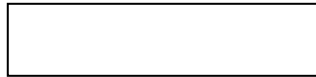
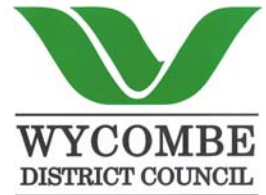

From: Imogen Coote [REDACTED]
Sent: 16 March 2019 19:03
To: NewLocalPlan
Subject: Save Golden Guff Lane End
Attachments: WDLP-Main-Mods-Response-Form-2019-01-22.doc

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For official use only



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
- by email to 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	Miss	
First Name	Imogen	
Last Name	Coote	
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

Y

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:

Imogen Coote

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

Proposed Main Modification number

PMM44 and PMM45

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.

PMM2 Para 2.1 states We need to make sure the patterns of new development reduce our reliance on the private car and ensure the District retains and enhances both its historic environment and its strong green infrastructure, particularly the Chilterns Area of Outstanding Natural Beauty, for future generations.

MODIFICATIONS PMM44 & PMM45 DO NEITHER, THEREFORE THEY AND THE CONCEPT OF DEVELOPMENT RUR1 ARE NOT SOUND.

PMM5 Policy CP3 Page 35 POLICY CP3 – SETTLEMENT STRATEGY, Para 4.22 states it ensures that development is not proposed in areas where development should be restricted such as AONB AS MODIFICATIONS PMM44 & PMM45 RELATE TO THE DEVELOPMENT OF RUR1 IN AONB, THE PROPOSAL TO DEVELOP HOUSES THERE IS THEREFORE UNSOUND.

PMM9 Policy CP10 Page 75 - 76 POLICY CP10 – GREEN INFRASTRUCTURE AND THE NATURAL ENVIRONMENT states The Council will promote the conservation and enhancement of the natural environment and green infrastructure of the District through: 1. Conserving, protecting and enhancing the Chilterns Area of Outstanding Natural Beauty and other natural environmental assets of local, national and international importance by: a) Protecting them from harmful development through development management policies in this Plan and the Delivery and Site Allocations Plan including the protection of biodiversity and landscape designations and landscape character based approach to considering proposals; b) Working with the Chilterns AONB Board and other agencies to improve the management of the AONB and other natural assets, and help people’s enjoyment of them; c) Taking a landscape character based approach to considering proposals. 2. Ensuring there is a net gain in biodiversity within individual development proposals and across the District as a whole over the plan period. 3. Working with local natural environment partnerships to protect and enhance Protecting and enhancing the green infrastructure network of the District by:

- a) Protecting designated sites and through management plans ensuring their biodiversity value will be enhanced

THE DEVELOPMENT PROPOSED IN MODIFICATION PMM44 and PMM45 CONTRADICTS ALL THE ABOVE POINTS AND IS THEREFORE UNSOUND. IN PARTICULAR, BIODIVERSITY CANNOT BE PROTECTED AND ENHANCED IF AN OPEN FIELD BORDERING ANCIENT WOODLAND IS TO BE BUILT ON AND NEITHER CAN THE LANDSCAPE DESIGNATION OF AONB BE SUSTAINED AS PMM45 DOES NOT STIPULATE THAT THE UNDEVELOPED PORTION OF THE FIELD (WHICH COMPRISES OVER 64% OF THE ENTIRE FIELD) BE USED FOR AGRICULTURE OR BE SUBJECT TO STEWARDSHIP TO MAINTAIN ITS BEAUTY AND IMPORTANT NATURAL FUNCTION AS AN AQUIFER.

Paragraph 4.105 Page 75 4.105 states The landscape character and green infrastructure within the District are vital to its sense of place. Planning for and Protecting and enhancing existing assets

through planning is of strategic importance.

By requiring net gain in biodiversity for all development, and long-term management and monitoring plans to secure it, including where designated sites are adjacent to development, an enhancement of the biodiversity value of these sites can be ensured.

THE DEVELOPMENT PROPOSED IN MODIFICATIONS PMM44 & PMM45 CONTRADICTS THE FIRST STATEMENT: IT WILL NEITHER PROTECT NOR ENHANCE EXISTING ASSETS; ADDITIONALLY, REDUCING GREEN INFRASTRUCTURE AND BUILDING HOUSES CANNOT ENSURE THAT THE ENHANCEMENT OF BIODIVERSITY VALUE WILL BE ENSURED. ON BOTH COUNTS THEREFORE, THESE MODIFICATIONS ARE UNSOUND.

PMM63 Policy DM30 Page 346 POLICY DM30 – THE CHILTERN AREA OF OUTSTANDING NATURAL BEAUTY "1. The Council will require development within the Chilterns Area of Outstanding Natural Beauty to: a) Conserve, and where possible enhance, the natural beauty of the Chilterns AONB; b) Be appropriate to the economic and social wellbeing of the local communities within the AONB, or to promote the understanding or enjoyment of the AONB; c) Deliver the highest quality design which respects the natural beauty and built heritage of the Chilterns and enhances the sense of place and local character. 2. Planning permission for proposals which constitute major development within the Chilterns Area of Outstanding Natural Beauty will only be permitted in exceptional circumstances accordance with national policy, and will otherwise be refused." ON ALL THE ABOVE COUNTS, MODIFICATIONS PMM44 & PMM45 FAIL AND ARE THEREFORE UNSOUND.

PMM66 Policy DM34 Page 360 POLICY DM34 – DELIVERING GREEN INFRASTRUCTURE AND BIODIVERSITY IN DEVELOPMENT "1. All development is required to protect and enhance both biodiversity and green infrastructure features and networks both on and off site for the lifetime of the development. 2. Developments proposals likely to affect the significance of designated or non-designated green infrastructure assets are required to evidence a thorough understanding of context through the preparation of a proportionate assessment of existing and planned green infrastructure biodiversity and ecological features and networks both on the site and in the locality, and demonstrate how: a) Through physical alterations and a management plan for the lifetime of the development: i. Existing green infrastructure and biodiversity assets will be protected or maintained maximised; ii. Opportunities to enhance existing and provide new green infrastructure and biodiversity assets will be have been maximised, including delivering long lasting measurable net gains.¶ iii. Development will deliver long lasting measurable net gains in biodiversity.

If significant harm cannot be avoided in this way, development will not be permitted."

MODIFICATIONS PMM44 & PMM45 FAIL TO MEET POINTS 1 AND 2ai-iii ABOVE AND ARE THEREFORE UNSOUND AND SHOULD NOT BE PERMITTED PER THE FINAL SENTENCE OF THE GREEN INFRASTRUCTURE AND BIODIVERSITY POLICY ABOVE.

PMM66 Policy DM34 Page 360 POLICY DM34 – DELIVERING GREEN INFRASTRUCTURE AND BIODIVERSITY IN DEVELOPMENT: "Green Infrastructure is hugely valuable – it provides us with multiple benefits from ecological to social and economic. These are known as “ecosystem services” and need protecting and enhancing. Biodiversity refers to the diversity of species and habitats in the environment and biodiversity assets are those parts of the environment that contribute to biodiversity." MODIFICATION PMM45 FAILS TO REFERENCE THE EXISTING UNIQUE UPLAND MIRE CHARACTER OF THE AREA AND ITS VITAL CONTRIBUTION TO THE FLORA AND FAUNA OF THE AREA, INCLUDING BATS, NEWTS, DEER AND BIRDS. IT IS THEREFORE UNSOUND. IN PARTICULAR THE FIELD RUR1, KNOWN LOCALLY AS GOLDEN GUFF, IS USED FOR GRAZING DAIRY CATTLE. NO PROVISION IS MADE IN MODIFICATION PMM45 FOR CONTINUED GRAZING AND WITHOUT THAT, UNGRAZED AREAS WILL BECOME A FALLOW WASTELAND. THERE IS A WIDER IMPACT ON THE SUSTAINABILITY OF THE BAT POPULATION THAT FORAGES FOR INSECTS OVER THIS FIELD AT NIGHT: LOSS OF GRAZED LAND=LOSS OF CATTLE=LOSS OF MANURE=LOSS OF INSECTS=LOSS OF BATS. ADDITIONALLY, RED KITES NEST IN THE ADJACENT FININGS WOOD. RED KITES ARE LISTED ON SCHEDULE 1 OF THE WILDLIFE & COUNTRYSIDE ACT 1981. See <https://www.rspb.org.uk/birds-and-wildlife/advice/wildlife-and-the-law/wildlife-and-countryside-act/schedules/> and <https://www.redkitesnet/section108846.html>. IT IS AN OFFENCE TO DISTURB A NESTING BIRD WHICH IS LISTED IN SCHEDULE 1. ONCE AGAIN, PMM44 & PMM45 ARE UNSOUND IN YET ANOTHER REGARD.

PMM67 Policy DM35 Page 365 - 366 POLICY DM35 – PLACEMAKING AND DESIGN QUALITY states: "1. All development is required to improve the character of the area and the way it functions" and " Prevent significant adverse impacts on the amenities of neighbouring land and property". THE DEVELOPMENT PROPOSED IN MODIFICATIONS PMM44 & PMM45 ABSOLUTELY FAILS THE

TWO POINTS ABOVE: IT WILL DESTROY GREEN INFRASTRUCTURE AND IMPACT ADVERSELY THE LAND AND EXISTING PROPERTIES BY CREATING HOUSES WHICH WILL LOOK DOWN ON CURRENT PROPERTIES FROM A SIGNIFICANT HEIGHT. IT IS THEREFORE UNSOUND.

The Sustainability Assessment (revised December 2018) lists as objectives: "1: To conserve and enhance biodiversity. 2: To conserve and enhance the District's landscape and, in particular, those areas designated for their landscape value. 3: To conserve and enhance the District's townscapes and historic environment, and, in particular, those areas designated for their heritage importance". THE DEVELOPMENT PROPOSED IN MODIFICATION PMM44 and PMM45 CONTRADICTS ALL THE ABOVE POINTS AND IS THEREFORE UNSOUND. IN PARTICULAR, BIODIVERSITY CANNOT BE PROTECTED AND ENHANCED IF AN OPEN FIELD BORDERING ANCIENT WOODLAND IS TO BE BUILT ON AND NEITHER CAN THE LANDSCAPE DESIGNATION OF AONB BE SUSTAINED AS PMM45 DOES NOT STIPULATE THAT THE UNDEVELOPED PORTION OF THE FIELD (WHICH COMPRISES OVER 63% OF THE ENTIRE FIELD) BE USED FOR AGRICULTURE OR BE SUBJECT TO STEWARDSHIP TO MAINTAIN ITS BEAUTY AND IMPORTANT NATURAL FUNCTION AS AN AQUIFER.

The Sustainability Assessment Para 3.1.1 states the need " To conserve and enhance biodiversity" whilst Para 3.1.6 states the aim to " reduce the need for travel by car and reduce the negative impact of transport on the environment". MODIFICATIONS PMM44 & PMM45 DO NEITHER, THEREFORE THEY AND THE CONCEPT OF DEVELOPMENT RUR1 ARE NOT SOUND.

- Appendix III Page 37 concludes: "Sites SLE0017 (Land south of Finings road (whole site)), Part of SLE0017 (Land south of Finings road (reduced)) and SLE0030 (Lane to the South of Clinkard Place) are all situated adjacent to the conservation area. Development at these sites has the potential for negative effects on the historic environment by affecting the setting of the conservation area. Development on northern section of site SLE0017 (Land south of Finings road (whole site)) as well as on the separate option, Part of SLE0017 (Land south of Finings road (reduced)), could also affect the setting of Grade II listed building.

All three sites have the potential for a residual long-term negative effect on the historic environment by affecting the landscape and therefore setting of the conservation area". MODIFICATIONS PMM44 & PMM45 ARE THEREFORE UNSOUND.

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

Name or Organisation:

Imogen Coote

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

Proposed Main Modification number

PMM44 and PMM45

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.

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(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.