Wycombe District Council

New Local Plan Options Consultation

Feedback Report – Development Management section

February 2015

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1. Introduction

1.1.   As well as consulting on overall levels of growth and sites options, we also consulted on a number issues relating to the management of future developments.

1.2.   The New Local Plan will contain a number of policies that aim to influence and shape future developments and be used to determine planning applications.

2. Summary of Written Responses – Managing Development

2.1.   This section sets out a summary of the written responses to the Managing Development section of the consultation and provides an overview of the issues raised.

2.2.   There was a much lower level of responses to the DM questions compared with questions relating to sites / options for growth (see October 2014 report). There were 1011 individual issues raised by 138 respondents.

Issues with the highest level of response

2.3.   Overall the most responses on section 6 of the consultation document (questions 44 to 58) were received in relation to the homes section (6.2).

2.4.   Looking at the breakdown of questions, topics with the highest level of responses in section 6 were

- broadband and digital connectivity (43 responses)
- allocations for specialist housing (42 responses)
- housing mix/ tenure (38 responses)
- older people housing on strategic sites (as percentage) (36 responses)
- housing density (36 responses)

2.5.   The potential for a **broadband and digital connectivity** policy received significant support particularly in relation to encouraging home-based businesses / home working patterns, thus reducing commuting levels, and ensuring the competitiveness of rural areas in particular.

2.6.   **Specialist housing** was broadly encouraged, as it would free up some market housing whilst being more fit for purpose. Better access to specific infrastructure such as public transport/ medical centres / university was seen as a key issue.

2.7.   A majority of respondents favoured a flexible approach to setting **housing mix / tenure** through guidance outside of the plan. The use of standards in the plan or as part of a policy was deemed inappropriate.

2.8.   The main issue raised in relation to providing housing for **older people on strategic sites** highlighted the need for elderly accommodation across the District; and questioned the suitability of the strategic sites to meet this need.

2.9.   The main issue raised in relation to **housing density** was the need to ensure high quality design whilst taking into account site specifics and context. A criteria-based approach rather than standards was preferred to ensure flexibility.

Appendices

Appendix 1 Response summaries index

The following summaries are based on all of the responses we have received; they do not aim to reproduce everything that was written to the Council, but provide a summary and overview. Where appropriate there are direct quotes from responses to provide an indication of the nature of response received.

A list of who commented on what site/question or option is available on the Council website along with a copy of all the responses received.

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Homes: Summary of Responses

Questions 44 a to 44 e

Affordable homes section

Total responses: 5 Support: 2 Object : 0 Comment: 5
There were a few comments relating to affordable housing generally which can be summarised as follows: • high quality affordable housing is required, particularly in rural areas • current policies should stand if they are working • viability is critical in the delivery of both market and affordable housing • policies must be flexible enough to take account of site specifics

Question 44 a – What size schemes should provide affordable housing?

Total responses: 32 Support: 3 Object :1 Comment: 28
There were many diverging comments on this question. • Sizes suggested ranged from schemes of 3 units or more to schemes with 20 or more units. • Those supporting a lower threshold argued that this would contribute towards delivering more affordable housing, particularly in rural areas. • Those who were in favour of a higher threshold expressed concerns over a schemes viability if the threshold was too low. • It was also suggested that comparisons should be made with what is built elsewhere • Several respondents argued that all schemes should contribute to the provision of affordable housing to some degree, even if only through S106 contributions Other comments on affordable housing provision more generally related to : • the need to provide schemes solely for affordable housing as the need is high. • the need to assess provision on a on a site by site basis – this would depend on identified need, location and type of development. • the siting of affordable housing – it should be encouraged in areas with good access to public services and transport • the potential to offset this financially throughout the District by making contributions to housing associations • the need for a flexible policy framework in terms of viability negotiations on specific sites where specific circumstances apply, although care should be taken not to create a need to negotiate viability matters for each individual site, resulting

in delays
- the need to provide affordable housing in rural areas to retain young people and ensure a vibrant and dynamic economy
- how to ensure affordability becomes perennial
- the strategic opportunity at Princes Risborough to deliver a significant proportion of market and affordable housing

Question 44 b – Should we take the same approach across the whole District?

Total responses: 27 Support: 17 Object : 5 Comment: 5
Support • There was a high level of unqualified support to this question. Qualifying comments argued: • that it may be easier to enforce a consistent policy • that a range of types of units should still be provided • that section 106 contributions should provide affordable component
Objections • Some respondents objected to having a district wide approach • Some argued for a site by site approach, having regards to location and type of development • Others pointed out that urban and rural areas may have different needs in terms of appropriate mix for market and affordable housing • Another approach advocated the need to vary according to extent of existing provision and of demand in the locality.
Comments A few comments were made about the approach to be taken: • There were some concerns over viability of schemes with current requirements • There was a view that rural exception schemes should be centrally funded. • Another view advocated for the use of pooled developer contributions to fund affordable housing in specific locations rather than pepper potting • There should be provision to review special cases • If there were to be a village expansion then different criteria would be required.

Question 44 c – What proportion of development should be affordable?

Total responses: 34 Support: 4 Object : 1 Comment: 29

Proportion of development

Some respondents commented on what proportion they thought should be affordable.

- This varied greatly with the lowest proportion proposed as 15% and the highest at 70-80% ; reasons given reasons as per question 44a in terms of providing a higher percentage of affordable housing versus maintaining schemes viability)
- Most suggestions were in the region of 30%.
- Several respondents were keen to retain the current flexibility of policy CS13 with regard to market conditions and site circumstances.
- Several respondents were keen to see some flexibility over the plan period to adapt to changing market signals such as land prices and housing affordability- avoid threatening viability and deliverability (housing delivery rate)
- one suggestion was to have a year on year increase
- Housing officers / associations should be consulted to determine this.

Other comments

- Several comments highlighted the need to base the requirement on need / location, rather than a percentage – in areas where there is a higher proportion of affordable already, lower levels should be sought to create mixed communities. In those cases regeneration can be served by higher levels of private rented housing.
- The policy should set a range of targets
- here was a view that there should be more discretion for officers to decrease the requirement
- One respondent argued that other ways to deliver affordable housing should be considered (e.g. Southwark directly funded housing delivery)

Some comments related to the need for affordable housing:

- There was a view that we should use existing affordable housing stock – no new housing
- There was a perception that there is no current basis of identified need over the next 15-16 years for affordable housing. There is no analysis showing the types and numbers of houses that need to be built.
- One respondent criticised the lack of an Economic Development Strategy or vision for a commuter of mixed economy district which means there is no base from which to determine the need for affordable housing and the suitable locations for such housing.

Some comments related to who needs the affordable housing element:

- increase affordable proportion to house those locally employed
- affordable housing should be provided for people with disabilities / impairments only

- Other comments related to the effects of pepper potting on tenants and on numbers delivery, the need to locate affordable housing with easy access to services and the need to provide a flexible policy that does not deter schemes viability.
- There was a view that current approach is simplistic and does not meet the need.
- Type, size, and location should be informed by the distribution of population required to support employment opportunities identified in an Economic Development Strategy.
- Registered providers, including Red Kite, should be involved in an emerging robust evidence work based on future needs, given their knowledge of the local affordable housing market.

Question 44 d – Should we seek different amounts of affordable housing on different types of sites?

Total responses: 28
Support: 14
Object :6
Comment: 8

Support
- There was a strong support for seeking different amount of affordable housing on different types of sites.
- Again, the current policy flexibility was supported.
- There was a view that local need should be overriding

Objection
- There were a number of objections to this question. Some respondents qualified their opposition by the following views :
  - different amounts should be sought if a viability assessment indicates so;
  - different amounts should be sought only if the area is mainly market housing

Comment
Those who commented raised the following points:
- The amount would vary depending on sustainability of the site- for example, greenfield sites have less constraints and abnormal costs than brownfield – could seek more affordable on them.
- A flexible policy should be implemented which can be reviewed in light of market changes and site specific considerations. This flexibility should be woven into S106 agreements for larger sites in order that developments can respond to market fluctuations over the duration of the build period.
- The percentage on smaller sites should equate to a financial commitment prior permission.
- There may be certain sites where a very high proportion of housing should be affordable in order to get sufficient density of housing provision.

Question 44 e – On what basis should we calculate the affordable housing requirement?

    a) **as percentage of bedspaces (as per our current policy)**
    b) **as a percentage of floor space (similar to the way we calculate the Community Infrastructure Levy)**
    c) **as a percentage of the number of units in a scheme?**

Total responses: 30 Support: 3 Object :2 Comment: 25
Percentage of number of units Most comments favoured calculating affordable housing on a percentage of the number of units in a scheme. • Size ranges should be agreed with developer in advance of planning application • More practical • Local housing need and demand will require particular housing mix and dwellings types in specific locations • Provides more certainty for developers allowing the level of affordable to be agreed at the outline stage based on the number of units only and not fixing the mix of the site. • Particularly given fluctuating guidance on internal arrangements for dwellings. • There was a concern that using bedspaces could encourage multiple occupancy
Percentage of bedspaces • Fewer people supported that approach.
Percentage of floor space • Calculations based on a percentage of floor space received the lowest amount of support. • One person felt it was the best way to discourage very small room sizes

Alternative approaches
• Some respondents supported other approaches :
    o on a site by site approach, where affordable housing should be subject to negotiation based on the scheme viability overall
    o on a site-by-site basis as a number of bedspaces not a percentage
    o Some felt that affordable housing should have a local connection criterion as a priority.

Question 45 – Should we control the creation of Houses of Multiple Occupation (HMO)?

Total responses: 34 Support: 22 Object: 5 Comment: 7
Support There was recognition that affordability is a key issue and has led to too many HMOs. Most respondents supported some control over their creation.

Some support was qualified by the need :
- to exercise some control over the supply,
- to prevent negative impacts on the character of an area
- to reduce the impact on residential areas, in particular issues around unacceptable levels of on street parking, conditions of grounds and gardens
- to reduce impact on infrastructure and services – utility providers should be consulted upon and refusal should be given where there is insufficient capacity
- to ensure they are sited in the most appropriate places,
- to provide enough amenity space and parking
- to restrict them to students only
- to create bespoke student accommodation instead
- to consult with the local population as well as applicants / developers
- for HMOs in a particular location – this should be determined by the population required to support an Economic Development Strategy
- to have area based restrictions e.g. in Terriers and Amersham Hill which include a third of the District's overall number of HMOs, or to set out restrictions as street level either having only a proportion of any existing street allowed to be converted, or having some street solely for HMOs
- for effective licensing and taxing, as some respondents considered HMOs akin to businesses

Objection
- Some respondents objected to the control of HMO creation, and preferred relying on the market as to their creation (conversion of larger homes, reuse of disused offices etc.)
- there was a view that HMOs are meeting a proven need, in particular for students as they reduce overall need for housing and for land as it is of higher density
- Others felt that current planning procedures are sufficient to control HMOs

Question 46 a – Should we allocate sites for specialist homes to meet the needs of different groups such as retirement homes, student accommodation or other types of specialist housing if there is an identified need?

Total responses: 42
Support: 22
Object: 9
Comment: 11

Support
- A majority of respondents supported the need to provide specialist housing.
- Perceived benefits of doing so included:
  o reducing the overall need for more housing whilst being more fit for purpose and higher density
  o providing better access to specific infrastructure such as university/college or access to facilities for those who rely on public transport or are less mobile
  o providing adequate social space as appropriate
  o integrating services and retail offer: provision of medical centres and pharmacies within retail centres for example
- Consulting the local estates agents would provide indication of the need.
- There was a view that provision for specialist housing should come from S106

| contributions. |
| • Hollands Farm in Bourne End was put forward as a potential site which could accommodate the requirement of a variety of specialist housing |

Objection

Many who objected did not provide comments. Those who did put forward the following concerns:

- Potential downgrading of the accommodation
- Fear that it could lead to extreme specialisation (per gender, sexuality, ethnicity)
- Fear that it could favour certain groups
- There was some opposition to having quotas.

Comments

Many comments related to older people's accommodation in particular :

- There was a recognition that we have an ageing population
- There was a view that site specific circumstances and market demand should be taken into account
- There was some disagreement regarding the type of accommodation provided, some preferring bungalows, others advocating for flats with lifts.
- One respondent felt that the demand amongst the elderly is variable, therefore flexibility was important
- Registered social landlords/housing associations and private providers could manage this
- When tied accommodation is required (e.g. nursing accommodation) provision should be made on site and where off site, a green transport plan should be in place and enforced.
- Care should be taken to retain a mix of ages and families in areas where elderly accommodation is provided, to make sure elderly people are an integrated part of a community
- An increase in provision of good quality retirement homes may encourage the elderly to move out of large family homes

Other comments relating to student accommodation highlighted the following:

- Having specialist sites could result in preventing HMO's changing traditional family oriented neighbourhoods, with the consequent loss of community cohesion.
- There was a view that students were already well catered for
- One respondent felt that the provision of student accommodation should be agreed by BNU to ensure there is a need for that accommodation. Recent student accommodation developments were felt to be speculative and not supported by BNU.

Finally, a minority of comments were made on affordable housing, with respondents keen on seeing its provision in with good public transport and walkability/cyclability, whilst ensuring they are integrated with the rest of the community

Question 46 b –Should we require a percentage of all housing on strategic sites to be for older people?

| Total responses: 36 |
| Support: 8 |

Object: 18
Comment: 10

Support

Those who were in favour of a proportional amount of housing to be for older people argued that :

- Providing for the older population is a priority
- It would reduce the overall need for more housing whilst being more fit for purpose and high density.

Objection

- A majority of respondents opposed requiring a percentage of all housing on the strategic sites to be for older people.
- A site by site approach was advocated by many respondents who did not consider all strategic sites suitable (in terms of public transport and services accessibility)
- There was a minor view that housing for older people is easier to get permission for and therefore does not need specific policy.

Comments

Several comments were made in relation to older peoples housing, but which did not relate to the strategic sites. These were as follows:

- Thought should be given to establish criteria to define who the targeted population is.
- There is a need for specific units for older people, but care should be taken not to make them feel isolated / stigmatised
- As most old people want to stay in their own home, more should be done to adapt existing homes (room for carers, downstairs bathroom)
- Others felt it was preferable to have bespoke accommodation grouped together
- Thought should be given to the sizing of housing, to encourage downsizing without moving from a specific area.
- One comment argued for the need to embed in policy what extra facilities should be provided in these areas (e.g. live in warden, social centre)
- Several respondents argued that building homes to lifetime homes standards would remove the requirement for different types of accommodation and allow transition through various stages of life (e.g. family to elderly). This should be embedded as good house building practice.
- Several respondents argued that although the local plan should identify the need for older people housing it should not prescribe through policy as there is no such policy requirement and as the need will change throughout the lifetime of the plan and vary throughout the District and between market and affordable sector. Therefore specific standards / percentages should not be included in the local plan as they would fail to provide sufficient flexibility. On the contrary, policies should be flexible enough to take account of site specific circumstances including viability, market demand and assessed need.

Question 47 – Should the local plan set standards for housing mix/ tenure? Or should we develop more detailed guidance outside of the plan?

Total responses: 38
Support: 8

| Object: 5 |
| Comment: 25 |

There was some support for setting standards or guidance <u>within</u> the plan.

- Some respondents argued that the plan should identify through its evidence base an indicative tenure, type and mix split , taking into account viability, to meet identified need, and set out principles / objectives, whilst guidance on provision should be set outside the plan
- In the case of affordable housing, a different housing mix and tenure may be justified based on a local need argument: any emerging local plan should have sufficient flexibility to take this into account.

A majority of those who commented deemed standards inappropriate. They argued that :

- Standards can rapidly become out of date
- Therefore more guidance on mix and tenure should be developed outside the plan to allow for more flexibility to ensure development meets up to date assessed need.
- This would allow flexibility to account for site specific circumstances.
- One respondent argued that care should be taken for the guidance to be as binding as the local plan
- In any case, guidance should be visible, reasonable and transparent

To reflect changes to household formations, there should be more detailed guidance to include first time buyers / family size housing / downsizing options for older people

Objection
- Most objections to any standards/ guidance were unqualified.
- One respondent felt that planning policy should adopt a flexible approach taking viability into account and leave the market to decide housing mix and tenures.

Question 48: Should we have a policy for rural exception schemes and if so should we allow a limited amount of market housing in them to make them more deliverable?

| Total responses: 33 |
| Support: 17 |
| Object: 3 |
| Comment: 13 |
| **Support** |
| • The majority of respondents gave unqualified support to this proposal. |
| **Objection** |
| • There was a view that affordable housing should be provided in areas with the greatest public transport options and community facilities rather than being provided in costly and isolated rural locations. |
| • One respondent argued that affordable housing should only be provided in rural areas if it is matched by corresponding employment opportunities. |

Comments

Some respondents commented on what the policy should cover:

- There should be some criteria setting out what makes a scheme acceptable
- The policy should ensure that the scheme is adjacent/part of a village
- It should not result in scattered development in the countryside
- Any policies applying to conservation areas should be taken into consideration
- The market housing element should only be in exceptional circumstances and not become the norm
- If there is a mix, there should be no substantial difference in design quality and materials
- Where a limited amount of market housing is allowed, viability should be submitted to public scrutiny.
- Sufficient infrastructure should be provided to accompany these schemes.
- Local authorities should work with parish councils and other parties to identify suitable exception sites in rural settlements

Wider considerations also included the following:

- Ensuring that these units remain affordable in perpetuity was seen as an important consideration.
- Community Impact Bucks is investigating setting up a Community Land Trust Umbrella to provide housing or other assets at permanently affordable levels for long term community benefits.
- One respondent pointed out that increasing the deliverability of sites would address both market and affordable housing shortage.
- Providing affordable housing was seen as a key component for sustaining a strong rural economy
- Some respondents supported small scale rural exception schemes but did not support cross subsidising them by allowing some market housing.
- There was a view that a market element should only be considered if this is consistent with achieving identified targets for increased need.

Question 49: Should town centre offices be protected by the scattered business sites policy?

Total responses: 24
Support: 4
Object: 10
Comment: 10

Support

- There was a minor support for protecting town centre offices by the scattered business sites policy. This was seen as an important way to maintain town centre viability / vibrancy.

Objection

- A high proportion of respondents objected to protecting business uses in town centres.
- There was a view that the nature of town centres was evolving (more Americanised) and that market forces should prevail.
- In Marlow, the increase in residential use was welcomed.

Comments
- Some respondents recognised that some control was needed over town centre changes.
- In particular, many respondents highlighted the need to retain a mix of offices, retail and other services in town centres as business workers will help retain, if not improve, the retail offer / facilities offer (bank, post office, cafes etc.)
- Others advocated for more flexibility for employment sites, for example empty premises should be allowed to change to residential use instead of remaining empty.
- It was however suggested that a threshold below which the conversion of upper floor office space to residential should be resisted could help retain a minimum provision and thus give more certainty to commercial landlords.

Question 50: Should we allow other uses on employment areas and if so should we control how many we allow?

Total responses: 35
Support: 19
Object: 2
Comment: 14

Support
- There was a high level of support for introducing other uses in employment areas in the form of ancillary facilities (food outlets, bank, crèches)
- It was felt that this would assist in attracting and retaining business investment and create dynamic places for the workforce
- There was some support for the reuse of empty premises for residential and mixed developments.
- There was also a view that we should allow for greater flexibility for other employment generating uses, for example, retail or leisure, which are defined as "Economic Development" in the NPPF.
- Some respondents qualified their support with the following:
  - The number of facilities should be related to need : number of employees, children requiring crèches
  - This should be agreed on a case by case basis within the management of each Business Park/ industrial area.
  - Some control will be needed to prevent problems such as car parking or traffic.
  - An allowance on a temporary basis was also suggested.

Objection
- There was a concern that this would have a detrimental effect on town / district centres footfall and wider vitality.
- There was a view that ancillary service provision is acceptable but a concern that this should not become a way of introducing core town retail space which should remain in town centres.

Comments
Further comments on this issue raised:
- The need to protect employment land whilst helping businesses wishing to expand / move to alternative suitable premises.
- The fact that greater flexibility will depend on the need in each site/ area
- Similarly requirement for and extent of control depends on local

circumstances.
- The need for a buy-in from individual companies on a specific site / area
- Allow a percentage relative to the number of units
- As a last resort only if no other business is interested in the premises
- Control by limiting square footage available to ancillary services to prevent undermining the employment area
- Food and drinks are already covered by travelling vans in an entrepreneurial way
- Change of use could be conditioned based on how many years the premises have been empty
- The following criteria should be considered when assessing whether to release site for residential:
  - Attractiveness of site for future employment use and evidence of marketing
  - Cost of update for modern retailer requirement
  - Suitability of site for residential in terms of location/ facilities.
  - Other site specific issues such as historical or environmental context

Question 51 a: Should we protect existing tourism developments in the District?

Total responses: 29
Support: 23
Object: 1
Comment: 5

Support
- There was a very high level of support for protecting existing tourism developments.
- Most responses were unqualified.
- Supportive comments highlighted that tourism facilities :
  - help deliver local prosperity and employment
  - add to the specialness/ competitiveness of the District
  - promotes healthy lifestyles for residents
- Many comments highlighted the fact that the District's economy relies heavily on tourism, in Marlow in particular where tourism has increased and the town is now dependant on the tourist trade.

Objection
- There was a minor view that we should leave it to the market to decide.

Comments
- There was a view that only those facilities that do not have a detrimental impact on the scenic quality and peacefulness of the AONB should be protected. Where such facilities are poorly sited and of poor design then removal or redevelopment may be the preferred option particularly where demand for the facility may have declined.
- More needs to be done to highlight the significance of High Wycombe (All Saints Church, historical figures, Hughenden, West Wycombe etc.)
- The Chilterns AONB should not be seen as a constraint to deliver new tourism developments as the attractive countryside of the AONB is a significant part of the appeal for visitors to come to the District and an important part of the tourism sector in the District

- Where tourism facilities are operating they should be supported although not necessarily protected. Where a facility fails consideration should be given to alternative uses
- Unless the facility if of national importance there should be no subsidy from WDC to maintain it

Question 51 b: Should we promote new tourism facilities?

Total responses: 30
Support: 18
Object: 4
Comment: 8

Support
- There was some qualified support for new tourism facilities. Most responses related to the rural areas and in particular to the AONB.
- There should be a good case for the need and benefits of the proposed development
- Preference should be given to modest, low impact facilities that help stimulate public interest and care for the beauty, history and character of the AONB or to support farm diversification
- low scale facilities were supported e.g. bed and breakfasts in connection with long distance paths and cycle routes
- wherever possible new facilities should be sited on the urban fringes or near existing settlements to minimise car movements and change in character of the surrounding countryside
- Thoughts should be given for the provision of new sites and venues: woodlands could promote walking which in turn would promote good health
- more facilities would boost trade in the area /create some employment
- Consultants Alder King promoted a new countryside park within Gomm Valley, stating that it would make a significant improvement to the tourist offer of High Wycombe, provide informal recreational public open space, better wildlife and landscape management and a defensible landscape buffer ensuring separation between High Wycombe and Tylers Green.
- In High Wycombe, diversification in the type of facilities was also sought (lack high class restaurants)
- Respondents highlighted High Wycombe's scope for tourism related projects in relation with its heritage with the added benefit of increasing awareness of local people on their town's history – development in the Leigh Street conservation area in particular should bear in mind the on-going interest in the town's furniture-related past.

Objection
There was a minor opposition to new facilities
- Large scale facilities in the AONB should not be permitted.
- There was a concern that the District had enough facilities and that further facilities would only put a strain on the environment and existing infrastructure. This view was qualified by a support for the delivery of the Little Marlow lakes country park.
- There was a view that the market should decide

Comments
- All development should be appropriate to a rural area and respect its visual amenity and openness.
- Special attention should be paid to the quality of design of the built part of any planning application
- Some respondents highlighted the fact that much of the tourism is long standing, and there may be little new demand
- There was a view that new facilities should not be at the expense of :
  - green spaces
  - high grade agricultural land should
  - existing rights of way network
  - archeologically important landscapes
- New buildings should only be permitted if there are no suitable existing structures

Infrastructure – Summary of responses
Infrastructure section

There were a couple of comments on infrastructure
- That there would need to be different policies for different aspects of infrastructure development;
- There should be a specific policy that deal with the provision and long-term maintenance of Green Infrastructure

Question 52 a – Should the Council include a policy specific to broadband and digital connectivity?

Total responses: 43
Support: 31
Object : 5
Comment: 7

Support for policy
- There was a high level of support for this policy.
- The principal benefits would be felt by enabling more people to work from home, so reducing commuting;
- It would attract inward investment and support online businesses;
- It would help support the rural economy, and relieve any rural disadvantage;

Objection
- There were very few objections. Some who did so felt that broadband provision should be market-led, and not 'interfered with' by politicians

Comments
- Some support was qualified by:
  - The need to support both urban and rural areas;
  - Cross-reference to policies to protect the AONB;
  - The need for all communications to be integrated with new housing and culverted, rather than overhead wires;
  - The need for service to existing properties;
  - The need to use existing phone lines
- Wifi in public or external spaces should be avoided because there is some

evidence that this is a risk to health.
• This policy should not duplicate any national policy.

Question 52 b – Should restrictions be placed on construction traffic to prevent damage to roads and reduce congestion?

Total responses: 33
Support: 24
Object : 3
Comment: 6
Support

• There was a high level of support for this proposal:
    o Construction firms should pay for road repairs once they have finished construction: enforcement of conditions requiring repair and reinstatement are necessary;
    o Routing of construction traffic should be managed to avoid narrow, winding or hilly lanes; rural areas; and residential areas.
    o There should be special routes for heavy loads.
    o Movement of large amounts of spoil should be discouraged and transport of construction materials kept to a minimum.
    o Parish Councils and local interest groups should be consulted.
    o Timing of construction movements should avoid the morning and evening peak hours, and the afternoon and weekend periods should be free of noisy operations.
    o It was observed that no construction should be necessary.

Objection
• It was felt that restrictions on construction traffic would make the delivery of development and infrastructure more difficult and fly in the face of the council's intention to reduce unnecessary policy.   • Others felt that construction matters could be acceptably managed through planning conditions.
Comments
• Some felt that this was not a matter for the Local Plan, but should be assessed on a project-by project basis.

Question 53 a –Should there be a policy to protect community facilities and if so which facilities? How could this work in practice, particularly if the community facility is a commercial business?

Total responses: 28
Support: 12
Object : 5
Comment: 11
Support
• There was a good level of support for this proposal.   • Facilities suggested included: pubs, cafes, restaurants, village halls, meeting areas, children's play areas, playing fields, local shops and post offices, class D1 non-residential institutions, schools, museums and places of worship.

- Permission should not be granted for changes of use, and big out of town developments should not be permitted.
- WDC could provide a mediation service between the community and those controlling any threatened facilities, or provide support to improve business models.
- It should be established that a facility is not economically viable before a change of use is considered.
- Redevelopment of sites should be restricted to D1 uses to discourage asset stripping.

Objection
- Community facilities should be self-justifying; protection policies will lead to sub-optimal outcomes
- Interfering in the commercial market will ultimately deter investment.
- Market forces should prevail.

Comments
- Some felt that there should be a case-by-case treatment of facilities depending on their local importance and viability.
- Others observed that it is difficult to protect facilities where demand is low.
- The Council should require some financial recompense from those who change a building's use away from community use.
- The policy should assist communities to organise their plan when time is of the essence.
- Controls should be locally determined.
- Protection should be restricted to not-for-profit or charity based businesses, and exclude commercial businesses.

Question 53 b –Should we rely on other tools to protect community facilities, such as the community right to buy?

Total responses: 18

Support: 9

Object :   4

Comment: 5

Support
- Most gave unqualified support to this suggestion.

Objection
- Most objections focused on the need to avoid government interference, that protectionism is not appropriate; and that it would ultimately deter investment.

Comments
- Some commented that the right to buy should be used alongside other tools such as: diverting developer contributions to buy, merge, or provide an alternative location, for facilities under threat.

Environmental Assets and Green Belt – Summary of Responses

AONB/Landscape: General comments

Total Responses: 7 Supporting: 0 Objecting: 3 Commenting: 4

There were a number of general comments on the AONB/landscape questions. These included the following views:

- Duplication of national policies is unnecessary, so there is simply no need for the sort of policies put forward here.
- Houses should not be built where they can be seen from the Chiltern escarpment. We have outstanding areas of beauty, which should not be ruined by building.
- One response said that there was insufficient information and discussion provided in the report to provide a basis for a response on landscape issues.

Question 54 a – Is there a need for a policy that deals with the locally distinctive features of the AONB? If so, what are they?

Total Responses: 30 Supporting: 10 Objecting: 6 Commenting: 14

- More people answering this question were supportive of a policy on the locally-distinctive features of the AONB than were opposed. Comments included the following:
    - Nothing should be allowed to develop which would risk losing the local AONB identity.
    - Some areas of land, although outside the AONB, will fall within the setting of the AONB, so will need due consideration also.
    - There should be a distinctive single policy which deals with AONB, Green Belt and landscape areas, which should seek to establish strict criteria for designation and protection.
    - There should be a policy that addresses the need to ensure conservation and enhancement of the natural beauty of the AONB in accordance with the duty to have regard to the purpose of the AONB in Section 85 of the Countryside and Rights of Way Act 2000.
    - A policy must be used to set out the protection for the special areas and landscapes.
- Respondents highlighted the following assets as being locally distinctive features of the AONB in Wycombe District:
    - Views
    - Building character

- Manmade and natural characteristics such as beech woods, chalk streams and chalk downland flowers
- Wildlife
- Cultural heritage
- Scenic quality
- Natural beauty of the landscape
- Streams and rivers
- Some respondents suggested that the distinctive features of the AONB were set out in the Chilterns AONB Management Plan
- One respondent suggested the need to safeguard the areas at the outskirts of High Wycombe and villages, so as not to impact on the quality of these parts of the AONB.
- One respondent highlighted the River Thames as a key feature and that it should have its own consideration in the plan following the loss of the River Thames Corridor Policy in the South East Plan.
- Some respondents argued that there wasn't a need for a special policy as the NPPF provides sufficient justification for the AONB.

Question 54 b – Should we replace our local landscape policies with a criteria-based policy rather than designating areas in the local plan?

Total Responses: 28
Supporting: 7
Objecting: 13
Commenting: 8

- Most people responding to this question favoured retention of the designated areas as defined in current policy. Comments by these respondents included:
  - The designations help to protect the setting of the Chilterns AONB
  - The designations help to ensure the necessary level of protection for what are areas of a particular landscape value
  - The designations provide clarity
  - The system has worked well in the past
- Some respondents supported moving to a criteria-based policy. Comments included:
  - A criteria-based policy is more appropriate and consistent with the NPPF
  - Support criteria-based policy as long as the criteria are the right ones
  - Sufficient protection for land in the countryside can be contained within a policy that covers the appropriateness of built development in countryside locations.
  - There is no physical change to the landscape that warrants extending existing landscape designations.
  - There should be no local landscape policies
  - The importance of landscape matters in determining planning applications is better dealt with on a site-by-site basis at the application stage.
- One comment suggested that further information was needed to make

comment on the issue
- One respondent was neutral on the issue but suggested that any revisions to local landscape policies should avoid duplicating the function of other nationally-designated areas and only provide a supporting role in protecting the landscape setting.

Question 54 c – Should we review the boundaries of the local landscape areas and have a single landscape policy?

Total Responses: 22
Supporting: 9
Objecting: 5
Commenting: 8

- There were a mixture of views on this question, with slightly more responses being opposed to a review of boundaries rather than supporting such a review.
- Comments included:
- Local landscape boundaries should be preserved; you cannot have one policy that fits all areas.
- Leave the areas as at present.
- Boundaries ought to be kept under review to take account of major changes of circumstances, but not where a designated site is adversely affected by a lack of management. In the latter case, appropriate management action needs to be taken.
- Although a single local landscape policy might be sufficient, retention of the two current designations is desirable as landscape areas can be ecologically important without necessarily being attractive.
- Whilst there is a case for periodic reviews of boundaries, this should be a two-way process. Where an area has deteriorated due to poor management, steps should be taken to improve the management rather than declassify the land.
- Boundaries should be reviewed provided protection is not weakened and the overall area is not reduced.

Question 55 a: How much detail should be included in local Green Belt policy?

Total Responses: 32
Supporting: 4
Objecting: 5
Commenting: 23

- There were a mixture of views in response to this question, with many responses suggesting a that there should be a high level of detail in the policy, but some suggesting that there should be more flexibility, that national policy should be followed or even that there should be no policy.
- Those who supported greater detail in policy commonly suggested that it was

needed to provide greater clarity and certainty for communities. Those supporting less or no policy commonly suggested that national policy was sufficient or that greater flexibility for Green Belt proposals was required.

- Detailed comments made included:
- Duplication of national policies is unnecessary, so there is simply no need for the sort of policies put forward here.
- Policies are needed to specify the type of development permissible in the Green Belt and showing the precise boundary of the Green Belt.
- Local policy should be detailed enough to back up national policy and provide the community with comprehensibility and certainty about interpretation
- Green Belt policy should be strengthened rather than weakened.
- There needs to be clauses in the policy for woodlands, pasture, roadside trees, ponds, streams, gradients, hillsides and views.
- The policy should promote tourist facilities, particularly alongside the River Thames and within/adjacent to existing settlements.
- More detail is needed on how openness is measured and how impacts on openness are assessed.
- More detail is required on what scale/categories of development are acceptable in the Green Belt.

Question 55 b: Should we keep Green Belt policies in relation to extensions and replacement dwellings?

Total Responses: 27
Supporting: 22
Objecting: 1
Commenting: 4

- The majority of respondents answering this question supported retaining policies on extensions and replacement dwellings in the Green Belt. Comments in support included the following:
  - If there are no policies there would be a free-for-all. The balance so far has served the environment well.
  - The NPPF is not robust enough to prevent encroachment, which impacts on neighbours and the wider community.
- Other comments included that proposals should be determined on a case-by-case basis, and that we should abide by national-level Green Belt policies.

Question 55 c: What is an acceptable size for an extension that is not "disproportionate" – should we set firm limits in terms of how much buildings can be extended?

Total Responses: 24
Supporting: 10
Objecting: 2
Commenting: 12

- Whilst many respondents supported the setting of firm limits on the extension

of buildings in the Green Belt, there was a wide mixture of views over what an acceptable size might be.

- Suggested size limits included 20% of the existing buildings (suggested by three respondents), 10% (suggested by two), 15% (one) and 30% (one). One respondent said the current limit should remain, and one said that no extensions should be allowed.
- Some respondents suggested that each application should be judged on its merits.
- Others suggested that the purposes of the policy should be to ensure that the openness of the Green Belt is not compromised, and that therefore if an extension causes a site to appear more built-up or restricts a previously accessible view, then it should be deemed unacceptable.
- Some respondents pointed out that the impact would depend on the context and the design of the proposal.
- A few respondents suggested that no firm limits should be set. One respondent pointed out that the disadvantage of fixed limits is that they can unnecessarily penalise owners of small houses and do not curtail the often intrusive extensions attached to large properties, and therefore that any limit set needs to be worded sufficiently flexibly to cover these situations.
- One respondent suggested that common sense should dictate what is considered to be disproportionate.

Question 55 d: What is an acceptable size for a replacement building that is not "materially larger" than the one it replaces – should we set a firm limit in the size of a replacement?

Total Responses: 26
Supporting: 10
Objecting: 2
Commenting: 14

- Similarly to the previous question, there were a great variety of responses to this question, with a division of views as to whether a firm limit should be set or not.
- Some respondents suggested that firm limits should be set, with a range of limits suggested including:
    - That the building should be no larger in total footprint or height or overall dimensions
    - Percentage limits on any larger floor area, with 5%, 10%, 15%, 20% and 30% and retention of the current policy limit (50%) being mentioned by various responses as possible approaches.
- Others suggested that limits should not be set and that each case should be decided on its individual merits, including its location and context, or that 'guide sizes' should be set.
- Comments made included the following:
    - Any replacement building should not stand out from its neighbours and should not detract from the local built environment.
    - Policy should allow for context and assessment of impact on the openness of the Green Belt.

• Any limit should have some flexibility to allow for a trade-off between height and footprint depending on the context of the site.
• Firm policies on all these issues are essential to prevent encroachment or 'chipping away' at Green Belt land.
• One respondent suggested that it would not be helpful to set a firm limit on the size of any replacement building as its impact upon the openness of the Green Belt is a function of a number of factors such as height, bulk, massing and design, and not simply of its floor area.

Question 55 e: What are the important factors to consider when previously developed sites in the Green Belt are redeveloped? Should we have a policy for them?

Total Responses: 25
Supporting: 4
Objecting: 1
Commenting: 20

- Several respondents to this question agreed that we should have a policy for Green Belt sites, with only a very few suggesting that there should not be such a policy.
- Common factors suggested as worthy of consideration for the redevelopment of such sites included:
    - Character, design and layout and whether these are in keeping with the surrounding countryside
    - Current land use/existing role of the site
    - Distance from main services
    - Access to public transport
    - Traffic generation
    - Visual impact
    - Assessment of impact of development on the openness of the site and wider Green Belt when compared with the existing development
    - Maintenance of the basic principles of Green Belt policy, namely that it should provide open space between more developed communities;
    - Should not create greater harm to the Green Belt than the development it replaces/site should not be developed further than it already is;
    - Support retention of the village's character – redevelopment should not result in an increase in the number of inhabitants and employees
    - Developments should not overload existing infrastructure
    - Redevelopment should be sympathetic to the surroundings
    - Value of the site in meeting future development needs
    - Suitability of land use, including considerations about landscape, biodiversity, transport links, community benefits, etc.
- One respondent suggested that there would be value in drawing up site-specific guidance for the most significant developed sites.
- One response insisted that it should be very difficult to build other than a minimum in the Green Belt.
- A number of responses stated that policy should reflect the approach of the

NPPF.

Heritage – Summary of Responses

Heritage section

There were a few comments relating to heritage policies generally:
- There was a view that local policies would duplicate national policies and were therefore not needed.
- Another view was that we had adequate policies which needed to be enforced.
- One respondent queried about the Heritage Champion project.
- Some respondents criticised the lack of examples and the phrasing of the questions

Question 56 a – What are Wycombe District's most important heritage assets? Is there a need for specific policy to protect these?

Total responses: 21
Support: 6
Object : 2
Comment: 13

Support for policy
- Most of the respondents supported a specific policy to protect and enhance important heritage assets. Many qualified their support by commenting on the various points below.

Designated assets
- Designated heritage assets were considered most important in terms of statutory protection and conservation. Their list changes as new information and research is produced.
- Some respondents were of a view that the current policies offered effective protection
- Further protection should be given to award winning buildings (through WDC's or other architectural awards) as well as those covered by any special condition
- There should be a policy to recognised existing designations, the likelihood of future designations and consideration of sites of equal significance to Scheduled Monuments.
- Consideration should be given to public accessibility to heritage assets including to view internal features when applicable e.g. Castle Hill House, White House, Guildhall, Town hall
- There should be a policy to consult the local list and take into consideration other heritage related detailed features of non-listed buildings (see section on most important heritage assets)

Input and guidance
- The NPPF sets out how LPAs should plan for the historic environment

- The Planning Practice Guidance on Conserving and Enhancing the historic environment should be followed.
- The guidance from English Heritage on Heritage and Local Plans: how to create a sound plan under the NPPF should be followed.
  - Input should be sought from local groups and individuals, in particular High Wycombe Society, Chilterns Management Board, the NEP, BBOWT, the Society for the Protection of Ancient Buildings etc.
  - Further collaboration with English Heritage is deemed necessary

Most important heritage assets

Many respondents listed what they consider to be important heritage assets:
- Listed Buildings (in Hughenden , West Wycombe)
- Grade I and II* listed buildings include:
  o All Saints
  o Guildhall
  o Little Market House
  o Disraeli monument on Tinker Hill
  o Church of St Mary and St George
- many grade II listed buildings
- Scheduled Monuments
  o ruins of Saint John's hospital
  o Desborough Castle
  o Castle Hill
- Other Archaeological sites of demonstrable significance to Scheduled Monuments – e.g. site at Holywell Mead
- registered parks and gardens
- conservation areas
- Sites on the Local List e.g. Pann Mill and others identified by the High Wycombe society
- Some buildings which do not qualify for the list but have significant heritage related detailed features: the Red Lion on the High Street, the Nag's head , the façade with the oil jars on the High Street, the Sundial on Crendon Street, the Hens and Chicken relief on Frogmoor
- non- listed buildings e.g. Jubilee Mosque
- Green spaces
- Town / village centre views (High Wycombe West Wycombe Great Missenden
- Marlow is a regionally significant asset, especially attractive Thames-side town
- some landscape , including the Chilterns AONB
- Green Belt and other undeveloped land
- large areas dark at night

Sources of information
- Respondents pointed out that details of designated heritage assets within the District are set out in the National Heritage List for England, whilst known non-designated assets are listed in the Buckinghamshire Historic Environment Record.

• Some respondents pointed out that some assets are not currently well-recorded, such as Parks and Gardens of Historic Interest, or even not discovered yet, such as archaeological sites
Objection
• There was a very minor view that heritage assets should be sympathetically redeveloped rather than conserved.   • Local protection policies was more generally opposed, as the NPPF guidance was deemed sufficient

Question 56 b – Should we have specific policies for different types of heritage assets?

Total responses: 16   Support: 7   Object : 2   Comment: 7
Support
• There was some unqualified support to this suggestion.
Objection
• Objections focused on the risk of duplicating the NPPG on conserving and enhancing the historic environment, and the proliferation of policies which should be resisted in the spirit of with the NPPF, despite different types of assets requiring types of conservation measures.
Comments
• Respondents welcomed the inclusion of policies that deal with heritage assets   • Assets mentioned includes listed buildings, archaeological sites, buildings on the Local List , conservation areas , green spaces, and the Thames Corridor   • Some felt that as well as designated assets, undesignated assets should also be considered   • There was a view that it may not be necessary to have separate policies but necessary to have detailed Development Management guidance set out in a policy as well as a strategic policy (this was seen as particularly important for Neighbourhood plans which need to be in conformity with only the strategic policies of the plan).   • Some felt that there are already specific legislation for some types of assets i.e. listed buildings, scheduled monuments

Question 56 c –Are there any assets specific to the District or parts of the District that require a policy?

Total responses: 13   Support: 3   Object : 1

Comment: 9

Input and guidance
- Here again, respondents advised to seek input from local groups and individuals, in particular High Wycombe Society, Chilterns Management Board, the NEP, BBOWT, BCC Archaeologists
- The NPPG on non-designated heritage assets should be followed
- English Heritage said they were not aware of any specific assets in the District that require a policy.

Assets specific to Wycombe

Respondents identified the following assets requiring a policy:
- undesignated assets on the Local List
  - The List should be published as part of the Plan (or as an appendix)
  - Communities should be encouraged to submit suggestions
- historic landscape types – as attested in the Buckinghamshire Historic Landscape Characterisation study (2006). i.e. survival of ancient semi-natural woodland and assarted enclosures that is characteristic of the Chilterns in Wycombe district.
- Round barrow cemeteries at 'Molins'/Slough Farm in Saunderton and at Low Grounds Farm, Marlow - these are Buckinghamshire's only two barrow cemeteries. Both are in valley bottoms and both are under arable cultivation. 'Molins' is mostly scheduled and the high Wycombe Society has previously suggested to Wycombe District Council that 'Molins' be used as a pilot for local listing.
- Specific well-preserved prehistoric (and later) earthwork complexes such as the monuments on Bledlow Cop and on Whiteleaf Hill, the medieval complex at Little Kimble, the hillforts, and Grim's Ditch.
- Romano-British villas in the Chiltern dip slopes and the Thames Valley. These are unique and have some rather unusual complexes, such as the site at The Rye in High Wycombe, and the Yewden villa site in Hambledon.
- Historic parks and gardens – e.g. West Wycombe.
- Links with military history – e.g. Naphill, Daws Hill.
- Medieval and post-medieval pottery and tile manufacturing areas e.g. Tyler's Green.
- Historic towns and villages - Buckinghamshire's Historic Towns survey covers Wycombe, Marlow and Princess Risborough.
- Not all villages are subject to Conservation Areas status and many are in need of review and re-assessment taking into account the entire historic environment interest.
- Industrial archaeology and survival of mills/factories and workers housing associated with the furniture industry 19th and 20th centuries – i.e. Existing research into High Wycombe's furniture factories. Most factories, but not all, are covered by Archaeological Planning Notification areas (but this just alerts to need for planning consultation). They are at risk of demolition/inappropriate development.
- Archaeological sites on private land
- The Thames corridor
- Green spaces: playing fields, recreation grounds urban woodlands, footpaths and cycle ways: all part of a green town legacy

• Existing conservation areas
• The river wye : policies should support its deculverting and in the town centre and restoration

Objection

• There was a view that no Wycombe specific asset warranted a local policy.

Places Policies – Summary of Responses

Question 57 a – What are the key issues for Wycombe District that should be included in specific design policies in the Local Plan?

Total responses: 24 Support: 2 Object : 2 Comment: 20

General
- Most respondents made qualifying comments on what should be included in design policies (see below).
- Community input in the design of schemes was seen as important.
- There was a view that design issues considered under the current policies were deemed relevant.
- One respondent said that there was insufficient information and discussion provided in the report to provide a basis for a response on design issues.

Building design
- Respondents were keen to see a high standard of design in new buildings, with original designs to avoid undistinguishable developments
- Sympathetic building design and density were seen as important.
- There was a view that internal layout should also be the subject of policy: a particular issue raised was the lack of storage space, which was seen as an barrier to downsize
- There was a desire to provide developers with details of what is expected from them from the outset to reduce uncertainty and risk
- To that effect, design policies need to make it clear what constitutes good design – including illustrative examples and case studies

Local distinctiveness
- Local distinctiveness was seen as a key component of good design
- Some respondents advocated encouraging local architecture, including contemporary designs that respond to local scale and character;
- Others thought that new development should blend with the existing built environment and be in keeping with surroundings
- Some respondents stressed that materials used should be of high quality.
- Many people aspired to see the creation and maintenance of a distinctive character related to the area by use of local materials and vernacular architecture and respect for existing structures, although, as one respondent pointed out, these details do not per se confer quality to a design
- There was a strong support for referring to the Chilterns Buildings Design Guide and associated technical notes on building materials.

- The use of the RIBA guidance "Good design it all adds up" was also recommended to inform the Council's Residential Design Guidance, as well as the use of an Architect's Design Advisory Panel to provide guidance on design.
- There was a view that the Council should revisit the role of the Conservation Officer (currently part time).

Sustainable construction

Many people linked good design and sustainable construction, advocating :
- energy efficiency
- recycling of grey water in residential and business properties
- rainwater capture in residential and business properties for watering green areas and enhance use of grey water where appropriate
- use of heat exchange technology on ventilation in new domestic properties
- increased level of insulation
- use of triple glazing windows
- building to level 6 of codes for sustainable homes (or its replacement)
- more public transport/cycle paths to increase sustainability and reduce car reliance

Open spaces and Landscaping

Key issues to be considered when drafting design policies:
- Retention of open space and trees,
- preservation or creation of green space in and around developments
- hard and soft high quality landscaping,
- streetscape design
- open aspects
- views across HW from Marlow Hill and Amersham Hill
- wider townscape
- topography

Parking
- Adequate provision of car parking was seen as a key design issue by some respondents.
- Cars should be kept out of sight as far as possible; flats should be serviced by underground car parks and refuse facilities so that these do not impinge on ground level views.
- If this was done, there would be space for improved landscaping and tree planting.
- There was a view that on-site parking should have a minimum of one space per bedroom and an absolute minimum of 2 spaces per dwelling.

Wider considerations

For some respondents, a design policy should also refer to and contribute to:
- Protection of the environment including maintenance and enhancement of biodiversity
- protection of the Green Belt
- preservation and enhancement of the distinct character and landscape amenity of the AONB
- avoidance of encroachment of rural villages
- Enhancement of the attractiveness of an area.

Residential Design Guidance

Some respondents felt that the residential design guidance should be consulted on and should include:

• use of environmentally friendly materials,
• recycling,
• lowering carbon emissions,
• Lowering energy use.
• unusual design
Objections
• Objections focused on the risk of duplicating national policy.

Question 57 b – Do you think we should have a policy on housing density and if so, should it set out actual standards or be criteria based?

Total responses: 36 Support: 17 Object : 6 Comment: 13
Support
• Many respondents supported a policy on housing density
• Many were keen to see high design standards to achieve quality in highly dense developments
• There were differing views on whether high or low densities were appropriate.
• One respondent observed that best use of a site should be made to reduce overall need of sites to meet objectively assessed needs.
• Higher densities would help keeping development within the perimeter of town.
Key principles Many people who supported a density policy agreed that
• a policy on density should be flexible, allowing different densities to apply across the site and for different sites
• avoid any unnecessary prescription or detail, similar to H8
• density should be design-led
• density should be considered on a site by site basis
• each scheme should be subjected to extensive public consultation
• Sufficient space for parking, planting etc. should be achieved.
• In terms of parking, one respondent t felt that the reviewed parking standards should be followed or until completion of the review, the same parking provision as in Daws Hill site should be used...
Criteria based policy

• There was a strong support for a criteria based policy. Criteria should include (but not be limited to)
  o need and location
  o optimisation of site
  o impact on residential amenity space
  o space for parking
  o ensuring appropriate mix of use
  o proximity and accessibility of public transport and local facilities
  o landscape, ecological and topographical features
  o character and density of adjacent development
  o wider visual impact of scheme
  o assimilation to existing build context / have regard to context
  o whether it is in the AONB

- o whether it is in a rural or urban location
- These criteria would vary according to type and location of the site – i.e. higher densities to be encouraged in areas close to town centres and public transport infrastructure.
- Several respondents were in particular keen to see high density in High Wycombe built up area, with a respondent advocating for an urban master planning approach for the western part of High Wycombe, with guidelines for developers on various massing and density throughout.
- Although higher density was seen as desirable in an urban setting, context/ effect on visual and social amenities of residents and neighbours should also be taken into account.

Standards policy

There was a moderately strong support for a policy based on standards. Comments included:
- Standards were seen as a clear way to set out policy requirement, in particular in terms of quality.
- standards should be flexible, considering site size and location

Benchmarking

Some respondents who supported high densities referred to several high density developments elsewhere:
- The Eden Shopping Centre: there was a view that it had set a precedent for acceptable scale and density in the town centre.
- Reading: recent apartment blocks in Reading combine high density with high quality
- European cities: blocks of apartments of 4/6 storeys provide affordable rented accommodation and, being rented, leave more disposable income.
- Auckland, New Zealand: very wide roads, pavements and grass margins and large public spaces make the area feel spacious despite the actual housing plots being small.

Objection
- Several respondents objected on the basis that this policy would be a duplication of national policy, and was therefore not needed.
- To one of the respondents, the constraints of the site and the needs of the market should determine density.
- Clarification was sought on the difference between standards and criteria – a respondent felt that setting out the pros and cons could have helped.

Question 57 c –Do you think we need policies to control advertisements?

Total responses: 27
Support: 22
Object : 4
Comment: 1

Support

There was a very high level of support for advertisements control.
- Many respondents were keen to have a policy preventing unsightly or disproportionate advertising e.g. A boards
- The siting and number of advertisement should be limited
- The size, location and duration of advertising should be controlled.

• There should also be control on the maintenance of the ground on which advertisement is to take place
• It was felt that particular control is needed in the AONB and conservation areas, as well as in public places under WDC custody
• Questions were raised over the enforcement of such policies (including over staff capacity and funding).
Objection
• Objections focused on the risk of duplicating national policy, which should be adhered to, and the existence of present rules, deemed sufficient if properly enforced
Comment
• It was felt that a pragmatic approach on a site by site basis was preferable to a "one size fits all policy

Question 57 d – Do you think we should have a specific policy on trees, both for their protection and to secure them in new developments?

Total responses: 31   Support: 22   Object : 2   Comment: 7
Support   There was a high level of support for a tree specific policy. Comments in support included the following points:
• It was felt that a tree policy was essential to protect woodland and individual specimen trees, in particular mature trees, as well as biodiversity and wildlife generally.
• Where appropriate, new developments should protect any historical use of the site represented by native and alien trees.
• Having specific policies could encourage appropriate tree planting and landscaping in new developments (including native trees), thereby reducing roadside pollution
• Respondents also argued that more consideration should be given to streetscape design quality, and that landscape architects should be employed to select suitable species depending on location
• Trees and hedges can be used to soften the impact of development on the landscape.
• The issue of inspecting and managing the planted material (e.g. pruning) was also raised, respondents highlighting the role of Highways / Town and parish councils.
• One respondent felt that a general policy overall should cover trees, but that there should be further consultation on types / numbers.
• It was felt that a pragmatic approach on a site by site basis was preferable to a "one size fits all policy.
Objection
• A few respondents objected on the basis that this policy would be a duplication of national policy, and that there is no need for a local policy.
• Some comments pointed out that tree protection was currently covered by other policies such as TPOs or landscaping of new developments.

• There was a view current policy for TPOs should continue and infringement strictly enforced and prosecuted.

Question 58 – Should there be policies that cover specific types of pollution or a general policy to make sure pollution impacts are considered?

Total responses: 34
Support: 11
Object : 3
Comment: 20
Support   The great majority of respondents supported or commented favourably on having a pollution policy.   • A majority of respondents supported a general policy, deemed to be sufficient to ensure all pollution impacts are considered (including light and visual pollution).   • one respondent felt that this should be reflected in WDC vision for Wycombe as well as a policy in the Local Plan   • Clarity was sought over what a District policy would achieve considering pollution areas are covered by statutory requirements.   • A minority of respondents gave support to having specific policies covering specific types of pollutions and their impacts
Objection   • A minority of respondents felt that we should follow national guidelines and avoid duplicating policies at local level.