
From: Timothy Bingham [REDACTED]
Sent: 27 March 2019 12:17
To: NewLocalPlan
Subject: Local Plan modifications
Attachments: WBEPC Local Plan Consultation on Amendments March 2019.doc

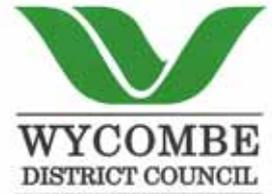
Please find attached our representation in respect of the modifications proposed to the Local Plan.

Regards
Councillor Tim Bingham
Chairman of NDP Working Party
Wooburn and Bourne End Parish Council

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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	Timothy	
Last Name	Bingham	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Wooburn and Bourne End Parish Council NDP Working Party	
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:

Wooburn and Bourne End Parish Council

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 change in settlement boundary has been brought to our attention by the Councillor representative on the Future of Our Village forum and we confirm our support of the points that they have made which we repeat below:

The change proposed to insert an additional paragraph after paragraph 6.123 is welcome, strongly supported and considered to be necessary to make the Local Plan sound. For many years the semi-rural area at Hawks Hill / Harvest Hill / Widmoor came under policy C16, which recognised the semi-rural and special nature of the area. Such areas form an intrinsic part of the local character of local conurbations and help maintain the separation of distinct areas, as recognised as being of importance by the NPPF.

However, it has come to our attention that linked to this matter is the somewhat stealthy urban expansion of the Bourne End settlement boundary, which WDC has included for ratification via this Local Plan Examination albeit it is not formally a part of the Plan. The Inspector should be made aware that WDC has included an alteration to the Bourne End settlement boundary in the Local Plan Policies Map, in which it silently proposes an expansion of the urban area to wholly include 34.5 hectares of the semi-rural area at Hawks Hill / Harvest Hill / Widmoor 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. It is our belief that the proposed urban expansion, without proper due diligence via a settlement boundary review and evidence based approach, the resultant lack of public consultation and a sustainability appraisal makes the Plan unsound in this respect.

Given the risk to the Hawks Hill / Harvest Hill / Widmoor area by such major urbanising development resulting from the proposed removal of the Green Belt designation on the adjacent site; coupled to the proposed deletion of Policy C16 and this new and un-validated urban expansion in the countryside outside of the existing settlement boundary, the supporting text after Paragraph 6.123 should be supported by effective measures to resist adverse proposals coming forward in the Hawks Hill /

Harvest Hill / Widmoor area.

This being so we conclude that following changes are necessary to the modification proposed under and related to PMM65 to make the new Local Plan sound.

1. Reject the change to the Bourne End settlement boundary and resultant urban expansion included in the unapproved and therefore ultra vires Policies Map 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.

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

Name or Organisation:

The Future of Our Village Forum – Bourne end

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 have reviewed the proposed modification PMM43 as detailed on page 88, which 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. We conclude that there is no basis for making this change, which has the effect of downgrading the protection that those heritage assets should be afforded. "Have special regard" has no meaning in the sense of protecting such assets as it puts no obligation on the developer who only has to basically consider the matter. In other words it is a toothless statement that would reduce restrictions on the development of this site that abuts a highly regarded heritage site. This is not in accord with the NPPF, which clearly puts a much greater emphasis on the protection of such 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...

Given the above, we conclude and request that, to make the new Local Plan sound, the proposed modification PMM43 should be rejected.

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



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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.