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**From:** Cheryl Scott [REDACTED]  
**Sent:** 14 March 2019 17:38  
**To:** NewLocalPlan  
**Subject:** Response to consultation on Plan modifications  
**Attachments:** Local plan mods response.doc

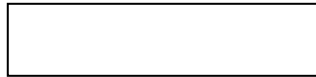
Dear Sirs

Please see attached my comments in response to the consultation on the modifications to the Local Plan.

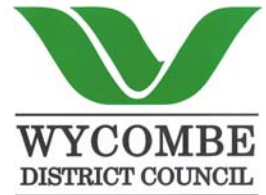
Regards

Cheryl Scott

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## Wycombe District Local Plan Proposed Main Modifications (February - March 2019) Representation Form

The Wycombe District Local Plan was submitted for examination in public in March 2018. Hearings were held over the summer of 2018.

The independent Local Plan inspector has identified various changes that she considers may need to be made to the Plan (known as “Proposed Main Modifications”) to make the Wycombe District Local Plan a “sound” plan.

We invite your comments, also known as representations, on these Proposed Main Modifications.

- Please quote the Proposed Main Modification you are commenting on (question 1 in part B).
- Please give your comments on the Proposed Main Modification and indicate any further changes to the Proposed Main Modifications that you feel are necessary (question 2 in part B).
- **Comments will only be accepted for the Proposed Main Modifications. General comments about the content of the Local Plan not related to a Proposed Main Modification will not be accepted.**

The deadline for responses to be received by the Council is **11:59 pm on Wednesday 27 March 2019**.

Responses can be submitted:

- online at [www.wycombe.gov.uk/local-plan-modifications](http://www.wycombe.gov.uk/local-plan-modifications)
- by email to [newlocalplan@wycombe.gov.uk](mailto:newlocalplan@wycombe.gov.uk) (an automatic email response will confirm receipt)
- or sent by post to:  
Planning Policy Team,  
Wycombe District Council,  
Queen Victoria Road,  
High Wycombe,  
Bucks,  
HP11 1BB

**You can submit as many comments as you would like.** Please complete a separate part B for each part of the plan on which you want to comment.

This form has two parts:

- Part A – Your Details
- Part B – Your comment(s). Please expand the comments table as appropriate

All comments received will be passed to the independent Local Plan Inspector for consideration.

## PART A

### 1. Personal Details

### 2. Agent's Details (if applicable)

*\* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs	
First Name	Cheryl	
Last Name	Scott	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Telephone		
Email Address		

### 3. Client Details

If you are an agent representing a specific site interest, please fill in the details below.

Site Interest	
Client's Name	

**4. Please tick this box if you wish to be notified of future stages of the Wycombe District Local Plan**

**5. Please tick this box if you wish to receive our electronic Weekly Planning Bulletin which gives you updates on local and national Planning matters (you will need to supply an email address to receive this)**

**PART B – Comments on the Proposed Main Modifications– Please copy and use a separate sheet for each representation**

Name or Organisation:

Cheryl Scott

**1. Which of the inspector's Proposed Main Modifications does this response relate to?**

Proposed Main Modification number

PMM5

**2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.**

**If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The modification to Paragraph 4.22 of the plan “ensures that development is not proposed in **areas where development should be restricted such as AONB, Green Belt and areas at risk of flooding, or in** places without the facilities and services to support it.”

This would be reassuring but is not reflected in the substance of the proposals which still include sites for development in areas where development should be restricted such as AONB and Green Belt.

On its own, this modification is inadequate.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

Cheryl Scott

**1. Which of the inspector's Proposed Main Modifications does this response relate to?**

Proposed Main Modification number

PMM6

**2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.**

**If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The reason for proposed change PMM6 is given as "To provide clarity on the 2016-based Household Projections for England and their effect on the Plan." In fact, it does nothing of the sort.

It acknowledges that the figures published in September 2018 projected lower projected household growth but then effectively ignores them. This modification simply shows that WDC intends to continue to base the local plan on out-dated estimates of the housing requirement and only revisit it if future estimates prove to be inadequate.

The plan includes controversial proposals to build on sites within the green belt and with AONB status. If the housing need does indeed turn out to be lower than expected (in line with these latest published estimates or even lower) the 'exceptional circumstances' which are said to justify the inclusion of such sites within the plan fall away completely and yet WDC will still have them included in the list for development.

This is completely unacceptable – there are many places in the Plan and in the modifications where WDC pays lip service to the principle that development should not be proposed on land within the green belt (for example in Policy CP3 -para 4.22- as modified by PMM5) , or certainly not unless there are exceptional circumstances prevailing. No exceptional circumstances will exist if the housing need is satisfied by the other elements of the plan that do not affect the green belt.

The modification should be further amended to recognise that the uncertainty around future housing needs created by the 2016-based figures is enough to justify removal of greenbelt sites pending certainty on the extent of the housing needs.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

Cheryl Scott

**1. Which of the inspector's Proposed Main Modifications does this response relate to?**

Proposed Main Modification number

PMM63

**2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.**

**If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The addition to paragraph 6.101 is welcome.

This says that: "All development should, as a minimum, conserve the natural beauty of the Chilterns AONB. Development should also, wherever possible, provide for positive enhancement to the natural beauty of the Chilterns AONB. The Council recognises that not all development can enhance natural beauty, but where there are opportunities to do so, then permission may be refused if these opportunities are not taken."

**However**, this commitment is not reflected elsewhere in the plan, which still contains proposals to replace open fields with housing. The Council recognises that not all development can **enhance** natural beauty, but I would argue that the replacement of a natural rural environment with a housing estate cannot by any objective reckoning be said to **conserve** natural beauty.

Modification PMM63 needs to go further to ensure that the plan explicitly rules out any proposal which fundamentally changes the character of a site within the AONB to the extent that it becomes predominantly a site of human habitation rather than a site of natural beauty.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

Cheryl Scott

**1. Which of the inspector's Proposed Main Modifications does this response relate to?**

Proposed Main Modification number

PMM73

**2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.**

**If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

The reason given for the modifications made at PMM73 is "to more accurately reflect the requirements of the NPPF."

This modifications actually made do not seem to do this and simply rephrase the previous text. I assume that the NPPF being referred to is the 2012 version but I cannot see an obvious correlation with the text in Chapter 9 of the 2012 NPPF or in Chapter 13 of the subsequent versions.

The NPPF (in all the 2012, 2018, and 2019 versions) lists the five purposes of the green belt – these are clearly settled national policy priorities in place and it is much important that the Local Plan ensures that development proposals do not defeat those purposes.

I would suggest that PMM73 needs to go further than the current draft and ensure that in evaluating proposals for development in the green belt, the impact on those stated purposes should be explicitly examined.

It should also reflect the fact that the relevant chapter of the NPPF (all versions) states that Green Belt boundaries should only be altered in exceptional circumstances.

Exceptional circumstances can only be proven where a reliable assessment of housing need cannot be met by development options elsewhere and given the current uncertainty about the scale of the housing need (see my comments in relation to PMM6), I would suggest a further modification is needed in order to reflect the requirements of the NPPF to remove from the plan proposals to develop housing on sites currently within the green belt.

(Please continue on a separate sheet/expand box if necessary)

# Privacy notice

Wycombe District Council Planning Policy Service collects, uses and is responsible for certain personal information about you.

This response form collects the following personal information from you:

- your name
- your phone numbers
- your email address
- your home address

This information is being collected to allow us to fulfil our statutory function of producing a Local Plan covering the Wycombe District.

Your submissions, including personal data, may be shared with the Local Plan Programme Officer and the Local Plan Inspector. We may also share your submissions with other government partners and agencies such as Buckinghamshire County Council, the Environment Agency, Historic England and Natural England, or other service departments within Wycombe District Council.

Your submissions will be published on our website. These will be redacted (“blacked out”) to remove personal information including:

- personal contact details - Telephone numbers, email addresses, postal addresses
- signatures
- information about health conditions or ethnic origin
- information agreed to be confidential

If you are submitting information which you would like to be treated confidentially or wish to be specifically withheld from the public register, please let us know as soon as you can.

Your submissions and personal information will be kept until the Local Plan is superseded.

If you have questions about data or privacy, please see our full privacy policy on our website: <https://www.wycombe.gov.uk/pages/About-the-council/Privacy/Our-privacy-policy.aspx>

Alternatively you may contact our Data Protection Officer at **Wycombe District Council, Queen Victoria Road, High Wycombe, HP11 1BB** or at [access2information@wycombe.gov.uk](mailto:access2information@wycombe.gov.uk).