

**South Bucks Local Development Framework
Core Strategy : Preferred Options Document**

Notes by the IMG for the Advice of Council

1. INTRODUCTION

The Preferred Options Document is a well prepared, accessible and professional report with a number of proposals which are, *prima facie*, to be welcomed.

Some comments made by the Parish in response to the Core Strategy : Issues and Options Paper and from meetings with SBDC staff have been acknowledged and incorporated in the current document. These include the strategic requirements for the redevelopment of the Mill Lane Area, (Preferred Policy Approach (PPA) 3, Areas of Potential Change), the redesignation of the Taplow Riverside Conservation Area as GB 1, the extension of Taplow Village and Taplow Riverside Conservation Areas, some tightening up on Green Belt protection (but not enough), a more positive statement on landscape (PPA 14. Landscape Protection) but which is somewhat limited.

The Planning Policy Unit has also been cooperative by alerting the Parish Council to situations bearing on a response to the Preferred Options Document. However positive actions such as the above do not detract from the need for a mechanism by which to facilitate a proactive dialogue between District and Parish through the vehicle of the Parish Plan as indicated in PPS 1. Proactive dialogue between statutory authorities concerned with development planning is a normal part of the planning process with or without a policy statement by government. Reference is made in the Document to Parishes which are “preparing” Parish Plans. As SBDC knows this Parish completed a plan in 2005 and distributed to District and County in October of that year.

Each preferred policy is preceded by a statement under the words *What you told us*. No indication is given of the number of respondents in relation to the views expressed. The distribution of respondents between individuals, amenity societies, official organisations or parish councils is not recorded. Conventionally each should have a different weight. Without additional information, as above, a statement of public preferences is not very meaningful.

A very useful statement is made after each Preferred Policy Option under the heading *Delivery mechanism*. One of these is “The determination of planning applications”. This raises a question of credibility. Observation suggests that decisions taken on development applications, particularly in sensitive situations and where the decision is delegated, frequently depart from conventional planning principles and in some cases are positively perverse. Decisions are frequently made which are contrary to local public opinion. It has become apparent over the last few years that the Development

Control Unit uses a quasi legalistic approach to its interpretation of policies for implementation. In the view of Taplow Parish Council this has led to the permitting of development clearly not intended by the District Plan. It is recommended that the wording of all policies be rigorously checked by the Legal Department to eradicate possible misinterpretation at the implementation stage.

Significant references are made to the “Community Plan” (which seems to appear under a variety of titles) which is clearly recognised by SBDC as an important document. This is not understood. It is not clear which community’s aspirations it represents or the source of information on which it is based. It appears to bear no relationship to Parish Plans. The means of ratification is not understood. The “plan” was originally approved by “conference” but then amended without being put before “conference” again. The credibility and legitimacy of such a “plan” must be in doubt.

It is noted that there is no specific policy on provision and promotion of leisure facilities. The location and character of this and similar parishes, accessible to surrounding towns and villages, causes them to manifest themselves as important providers of extensive and intensive leisure. This function should be protected and promoted by an appropriate Preferred Policy Approach.

2 PREFERRED POLICY APPROACHES (PPA)

The point has been made in the Preferred Options Document that more detail on the preferred options will be given later in the process. This is understood. However some indication is required of the issues to be detailed in order to understand the direction in which the policy will be implemented. The method of implementation may change the character of the policy.

PPA 1 – Promoting Sustainable Development.

The purposes of the policy are endorsed subject to the following - In the statement commencing “is located to minimise the need to travel.....” “public” should be substituted for “sustainable.”. In this instance the term “sustainable” is somewhat vague.

PPA 2 – Overarching Spatial Strategy

Endorsed but subject to the following: in the final paragraph delete all after “where” on the second line and add “comprehensive development or development according to a comprehensive plan will be required”.

PPA 3 – Areas of Potential Change

Endorsed but add “and the Jubilee River” after “River Thames”. The policies for Mill Lane should also be expanded to include the preparation of a Planning brief along the lines of that prepared for Dropmore, the need for an archaeological (including industrial archaeological) survey and a stringent assessment of the flora and fauna to determine whether any sites of biodiversity and/or special scientific interest should be designated.

PPA 4 – Overall Housing Provision.

The preferred approach is for provision of 1,350 additional dwellings. It is noted that there are extant permissions for 800 dwelling units. The figures given for the three phases are acceptable as long as current permissions are included in the figures quoted.

PPA 5 – Making efficient use of land whilst protecting character.

Rigid implementation of the policy in the third paragraph may inhibit provision of “affordable” housing or housing for key workers in sustainable locations, i.e. on public transport routes in some cases. The demolition of houses in Gerrards Cross and Beaconsfield which represent a local architectural vernacular with a Voysey-ish or Edwardian charm and replacement by crude and mendacious imitations of houses of the 18th and 19th century would appear to be a waste of national resources and a failure to protect character.

PPA 6 – The mix of new housing types and sizes.

Endorsed

PPA 7 – Affordable Housing.

The numbers of dwelling units above which a proportion of affordable housing must be provided has been reduced from 14 to 10. This does not appear to have overcome the problem. Future housing development will simply be built in increments of ten instead of 14. This sort of strategy does not provide for appropriate numbers of “affordable” housing at the right time or in the right place. It also has an adverse effect on urban design and the street scene, development being restricted to a repetition of unrelated small units. A more positive approach is required. Without it there are difficulties in calculating and providing for social and physical infrastructure as well as working to gross density standards rather than the net standards for individual sites. Present experience demonstrates a lack of provision for Green Spaces in the form of play areas and parks. Policies should also include the determination of appropriate locations for “affordable housing” with a strategy for their provision through housing associations or by public housing.

PPA 8 – Gypsies and Travellers Accommodation

The fact remains that the particular life style followed by travellers cannot be easily accommodated in a way that is environmentally friendly, socially compatible and with the proper provision of social facilities, particularly for children. The parameters given for locating pitches are acceptable except for the inclusion of “...unless there are very special circumstances” in the third paragraph. This should be deleted. The imposition of these parameters would seem to ensure that practically no site could be made available in South Bucks. The reality of the situation is that these people must be accommodated in some way. A more positive approach is required or unsuitable siting will occur by default.

PPA 9 – Making Better Use of Employment Land

The approach given is generally endorsed but with some reservations. In the first parameter the word “significantly” should be deleted. The effective implementation of the stated parameters is almost wholly dependent upon development control. This raises a major problem. Experience in this Parish illustrates that development applications are processed in a significant number of cases without reflecting planning policy or the views of the parish community.

PPA 10 – Maintaining and Enhancing Town Centres

Policies to date have ensured the demise of a large number of specialist shops, particularly food outlets, in both Beaconsfield and Gerrards Cross. The quality of shopping has deteriorated significantly as a result. There is nothing in PPA 10 which will change this trend. In a town in Norfolk there has been an absolute ban on “supermarkets” which, it is understood, has been a great success and is worthy of consideration. The Bishop Centre comprises small and medium size shops and as such is a useful facility. It should remain at the present scale and not be allowed to be redeveloped as yet another retail park with large scale “superstores”.

The Bishop Centre is in Taplow Parish and NOT Burnham as has been pointed out before.

PPA 11 – Television and Film Industries

Endorsed.

PPA 12 – The Rural Economy.

This would appear to be a *de minimis* approach. The suggestion by the Woodland Trust should be incorporated in policy and, where appropriate, farmers encouraged to develop commercial, largely broad leaf woodlands. Leisure facilities such as riverside activities, equestrian pursuits and rambling etc generate employment and are important components of the rural economy. Policies should be written into the Document for the encouragement of these commercial enterprises. This encouragement, however, must be accompanied by a strong protection of the Green Belt both to keep the environment in which leisure pursuits thrive as well as limiting leisure activities that damage the rural character. The perpetuation of employment and income generating leisure activities is dependent on the strict limitation of traffic movements, particularly by HGVs and traffic cutting through and the conservation of the Green Belt. The adverse effects of leisure infrastructure, such as parking facilities, boat storage, stabling, as well as traffic generation and high levels of intrusive activity must also be taken into account in policies for the conservation of the Green Belt. The latter is essential for the perpetuation of leisure facilities and the rural economy.

PPA 13 – Protecting and Enhancing the Green Belt.

The policy approach is endorsed but more needs to be done if the Green Belt and activities dependent upon the Green Belt are to endure. Accessibility by adjoining towns and villages to the Green Belt in this and similarly located parishes with leisure facilities also makes it particularly vulnerable to pressure for development by

property developers and speculators. The Green Belt must be seen as a spatial, structural component of the natural and built environment. It is a perpetual element and not a residual. Strategies have already been developed to achieve this concept. One is termed the “Green Arc” originally sponsored by the City of London and implemented for the north east sector around London. Proposals are in course of preparation for the north west sector with Buckinghamshire County Council as the “Leader”. The partnership for the north east “Green Arc” comprises sixteen agencies representing County Councils, government departments and agencies, and environmental bodies such as the Woodland Trust and the Forestry Commission. The second strategy is referred to as “Green Infrastructure” on which officers have reported to the BCC Overview and Scrutiny Committee for Community and the Environment. One of the Action Areas identified as a priority for the creation and enhancement of green infrastructure is that covering the woods and heaths of South Bucks. It is essential that these initiatives are incorporated in PPA 13 as positive proposals.

Protection of the integrity of the Green Belt is also dependent on the limitation of traffic movements and flows, particularly by HGVs and traffic cutting through.

A ban on all development is required in the Green Belt between Slough and Maidenhead and Beaconsfield and Windsor.

PPA 14 – Landscape Protection

This approach needs to be extended to cover other appropriate Landscape Character Zones identified in the Landscape Plan for Buckinghamshire. This northern part of the Parish falls largely within the Wooded Plateau Zone, an area of wild character with woodlands and hedgerows up to the road verges. This singular character is very vulnerable to suburban-isation by inappropriate entrances, the cutting back of hedgerows, traffic “improvements”, such as white lining, and traffic management. There is also a need to strongly protect the rural area surrounding Taplow Village, the fields to the south of the M4 adjoining Marsh Lane and the rural landscape between the Thames and Jubilee Rivers.

PPA 15 – Colne Valley Park

Endorsed

PPA 16 – Damaged Land

Endorsed

PPA 17 – Biodiversity and Geological Conservation

Endorsed but add after “...County Wildlife Sites,”” vulnerable Landscape Character Zones and”

PPA 18 – Protecting and Enhancing the Built Environment

This is very much endorsed but see comments on PPA 5. High quality design of buildings and good urban design is dependent on effective development control with

advice from those qualified in these areas. One would wish to be convinced that appropriate advice is available before the implementation of this policy becomes credible.

PPA 19 – Prevention of Pollution to Air, Land and Water

Endorsed.

PPA 20 – Protecting and Enhancing the Water Environment.

Very much endorsed. The policy in the last paragraph is essential in view of water shortages in this area. Development control should provide for the storage of roof water for gardening purposes.

PPA 21 – River Thames and its Setting.

Reference should be made to the Jubilee River and the island created by the two waterways, (termed Jubilee Island in the Taplow Parish Plan). The title should be reworded as “The Rivers Thames and Jubilee and their Setting” This policy area needs to be considerably strengthened. The whole riverside area requires a much more stringent process of development control. Parking of vehicles and storage of boats, some of which often obstruct the Thames Path, is a major environmental problem. This is an area of attractive Edwardian houses the character of which needs to be recognised. Development control should aim at the rehabilitation of both the natural and built environment where necessary. A more sensitive approach is required. Action is needed to maintain access to the Thames river bank and to restore visual access to the River by the removal of fences and high hedges. These issues should find expression in the policy.

PPA 22 – Community Infrastructure

The provision of community infrastructure in relation to the needs created by the changing demographic structure of society is essential. Evidence provided to GC2C has identified problems of provision in relation to the elderly and this problem should be acknowledged in the text.

PPA 23 – Encouraging Sustainable Transport

Generally endorsed but the last paragraph is not understood. Visual evidence indicates that developers usually make inadequate provision of parking.

PPA 24 – Railway Safeguarding

This is endorsed subject reference being made to the safeguarding of the environment from excessive traffic movements and impact on the natural environment. Despite Crossrail’s Environmental Statement it is a common phenomenon that traffic movements and flows are grossly underestimated. It is our view that this is the case here. It will also be necessary to discuss the safeguarding of the natural environment with Crossrail and in particular tree stands. Railways are known as ruthless cutters of trees and have an insensitivity generally towards the environment.

PPA 25 – Dorney Rowing Lake

Endorsed

PPA 26 – Sustainable Waste Management

Endorsed

PPA 27 – Energy Efficiency and Renewable Energy

Endorsed. It is assumed that all new development will be required to install and use solar panels.

PPA 28 – Securing Infrastructure through Planning Obligations

Endorsed but no reference is made in the document to the forward planning of services by statutory undertakers. This would appear essential as the economics of service provision is one of the determinants of development location and phasing. :

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