

## **Examination Statement by the Chiltern Society**

This statement addresses Inspector's questions 1 c, d, f, l and q of Matter 7.

**Q1. Are the following allocations soundly based and is there evidence that the development of the sites is viable and deliverable?**

### **c) HW6 Gomm Valley and Ashwells**

1. By referring only to “minimising the effects” of severance on habitats, Point 3 a) i) of Policy HW6 does not adequately reflect the test set out in para 118 (old) / 175 (revised) NPPF about avoiding, mitigating, or, as a last resort, compensating for, harm to biodiversity. Although accompanying text 5.1.48 does at least hint at avoiding harm through examination of alternatives, and of mitigation / compensation, this should appear in the Policy itself.

Potential alternative wording for 3 a) i) might be:

“Wherever possible, avoiding harmful effects of severance and disturbance on existing habitats caused by access and development; where avoidance is not possible, providing adequate mitigation or compensation which provides a demonstrable gain in biodiversity”.

2. A “symptom” of the current approach is the inclusion in the illustrative layout plan Figure 12 of a road linking Parcels 1 and 2, cutting across an existing Local Wildlife Site. This element should not be taken forward without convincing evidence of its justification, and / or adequate mitigation / compensation measures, which the stronger policy wording would trigger.

3. Greater clarity needs to be provided about the status and weight of the indicative dwelling capacity given at 5.1.37, and about the relationship with the adopted development brief alluded to at 5.1.38, which also contains a capacity figure. It is our view that if the development requirements [strengthened as above] of Policy HW6, and the Development Framework Objectives of the Brief (and all other relevant Plan policies) are fully met, then the indicative capacity should not be treated either as a ceiling or as a minimum requirement.

In particular the density guidelines in the Development Brief for different parcels could be seen as too prescriptive, because they do not allow for innovative design, or a “non-traditional” mix of dwelling size, or similar factors, which could contribute to a high quality and policy-compliant development which delivered more (or fewer) dwellings.

#### **d) HW7 Terriers Farm and Terriers House**

Point 4 a) ii) of Policy HW7 is unsound and not consistent with national policy, because the “access onto the A404 opposite De Havilland Drive would involve the loss of trees from what evidence suggests is ancient woodland. This would be contrary to the provisions of NPPF paras 118 (old) / 175 (revised, with strengthened protection), due to the lack of evidence of need, evidence of benefits outweighing loss, or wholly exceptional circumstances [as appropriate].

At minimum, this sub-paragraph should be amended to make clear that any second access onto the A404 should avoid adverse impacts on ancient woodland or other features of biodiversity importance.

#### **f) HW9 Part of Greens Farm, Glynswood, Green Hill, High Wycombe**

The Policy wording is currently not consistent with the requirements of national AONB Policy as set out in the NPPF and CROW Act, which requires development to conserve and enhance the AONB, not just “limit its impact”.

Furthermore it should more explicitly highlight additional features of the site and its environs which will require protection to have any prospect of meeting the test, namely the hedgerow and associated vegetation alongside the footpath (not just the footpath itself).

At minimum, the Policy wording requires amendment to make it sound. Possible alternative wording might be:

“The site as shown on the Policies Map is allocated for residential development.

Development of the site is required to:

1. Provide a landscape-led positive approach to design and layout which will conserve and enhance the Area of Outstanding Natural Beauty, and not have an adverse impact on long distance views from Hughenden Park and Manor;
2. Provide access off Glynswood Road;
3. Retain the footpath which borders the site, including its boundary hedgerows, other vegetation and character;
4. Avoid any adverse impact on surface water flood risk.”

Potentially, the Allocation itself will be unsound if no scheme can be shown to meet these requirements.

#### **l) HW15 Land to the rear of Hughenden Road, High Wycombe**

For consistency with Policy DM15 (being carried forward from Delivery and Site Allocations Document, and thus forming part of this Local Plan), and to comply with Environment Agency best practice, an ecological buffer zone should be 10m. For this site, this should remain the requirement, unless clear evidence exists to show that only 8m is achievable – a blanket requirement of only 8m is not appropriate or sound.

Accordingly Point 3 of Policy HW15 should be amended to read:

“Be set back 10 metres from the Hughenden Stream to enable its ecological enhancement for biodiversity purposes, unless there is clear evidence that this is unachievable within the constraints of the development site; in any event, to be set back no less than 8m”, or similar.

#### **q) HW21 Land at Queensway, Hazlemere**

The AONB status of this site needs to be reflected in the Policy wording, which currently omits any reference to it, and is thus potentially unsound.

This might be done by expanding Point 4 of the Policy to read: “Contribute to the enhancement of features within the site and surrounding area by retaining the openness of the Green Belt, and by conserving and enhancing the natural beauty of the AONB”