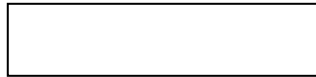

From: Mike Chadwick [REDACTED]
Sent: 26 March 2019 22:56
To: NewLocalPlan
Subject: Comments on Local Plan Major Modifications
Attachments: ChilternSociety-WDLP-Main-Mods-Response-Form-2019-01-22.doc

Hello,

Please see attached comments on behalf of the Chiltern Society.

Mike Chadwick,
Wycombe Planning Coordinator

Click
https://www.mailcontrol.com/sr/NSwCXk9e7LLGX2PQPmvUmOJbwVFXRCWm64xqtQYu_vsNRx3oB5HkNVFztxc6CW9X2ae2OL9CqmNc_rJiVGaJg== to report this email as spam.



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	Mr.	
First Name	Michael	
Last Name	Chadwick	
Job Title (where relevant)	Wycombe Planning Coordinator	
Organisation (where relevant)	Chiltern Society	
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

yes

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)

receive now

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

Name or Organisation:

Chiltern Society

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 second part of this PMM, namely the amended and additional text to 4.22, is said to respond to Action Point 2.5.

This Action Point reads: "AP2.5 - WDC in discussion with Chilterns Conservation Board to consider amending Policy CP3 to include a reference to the AONB." The PMM is therefore not an adequate response to this AP because no change is being made to the Policy itself.

Moreover the additional wording introduces a clear mismatch between what it CLAIMS the Policy does, and what it actually does, since the Policy does not refer to the AONB or these other "restricted areas" (and indeed some development is explicitly proposed within or adjacent to settlements in the AONB.)

One potential way to resolve this might be to amend Point 6 of CP3 to read: 'Outside of these areas and settlements, development will be restricted to that which is appropriate in a rural area, with additional restraint in those areas where development should specifically be restricted such as AONB, Green Belt and areas at risk of flooding.'

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM7

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 wording of point 3, referring to 'encouraging the development of new premises in the town' should read '...in the town centre' to be consistent with Action Point 4.1, the claimed reason for change, and for clarity.

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM9

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.

Strongly supported - this major re-wording of CP10, and changes to the accompanying text, is a very considerable improvement on the original version.

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM17

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.

Point 1 of Policy should be amended to 'Provide a landscape-led positive approach to design and layout which conserves, and where possible enhances, the natural beauty of the Area of Outstanding Natural Beauty' in order to provide consistency with Policy DM30, and closer compliance with CROW Act duty [which might imply even stronger wording, viz '.....which conserves and enhances the natural beauty.....']. It is noteworthy that PMM23 relating to Policy HW21 DOES use '....conserve, and where possible enhance,....'

This will ensure that only the very best quality schemes for these sensitive sites will be policy-compliant.

This should then be used as the 'standard' phrase for all site allocations within the AONB, so as to achieve the consistency sought by Action Point 9.2.

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

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

Name or Organisation: Chiltern Society

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

Proposed Main Modification number PMM21

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.

Point 2 of the Policy should be amended to the revised ‘standard’ phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM25

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.

Point 1 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM36

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.

Modification supported because of the significant expansion and strengthening of the policy in terms of its ecological aspects; and the additional flexibility regarding site access.

However, point 2 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM41

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 of in-principle support for tourism-related development generally like a visitor centre, not just a hotel is explicitly supported.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM43

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.

In point 1b of the Policy, ‘heritage assets’ should be lower case, not capitalised.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

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.

Point 4 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM46

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.

Point 2 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM47

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.

Point 1 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM50

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.

Point 1 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM51

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.

Point 1 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM52

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.

Point 1 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM54

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.

Point 2 of the Policy should be amended to the revised 'standard' phrase for all site allocations within the AONB which we advocate under PMM17, viz 'provide a landscape-led positive approach to design and layout which conserves, and wherever possible, enhances the natural beauty of the AONB'.

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

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

Name or Organisation: Chiltern Society

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

Proposed Main Modification number PMM62

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.

PMM62 re Policy DM29 Community Facilities. The Policy needs to be consistent with NPPF para 92c), which reads: 'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

.....
c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
.....'

To do this, Policy wording and implementation has to be very alert to the danger of community facilities, and particularly pubs, being 'run down' to a non-viable state either deliberately, or through incompetence or a lack of imagination. We believe that the very brief Policy DM29, and the proposed removal of any reference to viability in the accompanying text, would render the Policy ineffective in this respect. Our suggestion for remedying this would be to add a second sentence to point 2 of the Policy so that the Policy as a whole would read:

- POLICY DM29 - COMMUNITY FACILITIES**
1. Development which cannot be adequately served by existing built facilities is required to provide sufficient additional built facilities as are needed to meet the needs of future occupants. This assessment shall take account of the capacity and accessibility of existing facilities. In assessing capacity, first priority will be given to allocated and committed growth in the area.
 2. Land or buildings currently or last occupied for community use must be retained unless the applicant has clearly demonstrated through an exhaustive needs assessment that the land and/or buildings proposed to be lost are surplus to any community needs. Any claims about a lack of viability should be robustly scrutinised.

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

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

Name or Organisation:

Chiltern Society

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.

PMM63: so that Policy DM30 truly replicates the NPPF, rather than paraphrasing it in a potentially misleading way by reversing the starting-point / implied "presumption" for the assessment of major development, point 2 should be amended to read
'Planning permission for proposals which constitute major development within the Chilterns Area of Outstanding Natural Beauty will be refused, unless all the tests set out in national policy are met' or somesuch.

But the changes to the accompanying text are, we believe, improvements, and are thus supported.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM66

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.

PMM66: these extensive changes to the Policy and accompanying text are a vast improvement, so are strongly supported.

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

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

Name or Organisation:

Chiltern Society

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

Proposed Main Modification number

PMM72

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.

PMM72: newly combined para 6.207 should be amended to remove the erroneous reference to 'appropriate' as opposed to 'not inappropriate' development within the Green Belt, which would also bring it into line with subsequent Policy DM42. Suggested replacement wording is: 'The Green Belt is a policy tool which aims to prevent development within designated areas. The starting point is that all development is inappropriate, and as such will not be permitted. The NPPF identifies various exceptions to this, which are relevant to Policies DM42 and DM43. The following set of policies responds to local circumstances and provides clarity and interpretation of a number of the terms set out in the NPPF.'

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

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

Name or Organisation:

Chiltern Society

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.

PMM73: the changes to the wording to 'more accurately reflect the requirements of the NPPF', including the removal of erroneous references to 'appropriate development' are naturally supported since they arose from dialogue with us during the Examination. [Cf PMM72.]

(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.