
From: Steve Pickles [REDACTED]
Sent: 21 March 2019 08:53
To: NewLocalPlan
Cc: simon fowke
Subject: 583_06_2019-03-21_Wycombe District Local Plan Proposed Main Modifications - representations
Attachments: 583_06_2019-03-07_WDLP-Main-Mods-Response-Form-2019-01-22.pdf

Dear Sir/Madam,
Please find attached representations which I am submitting on behalf of the Hawks Hill Widmoor Residents Group in relation to proposed main modification PMM65. I would be grateful if you would kindly acknowledge receipt.

Regards

Steve Pickles



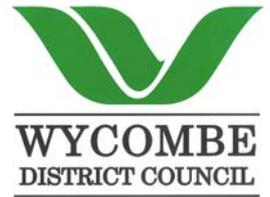
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Wycombe District Local Plan Proposed Main Modifications (February - March 2019) Representation Form

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
- 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		Mr
First Name		Stephen
Last Name		Pickles
Job Title (where relevant)		Policy Planner
Organisation (where relevant)	Hawks Hill Widmoor Residents Group.	West Waddy ADP
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:

Hawks Hill Widmoor Residents Group

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

Proposed Main Modification number

PMM65

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 proposed change inserting a new paragraph after paragraph 6.123 is strongly supported and considered to be necessary to make the Local Plan sound. Previously, the semi-rural area at Hawks Hill/Harvest Hill was subject to policy C16 which recognised the special character of this area.

In the submission Local Plan paragraph 6.123 referred to the importance of retaining a perceived visual break and a sense of openness between settlements, but did not make reference to protecting the character of semi-rural areas such as the Hawks Hill/Harvest Hill area, potentially leaving them unprotected from development that would adversely affect their character and which cumulatively over time could destroy it altogether. This was a significant omission which meant that policy DM32 and the supporting text was not soundly based, justified or consistent with the requirements of national policy.

The proposed new paragraph proposed after paragraph 6.123 is considered to be necessary to make the Local Plan sound:

Firstly, because having policies and explanatory text to protect the distinct character of particular areas is necessary to accord with the advice in the National Planning Policy Framework (NPPF), both in its 2012 version and the revised February 2019 version. The February 2019 version of the NPPF states in paragraph 214 that *‘The policies in the previous Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019,’* which therefore applies in the case of the Wycombe District Local Plan. We have previously set out in our Regulation 19 representations and the written statement to the Examination how the 2012 NPPF provides policy justification for protecting the special character of the Hawks Hill/Harvest Hill area, such as the core planning principle that planning should *‘take account of the different roles and characters of different areas,’* (para 17); *‘respond to local character and history, and reflect the identity of local surroundings and history,’* (para 58); that it is *‘proper to seek to promote or reinforce local distinctiveness,’* (para 60); and that the *‘planning system should contribute to and enhance the natural and local environment by*

protecting and enhancing valued landscapes,' (para 109). Similar wording is also included in the February 2019 NPPF, which shows that the approach is still up to date in terms of Government policy as it states that, that '*planning policies and decisions should support development that makes efficient use of land, taking into account:...d) the desirability of maintaining an area's prevailing character and setting (including residential gardens),...*' (para 122 d)). Paragraph 170 also states that '*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes.*' While 'valued landscapes' are not defined, Geoff Salter, who undertook the 'Local Plan to 2011' Inquiry clearly considered the Hawks Hill/Harvest Hill area to be a 'valued landscape,' as he stated that '*the random pattern of development and building styles, high level of tree cover, narrow country lanes all contribute to a rural ambience,*' (para 8.16.1) and described it as having '*a special character,*' (para 8.16.6) which merited protection.

Secondly, the change is considered necessary to make the Local Plan sound because the evidence that underpins it indicates that the Hawks Hill/Harvest Hill area still has a distinct character that merits protection. The Wycombe District Landscape Character Assessment (2011) carried out by Land Use Consultants, which forms part of the evidence base for the new Local Plan, divides the Hawks Hill and Harvest Hill area into Local Character Area 19.1 (LCA 19.1) High Wycombe Settled River Valley and Local Character Area 24.1 (LCA 24.1) Burnham Beeches Wooded Terrace. With regard to LCA 19.1 it states on page 132 that '*The valley floor is dominated by settlement but the undeveloped slopes in the south and east retain a rural character with farmland, woodland and parkland. These remaining undeveloped slopes are important in containing the valley and providing a setting to the town of High Wycombe.*' The Landscape Guidelines include:

- Conserve the remaining undeveloped valley sides in the south and east which contain and form a setting to the developed valley floor. Restrict incremental development which would alter the character of the valley.
- Conserve views from each side of the Wye Valley, across the valley to wooded and farmed slopes.
- Maintain the rural character of roads, avoiding road improvements and widening which would alter their character.

The upper part of the area which has been covered by Local Plan policy C16 at Hedsor is within LCA 24.1. It is stated that in this area '*Settlement is sparse and highly dispersed, mainly comprised of individual properties, or small hamlets. Settlement is well integrated with the landscape, often nestled within woodland,*' (p161). There are: '*A number of small winding tracks and rural lanes, some of which are sunken lanes, cross the landscape,*' (p161) and: '*The landscape retains a high level of rural naturalness and a strong sense of tranquillity. Woodland and tree cover creates a strong vertical element, as well as a variety of texture and colour,*' (p162).

The evaluation section states that: '*The strength of character and intactness of Burnham Beeches Wooded Terrace is strong. Key characteristics are distinctive, and the physical and visual intactness is strong, despite the prevalence of paddocks in the area.*' The sensitivities include:

- The strong sense of tranquillity and intimacy, associated with low settlement and quiet roads.
- Low level of dispersed settlement, vulnerable to infill.

The Landscape Guidelines include:

- Maintain the essentially undeveloped character, with limited settlement development and quiet rural lanes.
- Seek to reduce road traffic pressures which could alter the tranquil, rural character of the landscape.
- Ensure that new buildings and development is sensitively integrated into the landscape through careful siting

This updated evidence base which underpins the new Local Plan therefore indicates that the characteristics of the area which underpinned the formulation of policy C16 and were strongly endorsed by the Local Plan inspector in 2002, still apply.

Proposed PMM65 will ensure that the need to protect the semi-rural characteristics of the Hawks Hill/Harvest Hill area and other semi-rural areas, will continue to be taken into account in determining planning applications. It will do this:

Firstly, by providing additional explanatory text which will be used in the interpretation of policy DM32 when considering development proposals which relate to the Hawks Hill/Harvest Hill area and other semi-rural areas.

Secondly, it recognises the particular characteristics of the Hawks Hill/Harvest Hill area, that have been identified in the evidence studies as needing protection. These are:

1. The need to protect the semi-rural character of the area from development that would introduce an urban character through its design, density or layout;
2. The need to protect the sunken lanes and low density development that are more characteristic of a rural area.

The soundness tests include the requirement that the plan is justified, which under the terms of the 2012 NPPF consists of the plan being '*the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence,*' (para 182). In the view of the Hawks Hill and Widmoor Residents Group, proposed change PMM65 addresses the significant gap that was present in the submission Local Plan, which removed the existing C16 policy protection for the Hawks Hill/Harvest Hill area, while putting nothing in its place. The proposed change also provides specific guidance that will protect the distinctive character of the Hawks Hill/Harvest Hill area as identified by the 2011 Local Plan Inspector and the Wycombe District Landscape Character Assessment. It therefore also makes the Local Plan consistent with national policy in terms of providing guidance to protect the distinctive local character of this area.

For these reasons PMM65 which involves the insertion of an additional paragraph after paragraph 6.123 relating to semi-rural areas is strongly supported.

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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.