

Buckinghamshire and Milton Keynes Natural Environment Partnership

The NEP wishes to make a written statement to note the following in relation to the matters, issues and questions raised by the Inspector of the Wycombe District Local Plan Examination.

NB This statement refers to a Statement of Common Ground between the NEP and Wycombe District Council, the substance of which was agreed on 28 June 2018. The Statement itself will be submitted formally by Wycombe District Council shortly.

Written Statement in relation to Matter 5, Natural, Built and Historic Environment

Matter 5

“Does the Plan provide a framework for the management of the Natural, Built and Historic Environment that is soundly based, justified and consistent with the requirements of national policy?”

In respect of the Inspector’s questions covering Natural, Built and Historic Environment, the NEP wishes to highlight the Statement of Common Ground in relation to Policy CP10 and Policy DM34, and to summarise and cross refer to its previous submission in relation to other Policies, as follows:

Policy CP10

The NEP is now satisfied with the soundness and consistency of this Policy with the improved wording as agreed in the Statement of Common Ground between the NEP and Wycombe District Council. The substance of the statement was agreed between the two parties on 28 June 2018. The Statement itself will be submitted formally by Wycombe District Council shortly.

Policy DM34

The NEP and WDC have agreed a Statement of Common Ground since the Regulation 19 version of the Local Plan was submitted. We wish to emphasise the importance of changes to the Policy to reflect the form of words in that Statement to improve the soundness and consistency of the policy with national policy.

For other policies listed in the matters and issues document at Matter 5, we refer to our submission to the Regulation 19 version of the Wycombe District Local Plan ([WDLP19 0831](#)) and note in summary the following:

Policy DM30

The NEP supports the use of the suggested Chilterns Conservation Board model policy for Local Plans regarding the Chilterns AONB.

Policy DM35

The NEP considers that clarity to improve the soundness and effectiveness of the policy is needed regarding the meaning in Para 4 of “*where the scale of development in its context ...*”. Also – a clear explanation is required at Para 6.170 as to what is meant / required by “...*an assessment of the existing networks around and across the site*”. In the NEP’s view this should refer to a review of the green infrastructure (nature, extent, quality functions provided) that already exists on a development site / surrounding it, and a review of how to maximise the potential for that green infrastructure (GI) – through improvement, enhancement, better connections, etc. to help achieve the NEP’s Vision for GI; maximise the opportunities for GI to provide benefits and services to all; and to provide the services and benefits needed / in demand by the development (e.g. for amenity biodiversity, transport, access, etc.)

Policy DM38

At Para 6.163 the NEP would like to see added to the sentence after “SUDs which contribute to removing pollutants” the words “*and which are designed to maximise the opportunity to benefit biodiversity*” to improve internal consistency in the Local Plan in pursuing opportunities through development to achieve net biodiversity gain.

Policy DM39

Request to add to the Policy at Para 6 “The need to avoid building over or culverting watercourses and encourage the removal of existing culverts”.