



# **Wycombe Reserve Sites Draft Infrastructure Delivery Plan**

## **Report of Consultation**

**June 2016**



## **Table of Contents**

<b>1. Introduction .....</b>	<b>1</b>
<b>2. Comments from the public and residents associations etc .....</b>	<b>2</b>
<b>3. Comments from developers.....</b>	<b>28</b>
<b>4. Next steps .....</b>	<b>42</b>

## Chapter 1 - Introduction

This report sets out our response to the views we received on the draft Reserve Sites Infrastructure Delivery Plan. The consultation on the draft plan was held between 25 January 2016 and 7 March 2016.

This follows the release of the sites for development by Wycombe District Council's Council Cabinet in November 2014 and the setting up of Liaison Groups of local stakeholders to discuss the progress of development on the reserve sites and the opportunities and challenges that emerge, and to hold the Council and the landowners/developers to account. A roundtable group of interested parties was also established to consider the collective infrastructure impacts of the sites.

The consultation on the Draft Reserve Sites Infrastructure Delivery Plan was publicised on the Council's website, through the Council's Weekly Planning Bulletin and through targeted emails to members of the Reserve Sites Infrastructure Roundtable and the specific site Liaison Groups.

We received fifty two separate responses to the consultation which can be broken down as follows:

- General public – 29
- Organisations and constituted bodies (e.g. parish councils, residents associations) – 17
- Developer representatives – 6

The majority of comments from the public or from organisations focused on one site. Some comments were more over-arching. The site specific comments are broken down as follows:

- Abbey Barn North and South – 6
- Gomm Valley & Ashwells – 16
- Terriers Farm – 7
- Slate Meadow – 13

This report summarises the comments received during the consultation, and provides our response. Chapter 2 of the report summarises the comments and themes from the public, residents associations etc. and responses to these. Chapter 3 of the report summarises the comments received from developer representatives and the Council's responses to these. Both these chapters are organised by themes (e.g. transport, green infrastructure etc.) and where appropriate by specific sites within these. Chapter 4 of the report sets out the next steps and the areas where further work is necessary.

## **Chapter 2: Comments from the public residents associations etc.**

### **General comments, comments on introductory chapter, policy framework and consultation**

#### Principle of development

Most representations recognise the need for more housing and the need for the Council to identify land for housing to meet the national requirements of a rolling five year housing supply. At the same time a number of comments were received setting out concern that a specific site has been released for development, with the main reasons being that the green spaces are required or that infrastructure cannot cope.

Response – The Council fully recognises the concerns expressed in this consultation and in previous consultations over the decisions to allocate the reserve sites for development and to now release the sites. The various sites include important green spaces and the Council aims to ensure that a significant proportion of the sites remain undeveloped. For example:

- Most of the eastern side of the Gomm Valley will be undeveloped
- A large woodland Ride will be retained on Abbey Barn South
- There will be a significant buffer to the historic woodland at Abbey Barn North
- A village green and river buffers will be retained on Slate Meadow, and
- Significant areas of sport and recreation green space will be provided at Terriers Farm

Over the past 20 years the Council has been successful in meeting development needs on brownfield sites in the urban areas of the district. The combined factors of less brownfield land being available, and significantly increased housing requirements in line with the National Planning Policy Framework (NPPF) means that the reserved sites have been released for development, contributing to the five year land supply that is required. Further difficult options are having to be explored to meet short and long term housing need including identifying a major expansion area at Princes Risborough. The future housing options for the District are set out in the Local Plan (the draft of the new Local Plan is due to be published in summer 2016) – more information can be found on the Council's website at <https://www.wycombe.gov.uk/browse/Planning-and-building-control/New-local-plan/New-local-plan.aspx>.

#### Existing infrastructure issues in High Wycombe and Bourne End

A number of comments stated that no development should be progressed until existing infrastructure issues are brought up to standard.

Response – The Council recognises the pressures on infrastructure and is committed to working with developers to ensure that these contribute fully to infrastructure needs that have been identified. This builds on developer funding that has been secured over a number of years for infrastructure improvements that include public transport improvements, the Cressex link road, and town centre enhancements

In setting up the Liaison Groups, working with developers to produce development briefs and in working with infrastructure providers to assess the requirements, better results in terms of infrastructure delivery will be achieved which takes local residents views and experience into account.

### Housing numbers

A number of comments highlight that the exact housing numbers of the sites have yet to be confirmed and therefore the infrastructure assessments will not be fully accurate.

Response – As caveated in para 1.15 of the Reserve Sites Infrastructure Delivery Plan the housing numbers are indicative and have been used for assessment purposes.

Any changes in housing numbers being proposed are expected to be relatively small and will not have a fundamental impact on the assessment of major infrastructure requirements set out in the report and the suggested way forward for delivery. It is a normal process of planning to make assumptions of the broad capacity of sites prior to detailed assessments and planning application that ties down the detail.

In responses to the consultation, developer representatives for the Gomm Valley and Slate Meadow sites have indicated a lower site capacity than set out in the report, whilst the Terriers Farm developer representatives state that their site has a higher capacity than that set out in the draft report.

When making planning applications it remains the responsibility of the developers to demonstrate that the levels of development they are proposing can be accommodated on the sites taking account of the various issues such as landscape, flooding, site access, local transport conditions etc. In advance of planning applications, the Council is working with the developers and Liaison Groups in producing development briefs to provide the vision, the development principles and a broad framework that will guide and inform the planning application stage that follows.

### Other developments not taken into account in the infrastructure assessments

Some respondents pointed out that the reserve sites are not being developed in isolation, with a large number of small, medium and large developments

underway or in the planning process. Therefore the infrastructure issues associated with these sites needs to be taken account of along with the reserve sites.

Response – the purpose of the report and the Infrastructure Roundtable was primarily to identify the infrastructure requirements of the reserve sites as they have been released for development at the same time. With the sites being released at the same time, there is the opportunity to assess the infrastructure impacts collectively and to set out where there are synergies between the sites in providing the required strategic infrastructure.

In terms of wider development the Council is preparing the new Wycombe Local Plan. A District-wide Infrastructure Delivery Plan is being prepared as part of this work. This involves engaging with the different infrastructure providers on the infrastructure requirements to support the development identified in the Plan. This will be published in summer 2016 alongside consultation on the draft Wycombe Local Plan.

## **Transport**

### **General transport conditions**

#### Transport conditions are critical now and action needs to be taken in advance of the sites commencing

Response – As confirmed by the Jacobs Transport Framework Report<sup>1</sup>, it is recognised that certain parts of the highway network are heavily constrained at peak times, and the Councils recognise the challenge posed by the need to accommodate new development. In order to respond to these challenges the framework identifies the need to improve travel choices, in addition to highway improvements.

Provided necessary travel choice improvements are made and changes in travel behaviour are enabled then traffic problems can be mitigated so as to keep the town moving. We are committed to securing funding from development for infrastructure improvements, although for the reserve sites the funding cannot be secured until the developments commence.

In advance of this, funding has been approved to help to improve travel conditions and choices. For example in March 2016, Wycombe District Council allocated £250,000 S106 funding to support bus improvement measures identified by the County Council. These include measures to make using the bus network more attractive, for example progressing smart ticketing proposals and installing real time electronic timetable on the bus stops.

---

<sup>1</sup> This is the report published in January 2016 commissioned jointly by WDC and BCC to set out a package of transport measures to mitigate the impacts of the reserve sites.

Buckinghamshire County Council has been provisionally allocated funding from the Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) Growing Places Fund to wider transport infrastructure needs arising from the reserve sites. Officers will be working on how the use of this funding is to be prioritised and further consultation will be carried out where appropriate.

#### Population figures used for transport assessments

Some respondents have queried where the population figures used for the baseline transport assessments have been used.

Response – Jacobs advise that the population figure in the reporting is taken from the National Trip End Model (TEMPRO) assumptions.

#### Improving public transport

A number of responses recognise the need to improve the attractiveness and efficiency of public transport as an alternative to private car travel as only attempting to add capacity to the general road network is not a sustainable or viable solution. However responders were also sceptical that some of the measures proposed such as additional bus lane space will improve matters to any great extent.

Response – the number one priority highlighted in the town wide infrastructure workshop in January 2015 was improving the provision of public transport so that people would have a viable and attractive alternative to the private car. The Jacobs report sets out a number of measures from ensuring new sites are served by public transport, enhancing walking and cycling links and making some improvements to bus lanes on the primary network.

BCC are also progressing specific measures with the bus operators to ensure better co-ordination of ticketing and bus stop improvements. The bus operators are also rolling out more modern, low noise, low emission vehicles. It is recognised that improvements are often incremental but experience indicates that cumulatively these can increase ridership and reduce the need to use the private car. Indeed bus ridership has been increasing in High Wycombe year-on-year from 600,000 trips per quarter at the beginning of 2014 to over 700,000 trips at the end of 2015.

#### A40 London Road

##### Wycombe Marsh junction

This junction is recognised as a major bottleneck on the A40. Respondents requested the relevant authorities to carry out the junction improvements as soon as possible.

Response – Further work will be progressed on possible improvements in this area and it is recognised as a priority. Improvements or amendments to one

junction may have knock on effects at other junctions and that it will be necessary to consider these in a coordinated way.

#### Rayners Avenue junction improvements

Improvements to this junction were supported, however a different approach was suggested i.e. investigate taking out the traffic lights completely and installing a roundabout or a double roundabout. It was noted that the lights on the London Road are often red with no traffic coming from the side roads from Rayners Avenue or the business park. It has also been queried whether completing two lanes eastbound will make any major improvements as traffic will still be concerned with getting stuck behind right turning traffic in to the business park and will therefore continue to use just the one lane.

Response – This will be considered further including investigating alternative approaches to how this junction operates.

#### Major town diversion road/by-pass

One respondent suggested that the relevant authorities need to look into major diversions around the town.

Response – The traffic modelling undertaken by Jacobs shows that a significant number of journeys (33% in the AM peak) start and finish in the High Wycombe urban area – a further 46% of trips have either an origin or destination in the area with only 21% of traffic passing through. Hence it is therefore local traffic that causes most congestion in High Wycombe. Owing to local constraints (of topography and development) there are very limited opportunities for major new routes round the town and the cost of these would be very great.

### **Transport – Abbey Barns**

#### Widening Abbey Barn Lane

A number of comments received have suggested that the identified pinch points on Abbey Barn Lane should be maintained as they are as that will help slow traffic.

Response – The points regarding the pinch points are noted and the need for the modest widening suggested in the Jacobs report will be further examined as the process moves forward. The proposal to widen narrow sections of Abbey Barn Lane has been put forward in order to achieve an appropriate width for the anticipated level of traffic including that from Abbey Barn North and Abbey Barn South.

#### Widening the bridge over the former railway line on Abbey Barn Lane

Respondents generally supported widening the bridge provided new traffic signals were not included.



Response – The widening of the bridge on Abbey Barn Lane is an important scheme for both the Abbey Barn North and South developments. Further work is required with the County Council and developers on the design, cost and timing.

Junction of Abbey Barn Road/Kingsmead Road/ Abbey Barn Lane and suggestion of new double mini-roundabout (including where traffic goes then)

A number of respondents welcomed proposed improvements at this junction, particularly with no new traffic lights being proposed. However there were some reservations about where the traffic goes as the Abbey Barn Road/London Road junction is already constrained.

Response - The constraints in the Wycombe Marsh area are recognised and improvements are a priority. Previous proposals have considered the potential for a new north south route between Heath End Road and the A40 at Gomm Road. This would help to distribute traffic however the costs and impacts of such a route would be significant.

In any event it is recognised that improvements in this area should be planned and delivered in a co-ordinated way, and this is likely to entail widening the bridge at Abbey Barn Lane, the reconfiguration of the junction and how the Abbey Barn North Site may be accessed, as well as any changes to A40 junctions in this area.

An alternative access point for the Abbey Barn North site may be possible direct from Abbey Barn Lane, subject to dealing with levels issues and sight lines. This would likely require a signal control. It would be assessed in the development brief process and in any forthcoming planning application. If an alternative access is used, improvements will still be required to the junction.

Buckinghamshire County Council, along with developers will be doing further modelling and design work to assess the best solutions in this area, including a review of the options to connect north south traffic to the A40. Any specific proposals would be the subject of further consultation.

Marlow Hill right turn from Daws Hill Lane

Respondents have noted that there was previously a right turn from Daws Hill Lane to Marlow Hill which was stopped which may have been because of road safety measures. Respondents are concerned that congestion during peak hours on the North bound lane of Marlow Hill (downhill) is likely to mean that the traffic turning right from Daws Hill Lane will be queuing across the South bound lane adding to congestion and a possible road safety issue.

Response – This scheme was put forward in the reports because there is a significant traffic flow, including buses, that turns left from Daws Hill Lane and

then carries out a U-turn at the Marlow Hill gyratory. However this scheme needs to be considered as part of a potential sustainable travel link where funding was secured as part of the RAF Daws Hill development which remains a priority.

#### Opening up Winchbottom Lane

A number of respondents suggested that Winchbottom Lane should be opened up to provide an alternative route to the A404 instead of using Handy Cross roundabout or going through Flackwell Heath to the Marlow bypass. At the same time the local parish council supported the conclusion that it should be retained as it is but with traffic calming to discourage use as a rat run.

Response – The possibility of opening up Winchbottom Lane has been looked in some detail through this and previous transport study work. The possibility of widening and upgrading on the lane has not been recommended because previous studies have indicated little overall traffic benefits despite very high costs and impact on the AONB.

#### Proposed three arm roundabout at the junction of Heath End Road and Abbey Barn Lane

The proposed new three arm roundabout was generally supported by responses which should improve the capacity of the junction and lead to reduced speeds on Heath End Road

Response – Support noted. This is a necessary scheme for the Abbey Barn South development.

#### Reduction of speed limits on Heath End Road and Abbey Barn Lane

All responses on this topic supported the reduction of the speed limit on these roads. It was also suggested that pinch points should be maintained to assist in keeping the speeds down.

Response – Noted.

#### Cycling/walking links on Heath End Road

Support was received for improved cycling and walking links to Flackwell Heath on Heath End Road.

Response – support noted. Form of upgrade will be the subject to further work with the relevant authorities and the developers.

#### Cycling/walking links in the Abbey Barn area

A number of comments supported measures to improve walking and cycling links in the Abbey Barn area. The difficult topography of the area was

commented upon although it was noted that the increased prevalence of electric assisted cycles could overcome some of the topographical difficulties.

A respondent has questioned whether widening the pedestrian bridge Bassetsbury Lane is necessary.

Response – The widened footbridge over the Back Stream that connects Kingsmead Road with Bassetsbury Lane to 3 metres width would provide a low traffic volume cycle/walking route from this area to the town centre. Further work should be done to ensure that improving this pinch point is the best way to improve this low traffic walking and cycling route into town.

#### Walking/cycling links through Deangarden Wood

Questions have been raised whether Deangarden Wood is suitable for cycling links through it.

Response – It is recognised that the ancient woodland of Deangarden Wood is sensitive to changes and that a tarmac surface may not be appropriate. Nonetheless there does seem scope to provide a route that works with the topography so as to provide a less steep route which would be of advantage to many different users, and which has the potential to be well used given the proximity of new developments, the town centre and the valley floor. Improving travel choices is an important part of keeping the town moving. Any specific proposals will be subject to public consultation on the detailed design.

### **Transport - Gomm Valley & Ashwells**

#### Capacity upgrades at Gomm Road junction

Support was received for implementing capacity upgrades at the Gomm Road junction. However some respondents questioned how traffic would be managed from the Westfields developments opposite the junction that is converting office space to new residential units.

Response – the capacity upgrades at the Gomm Road junction will be essential for the Gomm Valley development. The County Council will be working closely with the developers on the traffic modelling and design of the scheme which will also take into account the access into the adjacent Westfield development.

#### Spine Road

The majority of the comments received relating to the Gomm Valley development supported the provision of a spine road through the site rather than a full scale widening of Cock Lane.

Respondents felt there should be more detail of the exact specifications of the road and that it should be designed in a way that does not encourage rat runs through Penn and Tylers Green.

Response – support for the provision of the spine road is noted. The Council is concerned to take opportunities to integrate new developments into the existing road and street network (avoiding large cul-de-sacs for instance). The developers will be required to design the road to ensure that the needs of traffic do not take precedence over the need to create liveable places. These details will be developed through the design process and will be subject to further discussion with the Liaison Group and wider consultation.

#### Spine Road – where it meets Cock Lane

The majority of comments on this issue suggest that the Spine Road should connect with Cock Lane just above the top of Pimms Close / at the southern end of the single track section. It is felt that if the spine road connects through to the roads within the Ashwells development this would be detrimental to keeping a separation between Penn & Tylers Green and High Wycombe.

It is also suggested that the northern end of Cock Lane should not be widened so as to avoid this becoming a rat run to Tylers Green with the new spine road.

Response – Comments noted. However it is considered necessary that the spine road joins Cock Lane at the southern extent of the green gap that is being maintained between the settlements of Penn and Tylers Green and High Wycombe. This avoids the need for a road parallel to Cock Lane which would erode the quality of this gap. The stretch of Cock Lane from this point north will be widened to ensure the function of the spine road is achieved through the site. The widened road will maintain a rural character and contain traffic calming measures. Further details will be included in the Gomm Valley site specific development brief.

#### Spine road – wildlife impacts

Objections to the spine road on the grounds of the loss of habitat have been received by the Berks Bucks Oxfordshire Wildlife Trust (BBOWT). They suggest that if the spine road is pursued then a number of measures will be needed including:

- a) minimising impact on the woodland between Gomm's Wood and Little Gomm's Wood by minimising the width of land-take and allowing the tree canopy to grow across the road;
- b) doing likewise near Pimm's Grove so that the negative impact on the woodland link proposed is minimised;
- c) avoiding or minimising any lighting along the road. If lighting is unavoidable then turn-off time during part of the night should be considered and both lighting intensity and light escape should be minimised;

- d) imposing a 20 or 30 mph limit on the road to reduce the likelihood of collisions between animals and vehicles;
- e) measures to deter the use of the road by through traffic, as opposed to residents, so as to minimise its use and reduce the impact of pollution, disturbance and the above-mentioned collisions;
- f) to take measures to reduce the likelihood of the new road increasing recreational pressure on the LWS and SSSI.

Response – the comments on the measures required if the spine road is taken forward are noted and as far as possible will be taken into account as the process moves forward, including the Development Brief.

#### Access to plot 1 from Hammersley Lane

Strong objections have been received regarding the access point for plot 1 of the Gomm Valley development which may also require traffic signals at Hammersley Lane.

It is suggested that putting traffic control on traffic passing under the rail bridge will mean, at busy times, traffic coming up the hill from London Road and stopping at the lights will tail back to London Road, causing delays on London Road. Similarly, traffic coming down Hammersley Lane will be backed beyond Robinson Road. The bottle-neck caused in Hammersley Lane around the rail bridge would greatly increase the volume of traffic using Robinson Road/Rayners Avenue as a rat run.

It is suggested that Plot 1 should be accessed via Gomm Road to avoid the problems set out above.

Response – The comments regarding the access point to plot 1 and the alternative put forward are noted and will be shared with the developers and the County Council who recognise the challenges of securing access for plot 1. This is primarily a site specific matter and will be a matter for the Development Brief.

#### Pedestrian improvements at Hammersley Lane

Support was received for improving pedestrian links on Hammersley Lane but more detail requested on the exact locations and nature of the improvements.

Response – support for improved pedestrian facilities noted. Exact specifications and designs will be developed as the process moves forward.

#### Construction traffic through Ashwells

A number of comments received stated that construction traffic should not be routed through the existing residential areas in Ashwells as the roads are not suitable.

Response – comments noted and will be shared with relevant parties as this is primarily a site specific issue. Developers will be required to manage the construction traffic with minimal disruption to other users of the highway. The Highway Authority are able to raise concerns on construction route plans where there is a risk to highway safety or would result in capacity problems on the network.

#### Street lighting at Ashwells

A number of comments have highlighted the absence of street lights in Penn & Tylers Green and have requested that the Ashwells development has no street lights to maintain the dark skies in the area and maintain the village feel.

Response – Comments noted and the report will be amended to state that traditional street lighting should be avoided at Ashwells if possible.

#### Changes to bus route 31

The suggestion to extend bus route 31 into Ashwells has received strong objections in the comments received to the consultation. Respondents have highlighted the low number of extra passengers likely to be generated from the Ashwells development and the relatively short walking distance to the nearest bus stop. Respondents have also objected to the extra journeys times that would be created and the unsuitable layout of the Ashwells site for a bus routing.

Response – Comments noted. However given the potential additional traffic it will be important to significantly improve travel choices unless there are compelling reasons not to do so. This will be considered further as part of the planning process.

#### Changes to bus route 27

The proposals to extend route 27 received more support with suggestions that it could be re-routed up Cock Lane to join the new spine road north of Pimms Close.

Response – Noted and further work will be required to see if a suitable route can be brought forward.

#### Cycle paths within the development and conflicts with grazing and wildlife

Objections have been received to the proposed shared use cycle/ pedestrian path within Gomm Valley, along the alignment of the existing public right of way connecting Gomm Road with Hammersley Lane because it would be incompatible with grazing animals.

Response – Comments noted and the design of walking and cycling routes will need to be carefully considered. Permanent surfacing for cycling to

ensure a co-ordinated and attractive transport network is not necessarily incompatible with grazing animals or other proposed uses of the transport network. It will be important to significantly improve travel choices unless there are compelling reasons not to do so. This will be considered further as part of the planning process.

## **Transport - Terriers Farm**

### Traffic calming in Widmer End

Local residents have raised concerns that areas such as North Road and Brimmers Hill will become rat runs. However, the local residents association have cautioned to avoid engineered traffic calming such as speed humps and have questioned whether more traffic calming would have any effect other than increasing congestion and spawning further rat runs elsewhere.

Response – Site modelling will demonstrate if roads such as North Road and Brimmers Hill will become ‘rat runs’ due to the potential implementation of residential proposals at the Terriers Farm site. Should this be shown to be the case, consideration will be given to what and where traffic calming should be installed and located. It should be noted that the Jacob’s report only modelled one access onto Terriers Farm and modelling for two accesses one of which is onto the A404 is likely to reduce the impact upon roads such as North Road and Brimmers Hill.

### Two site accesses (but concerns with access through the woodland)

A number of responses have supported the Council’s view that two vehicle access points are necessary for the Terriers Farm development. Local residents are concerned of the bottlenecks and traffic congestion on Kingshill Road with only one access point, the inefficiency of the site and the advantages of traffic travelling north on the A404 having the option of accessing directly on the A404.

At the same time a number of comments have been received expressing concern that the potential access onto the A404 would go through a wooded area with protected trees.

Response – As set out in the report the Council believes that two access points are important for the site for legibility and connectivity. Any development must not prejudice the potential for an access to the site from the A404 and the internal road layout should be designed to facilitate connections to potential access points.

### Pedestrian improvements

Support has been received for improving pedestrian facilities in the area, particularly the link to Benjamins footpath, providing a primarily off-road alternative link between Hazlemere and High Wycombe. Respondents have

stressed that any upgrades should be carried out sensitively. Comments also request that Lady's Mile be retained largely as it is, as it is much enjoyed in its current form.

Response – Support for improved pedestrian facilities in the area is noted and the Council recognises that these upgrades should be carried out sensitively. This needs to be balanced with need to provide facilities that are useable in all weathers.

#### School drop off point on map

A number of comments have stated that the annotation on the Terriers Farm local site package map shows a potential school drop-off point. It is noted that this would not be a suitable location for a school drop-off point as the nearest school is Highworth and parents would not choose to park at Terriers Farm and walk to local schools as they are too far away.

Response – Agreed that Terriers Farm is not a suitable location for a school drop-off point facility. Providing improved links to local schools from the site to improve travel choices and reduce traffic congestion is preferable.

#### Park and ride

Some comments have queried whether the site is still considered a suitable site for a park and ride and whether land should be retained on the site for such a use.

Response – It is now considered that the Terriers Farm site is not a suitable location for a park and ride facility.

### **Transport – Slate Meadow**

#### Forecast traffic movements

Some respondents are sceptical as to the accuracy of the forecast traffic movements in the Jacobs report and have asked that the TRICs calculations and forecasts are revisited and verified when a planning application is presented.

Response – The promoters and developers of the sites will be required to carry out their own traffic assessments which will be verified by the transport authority for accuracy. There are no reasons at this stage that would appear to point toward an in principle objection based specifically on the amount of additional vehicle movements that would be generated by the development of this site.



### Suitability of site access points

A large number of respondents have raised concerns over the potential access points to Slate Meadow highlighted in the report. The specific concerns include that the identified access points are very narrow and were not designed as through routes and there would be increased congestion at school peak times around Stratford Drive.

The fact that no through road across the site is recommended is welcomed by respondents.

Response – Given the level of traffic that would be expected to arise none of the potential access point identified at this stage appears to be unacceptable in principle, if necessary with localised improvements. The scope for more than one access will distribute traffic. If necessary measures to prevent parking at access points will be considered. As part of the detailed planning process each access will need to demonstrate its suitability to serve the level of development proposed.

### School drop-off point

The proposed drop-off point on Slate Meadow for St. Pauls School was welcomed by some respondents, who believe a drop-off point is preferable to school traffic circling or parking on the local road network.

However other respondents raised concerns including that children and parents crossing Stratford Drive would add to the congestion, and also that congestion would be made worse by cars queuing to enter and leave the drop-off area.

Alternatively, Bucks County Council state the development of the Slate Meadow site would effectively result in displacing children that currently attend the school from outside the catchment and reduce the number of car journeys.

Respondents are also concerned that a park and walk facility should not take away from the open space and green infrastructure requirements of the site.

Response – It is recognised they are differing views as to whether a school drop-off point is desirable on the Slate Meadow site. This will need further discussion with all parties involved as the process moves forward, and if it is progressed it will be need to be carefully designed to avoid the potential issues highlighted in the consultation responses. This should go hand-in-hand with improving travel choices to reduce the localised traffic issues.

### Former rail corridor pedestrian upgrades

A number of respondents welcomed improved pedestrian and cycle facilities proposed on the former rail corridor from Bourne End to High Wycombe. Some respondents pointed out that it is not in the Council's gift to upgrade this

route as it is strongly opposed by the land owner and is subject to an ongoing public inquiry.

Response – the proposal to upgrade the former rail corridor from Bourne End to High Wycombe is strongly supported in planning policy and funding has been allocated to implement the first phase if there is a positive decision following the public inquiry. It is appropriate that the Slate Meadow development contributes to the proposed improvements on the former rail corridor to contribute to improved travel choices and help mitigate the impacts of the development on a constrained network.

#### Parking in Bourne End and Wooburn

A number of respondents have raised concern that parking in the Wooburn and Bourne End area is constrained at the moments that the extra housing proposed will exacerbate the problems.

Response – New development will be required to make appropriate parking provision in accordance with the County Council's Countywide Parking Guidance.

#### A4094 improvements

Although potential improvements to the environment and traffic flow of the A4094 have been welcomed, respondents have stated that the report is too vague on what the measures might be.

Response – The proposals on the A4094 include proposals to reduce inconsiderate parking that causes localised congestion and to enable right turns so as to avoid blocking of the road by vehicles turning right at a number of places.

#### Signalisation of crossing to Stratford Drive

Whilst the potential safety benefits of this scheme are recognised, it is felt it would add to congestion in the area with tailbacks of traffic waiting for light changes.

Response – Noted. The balance between safety and convenience will be a decision for the Highway Authority.

#### Bus stop improvements

It is felt by some respondents that the wording in the report was too vague on which bus stops were included and what the improvements would be.

Response – Further work is necessary to assess what improvements would be necessary to local bus stops.

## **Section 5: Education**

### Secondary schools

A number of respondents felt that secondary school demands generated from the reserve sites and how these are to be addressed was not covered in sufficient detail in the report.

Response – The reserve sites will generate the need for 270 extra places as set out in the table in Appendix 1 of the report.

Buckinghamshire County Council has provided some extra information on secondary school provision since the publication of the report. They reiterate that their preference is to work with existing schools on expansions, however they cannot require existing schools to expand to accommodate the need for additional places.

To meet increased demand in the short term, works have recently commenced on site or are planned shortly to expand the following schools by a form of entry each:

- St Michael's Catholic School, Daws Hill Lane, High Wycombe
- Sir William Ramsay, Rose Avenue, Hazlemere
- Great Marlow, Bobmore Lane, Marlow

Feasibility studies have also been commissioned to expand the following secondary schools:

- Highcrest School, Hatter's Lane, High Wycombe – 1FE expansion
- Princes Risborough School, Merton Rd, Princes Risborough – 1-2FE expansion

BCC state that housing growth across the district over the next 15 to 20 years may justify the need for a new secondary school in Wycombe - especially when some schools do not want to expand (and under new regulations BCC cannot direct schools to do so) while others are unsuitable for expansion (e.g. due to site restrictions or other priorities). A new school would have the added benefit that it could be future proofed to cater for further growth. The need for a new school will be kept under review by Buckinghamshire County Council in line with the possibility of new free schools being brought forward outside the local authority system.

### Accuracy of pupil yield numbers

Some respondents have queried whether the pupil yield rates used by Buckinghamshire County Council to calculate the likely children generated from new development is out of date because data from the 2001 census is being used.

Response – the pupil yield rates are used for assessment purposes and are in line with the yield rates experienced from new developments in Buckinghamshire and those used by neighbouring authorities.

Number of surplus places in primary schools

A number of respondents state that the information in Table 5.2 of the report (High Wycombe primary school planning area capacity) that states there is currently a 3% surplus of primary school places in High Wycombe is out of date because it was situation as at 2013/14. In the meantime there has been more housing growth in the area and therefore current day figures should be obtained before attempting to finalise school plans.

Response – BCC state that as at 2015/16 there were 4% surplus primary school places across all years as per the table below:

School Name	Admission No		Surplus/Deficit							
			2015/16		KS1		KS2		Total	
	KS1	KS2	Capacity	Pupils	Actual	%	Actual	%	Actual	%
High Wycombe	1262	1258	8758	8441	50	1%	267	5%	317	4%

The overall surplus does not reflect that the number of young children in the area has been rising over the last few years largely due to housing growth - with only 1% surplus at Key Stage 1 compared to 5% at Key Stage 2. The surplus figure takes into account the additional places provided at Castlefield, Disraeli, Millbrook and Hughenden - where the places are being phased in to ensure class sizes remain viable at all schools.

New school at Gomm Valley (and the distance from Terriers Farm)

Whilst some respondents welcome the fact that there is a requirement for a new school on the Gomm Valley site, the fact that it is stated in the report that this school will meet the demands from both the Gomm Valley development and the Terriers Farm development caused confusion and concern given the distance from Gomm Valley to Terriers. Some respondents also felt that a new school should be provided on the Terriers site.

Response – It is acknowledged that children living on the Terriers Farm site would not attend the new school on Gomm Valley. However, the new school will not only accommodate demand from the Gomm Valley site but will also provide additional capacity for the local area.

The new school at Gomm Valley will result in a local catchment area and a review of the existing catchments. This will effectively free up places in existing schools near Terriers Farm for children from there entering the system and displace out of catchment children back to their local schools which would have increased capacity created by the proposed new school at

Gomm Valley. Any changes in catchment area can be sensitive and will be subject to consultation – so BCC may need to review the situation in the future.

In addition BCC has undertaken feasibility studies at Cedar Park and Hazlemere CE to assess the potential of the schools to expand to meet the growth in this area, including some pupils from the Terriers Farm development.

Have discussions taken place with the schools in Bourne End over the proposals (i.e. possible review of St. Paul's catchment; expansion of Clayton's Combined School)?

A number of respondents highlight that as a CoE Voluntary Aided school, the criteria for admission to St. Paul's is not purely on LEA catchment area. Indeed the first, non-special arrangement criteria (no. 3) references Ecclesiastical Parish of Wooburn.

Response – Clayton's Combined Primary School have indicated they would be willing to expand the school by a half form of entry.

It is recognised that St. Paul's is a CoE school and prioritises children whose parents are members of the Church of England and habitually worship at one of the Designated Churches and whose home is in the Ecclesiastical Parish of Wooburn (Criteria 3).

The school generally admits all children under criteria 5 which is based on the LA catchment area as well as out of catchment children. If the school were to become oversubscribed from within catchment then it would still be expected an expanded Clayton's School would accommodate any increased demand from within St Paul's LA catchment area. It should be noted that under criteria 3, St Paul's currently admits a number of children from the Clayton's catchment. If the school were to become oversubscribed in the future, it may be that BCC consider a review of the St Paul's LA catchment area.

## **Section 6: Green infrastructure, outdoor sport and play areas**

### Gomm Valley & Ashwells

#### Green gap between Gomm Valley and Ashwells parts of site

A number of respondents expressed the need for a significant gap between developed areas of the Gomm Valley and Ashwells parts of the site.

Response – The concept plans drawn up by the Council and developers, and shared with the Liaison Group indicate significant undeveloped areas throughout the site including the areas between the Gomm Valley and Ashwells parts of the site.

#### Access enhancements

There was general support for the proposals to improve access to the undeveloped areas of Gomm Valley and to the cycling and walking schemes outlined. However there were some specific concerns regarding increased public access and the potential conflicts with sensitive parts of the site, including with grazing animals.

The BBOWT suggest that the existing public right of way connecting Gomm Road with Hammersley Lane should be retained as it is and not upgraded so that the Local Wildlife site is not adversely affected. They also suggest that a proposed shared use cycle/pedestrian route on the Gomm Valley floor may need to be fenced to insure it does not lead to adverse impact on the SSSI and LWS, the proposed chalk grassland creation areas, particularly, in relation to dogs, and to ensure no conflict between grazing animals and cyclists.

Response – the detail comments put forward by BBOWT on how the proposed access improvements should be delivered sensitively have been noted and will be taken into account as the Development Brief moves forward. An attractive walking and cycling is important for the site and other uses of the undeveloped area such as the chalk grasslands and grazing animals are not necessarily incompatible with walking and cycling as evident by the many walking and cycling routes throughout the Chilterns.

#### Play areas

Whilst the proposed play areas are generally welcomed, a number of respondents have requested that they should be of a smaller scale rather than elaborate and large NEAPs that may attract people in cars and causing localised congestion and parking issues.

Response – Comments regarding the scale of play proposals on the site are noted particularly in avoiding attracting car borne trips to the area. NEAPs are

for local provision, and it is not expected – nor regarded as desirable – that parking is required for them.

### Abbey Barns

#### Deangarden Wood

Respondents have reinforced the importance of development buffers to Deangarden Wood and that access through the wood should be carried out sensitively.

Response – Comments noted.

#### Location of sports facilities

Comments have been received stating that new sport facilities and the ancillary facilities that may come with them (changing rooms, car parking) should not be located on green belt land in the area between Flackwell Heath and Abbey Barn South.

Response – While outdoor sports facilities maybe acceptable uses in the greenbelt, provided the openness of the greenbelt is maintained, the comments from Liaison Group members objecting to locating facilities at this location have been noted. It will be up to the developer to bring forward an acceptable off-site solution to providing the necessary playing pitch requirements.

### Terriers Farm

#### New sports facilities (floodlighting of STP)

The new sports facilities proposed at Terriers Farm have been generally welcomed by the responses received. However, some concern has been expressed that having a floodlit synthetic turf pitch (STP) on the site will further urbanise the area, will not retain the gap between High Wycombe and Hazlemere, and would conflict with the AONB.

Response – Noted. The site is not within the AONB and the final location of any STP has yet to be decided. Floodlighting technology is now extremely advanced with flat glass light systems, which ensure optimum pitch/court lighting, with minimal spillage so any conflicts with the adjacent AONB can be minimised. It is considered that the benefits of an SPT to the wider community outweigh any perceived urbanising impact and as it would be within a wider cluster of sports facilities.

#### Lack of cemetery space and allotments

A respondent has stated that the developers should be required to pay contributions to new cemetery space as there is an acknowledged shortage in High Wycombe. It is also stated that providing allotment space at Abbey Barn South would not meet the needs of the Terriers Farm development.

Response – It is considered that CIL funds are most appropriately used for providing cemetery space. The High Wycombe Town Committee will be using CIL and other funding to provide new cemetery space.

Allotment provision as an alternative to other facilities on site may be acceptable but will need further discussion with WDC Community Services, the Liaison Group, developers and the parish council. However it should be noted that the demand from all of the reserve sites for allotments space amounts to approximately 1 ha. Allotment sites smaller than this are expensive and difficult to manage. It is acknowledged that residents of the Terriers Farm development will unlikely use allotments at Abbey Barn South, but creating capacity in the town as a whole should free up capacity in allotment provision closer to the site.

### Slate Meadow

#### Retention of Village Green

The majority of respondents stated that the Village Green should be retained in its current location. Respondents also note that the size of the village green is 2.7ha and not 2.25ha as set out in the report.

Response – It is recognised that the preference in the local area is that the village green is retained in its current location and this will be taken into account as the process moves forward. The size of the village green will be corrected in the final report.

#### River Wye buffer

Respondents have asked that the document is explicit that there is a requirement for buffers from the River Wye.

Response – Noted and the final report will be amended.

#### Location of green space and play areas

Respondents have requested that the open space requirements (over and above the retention of the village green) should be provided mainly to the centre of the development to maintain the separation between Bourne End and Wooburn.

Response – The preference for the location of the open space is noted – this will primarily be a site specific issue and will be covered in detail in the development brief.



## **Section 7: Community facilities**

### No firm proposals

A number of respondents have stated that there are no firm proposals in the report of any community facilities that will be progressed.

Response – It is accepted that the document has not gone into specific details about what new community facilities may be brought forward to meet the development needs. Further detail will be provided on recent and forthcoming schemes to meet community facility deficiencies as well as further potential schemes to meet development needs. However with the Council now operating a CIL system, service providers including the District Council and parish and town councils may bring forward other proposals in the coming years.

### Abbey Barns

Similar to the comments regarding sports facilities, some respondents state that new buildings should not be located on green belt land between Abbey Barn South and Flackwell Heath.

Respondents also supported the potential use of school buildings for wider community use e.g. small library, community meeting area.

Response – Comments related to the location of community buildings in the green belt noted and will be taken into account as the process moves forward. The use of school buildings for wider community use will be investigated with Buckinghamshire County Council.

### Terriers Farm

A number of respondents have raised concerns that no onsite community buildings are being proposed for the Terriers farm site, with the risk of a development of hundreds of housing with no sense of community. Respondents highlighted that the neighbouring Wellesbourne development was completed with no community centre and that the Terriers & Amersham Hill ward is recognised as a deficiency ward in the Council's Community Facilities Strategy. With no village centre for people to meet everyday needs, people will need to travel and there will be no sense of community.

It is also highlighted that the Hazlemere Memorial Hall may not be available for increased levels of community use as it is leased out as a private facility.

Response – The comments regarding the lack of facilities in the Terriers area are noted and it is agreed that some form of community facilities should be available at or near the site. However the aim is for the site to integrate into the wider community not to be a stand-alone inward facing development.

Community facilities do not necessarily need to be buildings and it is considered the sport, play and possible allotment facilities, as well as improvements to the existing facilities on the adjacent recreation grounds will add to the sense of community in the area. There are shopping and restaurant facilities a short walk away on Amersham Road and proposed walking and cycling links will enhance this access.

In terms of built facilities, WDC are taking forward a project to build a new community centre on Totteridge Recreation Ground which is a short walk from the site. Finally, as set out in the report, community access may also be available at the Hazlemere Memorial Hall.

Having said the above there is the potential for one of the buildings at Terriers Farm complex to be converted to a community building if an additional need is identified.

#### Slate Meadow

Some respondents state that there is a lack of facilities in Bourne End and Wooburn that can be upgraded.

Response – Discussions will take place with the Parish Council (who will receive 15% of CIL funds collected from the development) on potential upgrades to community facilities in the area.

## **Section 8: Health**

### Disparity between confidence of NHS in dealing with impact of reserve sites and acknowledged recruitment and capacity issues

A number of respondents feel there is a conflict in the NHS acknowledging there is building capacity and recruitment issues but at the same time stating that they are confident that the extra demands created by the development of the reserve sites can be met.

Response – The Chiltern CCG have acknowledged there are immediate recruitment issues for a number of GP practices in the area but these are manageable in the short term. NHS England have set out a number of improvements necessary in the short to medium term to provide additional clinical space in existing surgeries and the possible expansion of a facility in Bourne End.

The management of GP provision, including the buildings is moving from NHS England to the CCGs. The CCG are commencing a further estates review, working with the practices to identify future needs and to ensure fit for purpose, future proofed buildings. Details of this review and the next steps will be shared when this becomes available.

### Closure of Lynton House Surgery and lack of facilities in east Wycombe

A number of respondents have highlighted that Lynton House Surgery is due to close meaning there will be a greater gap in provision in the east of High Wycombe. They urge the NHS to move forward with a new high quality facility in east Wycombe.

Response – The GP provision from Lynton House will be replaced at a new clinic at the Hospital and at Hanover House, Cressex. It is acknowledged there is a spatial gap in east Wycombe of GP provision. This has been raised with the NHS throughout the process and the Council will be engaging further with the NHS on the future provision of primary health care in line with future housing allocations in our new Local Plan.

### Possibility of expanding the Hawthornden Branch Surgery

Respondents have noted that the Hawthornden Branch Surgery in Flackwell Heath is missing from the Map 8.1 which shows the location of existing surgeries. It is also suggested that this surgery could expand to meet the needs from the reserve sites and wider growth.

Response – The map will be amended showing the Hawthornden Branch Surgery and the suggestion that the surgery could expand will be shared with the NHS. However it should be note that the NHS have expressed preference for larger facilities for management and economies of scale purposes and that

a proposal from the Hawthornden and Pound House surgeries to co-locate may be brought forward.

#### New facility at Terriers Farm

Some respondents have suggested that the NHS should locate a new facility at Terriers Farm as existing facilities are constrained and it would also go to creating a sense of community on the site.

Response – Whilst the feedback will be shared, it is highly unlikely the NHS would consider creating a small GP surgery at Terriers Farm as their preference is to create large facilities for management and economies of scale purposes.

#### Possible expansion of Orchard House surgery, Bourne End

Some respondents state that representatives of the Orchard House surgery have had no discussion with NHS over a possible expansion and they state the NHS should put forward a more robust approach with, proper analysis and detailed action plans.

Response – The strategy for GP provision in Bourne End has been followed up with the Chiltern CCG who now state that the Pound House and Hawthornden surgeries are seeking to relocate into one modern fit for purpose premises although this is still at an early stage.

## **Section 9: Utilities**

#### Little Marlow Sewage Treatment Works

A number of respondents have raised concerns that although Thames Water state that the LMSTW will require an upgrade, the consultation is only scheduled for 2018 and upgrades post 2020. Respondents feel the upgrades should be carried out to a faster timetable.

Response – The consultation comments will be shared with Thames Water. The Council does work closely with TW in sharing levels and timings of growth that they take into account in the asset management planning. Further updates will be received from Thames Water to support the Council's Infrastructure Delivery Plan that will set out the broad infrastructure requirements for the new Wycombe Local Plan.

#### Water and wastewater network upgrades

A number of respondents have raised concerns over the potential works on the public highway to facilitate the necessary water and wastewater network upgrades to serve the site and the congestion these works may cause.

Response – Comments noted. These are site specific issues and will be followed up with developers, utility providers and Buckinghamshire County Council.

#### Timing of upgrades

Respondents have stated that conditions should be imposed to ensure water and waste water upgrades are in place before development.

Response – As set out in the report conditions will likely be imposed to ensure the upgrades are in place before occupation of developments.

### **Section 10: Emergency services**

#### Emergency vehicle access into sites

Concerns have been expressed about emergency access into Slate Meadow through the access points proposed.

Response – The access point will be required to be assessed to be appropriate for all vehicles.

## **Developer representations**

There were a total of 6 responses received to the consultation from planning agents representing developers.

Although not a reserve site, the representatives of the prospective developers of the Wycombe Summit development adjacent to Abbey Barn North and South made representations regarding the access through Deangarden Wood.

The other representations were as follows:

- Kemp & Kemp on behalf of Berkeley Strategic – Abbey Barn South
- Wolf Bond Planning on behalf of Persimmon Homes and Redrow Homes – Terriers Farm
- Savills on behalf of Wycombe District Council – Gomm Valley & Ashwells
- Alder King on behalf of Axa REIM – Gomm Valley & Ashwells
- Kember Loudon Williams LLP on behalf of Avant Homes & Croudace Homes – Slate Meadow

The rest of this chapter summarises the comments received from the developer representatives and the Council responses to these.

## **Transport**

### **Wider transport schemes particularly A40 measures**

Some of the developers stated that the approach set out in the report to use CIL and pooled S106 contributions for the wider area highway improvements that are required to address the cumulative impact of the reserve sites is supported. However there were specific comments as follows:

- Costs borne by each development site for the wider schemes outlined in Table 4.1 should be proportionate to the related traffic effects arising from that development.
- Contributions via S106 should only be sought for specific schemes that have been properly costed and that have clear programmes for delivery and implementation.
- Measures highlighted for the A40 London Road corridor should be funded through the CIL.

Response – It is not expected that the reserve sites will fund all the measures identified in the report. However, all of the reserve sites will add pressure to an already constrained network and therefore it is appropriate to contribute to the wider schemes. The schemes in Table 4.1 will mitigate the wider traffic generated from all the sites to some extent. For simplicity of the delivery

process the schemes are targeted at certain sites, which is considered a fair, proportionate and equitable approach.

It is agreed that further work is required on the designs, costs and timing of the schemes.

It is not possible for CIL to fund all measures – CIL is set at a level that cannot pay for all infrastructure. CIL will be used for secondary schools, sustainable transport measures including wider bus improvements such as smart ticketing and bus stop infrastructure improvements, community centres, health provision etc. It is therefore necessary that the reserve site contribute to the schemes and measures set out in Table 4.1 that are indicated to be delivered through pooled S106 measures.

Table 4.1 – Scheme 1 – Abbey Barn Lane/Kingsmead Road/Abbey Barn Road Junction

Berkeley Strategic state that as the proposed new double mini-roundabout here is attributable to more than one development, the development of Abbey Barn South should not be contingent upon the delivery of this scheme.

They suggest the way forward is to pool S106 contributions from Abbey Barn North, Abbey Barn South and Gomm Valley & Ashwells towards the delivery of the proposed double mini-roundabout.

Response – As identified in the report the need for this scheme is likely to be justified as a result of the Abbey Barns developments irrespective of other developments. This will be firmed up as the process moves forward including the completion of transport assessments and the proposed access point for Abbey Barn North.

Whilst the Jacobs High Wycombe Transport Framework report identifies this junction as potentially impacted by the Gomm Valley development, the approach put forward in the delivery matrix in Table 4.1 of the report is for each of the sites to contribute towards or delivery a number of schemes to mitigate the cumulative reserve sites transport impacts prioritising those where the impact is likely to be greatest. The Gomm Valley site will be contributing to a number of schemes on the London Road that will mitigate wider impacts including from the Abbey Barn developments to which these developments will not be asked to contribute.

Table 4.1 – Scheme 2 – Upgrade and widen the bridge over the former railway line on Abbey Barn Lane

Berkeley Strategic state that pooled contributions should also be sought towards the scheme to upgrade and widen the bridge over the former railway

line on Abbey Barn Lane from the Gomm Valley & Ashwells development as the Jacobs report states that this scheme is also relevant to that development.

Response – Although the Jacobs report also links this scheme to the Gomm Valley site, it is considered it is much more closely related and necessary for the development of the Abbey Barn sites. It is considered that this scheme should be delivered through a joint S278 arrangement.

The Gomm Valley site will be contributing to a number of schemes on the London Road that will mitigate wider impacts including from the Abbey Barn developments to which these developments will not be asked to contribute.

Further work will be undertaken by the Highway Authority in conjunction with the developers on the detailed modelling, potential design and cost of this scheme.

Table 4.1 – Scheme 3 – Traffic calming measures outside Marsh School

Berkeley Strategic state that more evidence is needed for the proposed scheme of traffic calming measures outside Marsh School.

Response – The Jacobs report shows that Abbey Barn Road is one of the roads most significantly affected by development traffic from both the Abbey Barn North and Abbey Barn South sites. This runs through a residential area and adjacent to Marsh Infant School and so could worsen problems of severance and local environmental quality. The nature, design and costs of the traffic calming measures will be subject to further discussions with the transport authority.

Table 4.1 – Schemes 10 and 11 – School travel planning and behavioural change

Axa (Gomm Valley) state they should not have to contribute to wider measures such as school travel planning and behavioural change without being explicit how that money is spent.

Response – As set out in the Table 4.1 it is proposed these measures are funded through CIL and/or other transport funding measures, but not specific S106 contributions. It is clear that major localised congestion occurs in High Wycombe in the morning rush hour in particular linked to school traffic and this issue was one of the major priorities in public consultations and in reserve site workshops.

Promoting sustainable transport alternatives is considered essential to dampen overall traffic growth to keep the town moving. CIL funds will be used for targeted promotional activities to encourage use of alternatives to single car journeys such as walking, cycling, car-sharing and public transport.



#### Table 4.1 – Scheme 4 – Improve Rayners Avenue junction

Persimmon and Redrow (Terriers Farm) state that the pro-rata contribution from development of the Terriers Farm site should be based upon projected traffic on Rayners Avenue junction that are directly related to the Terriers development and that this scheme should be attributable to all reserve sites.

Response – All of the wider schemes in Table 4.1 will mitigate the wider traffic generated from the Terriers Farm to some extent. For simplicity of the delivery process the schemes are targeted at certain sites. The approach is considered fair and equitable. Further work is required on the design and costing of the scheme as there has been consultation feedback challenging whether signals are necessary. It won't be expected that the Terriers Farm development would be required to pay for the whole junction and costs will be proportionate to the impact of the development on the wider network.

#### Table 4.1 – Schemes 5, 7 and 9

Avant Homes and Croudace Homes (Slate Meadow) state that the wider transport measures identified in Table 4.1 attributed to Slate Meadow are not directly related to the site.

Response – It is not agreed that the identified schemes are not directly related to the Slate Meadow development. A proportion of the extra traffic generated from the Slate Meadow development will travel to and from High Wycombe and therefore improving the Rayners Avenue junction, the general A40 corridor and improving conditions for public transport will mitigate the impact of the development on the wider transport network.

As this is a pooled approach with other funding it is not expected that the Slate Meadow development will fund the entirety of these measures, but as set out above a proportionate contribution is considered appropriate to mitigate wider traffic impacts of the development.

#### **Abbey Barn local transport package**

##### Footway improvements to Flackwell Heath

Berkeley Strategic state that the likely need for the identified footway/cycle path to Flackwell Heath for the residents of Abbey Barn South would be small and would not warrant the level of investment required. In addition, land ownership issues mean that a full width route is unlikely to be feasible. Buckinghamshire County Council has suggested previously that a - 'narrow' footway/cycleway below normal standard could be acceptable given cost, land constraints and the semi-rural location.

Response – Providing a safe and reasonably attractive cycle/footway linking to Flackwell Heath and Daws Hill Lane would improve travel choice for local trips on a level route and linking to the rights of way network offering scope to mitigate additional traffic arising from the development. Opportunities to

deliver the footway/cycle path in a way that is cost effective will be considered sympathetically. The developers will need to demonstrate that a safe and acceptable scheme can be delivered. The detailed specification, costs and timetable for delivery will be subject to future discussions with the LPA and the transport authority.

#### Widening of Abbey Barn Lane

Berkeley Strategic state that extensive widening of Abbey Barn Lane would need third party land and expensive engineering which may lead to viability issues with the whole development.

Response – There has been general feedback that the ‘pinch points’ on Abbey Barn Lane should be retained as they are to enabled reduced speeds. The report does state that the scheme would need modest widening and realignment - limiting the need for third party land and large scale engineering and should be investigated in order to achieve an appropriate route in an area that will be subject to significantly increased levels of development and associated traffic.

#### Sustainable transport measures through Deangarden Wood

Hambledon Land, the proposed developers of the Wycombe Summit site, state they have produced a Public Rights of Way strategy that includes a proposed route linking Abbey Barn South and Abbey Barn North. However, this link and all other footpaths through Deangarden Wood should be for pedestrian use only.

Response – The comments from the developer are noted on restricting this route to pedestrians only and will be taken into account as the process moves forward. Nonetheless there does seem scope to provide a route that works with the topography so as to provide a less steep route which would be of advantage to many different users, and which has the potential to be well used given the proximity of new developments, the town centre and the valley floor. Improving travel choices is an important part of keeping the town moving. Any specific proposals will be subject to public consultation on the detailed design.

#### **Gomm Valley & Ashwells Transport package**

##### Spine Road

Savills agree with most of the public comments on this issue that with the spine road as a preferred option. They also state that is not automatically necessary to widen Cock Lane to provide access to the Ashwells site.

Response – The comments from both developers and the public regarding where the new spine road meets with Cock Lane and whether the northern end of Cock Lane is widened have been noted. The Jacobs report is clear

that the Ashwells site should not come forward with Cock Lane in its present form (see section 7.8 of the Jacobs Report).

It is considered necessary that the spine road joins Cock Lane at the southern extent of the green gap that is being maintained between the settlements of Penn and Tylers Green and High Wycombe. This avoids the need for a road parallel to Cock Lane which would erode the quality of this gap. The stretch of Cock Lane from this point north will be widened to ensure the function of the spine road is achieved through the site. The widened road will maintain a rural character and contain traffic calming measures. Further details will be included in the Gomm Valley site specific development brief.

#### Bus route 31

Savills agree with most of the public responses that it is not necessary to extend bus route 31 into the Ashwells site.

Response – The comments from both developers and the public regarding the extension of bus route 31 into the Ashwells site have been noted. However given the potential additional traffic it will be important to significantly improve travel choices unless there are compelling reasons not to do so. This will be considered further as part of the planning process.

#### **Terriers Farm transport package**

##### Access points to Terriers Farm

Persimmon and Redrow believe that the requirement to provide a second access point should not be unilaterally sought by the Council - rather any aspiration of this nature should be informed by a collaborative approach through supporting material as part of the development brief.

Response – As set out in the IDP report Wycombe District Council considers that a vehicular access point off the A404 is important for the site for legibility and connectivity. Any development must not prejudice the potential for an access to the site from the A404 and the internal road layout should be designed to facilitate connections to potential access points.

##### A404 mini roundabouts

Persimmon and Redrow accept that some improvements will be needed to the A404 mini roundabouts, although this should be contained within highway boundary.

Response – This junction is very close to what will be a principal access to the new development and will be significantly affected by traffic associated with the development so that mitigation will likely required. The junction should be assessed in the developers Transport Assessment and a scheme designed appropriately in line with advice from the Transport Authority. If possible this will be contained within the highway boundary.

### Traffic calming measures on North Road and Brimmers Hill

Persimmon and Redrow state that traffic calming on North Road and Brimmers Hill would not be directly related to traffic flow from the Terriers site and therefore financial contributions should not be required.

Response – It is evident from the Jacobs high level traffic modelling that traffic generated from the Terriers Farm development would impact on roads leading to Widmer End, although this may change once a second access is modelled. The required developer led transport assessment should make clearer the level of additional traffic likely on roads such as North Road and Brimmers Hill. Should this be required, further consideration will be given to detailed proposals.

### School drop-off

The developer comments match the public comments that there should be no school drop-off on the site as it would not be utilised to any great extent.

Response – A school drop-off point on the site will not be a requirement. It is still necessary to consider how children living on the site can travel to school in a sustainable and safe way without adding to morning peak time congestion. This should be part of the wider transport and planning assessment of any proposal for development on the site.

### **Slate Meadow transport package**

#### Former Bourne End to High Wycombe rail corridor

Avant Homes and Croudace Homes state that as the project to create a shared bridle/cycle/walkway on the former rail corridor is listed on the Council's CIL Regulation 123 List, then it is unreasonable to seek S106 financial contributions for the scheme.

Response – The Council have amended the CIL (R123) Infrastructure List to make it clear that CIL may be used for the High Wycombe to Loudwater section of the link. Securing S106 contributions that are necessary, directly related and proportionate for the Bourne End to Loudwater section does not conflict with the statutory tests for S106 contributions.

The Slate Meadow development is adjacent to the former rail corridor which offers great potential for a sustainable transport link separate from busy main roads linking Bourne End to Wooburn and High Wycombe. This will significantly improve travel choices and help mitigate the impact of the development on the wider transport network.

### Improvements on the A4094

The Slate Meadow developers state that it is unreasonable for the Councils to seek parking improvements to the A4094 from the development as they will provide sufficient parking for the development.

Response – Traffic movements generated from the Slate Meadow development will use the A4094 which is heavily constrained. A proportionate contribution to the measures outlined will help ensure that this route is able to cope with the impact of the development on the network.

#### Right turns on A4094

The Slate Meadow developers state that it is unreasonable for the Councils to seek contributions towards a new right turn into the commercial area adjacent to Slate Meadow as residents from Slate Meadow will not drive to this facility

Response – the right turn is constraint to the free flow of traffic on the A4094 and the development of Slate Meadow will add to traffic on this route. It is important that this route is improved so that it is able to cope with additional traffic from the development. Therefore a contribution here may be considered appropriate.

## **Education**

Persimmon and Redrow, the prospective Terriers Farm developers support the approach set out for meeting the education needs of the developments, including the need for s106 contributions.

Berkeley (Abbey Barn South) state that the pupil yield rate from the Abbey Barn South and North would not generate the need for a full form entry of primary school and that other contributions would need to sought. They state that the primary school should be funded through CIL contributions and not S106 contributions.

The Gomm Valley & Ashwells developers also suggest that primary education provision should be funded through the CIL. The Gomm Valley developers also suggest that WDC have not factored in the loss of developable land in lieu of the requirement of the land for the school. They also suggest that requiring land for sports facilities at Terriers Farm is not the same as that land could not be developed (as it is stated in the report that locating the pitches at the western end of Terriers Farm would assist in keeping a strategic gap between Hazlemere and High Wycombe). They also state that the Ashwells part of the site would contribute no land to sports or education. They therefore state that all of the education contributions should be borne from the Terriers Farm and Ashwells developers.

The Slate Meadow developer team state that the secondary schools listed on the CIL R123 List are not close to the site. They also state that Claytons primary school is a distance away from the site and that pupils living on Slate Meadow would be unlikely go to this school.

Response – As set out in the report and in the Council’s CIL R123 List, CIL funds will be used to meet the secondary school needs of all of the sites including Slate Meadow.

The Council does not accept that CIL contributions should be used to provide the primary education needs of the reserve sites. Notwithstanding the fact that CIL funds are limited (being required to fund secondary school provision, some strategic transport schemes and programmes, health facilities, community facilities etc), the approach set out in the report is fair and reasonable. Primary schools in the district are near capacity and there is a direct need for S106 contributions and land to provide the necessary extra capacity.

Buckinghamshire County Council will pool other contributions with those from the reserve sites to extend the school to be provided at the Pines Trees development to a 2 form entry primary school when this is required. The developers are provided to pay proportionate contributions and the County Council will deliver the school at the appropriate time, depending on build out rates etc.

It is not accepted that the developers of the Gomm Valley development should avoid making any financial contributions towards the delivery of the school because they are providing land. As set out in the report, local schools are at or near capacity and are not able to expand and therefore a school is required on the site to meet the education needs of the site. It is accepted the site is not of a sufficient scale to require a full new school without pooling contributions from elsewhere and therefore contributions will be pooled from the Terriers Farm site to actually deliver the school, with capacity being freed up in schools closer to the Terriers site by amending catchments.

The developers are incorrect in stating that there is no potential loss of developable land at the Terriers site. It is not an absolute policy requirement that the pitches are located as suggested at the Terriers site – this is however the Council’s preferred approach confirmed by wider consultation feedback. However the pitches could in theory be located elsewhere at the Terriers site. In addition the developers of the Terriers site will be required to lay out the pitches to the required specification (whereas Buckinghamshire County Council will deliver the school build on the Gomm Valley site). So a commensurate amount of potentially developable land at Terriers Farm will be lost to provide formal open space and to compensate on a pro rata basis for the school land at the Gomm Valley site.

The proposed way forward for education and formal sport and play provision delivery as set out in the report is fair and equitable. Developments of this scale require on site facilities and it is therefore questionable to claim that significant areas of developable land are being lost. In any case it is

understood that the likely location of the school on Gomm Valley would be located on land that would otherwise be used for employment space. It is also reasonable to assume that the overall value of both sites would be enhanced by having a new school on site or by having new sport and recreation facilities.

Therefore the Council reconfirms that the requirements for meeting the education needs of the four High Wycombe reserve sites as follows:

- 1.2 ha site on the Gomm Valley site.
- Financial contributions from all sites, based on Buckinghamshire County Council's cost multipliers (an average of £4,564 per dwelling) that will be pooled to deliver the new school on the Gomm Valley site and an extra form of entry to the new school proposed on the Pine Trees site.

Requiring S106 contributions to meet the primary school needs from the Slate Meadow site is not double counting or in conflict with the CIL Regulation 123 List. As set out in the report the proposed way forward is to pool contributions from Slate Meadow and some other local developments to expand Clayton's Combined Primary School by a half form of entry. With a review of the catchment for St. Pauls Primary School, the majority of children from the Slate Meadow development would attend St. Pauls (although it is recognised this is a CofE school so not all children will attend), with out of catchment children being forced back to local catchment schools.

## **Green infrastructure, formal sport and play**

### Abbey Barn South

Berkeley Strategic state that the baseball club that was previously on the site have been relocated. Nevertheless it is recognised that there are national and local policies that protect land used as playing fields. This includes Paragraph 74 of the NPPF which states:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Berkeley state there are two main options, either the baseball pitches stay in their present location, or if the pitches are replaced by employment land, then

the tests in Local Plan Policy RT3 and paragraph 74 of the NPPF should be applied to determine if the pitches need to be replaced.

Berkeley state that the locations referenced for off-site provision of the formal sport pitches are not currently available and that an off-site financial payment should not be precluded.

Response – Local Plan Policy RT3 and NPPF paragraph 74 highlight the importance of existing sports pitches and serve to protect them from development. These policies continue to apply to the baseball fields notwithstanding they are no longer in use.

The requirement for formal sport pitches (2 youth football pitches and accompanying facilities) are directly required as a result of the development. Whilst an off-site approach may be acceptable, at this stage a financial contribution is not acceptable because the Council do not have locations where this could be provided.

#### Gomm Valley & Ashwells

The developer representatives of the Ashwells site suggest that the required NEAP should be provided towards the south of the Ashwells site on land that is not suitable for residential development to maximise the delivery of housing on the site.

Response – The exact location of the NEAP will be subject to further discussion with relevant parties through the development brief and planning application process.

#### Terriers Farm

The prospective developers of the Terriers Farm site have objected to the requirement for on-site sport and recreation facilities on the site. They state that the Council needs to provide more evidence for the need for the facilities and objection to the notion of a sports hub at this location. They also object to the requirement for a floodlit STP which may have adverse impact on the AONB. Finally they consider that the needs of the development should be accommodated on the adjacent recreation ground through CIL or S106 funding.

The developer also states that if facilities are provided on site then they may form a management company and therefore the 25 year maintenance payments would not be required.



Response – The Council disagrees with the suggestion that the facilities are being imposed on the developer or that the Council do not have sufficient evidence to require these facilities.

The requirements are based on the quantitative requirements as per Policy DM16 of the Delivery and Site Allocations and the actual facilities that are required are based on the future projected deficiencies in facilities as outlined in the 2015 Sports Facility Strategy. Policy DM16 is explicit that the strategic open space requirements of major sites, including the reserve sites should be provided on site.

As set out in the report, it is proposed that land is allocated at the Gomm Valley site for a new school that is required as a result of both the Gomm Valley & Ashwells developments and the Terriers Farm developments. It is a fair and equitable approach that the Terriers Farm site provides extra land for formal sports pitches, particularly with the topography of the Gomm Valley site being unsuitable for pitches.

The suggestion that the facilities should be provided on the adjacent recreation ground is not supported. There is no space on the adjacent site for the new playing pitches and play facilities required as a result of the new developments. The report does however state that the Council would likely use CIL funding to upgrade the capacity of the adjacent car park and changing room that would also be necessary as a result of new developments.

There appears to be confusion over the use of the term ‘sports hub’ in the report. This term is used because locating the required facilities (synthetic turf pitch, youth football pitches, and skate park) at the location suggested in the report, adjacent to the existing recreation ground, would mean a consolidation of sports and recreation facilities in this location and economies of scale in terms of management and ancillary facilities.

It is recognised that there is some potential that a new floodlit synthetic turf pitch may have impact on the AONB. However there is now high tech floodlighting with flat glass light systems, which ensure optimum pitch/court lighting, with minimal spillage. Full consultation will be held with the Chilterns Conservation Board on these proposals.

Finally the Council have recognised in paragraph 6.63 of the draft report that developers may choose not to offer new facilities for adoption by the Council, provided the Council is satisfied that alternative arrangements have been made for their long-term maintenance and that they will be kept as public open space in perpetuity. This may be through some form of private management arrangements, or some other form of partnership such as a local Trust.

In summary there is a clear policy requirement that strategic open space is located on site on the reserve sites and the Council are taking a pragmatic and equitable approach that the Terriers Farm site should provide some extra land for formal sports in lieu of the school site being located on the Gomm Valley site. The specific requirements set out in the report are not being sought to meet existing deficiencies, but rather to meet the projected deficiencies in facilities taking account of housing growth. The requirements for the Terriers Farm site are therefore what is set out in Table 6.2 of the draft report.

With regard to the proposed skate park it may be possible, subject to agreement with the Parish Council, to locate this within the existing facilities at the Hazlemere Recreation Ground and to use the land so released for allotments for the new development - this again would be subject to agreement from the Parish Council.

#### Slate Meadow

Avant Homes and Croudace Homes state that they consider a LEAP is more appropriate, given the scale of the site rather than a NEAP.

Response – The developers will likely propose up to 150 dwellings on the site and it is considered that this scale of development will require appropriate play facilities of the size of a NEAP. However this will be discussed further with the relevant parties as the process moves forward.

### **Community facilities**

Berkeley Homes (Abbey Barn South) states that it has now been generally agreed through the development brief process that community buildings at the Ride are not required and that the new community facility to be provided on the adjacent Pine Trees site is being sufficient to meet the needs of the Abbey Barn South development. They also highlight that the community facility requirements on the other reserve sites may be paid for by CIL and that should be the case.

Response – It is accepted that the Abbey Barn South Development Brief states that buildings will not be appropriate at the Ride.

WDC Community Facilities have requested that any changing rooms necessary for the pitches includes a small community room.

## **Utilities**

Persimmon Homes and Redrow Homes state that Grampian conditions for the provision of utilities are not acceptable.

Response – It is a normal part of the planning process that utilities are required to be provided in advance of certain phases of development being completed or before occupation of dwellings. Thames Water has requested Grampian conditions to ensure works are in place ahead of occupation.

## **Next steps**

Development briefs are being progressed for each of the reserve sites in advance of planning applications being submitted.

Chapter 11 of the Reserve Site Infrastructure Delivery Plan sets out the various delivery mechanisms by which infrastructure will be secured delivered either by developers directly on site or adjacent to the sites or the various agencies and utilities companies through developer contributions or specific agreements.

Further work is necessary in a number of areas including for example the design of the potential junction improvements on the A40 London Road; the long term management of the undeveloped areas of the Gomm Valley; the timing for the required modifications to GP surgeries to create more clinical space; the timing of upgrades to the Little Marlow Sewage Treatment Works. We will be continuing to work closely with the relevant service providers and the developers to progress these issues, and further updates and consultation will be carried out where necessary and further work will also be undertaken to support the infrastructure requirements of the housing and employment allocations in the new Wycombe Local Plan.