evidence that parking control has adversely affected town centre trade; other explanations suggest themselves. It may be that growing traffic congestion on the approach roads and the counter-attraction of out-of-centre retailing may have had the same effect.

7.19.5 The alleged need for additional off-street parking at Princes Risborough in advance of housing development does not itself invalidate the Policy. Indeed, to the possible extent that pressure exists on current provision, any deficiency cannot but be reduced if the Policy is both adopted and implemented. Elsewhere the case of Policy PR2 (Land Fronting New Road) is examined. One of the objectives of this town centre development allocation (to which Policy T19 will almost certainly apply) is to bring frontage land into more beneficial and intensive use. As noted, the pattern of off-street parking will be so arranged as to reduce or minimise accesses to and from the A4010 (a major distributor in the LTP network). This implies that the parking for most or all development in the allocation will be physically linked to achieve this pattern of circulation. It might reasonably be held that not only is Policy T19 consistent with PPG advice but it is also not inconsistent with Policies H2(A) and PR2 of the Local Plan.

RECOMMENDATIONS

- TR19/1 Modify Policy T19 in accordance with PIC 7/14

- TR19/2 Further Modify Policy T19 to read as follows:

POLICY T19

(1) IN ORDER TO PROMOTE TRIP LINKAGE AND MAXIMISE THE USE OF TOWN CENTRE PARKING RESOURCES, PARKING PROVIDED ON-SITE FOR ANY FUTURE LAND USES WHICH WOULD ATTRACT CUSTOMERS OR VISITS FROM MEMBERS OF THE PUBLIC MAY BE REQUIRED ALSO TO MEET THE WIDER SHORT-TERM PARKING REQUIREMENTS OF THE TOWN CENTRE (AS DEFINED BY POLICY S1) RATHER THAN BE DEDICATED TO THE INDIVIDUAL DEVELOPMENT IN QUESTION.

(2) FUTURE PROPOSALS FOR THE PROVISION OF PUBLIC OFF-STREET PARKING IN THE ABOVE DEFINED TOWN CENTRES, NOT SPECIFICALLY REQUIRED IN CONNECTION WITH AUTHORISED OR PROPOSED DEVELOPMENT WITHIN THE TOWN CENTRE, WILL NOT BE PERMITTED UNLESS IT CAN BE DEMONSTRATED THAT SUCH PARKING PROVISION IS BOTH NECESSARY AND GENERALLY IN ACCORD WITH THE AIMS OF THE LOCAL TRANSPORT STRATEGY.

T20: ROAD IMPROVEMENT SCHEMES

The Objections

0224/4	John Howard Spanner
0566/4	Mrs Lorna Elizabeth Brown
0595/16	Berks Bucks & Oxon Wildlife Trust
0595/17	Berks Bucks & Oxon Wildlife Trust
0699/3	The Frank West Trust
1039/9	High Wycombe Society – Transport Group
1090/4	J Murphy
1210/3	Sainsbury's Supermarkets Limited
1218/8	<i>R J Newell</i>
1387/3	Bradenham Parish Council
1441/2	Mr J W Johnson
1461/2	<i>G E Smith</i>

Summary of Objections

- (a) Mention should be made of 'Best Management Practice'. Conventional drains should be avoided.
- (b) A scheme to re-route heavy traffic from New Road and Rutland Avenue should be added.
- (c) Slough Lane junction improvements at Saunderton are not viable.
- (d) Building new roads is not sustainable.
- (e) Dovehouse Road designation is unrealistic given the requirements of Policy HW4.
- (f) Delete proposed A4010 improvements at rear of Grange Farm and the Rose and Crown (Saunderton) as it has been removed from Buckinghamshire County Council Transport Plan.

- (g) The proposed improvements to the A4010 at Saunderton are inadequate as they do not address problems at the Railway bridge at Bradenham or the Pedestal junction (A40-A4010) at West Wycombe.
- (h) Object to proposed improvements at Daws Hill Lane, Marlow Road and Abbey Road which will encourage traffic through Flackwell Heath.
- (i) Proposed improvements to Wycombe Lane will encourage traffic to cut between M40 and A4, impacting on the conservation area and properties in Red Lion Way.

Inspector's Reasoning and Conclusions

7.20.1 As the LPA points out, the purpose of Policy T20 is not to advocate specific road and junction improvements but merely to safeguard their possible implementation. The improvement schemes in question mainly derive from County Council initiatives and programmes and are listed in Appendix 11. As far as the individual objections are concerned, certain of these relate to improvement schemes which have been abandoned by the County Council. These schemes are as follows:

- (1) Rose & Crown and Grange Farm (Saunderton) Diversion (A4010).
- (2) Abbey Barn Lane and Heath End Road Junction Improvement.
- (3) Daws Hill Lane, Marlow Road and Abbey Road Improvements.

No further comment is necessary either on the merits of the road schemes in question or the relevant objections since neither the safeguarding nor the works themselves will apply during the initial currency of the Local Plan. It may be that an early review of either the Local Plan or the County Council's LTP programming will result in any or all of these schemes being restored. That would be a matter for public debate and consultation at that time.

7.20.2 The objection that any form of road improvement is unsustainable cannot be supported. The LPA point out that the road improvements safeguarded in the Local Plan appear to be consistent with the Buckinghamshire Structure Plan. Broadly speaking, the safeguarded schemes in the Local Plan provide for either (a) improvements that are strictly necessary to restore the status quo, in relation to network capacity, following development proposals or (b) to address specific problems of road safety that are prioritised on a county-wide basis. It is not the intention of the LTP or Local Plan to reduce journey times or to increase speed of travel in such a way as to induce modal shifts in favour of the private motor vehicle. Following inspection of all the locations in question, this view is endorsed. Detailed matters such as strict conformity with DTLR codes of practice for the drainage of new roads are not within the purview of land use planning; no doubt suitable representations may be made to the local highway authority.

7.20.3 The A4010 between High Wycombe and Princes Risborough is part of the Strategic Highway Network (SHN) as defined in the Buckinghamshire LTP. Indeed, its linkage of High Wycombe and Aylesbury (both identified as Major Towns in the Core Strategy of RPG9) adds weight to its importance. Frequent inspection during the course of the inquiry revealed that it functions very adequately outside peak periods and apart from isolated areas of poor junction layout. It runs through the Chilterns AONB and the abandonment of most of the improvement schemes along its length in Wycombe District would appear to be fully justified. The retention of the programmed junction improvement at Saunderton is vindicated on two counts. One is the probability of the relevant rail-based P+R scheme coming forward (see T17). The second is that there appears to be considerable commuter parking at Saunderton Station at present and it is entirely understandable that the road junction needs urgent improvement for road safety reasons.

7.20.4 The other objections relate to site-specific improvements. The case of New Road (A4010) is noted with sympathy but it would be clearly a major investment to divert this route from the urban area of High Wycombe and it would certainly require inclusion in the LTP. The

safeguarding of Dovehouse Road improvement is an integral part of Policy HW4 and the available evidence (including an extant planning permission) points to its facilitating development in this location, rather than the reverse. The impact of the improvement of Wycombe Lane (A4094) is noted with considerable sympathy but its alignment demonstrably needs attention and it is an obvious link between the M40 and A4, given the degree of congestion on alternative routes and junctions. The fact that it runs through a designated conservation area is a reflection that historic areas commonly sit astride long-established road links. The nature of the detailed improvements will undoubtedly reflect this delicate situation and no doubt the local highway and planning authorities will have close regard to the advice of PPG15 (and successor documents) in preparing and implementing the necessary works.

RECOMMENDATIONS

- TR20/1 Modify paragraphs 7.91-7.95 in accordance with PIC 7/15.
- TR20/2 Modify Appendix 11 in accordance with PIC A11/1.
- TR20/3 Modify the Proposals Map in accordance with PIC M/44.

T20(1): ROAD IMPROVEMENT SCHEMES (A404 HAZLEMERE DIVERSION)

The Objections

See Appendix 7C

Summary of Objections

- (a) Object as Proposal Map does not designate a complete/preferred route; no details are given of nature of route or cost implications.
- (b) Diversion would conflict with Government policy and emerging SERPLAN. Inappropriate in the Green Belt.
- (c) Diversion would increase noise, pollution, destroy green fields. Increase congestion.
- (d) Conflicts with other Local Plan policies and planning guidelines for the AONB. Road is incompatible with the Wycombe Transportation Study and conflicts with Local Plan paragraph 7.05 which states that major road building is no longer widely accepted as being the best solution to road congestion. Conflicts with Plan's aim of sustainable transport.
- (e) The Council should discourage Buckinghamshire County Council from including this road.
- (f) Road is unnecessary and would be inadequate to serve development of the sites. The provision of school buses and sensible traffic signalling is a better option.
- (g) Proposal will require compulsory purchase and will divide communities.
- (h) Proposal will put pressure on developing Grange Farm. Concerned there is a hidden agenda to develop Grange Farm.
- (i) Development in the AONB which will be damaging to sensitive landscape. No justification for building in AONB. Environmentally damaging. Road will be conspicuous and harmful to views.
- (j) Comments that as the Council is trying to deter vehicular access to the town centre, the route would be pointless. Suggest alternative route to M40. Suggest alternative link directly to the Marlow By-pass, going around High Wycombe.

Inspector's Reasoning and Conclusions

7.20.1.1 These objections are intrinsically linked to others proposing on the one hand the allocation of Grange Farm as a housing site and on the other its deletion as an ASL. The safeguarded road line is needed in the event of substantial development of the ASL, because there is insufficient capacity in the Amersham Road corridor to cope with projected traffic flows. The County Highway Authority also argued that the road would potentially bring other highway benefits to the northern part of High Wycombe, through reduced travel times. The objections relate to the northern part of the alignment. Similar objections were put before the previous two Local Plan inquiries, where the inspectors recommended the retention of the safeguarded line on the plans.

7.20.1.2 Section 3.2.4 of the report recommends against any housing on all or parts of Grange Farm, primarily because of its conflict with policy to protect the AONB as set out in PPG7 and Policy LS2 of the Structure Plan. The serious adverse impact on the landscape quality of the AONB could not be justified in the absence of a national need for the housing at this location, when other ASLs outside the AONB were still available. However, there is an inconsistency between the status of the land as an ASL outside the green belt which may be suitable for development at a later date and its AONB designation. However, PPG2 states that green belt boundaries should not be changed unless alterations to the Structure Plan have been approved. This leads to the conclusion that the potentially conflicting policy designations, including the relative weight to be accorded to the protection of the green belt and AONB, can only be addressed at the next review of strategic policy. However, the prospect of allocation for housing or other form of development would appear to be far into the future, if at all.

7.20.1.3 There is consistency between the Local Plan and the Local Transport Plan, which shows the scheme as an 'other protected line' but not for implementation during the ten year strategy. PPGs 12 and 13 give no specific guidance about safeguarding highway routes in these circumstances. The safeguarded route has to be considered in this context. It is also important to note that the line of the route passes through the green belt. The construction of a substantial road, with attendant junctions, hard surfaces and lighting columns would be inappropriate development in the green belt. The National Trust accepted that it would be premature to address the issue of whether the positive benefits of a road scheme in the future would outweigh the harm to the green belt, thus creating the very special circumstances needed to set aside the presumption against such development

7.20.1.4 However, while the issues of green belt policy may change over time, it was argued that the impact of a road on the safeguarded line should be assessed in relation to AONB policy. The impact of the road has to be tested against the criteria of paragraph 4.5 of PPG7:

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

As discussed in section 3.2.4, the provision of housing to meet Structure Plan requirements, even on the scale of development of all 100 ha or so of Grange Farm, is considered a local or sub-regional rather than national need. It is hard to equate the safeguarded road as being able to meet the first test of this policy therefore in current circumstances.

7.20.1.5 The route from Kingshill Road passes through the corner of the Four Ashes Conservation Area in an area of parkland that forms the setting for Brands House. Even though the road would be in cutting at this point, the disruption of the parkland would undoubtedly fail

to preserve or enhance the character and appearance of the Conservation Area.

7.20.1.6 The road would not be visible from Hughenden Manor itself but would be open to view from Hughenden Park and a number of other points on the opposite side of the main valley, and the Disraeli Monument in particular. Apart from the carriageway itself, the junction with a realignment of White Hill would almost certainly be a roundabout with lighting columns. Columns and a bridge over a public footpath would also be apparent at the northern end of the route. All of these features would intrude into the presently attractive rural character of the landscape. It is difficult to see what measures could be taken to moderate the impact of the road from these view points, since substantial tree planting would be inappropriate on the grassland; a deeper cutting would have greater impact.

7.20.1.7 The route passes through a mature hedgerow, designated as a BNS, which contains a badger sett virtually on the alignment. The loss of features at the point of breakthrough and the disruption of an important wildlife corridor would be severely adverse consequences of any road scheme. The objectors also provided information to indicate that the fields through which the road would run are likely to be a habitat for the Striped Lychnis Moth, particularly along the direct alignment in the valley bottom. In the absence of full surveys the available evidence indicates that there would be significant disadvantages for the protection of wildlife habitats to set against any benefits from the road.

7.20.1.8 The Council's argument that the likely costs of the road would be more than met by the very substantial level of development on the Grange Farm site is agreed. This would merely support a case for the feasibility or the likelihood of its construction, not the planning merits of the alignment or location of the new road link. Given the extreme sensitivity of the landscape and the improbability that any significant development (not merely new road construction) would be either proposed or authorised, the need actually to safeguard a road alignment in the development plan would appear to lack any immediate or practical justification.

7.20.1.9 The severely detrimental impact of a new road on the sensitive AONB landscape cannot be doubted. The route passes through a re-entrant dry valley in a highly prominent position readily visible from a number of viewpoints in the Hughenden valley. The full length of the alignment shown on the Proposals Map up to White Hill falls within the AONB and green belt. The prospect of any development proposals meeting the most stringent tests for these policy areas is considered extremely unlikely. The Council argued that if as owners the National Trust declared the land along the route inalienable, compulsory purchase procedures associated with any long term scheme would more complicated and time consuming. However, the likely time scales involved would provide plenty of opportunity to programme the necessary procedures. In the very uncertain long term event of development at Grange Farm to meet a national need, the need for any new highway measures would have to be assessed concurrently at that time. In the meantime, which is likely to be well beyond this Plan period, there is no need to protect the route.

RECOMMENDATIONS

- TR20/1 Delete the northern part of the safeguarded route from Kingshill Road to White Hill from the Proposals Map, and delete reference to the Hazlemere diversion from Appendix 11.

T21: STRATEGIC DEVELOPMENT SITES

The Objections

0182/1	AXA, Equity and Law Life Assurance Society PLC
0261/5	Mr John C Harris
0408/27	Ercol Furniture Ltd
0536/33	Chepping Wycombe Parish Council
0678/9	Thames Water Property Division
1013/4	Mr & Mrs L R Van Eesteren
1071/6	Persimmon Homes (TV) Ltd
1131/6	J Hitchen
1579/15	Oxford Land Limited

Summary of Objections

- (a) Policy unreasonable as it requires contributions from all new developments toward road improvements in respect of the development sites listed in Appendix 2.
- (b) Concern at approach to issue of transport improvements which may change over time. Policies T1, T4, T20 and G11 provide adequate controls. Delete policy.
- (c) Improvements proposed at Wycombe Marsh, Wycombe Marsh Paper mill, Abbey Barn North and South, Ercol, Ashwells and Pimms Close are inadequate.
- (d) A detailed transportation study should be undertaken for each of the development sites, before planning specific junction improvements.
- (e) Object to the Hazlemere Diversion, this will have no significant effect on traffic congestion and will increase noise and pollution to rural areas.
- (f) Proposed road improvements for Abbey Barn South would generate more traffic in Flackwell Heath.
- (g) Contributions to the Wycombe Transportation Strategy should be fairly and reasonably related to the sites development and identified at the detailed planning stage.

Inspector's Reasoning and Conclusions

7.21.1 The Council's decision to delete the policy seeking provision of new road schemes and transport improvements related to development proposals is supported, because it duplicates other parts of the Plan. The report deals with transportation requirements for individual schemes in section 3.2 and 14.2. Objections to the Hazlemere diversion scheme are considered in section 7.20 above.

RECOMMENDATIONS

- TR21/1 Modify the Plan in accordance with PIC 7/17

T22: MOTORWAY SERVICE AREAS AND MOTORWAY-RELATED DEVELOPMENT

The Objections

0158/88	High Wycombe and Marlow Green Party
0367/15	Highways Agency
0174/4	R Vitty, B A Vitty
0872/19	Government Office for the South East
0376/14	Highways Agency

1260/42 The Marlow Society

PIC 7/16 Objections

2133/3 Mrs Patricia Price

Summary of Objections

- (a) Mention should be made of alternative fuels.
- (b) Policy does not reflect the latest thinking on motorway service areas.
- (c) Delete wording: 'except where the need for the proposals, together with the lack of appropriate sites are clearly demonstrated'.
- (d) Do not wish to see any additional capacity at Handy Cross, taken up by the development of Cressex Island. An indication of the type of development that might be appropriate here should be given.
- (e) Congestion at Handy Cross is experienced briefly in the mornings and evenings. Lane system and phasing of lights should be given attention. Bus routes and priority corridors will not improve the situation. Use Marlow Hill by-pass.
- (f) Add additional wording to paragraph 7.97 to state 'A study was announced in July 1998 Roads Review, to consider congestion at Handy Cross and possible multi-modal solutions. The purpose of the study is to identify sustainable measures and actions which reduce congestion and delay at Handy Cross and support the Government's objectives for investment in the trunk road network'.
- (g) Improvement in public transport use can only be achieved with measures to enhance its use and to discourage use of private motor cars.

Inspector's Reasoning and Conclusions

7.22.1 There is little planning guidance at present on the use of alternative fuels for road motor vehicles. What there is (PPG13 Annex B) is concerned with recharging and refuelling facilities. Apart from the provision of such facilities, there is little direct or obvious connection at present between the use of LPG, CNG, bi-fuel vehicles, liquid hydrogen, fuel cells (and other emergent technologies) and land use planning. It may well be that such a nexus will indeed emerge. For example, policy documents recently put out by the Greater London Authority (GLA) in connection with their post-2003 plans for Central London road-pricing suggest that such non-polluting vehicles may in the future be given some access and taxation priorities or exemptions. It is conceivable that similar policies, if successful over the next 5-10 years, may lead to the definition of exclusion zones, for conventional vehicles, within local plans (or their then equivalents) beyond that timescale. However, it seems most likely that the subject of alternative fuels or propulsion systems for vehicles will not significantly enter the land use planning domain until well after the present Local Plan is reviewed.

7.22.2 The written justification of Policy T22 has been substantially revised by an addition to paragraph 7.101 (PIC 7/18). This is factual data based on Central Government policy statements for motorway service areas (MSAs). Given the directional access or capacity limitations on two of the three motorway junctions (J3 and J4) in Wycombe District, together with the M40's Green Belt or AONB location, it would seem most likely that the wording of Policy T22 effectively amounts to an embargo. However, PPG13 calls for policy guidance in all local plans. Notwithstanding the stringency of Policy T22, it does accurately and adequately reflect the extreme constraints that are likely to exist in the case of any future proposals. The Policy may well have relevance to future transport interchange planning. For example, it is not wholly improbable that the concept of 'coachway' facilities (see T17) may emerge in future joint land use and transport studies with respect to both Wycombe and adjacent Districts. However, the exceptional need for such facilities and the lack of alternative sites will have to be

conclusively demonstrated.

7.22.3 The Final Report of the 1999-2000 Handy Cross Study (CD/M/61) was published during the course of the inquiry. Although nominally an 'Integrated Transport Study' the main elements of its conclusions and recommendations seem to favour additional highway construction and related traffic engineering devices. In particular, it does little to address the key issues of 'coachway' provision, P+R terminal siting, interchange between express and local bus services, pedestrian or cycle movement and the integration of all these features. Indeed, this is precisely the point made by one of the objectors and it is a theme that is found elsewhere in the Chapter 7 objections. The Report does generally advocate (rather than prescribe) various LTP initiatives. These include better public transport connections between Marlow and High Wycombe and a P+R operation at Handy Cross. Other traffic reduction measures are advocated, such as 'Green Travel Plans' which are the subject of Policies in the present Local Plan. However, an overall conclusion might reasonably be that a sizeable modal shift will only come about through significant local investment in priority measures for public transport.

7.22.4 The decision of the LPA not to be too specific about preferred land uses on the Cressex Island (paragraphs 7.98-7.100) is supported. The size of the site (33 000 sq m) suggests that it might well have a significant (and welcome) urban housing capacity. It might therefore generate vehicle traffic tending to absorb at least some of the added capacity which the £3.0M improvement package at Handy Cross is intended to deliver within 5 years. However, it should be noted that the acceptability, density and timing of any development would be subject to fairly stringent control by Policy T1 (especially if modified as recommended). Moreover, it should be noted that the site is potentially very well located with respect to future (and possibly improved) local, express and P+R bus services. For this reason, it is wise not immediately to allocate it for housing since this might be premature and indeed serve to inhibit its longer term potential. However, in view of its proximity to public transport, employment, retailing and leisure facilities, its actual traffic generation may be comparatively moderate. There is accordingly no need at present either to specify or restrict its short-term development potential.

7.22.5 The objection which relates to the allegedly limited value of bus priority measures would appear to be levelled against the 'bus priority corridors' which feature in the adopted LTP. The route chosen for the southern approach in High Wycombe is Desborough Avenue. Without commenting in detail on the merits of this choice, it is obvious that one reason for its selection for channelling local bus routes is the fact that it is centrally placed within a large residential area. The possibly erroneous inference from this is that the Cressex P+R service and an improved interval bus service to Marlow will necessarily also follow this route. This may be an unwarranted assumption. An obvious approach to Handy Cross for possibly limited stop services such as the P+R operation and express buses connecting the High Wycombe and Marlow railway stations and a M40 coachway stop might be along the dual carriageway A404 from north and south. However, this is well outside the immediate scope of the present Local Plan and may in future be addressed in both the LTP and Handy Cross joint studies.

RECOMMENDATION

- TR22/1 Modify Policy T22 in accordance with PIC 7/18.

T23: ADDITIONAL POLICIES

The Objections

0379/19 Sport England
0402/5 Mrs B K Wallis

0831/19 Miss M B Messenger
0840/5 Marlow and District Chamber of Trade & Commerce
1039/11 High Wycombe Society – Transport Group

Summary of Objections

- (a) Thame-Princes Risborough disused railway and the proposed East-West cycle routes should be protected.
- (b) Transport section should include routes for cycles that would improve daily journeys made by cycles.
- (c) A developer contribution could be used to fund a relief road for Stokenchurch, which would avoid 'rat-running'.
- (d) The section in the Plan relating to transport in Marlow should be redrafted in light of the recent survey work and proposals and DETR guidance regarding an integrated transport policy. Accessibility Zones should be clearly identified and suggest enabling policies
- (e) A policy of vigorously encouraging delivery services should be pursued.

Inspector's Reasoning and Conclusions

7.23.1 The LPA state in rebuttal that the East-West cycle route in High Wycombe is shown on the Proposals Map (Sheet 3) which is indeed the case. It may be that the route selected is not the most direct through part of the urban area. If that is the case, the relevant objector may wish to make future representations to the LPA; in the absence of firm proposals and costings, no recommendation can be made. The Thame-Princes Risborough railway route safeguarding is slightly more complicated. This railway, closed in 1963, has recently been proposed by Chiltern Railways as part of a link from High Wycombe to Oxford. The outcome of this proposal is not yet known but may still feature in the Oxfordshire and Buckinghamshire future LTPs. As far as the Local Plan is concerned, the cycleway is partly shown on the Proposals Map (Sheet 1) and the LPA are content that a further section be shown on the Princes Risborough Inset. In view of the possible strategic connection with NCN Route 5 at Oxford, this is supported.

7.23.2 The suggestion that an A40 bypass to Stokenchurch be safeguarded in the Local Plan cannot be supported. Apart from the fact that this inevitably very expensive road link is not included even in the 10-year Investment Strategy of the adopted LTP (CD/M/18a), it would also have to be the subject of extensive consultation before it could be incorporated in the Local Plan. Moreover, it would probably have to be at least partly funded by residential development to the south of the settlement, which is not currently favoured by the LPA. The fact that both this development and the road link would run through the AONB strongly suggests, given more stringent policies regarding road and housing construction in such areas, that it is somewhat unlikely to be approved. There is also the site-specific question of environmental impact. Upon inspection, it was found that the locally elevated section of the M40 motorway is extremely intrusive within the local landscape and has created highly unwelcome partial severance between the urban area and the public footpath network to its south. These effects would be reinforced by the construction of a further new road link, which may be discounted for these reasons alone. The available accident statistics are inconclusive and do not add to the case.

7.23.3 The Local Plan has been updated, as far as policy content is concerned, following the Marlow Parking and Transportation Study (see M0). The question of larger scale plans showing accessibility is addressed in PIC 7/5 which amends paragraph 7.38 and refers to their appearance in Supplementary Planning Guidance. The objection that calls for a more vigorous policy of encouraging home delivery services cannot be supported. No doubt the greater use of delivery services, especially by foodstores, would in the longer term lead to tangible road traffic reduction. The matter has already been touched on in this report (see Chapter 5) and it has been concluded that the future impact of home delivery services is uncertain and its main

influence may well be on car parking provision at retail outlets. However, the clear possibility of more frequent access and passage of heavier home delivery vehicles to and within residential neighbourhoods will undoubtedly ;need to be considered by the LPA. Since this subject is covered by Policies T1, T3 and T4, no further recommendation is made.

RECOMMENDATION

- TR23/1 Modify paragraph 7.38 in accordance with PIC 7/5.