

Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

| Respondent | Comments | WDC Response |
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| <p>The Chiltern Society</p> | <p>We believe that on the whole this SPD provides a process which is as sound and comprehensible as it is possible to be with such a tricky policy area.</p> <p>However, in Step 2 of Stage 2 of the Assessment of Community Need (p12), we suggest the assessment of needs in rural areas should be "at the parish level unless otherwise agreed by the LPA", rather than the village level, because of the impossibility of defining precisely what constitutes a village. As an example Stokenchurch parish has its main central part, then a group of hamlets Studley Green, Beacons Bottom, Horsleys Green - are these latter 'villages'?</p> <p>Also, if the applicant is going to have reference to the Community Facilities Strategy, what geographical basis is that done on? - sensible to make it consistent.</p> <p>Possible suggestions: reword to say assessment of needs based at parish level unless otherwise agreed - putting onus on applicant to quibble if they think parish is too big; or define a geographical radius or appropriate area to be discussed with LPA in advance.</p> | <p>Whilst the Community Facilities Strategy (CFS) is presented on a Ward basis, the catchment areas for facilities in the CFS are based on distance, which differs depending on if the facility is in an 'urban' part of the ward or 'rural'.</p> <p>If the Assessment of Needs was carried out at a parish/ward level, it is considered that this is unlikely to be representative of the actual catchment areas of facilities. For example, wards such as 'Flackwell Heath and Little Marlow' have community centres miles apart and are separated by geographical features that would discourage the use of facilities in one centre by the residents of the other. Parish areas can be similar (for example Hughenden Parish includes Widmer End, Naphill, Hughenden Valley and Great Kingshill) and therefore are unlikely to be the most accurate representation of catchment areas for community facilities.</p> <p>It is considered that a more likely catchment area for community facilities is village level which gives residents the opportunity to walk or cycle to venues. Whilst it is appreciated that the boundaries of villages are not always clear, the Council encourages dialogue between the Applicant and Development Management Officer, to define the most appropriate area that should be considered in the Assessment of Needs,</p> |

Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| | | where the extent of the area is not clear. |
| <p>Wooburn & Bourne End Parish Council</p> | <p>Public toilets and Day Centres are not listed</p> <p>No acknowledgement of Bourne End and the lack of parks as defined in the recent Tesco planning application and the Councils own assessment of community space.</p> | <p>Agreed</p> <p>We agree that public toilets (a sui generis use) are community facilities and should be included. Therefore we have amended the text to refer to them. Day centres are a D1 use which is noted in the SPD as community facilities.</p> <p>The SPD does not go into detail about specific locations.</p> <p>It is already acknowledged that a local open space deficiency exists in this area, as noted in the Wycombe Open Space Framework. Furthermore, open space is protected by other planning policies such as policy CS17 (Environmental Assets).</p> |

**Community Facilities Supplementary Planning Document
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| <p>High Wycombe Society</p> | <p>In the fourth paragraph we note that in response to a situation described as "If ... there is no community requirement" the document goes on to say, "Where there is a need for the facility " etc. This describes a situation where the community has no requirement (or demand) for the facility but the Council decides that it needs such a facility in any case. We would ask for a balance in all descriptions of facilities as either "required" or "demanded" (based on assessable and measurable requirements/demands of the local community) rather than on the "need" as subjectively expressed by the Council.</p> <p>We fundamentally seek a more measured and careful justification of the assessment of any facility as required or in demand to avoid situations where the Council might act prejudicially against a closing facility which is no longer in demand and which has no further control over its future success.</p> <p>We would like to see a more rational statement than the Council's commitment "to ensuring these types of facilities remain available for community use", in such cases where there is clearly no further local demand or requirement for such a facility.</p> <p>The Council has chosen to focus on pubs as an example. We would like to see this page rewritten to avoid posing the</p> | <p>The SPD does not intend to describe a situation where the community has no requirement (or demand) for the facility that the Council will then decide that it needs such a facility in any case.</p> <p>The Council considers that the term “need” is more appropriate than “required” or “demanded”, as it is considered to be less subjective than the latter terms.</p> <p>The Council considers that a community facility site can be valuable to a community because it can enable a community facility in need to open up in the community. Therefore in some situations, the closing facility may not be in demand, but the site might be in demand for an alternative community facility use and therefore change of use/ redevelopment of the site for a non-community facility use may be resisted by the Council.</p> <p>Agreed. This sentence has been amended in the SPD to clarify that this is only where there is continuing requirement for the community use.</p> <p>This comment relates to the Background section which does not discuss how the Council considers</p> |
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**Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)**

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| <p>High Wycombe Society cont'd...</p> | <p>argument that a closing pub should automatically have to provide (or financially contribute towards providing) an alternative facility such as fitness centre, as this could potentially be an unfair penalty. We would accept such a penalty if it could be proven that the pub was a facility still in demand and required in the community and was being closed purely in order to progress a more lucrative venture for its owners. However, we would like to see the two scenarios distinctly separated.</p> <p>We completely agree with PPS7 Sustainable Development in Rural Areas and the statement that facilities should be "facilitated and supported by Planning, maintaining community vitality. "We urge the Council to keep this in mind as this does not always appear to be achieved at present.</p> <p>As stated above, we believe the Council should distinguish a measured "community demand" or "community requirement" from the current description of "community need", as only the latter phrase is used currently. A "need" in this context appears to be subjectively labelled by the Council without proper assessment or measurement. As such it could be merely the result of an officer's opinion and as such be contestable. To change this word throughout would improve and clarify meaning and be fairer to all concerned. If this is not done, the Council could appear to be applying financial penalties on whim alone.</p> | <p>applications that would result in the loss of a community facility should be dealt with. In any case, the SPD does not put forward the view that a closing pub should automatically have to provide or financially contribute towards providing an alternative facility such as a fitness centre. Furthermore, public houses have simply been used as an example of a type of community facility that is closing.</p> <p>However, 'fitness benefits' has been re-written as 'health benefits' on this page to reduce the likelihood that this page could be mis-interpreted.</p> <p>Noted.</p> <p>The Council's response to this point has been discussed above; the council considers that the term 'need' is less subjective than the terms 'demand' or 'requirement'.</p> <p>The SPD puts forward a process to assess community needs involving a number of stakeholders including Parish Councils and local residents. An element of tiered approach does currently exist in the assessment process as follows:</p> |
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Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| <p>High Wycombe Society cont'd...</p> | <p>We would like to see a distinction (and prioritisation) between 'primary purpose' community facilities (such as community centres, public halls, Post Offices, Schools, Health Centres, Libraries ...) and those commercial operations which may provide a convenience to the community but which essentially exist only when demand calls for them (such as local shops, pubs, etc). The treatment of cases in each distinct group should be different.</p> | <ul style="list-style-type: none">• Shops follow the assessment criteria in policy S6, rather than the generic approach applied to all other community facilities.• The remaining 'commercial' operations/ other community facilities are assessed using the generic approach whereby in urban areas, the community facility to be lost is assessed against the Community Facilities Strategy (CFS) in the first instance. If the facility is in a deficit area, the next stage of a community needs assessment (CNA) need to be undertaken. In areas where there is not a deficit, a CNA is only required if the application would result in the loss of a named community facility in the CFS which public houses and other community facilities are generally considered to be. In rural areas, a CNA is required for all types of community facilities (except shops). <p>A different approach has been taken for shops than other 'commercial' community facilities as sites for the latter are likely to be sizable and therefore suitable for alternative community uses, unlike shop sites. For example, a public house is more likely to be able to be converted into a nursery or community centre than a shop would.</p> |
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**Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)**

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| <p>High Wycombe Society cont'd...</p> | <p>Stage 1: We repeat our comment about the word "need" and the proper assessment of a facility.</p> <p>Stage 2: Ditto above. We are concerned that the many suggested research channels include everyone except the facility provider. In the case of an ailing commercial facility we feel that research into this aspect with the existing provider is necessary to distinguish genuine cases where lack of demand has caused the facility to ail. We repeat our comment about the word "need" and the proper assessment of a facility.</p> <p>There is a danger that this section (Outcome of Assessment and Evaluation of Need) may be worded against anyone applying for development and should be more carefully written to remain even handed.</p> <p>Financial Contribution: We are concerned by this single-handed emphasis on financial penalty as the norm for reasons expressed in our covering letter. We would prefer this to be the exception and last resort only and as such applied only in cases where a developer is clearly and intentionally damaging a community for financial gain alone.</p> <p>We do not agree (para 1) that it is necessarily.... "vital that</p> | <p>The Council's response to this point has been discussed above; the council considers that the term 'need' is less subjective than the terms 'demand' or 'requirement'.</p> <p>Agreed The SPD has been amended to include the facility provider in the list of suggested research channels.</p> <p>The Council's response to this point has been discussed above; the council considers that the term 'need' is less subjective than the terms 'demand' or 'requirement'.</p> <p>The Council considers that this section is clear and 'even-handed' in that it states that should the assessment process show that there is no community need for the facility or site, the principle of the loss of the community facility will likely be accepted.</p> <p>The SPD states that the Council's preferred solution would be to locate the community facility required by the community on the site, rather than providing a financial contribution.</p> <p>Agreed.</p> |
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Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| | <p>community facilities and land available for such is retained" This is presumptive; though it may be the case, equally it may not be. It is also at odds with the opening sentence immediately preceding it.</p> <p>No further specific comment, but our comments above apply equally where relevant in the appendices.</p> | <p>The sentence has been amended to take account of this comment.</p> <p>Noted.</p> |
| Hughenden Parish Council | <p>The Parish Council agrees with the retaining or developing of community facilities in rural areas, using a community needs assessment. It does feel that this should include the whole of Hughenden Parish. The methodology proposed appears to be robust, as long as it is just used as a guide in rural areas.</p> | <p>Some parts of Hughenden Parish are noted in the Core Strategy as either adjoining communities to High Wycombe or closely adjacent which in strategic terms means that they are part of the wider urban area of High Wycombe. Therefore these areas will be assessed accordingly as urban areas.</p> |
| The Marlow Society | <p>The Marlow Society would not agree with any provisions in the new SPD that increased or fundamentally changed the powers of the District Council as set out in the Wycombe District Development Framework Policy CF15 or Local Plan Policy S6.</p> <p>The Community Need as expressed in the draft SPD has been interpreted by the Society as the requirement of the community for a facility as assessed by the Community Assessment and the expression 'Need' has been interpreted accordingly throughout these comments and the draft documents.</p> <p>The Community Assessment should identify whether a failing facility, which is under review, has been purposely</p> | <p>The SPD would not increase or fundamentally change the powers of the District Council, rather it clarifies the process that an application to which policy CS15 applies, would go through.</p> <p>Noted.</p> <p>Agreed. The SPD has been amended to take into account</p> |

Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| <p>The Marlow Society cont'd....</p> | <p>run down for the purpose of developing another use - that is whether the existing facility use has been discontinued by the site owner but the community need is still in existence. In this case no change of use should be permitted.</p> <p>If no particular need can be identified for a particular facility, it seems unreasonable to the Society that an alternative facility (for which there is an identified need) should be imposed on the owner's site which he is also obliged to fund or part fund. It also seems unreasonable to expect him to fund or part fund an alternative 'required' facility on another (remote) site. In cases of genuine failure of a facility through clear evidence based lack of demand, it seems to the Society that the site owner should not be penalised and a case made for him to be encouraged or assisted to provide a facility that would have community support.</p> <p>Although the Society understands the expressed objectives of the SPD as set out in the draft, it is concerned that the characteristics, social and facility needs of a particular community are being identified 'top down' when a community might well be best left to develop naturally without the 'Formal Intervention' proposed. Many social and economic pressures such as car mobility and usage, different patterns of retail marketing (supermarkets and internet shopping etc.) will lead inevitably to changes in communities and, on which, formal intervention into particular facilities, particularly those which are</p> | <p>this comment.</p> <p>It is considered that the SPD provides sufficient flexibility to enable reasonable negotiations to be undertaken in order to find a mutually acceptable solution for all parties.</p> <p>It is considered that without planning guidance and policies and given the economic conditions currently, community facilities may be closed or re-developed. Given the cost and availability of buildings/land etc, it is considered unlikely that many community facilities would return and therefore they would be lost for good. This could lead to a less sustainable and physically and emotionally healthy society.</p> |
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**Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)**

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| <p>The Marlow Society cont'd....</p> | <p>commercially based, will have little effect. In this respect it would seem fruitless to attempt to perpetuate local services or facilities which are being provided more conveniently or more acceptably elsewhere. The objectives of the SPD should therefore take current social economic and social pressures into account.</p> <p>Assessments of Community Need or Demand for facilities in shops; facilities in urban and rural areas should take account of the differences between 'primary purpose' facilities (libraries, schools and education centres, places of worship and museums etc.) and those facilities whose primary purpose is commercially based. In the latter cases, the absence of local demand leading to a lack of trade or turnover should, we consider, only be considered an absence of 'need' if the reasons for the lack of trade or turnover have been properly researched. The Society considers that Marlow town centre is a relevant and interesting illustration.</p> <p>The local residents and the community at large in Marlow have, in the Society's view, a clear and evident need for Marlow's High Street and town centre to have shops that meet their everyday shopping needs such as household goods and day to day domestic provisions, largely having A1 Class usages. In recent years however, many traders of this type have been unable to cope with rising costs, and have often quoted steep increases in rents as the main problem. Because change of use to A2 and A3 uses (restaurants, licensed premises) has been readily</p> | <p>An element of tiered approach exists in the assessment process as discussed above (See response to High Wycombe Society comments)</p> <p>With regards to the frequency of A2 and A3 uses in Marlow Town Centre, this issue has been considered in the draft Delivery and Site Allocations Document for Town Centres and Managing Development which is out for public consultation between 2nd September and 14th October 2011. Please see policy MR1.</p> |
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Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| | <p>obtainable, the increased levels of rents have been achieved by the landlords.</p> <p>Although local residents do patronise the A2 and A3 establishments, much of their business is derived from visitors to the town and there is therefore a potential mismatch between the needs of local people for access to local shopping for domestic provisions and the demands of a wider market. It is the view of the Marlow Society that planning authorities should take this into account in their policy towards granting change of use, and that more research into the issue of local needs versus wider markets, and into why shops serving local needs are disappearing from our high streets, is urgently needed.</p> | |
| <p>Natural England</p> | <p>Natural England are pleased to see that PPG17 has been used when considering open space for outdoor sports in the preparation of this document. Natural England would consider green open space for informal recreation to also be a community facility, although this does not appear to be included in the Draft Community Facilities SPD. We are aware that Wycombe District Council has a Green Infrastructure (GI) SPD. It is our advice that the Community Facilities SPD should reference GI, and the GI SPD, as this would help to encourage a more holistic approach to GI as a 'multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability'.</p> <p>Natural England have no further comments to make.</p> | <p>Wycombe District Council does not have a Green infrastructure SPD; rather green infrastructure is considered by existing planning policy (such as CS17) and in the draft Delivery and Site Allocations Document for Town Centres and Managing Development (Chapter 6).</p> |

**Community Facilities Supplementary Planning Document
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| Little Marlow Parish Council | Little Marlow Parish Council has considered this document and finds it a useful addition to the Wycombe Development Framework | Noted. |
| Mrs Patricia Northcroft | The only comment I have is that it is important to protect existing facilities in rural areas. These are always under threat and especially if transport facilities are minimal, as is the case in Little Marlow, they are even more essential. | Noted. |

Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| <p>Cllr David Johncock</p> | <p>In Table 3.1 of the Consultation Statement dated June 2011, the Council's response to the 2nd topic area on the definition of a community facility states that "A list of community facilities is provided in the supporting text to CS15 and therefore cannot be changed". I do not accept that position and would ask that this be reviewed. Attached is my recent response to the consultation on the Community Facilities Strategy and I have identified this as an important issue which needs to be addressed. Can the "Council" please consider amending the definition?</p> <p>On Page 9, the Table of "What Are Community Facilities?" needs to be changed for local shops to read "Local shops within Rural Areas".</p> <p>On Page 13, Step 2 states that the assessment of needs should be based at village level in rural areas (Ward in urban areas), unless otherwise agreed by the LPA. As mentioned in my comments on the Community Facilities Strategy (attached), Wards such as Flackwell Heath and Little Marlow have community centres miles apart and separated by geographical features that would discourage the use of facilities in one centre by the residents of the other. It is therefore vital that the assessment of needs should be based on villages in the urban area where these can be readily identified.</p> | <p>The definition of community facilities is in the Adopted Core Strategy and therefore cannot be changed by the SPD. The proposed review of the Core Strategy from 2012 onwards will provide an opportunity to consider the type and nature of community facilities to be considered.</p> <p>As above.</p> <p>There is an opportunity for flexibility to be applied as inferred by the text in the SPD (see response to the Chiltern Society comments).</p> |
| <p>Marlow Bottom Parish Council</p> | <p>Marlow Bottom has two small parades of shops which provide essential shopping facilities for local residents. Many of the outlets on Brucewood Parade and Kingswood Parade are classified as A1. However this classification is</p> | <p>This is beyond local planning policy control as The Town and Country Planning (Use Classes) Order 1987 (as amended) enables changes from one type of shop to another within the same use class and in</p> |

Community Facilities Supplementary Planning Document
Comments received during the public consultation period (June – August 2011)

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| <p>Marlow Bottom Parish Council cont'd...</p> | <p>too broad as it allows a change from retail to a service (i.e. a recent change from a chemist to a hairdresser). Whilst in this particular case the chemist had relocated from Kingswood Parade to Brucewood Parade and there was no loss of this essential facility within the Parish, this would not have been addressed / safeguarded as suggested by Policy S6 (<i>extract removed</i>).</p> <p>If a building does not require any changes which would need planning permission (see 1), an essential shopping facility "which meets the day to day needs of local residents" may be lost. Within the A1 classification are sale of tickets or a travel agency, hairdressing, direction of funerals, display of goods for sale, With only 12 shops in total the balance can rapidly change to a high percentage of premises providing a service rather than essential shopping which would be to the detriment of all residents, particularly in a parish where there is a lack of public transport and an ageing population.</p> <p>The Parish Council would therefore wish to see greater control under the A1 Classification to ensure that essential day to day shopping facilities are retained.</p> | <p>some cases, between use classes.</p> |
| <p>Environment Agency</p> | <p>No comments to make as submitted.</p> | <p>Noted.</p> |
| <p>Oxfordshire County Council</p> | <p>No comments to make at this stage.</p> | <p>Noted.</p> |