
From: John Kelly [REDACTED]
Sent: 27 March 2019 09:48
To: NewLocalPlan
Subject: Main modifications representation
Attachments: HHWRG Response, Amendments March 2019.pdf

Dear Sirs,
Please find the attached completed Local Plan Proposed Main Modifications Representation form.

Kind regards,

John Kelly
Chairman
Hawks Hill Widmoor Residents Group CIC

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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	Mr	
First Name	John	
Last Name	Kelly	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Hawks Hill Widmoor Residents' Group CIC	
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 CIC

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.

This response is additional to the response already made on our behalf by our agents West Waddy, which we are making as a result of late information being brought to our attention and other additional concerns.

As has been clearly highlighted, for many years the semi-rural area at Hawks Hill / Harvest Hill / Widmoor (Hawks Hill Area) came under policy C16, which recognised the semi-rural and special nature of the area. As such, this areas forms an intrinsic part of the local character of our local conurbations and helps to maintain the separation of distinct areas, which is an important aspect recognised by the NPPF. The West Waddy response comments on the change proposed to insert an additional paragraph after paragraph 6.123 in Policy DM32 (Landscape Character and Settlement Patterns), which has been agreed with our Residents group and is therefore strongly supported by us and is considered to be necessary to make the Local Plan sound.

However, it has come to our attention that linked to this matter is the somewhat silent urban expansion of the Bourne End settlement boundary, which WDC has included for in this Local Plan Examination albeit it is not formally a part of the Plan. The Inspector should note that WDC has included an alteration to the Bourne End settlement boundary in the Local Plan Policies Map, in which it quietly details an expansion of the urban area to wholly include 34.5 hectares of the semi-rural area at Hawks Hill Area currently residing in open countryside. Although the matter has been raised through the consultation process it has had no acknowledgement or review in the process and is absent from the Main Modifications and consultation process. It is our belief that this proposed urban expansion has not had the proper due diligence that would be required and afforded by a settlement boundary review and evidence based approach and that the resultant lack of public consultation and the lack of a sustainability appraisal makes the Plan unsound in this respect.

With such a major urbanising development resulting from the proposed removal of the Green Belt designation on the site adjacent to the Hawks Hill Area; coupled to the proposed deletion of Policy C16 and this new and un-validated urban expansion into the countryside outside of the existing settlement boundary; we would suggest

that the agreed supporting text after Paragraph 6.123 in Policy DM32 should be supported by effective measures to help resist adverse proposals coming forward in the Hawks Hill Area, which would be, by default, within a new settlement boundary.

We therefore suggest that the following changes should be considered to the new Local Plan and the modification proposed under and related to PMM65 to make the new Local Plan sound.

1. Reject the un-validated Bourne End settlement boundary change and resultant urban expansion in the Policies Map as included in the draft New Local Plan and replace it with the existing validated and sound Policies Map.

Failing this:-

2. In the face of the above new previously undisclosed threat, add an additional development control policy by carrying forward the existing Policy C16; thereby underpinning the protection to be detailed in the new paragraph below paragraph 6.123 in Policy DM32.

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

Name or Organisation:

Hawks Hill Widmoor Residents Group CIC

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.

We note that the proposed modification PMM43 on page 88 inserts a sentence requiring development to "have special regard" to the conservation of heritage assets and their settings in the Hedsor Road and Riversdale conservation area as opposed to the former wording to "not have an adverse effect" to the conservation of heritage assets. It is our belief that there is no acceptable reason for making this change, which would effectively downgrade the protection of those heritage assets.

"Have special regard" puts no real obligation on the developer and, as a result, would reduce restrictions on the development of this site that adjoins this beautiful heritage site. This would not conform to the requirements of the NPPF, which clearly puts a much greater requirement on the protection of heritage assets.

NPPF:

16. Conserving and enhancing the historic environment

Considering potential impacts

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification....

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...

We therefore request that, in order to make the new Local Plan sound, the proposed modification PMM43 should be rejected.

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