

From: Sweet-Escott, Eleanor [REDACTED]
Sent: 22 March 2019 08:45
To: NewLocalPlan
Subject: NE response - 273420 - Wycombe District Local Plan - Main Modifications following the Inspector's report
Attachments: LU DOC 18 0012699 229041_Natural England Response_Wycombe LP_4.2.2017.pdf; NE response 273420 Wycombe District Local Plan - Main Modifications.pdf

Dear Aude,

Please find attached Natural England's consultation response to the proposed main modifications of the Wycombe Local Plan. I have also attached NE's letter dated 4.12.17 which is referred to throughout the 22.3.19 letter.

If you have any questions about contents of the attached letters, please don't hesitate to contact me by return email.

Kind Regards,

Eleanor Sweet-Escott

Lead Adviser

Sustainable Development

Thames Team
[REDACTED]

<https://www.gov.uk/natural-england>

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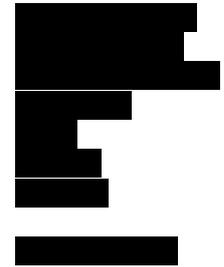
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Date: 22 March 2019
Our ref: 273420



Wycombe District Council

BY EMAIL ONLY



Dear Aude Pantel,

Planning consultation: Wycombe Local Plan – Main Modifications

Thank you for your consultation on the above dated 12 February 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is of the opinion that many of our concerns detailed in our representations to the Regulation 19 consultation have not been taken into account with the proposed modifications. We are therefore not satisfied that our comments dated 4 December 2017 have been adequately addressed.

These concerns, in reference to the proposed main modifications, are outlined below.

Proposed Main Modifications

PR8 Provisioning and Safeguarding of Transport Infrastructure

PR8 (iii) A new link road to connect Picts Lane to the A4010 south of Culverton Farm, incorporating appropriate landscaping with associated species-rich habitat.

We voiced our concerns at the Regulation 19 stage that insufficient evidence for this development has been provided to undertake the major development test in line with the NPPF para 172. The WDC Topic Paper 6: Princes Risborough states "*More detailed design and planning stages will need to show that any detrimental effects on the environment and landscape can be successfully mitigated*". This has not been provided by the proposed main modifications for the Plan.

Additionally, no further details of layout of the road or a mitigation strategy for the Chilterns AONB have been provided. Further details of our concerns can be found in our letter dated 4 December 2017 (also attached for your convenience).

HW4 Abbey Barn North

Due to no material change from the proposed Main Modifications within this policy, we uphold our existing concerns surrounding the likely loss of biodiversity and deterioration of deciduous woodland priority habitat and Ancient Woodland irreplaceable habitat on this site. Further details can be found in our letter dated 4 December 2017.

HW6 Gomm Valley and Ashwells

Our concerns surrounding this site are upheld due to not being satisfied that previous advice relating to our existing concerns have been satisfactorily addressed. The increase of the indicative capacity of the entire site from 520 to 720 exacerbates our apprehensions that are detailed in the letter dated 4 December 2017. The site includes Gomm Valley SSSI in the south east, species rich grassland in the north and south and ancient woodland in the centre and south west corner. The site is on the boundary of the Chilterns AONB and appears to be part of it in terms of landscape character. It is therefore incredibly sensitive to development.

RUR6 Great and Little Kimble-Cum-Marsh Parish

As no details have been provided with the Main Modifications around the location of development or the mitigation measures proposed for the Chilterns AONB, we maintain our comments detailed in letter dated 4 December 2017.

Revised Sustainability Appraisal

Natural England are in agreement with the findings of the consolidated SA report and that the changes and consolidation from earlier stages of the SA process do not change the overall findings of the Sustainability Report.

Revised Habitats Regulations Assessment – including Appropriate Assessment

Natural England concurs with the HRA screening conclusions of the Wycombe Local Plan.

In relation to the Appropriate Assessments conducted on the below effects:

- **Air pollution** at Windsor Hill SSSI and Bradenham Woods, Park Wood and the Coppice SSSI (components of Chiltern Beechwoods SAC), Aston Rowant SAC and Burnham Beeches SAC. Natural England agree with the conclusion drawn in the Appropriate Assessment that the Wycombe Local Plan will not lead to adverse effects, alone or in combination on the integrity of the relevant SACs in relation to air pollution.
- **Recreational pressure** at Windsor Hill SSSI (component of Chiltern Beechwoods SAC) and Burnham Beeches SAC. Natural England are in agreement with the conclusion drawn in the Appropriate Assessment that provided the mitigation measures identified in the Local Plan are implemented, no adverse effects on the SACs integrity due to recreational pressure are foreseen, either as a result of the plan alone or in combination with other plans and projects.

Natural England is therefore satisfied that the Local Plan will not have significant impacts to any European protected sites.

Sustainability Appraisal of the Proposed Main Modifications

Natural England are in agreement with the conclusion that the proposed main modifications do not significantly affect the findings of the Consolidated SA Report.

Habitats Regulations Assessment of the Proposed Main Modifications

We are in agreement with the conclusions reached that the proposed main modifications will not have significant impacts to any European protected sites. It is noted that the individual projects (Oxford to Cambridge Growth Arc and associated Expressway and Heathrow expansion) will be doing their own HRAs to determine Likely Significant Effect. It is also noted that further work will need to be done by the authority for the next plan or plan review.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me at [REDACTED]
[REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED].

Yours Sincerely,

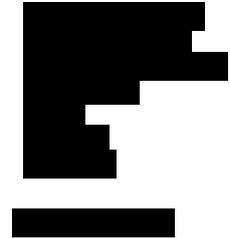
Eleanor Sweet-Escott
Lead Adviser, Sustainable Development
Thames Team

Date: 04 December 2017
Our ref: 229041



Wycombe District Council

BY EMAIL ONLY



Dear Aude Pantel

Planning Consultation: Wycombe Local Plan, Regulation 19.

Thank you for your consultation on the above dated 13 October 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is of the opinion that as it stands this Local Plan is not legally compliant and currently **does not** meet all of the tests of soundness, namely, whether it is effective and whether it is consistent with national policy. However, several of Natural England's concerns centre around the need for further evidence. Once this information is available we would be happy to review our advice with regards to soundness of the plan.

In our review of the Wycombe Local Plan we would first like to thank Wycombe District Council for taking on board many of our previous comments. We would like to comment further on some of the development allocations being proposed as part of the Plan.

RP4 Princes Risborough

Princes Risborough is a town on the edge of the Chilterns Area of Outstanding Natural Beauty (AONB) which is visible from several viewpoints within the AONB. As part of the Plan it will double in size over the Plan period. This will inevitably change the landscape character of the development area from rolling agricultural fields to urban areas impacting the landscape views both into and out of the AONB.

Paragraph 115 on the NPPF states, '*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty*'.

We appreciate the master plan approach to planning Princes Risborough's expansion and the emphasis on green infrastructure (GI). Although landscape character changes are inevitable we accept that they need not be negative. In fact the outcomes for biodiversity under this plan have the potential to deliver significant gains if the green buffers along the Alscot valley and between the extension and Longwick are wide enough and interconnected with internal GI. While we feel that the master planning approach has the best potential to mitigate the negative landscape and visual impacts we feel that a time dependent approach to the implementation of GI would produce better results. The wildlife corridors, buffers and the implementation of green infrastructure will eventually provide mitigation, however, it will be 15 years until the mitigation is in place (time taken for trees to mature). We request an additional policy stating that, as development comes forward, green infrastructure projects are

implemented first, before the grey infrastructure and housing. This would allow habitat corridors and screening belts to become established and mature before the built environment is in place reducing the visual and landscape impacts to an acceptable level.

PR8 Provision and Safeguarding of Transport Infrastructure

PR8 (iii) A new link road to connect Picts Lane to the A4010 south of Culverton Farm, incorporating appropriate landscaping with associated species-rich habitat.

This extension of the highway system runs through the Chilterns AONB. As this development is a major road, with potential impacts to the AONB and ecologically sensitive habitat, we consider it major development in the AONB. Insufficient evidence for this development has been provided to undertake the major development test in line with the NPPF para 116. The WDC Topic Paper 6: Princes Risborough states *“More detailed design and planning stages will need to show that any detrimental effects on the environment and landscape can be successfully mitigated”*. This has not been provided by the Plan.

Any development of this site will need to protect and enhance the character of the AONB in line with the Chilterns AONB management plan. There is a chalk stream on the site which is a habitat type highlighted in the AONB management plan and is an internationally rare habitat. The exact location of the road and any associated green and grey infrastructure needs to be specified to show compliance with the NPPF para 115. A more detailed development plan is required for this site. While we appreciate the wording of 5.3.139 and the commitment to minimising the lighting of this road, further details of the lighting design should be set out in the development plan. This development could impact the Chilterns AONB unless properly mitigated. Please provide further details of the layout and mitigation strategy in order to demonstrate compliance with Para 115 of the NPPF. As the Plan is not currently consistent with the NPPF it is unsound in its current form.

RUR6 Great and Little Kimble-cum-Marsh Parish

Unlike Princes Risborough, Great and Little Kimble are very small conurbations that are surrounded and enveloped by a rural landscape. This area is highly sensitive, with significant views to and from the Chilterns chalk escarpment. It is visible from Beacon Hill and Coombe Hill which are highly visited sites. The requirement for the Parish to find 160 dwellings could considerably alter the look of the villages and negatively impact the landscape character and views of the setting of the AONB. We consider further work is required to ensure the Plan is in line with the NPPF para 115. The number of 160 should be reduced or if possible removed and the provision of infill housing for local residents should be emphasised. As no detail has been provided around the location of development or the mitigation measures proposed the Plan is not consistent with Para 115 in the NPPF and therefore it is unsound in its current form.

HW4 Abbey Barn North

This site is covered with emerging deciduous woodland, partly open grassland with scattered mature trees and shrubs, in a glade formation merging into Ancient Woodland. This site is extremely ecologically rich and provides an extension of habitat for the Ancient Woodland with a mosaic of grassland/ scrubland/woodland habitats. There is no clear on-site boundary between the mapped Ancient Woodland and the deciduous woodland growing outside the mapped boundary.

It appears very likely that clearing this site for development would result in impacts to the Ancient Woodland and the species that reside there. If the deciduous woodland were to be cleared up to the boundary of the mapped Ancient Woodland the ancient wood will be degraded through ‘edge effect’ impacts. These impacts include damage to roots and root connections, changes in floral composition due to changes in light levels, increase in invasive plants, predation of woodland species by domestic pets, disturbance of fauna by light pollution and recreational pressures from residents (vegetation trampling, rubbish dumping, disturbance of fauna). If the central area were developed it would also isolate the eastern corner of the ancient wood.

Given the high biodiversity value of the site plus the requirement to fit 100 dwellings in the space it is unlikely that the development could provide sufficient green infrastructure to mitigate the loss of biodiversity unless compensation was provided off-site. Paragraph 109 of the NPPF states; *“The*

planning system should contribute to and enhance the natural and local environment by: ...minimising impacts on biodiversity and providing net gains in biodiversity where possible”.

This site contains deciduous woodland which is a priority habitat and is immediately adjacent to Ancient Woodland (irreplaceable habitat). Paragraph 118 of the NPPF states, ‘...*planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss*’. Also Paragraph 117 states ‘*To minimise impacts on biodiversity and geodiversity, planning policies should: promote the preservation, restoration and re-creation of priority habitats*’.

Paragraph 110 of the NPPF states that ‘...*plans should allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF*’. This woodland habitat should be avoided as other areas of lesser ecological value are available. This site could then be developed as greenspace for new housing allocations in High Wycombe. As a loss of biodiversity and deterioration of irreplaceable habitats is likely on this site under the Plan, it is not consistent with the NPPF and therefore the Plan is unsound in its current form.

HW6 Gomm Valley and Ashwells

This site includes Gomm Valley SSSI in the southeast, species rich grassland in the north and south and ancient woodland in the centre and south west corner. The site is on the boundary of the Chilterns AONB and appears to be part of it in terms of landscape character.

Paragraphs 118 and 115 of the NPPF provide for the protection of SSSIs, protected landscapes and irreplaceable habitats. The Gomm Valley provides a wildlife corridor at a landscape scale. It connects the two sides of the Chilterns AONB via King’s Wood (Ancient Woodland), and connects Gomm Valley SSSI with Millfield Wood SSSI. It is also part of the landscape character area of the neighbouring AONB. Development of the Gomm Valley has the potential to impact the SSSI, the landscape scale wildlife corridor, the Chilterns AONB and cause the deterioration of irreplaceable habitats (Ancient Woodland).

The number and arrangement of development parcels need to be reviewed;

- Parcels 7 and 8 block the wildlife corridor from King’s Wood across the site. The new internal road required for these parcels also severs the corridor.
- Parcel 2 is too close to the SSSI supporting habitat and could be better used as an outdoor nature based teaching area for the new school.
- Parcels 10 and 11 need to include connected green infrastructure and mitigate for the loss of species rich grassland.
- Parcel 6 needs buffering to the Ancient Woodland of Gomm’s little Wood (the mapping for Gomm’s little Wood is not consistent with Natural England’s Ancient Woodland mapping, the Plan map is smaller in area). Also access to the Ancient woodland should be controlled through designated walk ways and education signs to mitigate the impacts of recreational disturbance.
- The central undeveloped portion of the site should be managed as an extension of the SSSI for the species it supports.
- All development needs to be screened with vegetation to protect the landscape character in the setting of the AONB. Policies should be included to implement green infrastructure prior to the grey infrastructure to minimise the time of impacts on the AONB.

A more detailed master plan needs to be considered for this site. It is outlined in policy HW6 that development will provide a sustainable management framework, to be secured via legal agreement. Unless the detail of this management framework is defined mitigation cannot be guaranteed for this site. A management framework and master plan should be developed as part of this policy. The management of the non-developed part of the site should be based on the management of the SSSI. Impacts to the SSSI, the landscape scale wildlife corridor, the Chilterns AONB and irreplaceable habitats is likely on this site under the Plan. This is not consistent with the NPPF and therefore the Plan is unsound in its current form.

HW7 Terriers Farm and Terriers House

HW7 c) Retain the main North-South hedgerow, which has an adjacent public footpath, as the major green link through the site;

HW7 d) Retain a green link between King's Wood in the south and the Area of Outstanding Natural Beauty countryside to the north to retain its function as a wildlife corridor;

Similar to the Gomm Valley this site forms part of the landscape scale wildlife corridor that connects the two sides of the Chilterns AONB via King's Wood (Ancient Woodland), and connects Gomm Valley SSSI with Millfield Wood SSSI. In line with Para 117 and 110 of the NPPF, Part c and d of this policy need to stipulate a minimum width for the wildlife corridor. The policy on the Gomm Valley and Ashwells stipulates that the corridor through Gomm Valley will be 200m at its thinnest part. The ecological functionality of a corridor is linked to its width, and as a corridor is only as good as its thinnest part. We therefore request that the north-south wildlife corridor through the site is set at 200m wide.

Major Development in the AONB and Figures 4, 6, 7 and 8

While there is strong policy wording around the protection of the AONB and its values there are several allocations in the AONB that could be considered 'major' development. There appears to be a contradiction between the aims of the policies and their implementation which leads us to question the effectiveness of the Plan. We request that any comments provided by the AONB board on this matter are thoroughly considered.

There is a technical issue with the figures showing the AONB layer. It seems to stop at the boundary of settlements such as Lane End, Stokenchurch and Naphill. This needs to be fixed to show that these settlements are within the AONB.

Yours sincerely

Kirsty Macpherson
Lead Adviser
Sustainable Development
Thames Team