



Wycombe District Local Plan Examination August 2018

Action Point 1.2 and 1.3 – Response from WDC

Consultation on WDLP3a Revised Habitats Regulations Assessment report - July 2018

The Council published a revised HRA (WDLP3A) in advance of the July hearings and consulted Natural England as well as neighbouring authorities (South Oxfordshire DC, South Bucks DC and Royal Borough of Windsor and Maidenhead).

The background for the revised HRA can be found in the Council's Matter 1 Statement, responses to questions 8 and 9.

The inspector requested on day 1 of the hearings that the consultation be extended to Turley on behalf of SEGRO and City of London Corporation, who made previous representations on the HRA (WDLP3).

The Inspector also requested that, at the close of the consultation, the Council consider what, if any, changes need to be made as a result to the revised HRA (WDLP3A) or to the Plan (WDLP1) itself, and that these proposed changes are shared with her.

The deadline for comments on the revised HRA was close of play on Friday 3 August and the Council has received comments from:

- Natural England
- City of London Corporation
- Turley on behalf of SEGRO

The responses received are included at Appendix A of this document and at 1.3 (separate document); the Council proposed changes are at Appendix B of this document.

Appendix A – Responses to the consultation
Appendix B – Proposed changes

Appendix A

From: Aude Pantel
Sent: 23 July 2018 14:27
To: 'Turner, Marc (NE)'
Subject: RE: Consultation on the Wycombe Revised HRA report

Dear Marc

Thank you for your response.

I just wanted to make you aware that in between sending you the revised report and your response, the inspector has asked us to put the revised document on the website - which we did – and asked us to invite comments from City of London corporation and Turley on behalf of SEGRO who both submitted reps on the 2017 HRA. I gave them the same deadline of 3rd August.

Kind regards

Aude Pantel
Planning Policy Officer

Wycombe District Council, Queen Victoria Road, High Wycombe HP11 1BB
01494421538 aude.pantel@wycombe.gov.uk

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From: Turner, Marc (NE) [REDACTED]
Sent: 20 July 2018 11:54
To: Aude Pantel
Subject: RE: Consultation on the Wycombe Revised HRA report

Dear Aude,

Thanks for consulting us on this document. I have three very minor things to raise and that is it. It looks like a very thorough piece of work. All my comments relate to the HRA Document itself and not the appendices.

- I think it is important to Incorporate the words Appropriate Assessment in the title. You do complete one of these, so just to signpost it for the Inspector, I would add this to the title of the document
- 5.41 – the reference here is to an SPA not a SAC. Thames Basin Heaths is SPA, part of it is SAC, but under a different name.
- The numbering on page 149 needs looking at please

Kind Regards

Marc

Marc Turner – Senior Planning Adviser
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Natural England

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These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

From: Aude Pantel [<mailto:Aude.Pantel@wycombe.gov.uk>]

Sent: 13 July 2018 08:21

To: Turner, Marc (NE) [REDACTED]

Subject: Consultation on the Wycombe Revised HRA report

Importance: High

Dear Marc,

Wycombe District Council is consulting Natural England as the statutory Nature Conservation body in relation to its revised Habitats Regulations Assessment report.

We would welcome your comments by 3rd August 2018. You confirmed yesterday that this is an appropriate timescale.

Please note that the attached revised HRA shows the key track changes, and I have included some comments where I had already accepted the changes, or where I thought it would help with the understanding of the revised or new sections. I hope you find this useful. I will also email Appendix 4 (which you have seen already) and Appendix 5, which is the new AECOM report on in-combination effects. Do let me know if you have any question prior to submitting formal comments, if I can help clarify anything.

I will also send you a clean version of the whole report separately for convenience. I will share that version with SODC, RBWM and SBDC as well.

Kind regards

Aude Pantel
Planning Policy Officer

Wycombe District Council, Queen Victoria Road, High Wycombe HP11 1BB
01494421538 aude.pantel@wycombe.gov.uk

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Appendix B - Key changes to the HRA after consultation with Natural England and others

Who	What	Where	Why
Natural England	Refer to Appropriate Assessment in the title Propose to add “- including Appropriate Assessment”	In the title -	Because we have indeed done an Appropriate Assessment in this revised HRA
Natural England	Change: SPA not SAC	Para 5.41	To correct a factual error
Natural England	Para numbers need correcting	Page 149	To correct typo/ numbering
WDC in response to SEGRO	Add wording to clarify what is and is not the mitigation proposed for Hollands Farm. Propose to add: “To mitigate its impact, the Hollands Farm development should be required to provide improvements to the Country Park by way of S106 contribution.”	Page 151 at the end of para 7.41	To clarify that the mitigation proposed in the HRA relates to a contribution from Hollands Farm to the improvements to the existing Country Park and its access.
WDC	Para numbers need correcting	In the conclusion	To correct typo / numbering
WDC	Added “air pollution effects of the” before “plan alone or in combination” at now para 8.6.2	In the conclusion – for reader’s clarity	To clarify for the reader what this part of the conclusion relates to.
WDC	Amending wording in now para 8.13 to reflect the consultation that has taken place	last para re consultation with Natural England	To ensure the revised HRA includes the final view from Natural England
WDC	Append Natural England’s response	Appendix 6	As we have done for WDLP3.

Other changes:

- In the SA: the SA reports the conclusions of the September 2017 HRA – this should be changed to report the conclusions of the revised HRA in the final SA.
- In the Plan: references to the September 2017 HRA title need to be replaced with the 2018 revised HRA title as proposed to be amended.