

Statement of Consultation - Appendix 19

**Summary of Responses to Regulation 19
consultation October-December 2017**

Introduction

- 1.1 Wycombe District Council consulted on the Wycombe District Local Plan (Regulation 19) publication version between October and December 2017.
- 1.2 Work on the Wycombe District Local Plan began in 2012. The new Wycombe District Local Plan sets out strategic policies and allocates sites to meet local needs for housing, employment, and infrastructure, and addresses a range of other issues.
- 1.3 The Wycombe District Local Plan will replace the remaining saved policies in our current Local Plan (adopted in 2004) as well as our Core Strategy (adopted in 2008).
- 1.4 Following adoption, the Wycombe District Local Plan will form the development plan for the Wycombe District alongside the Delivery and Site Allocations Plan which was adopted in July 2013, and “made” Neighbourhood Plans which set out specific policies for their local areas¹.
- 1.5 This document sets out a summary of issues raised in respect of the Wycombe District Local Plan (Regulation 19) publication version. It does not set out to present a complete account of every comment made, instead presenting an account of the key issues and points raised on a policy-by-policy basis. Sections are also included for the Duty to Cooperate, the Sustainability Appraisal, and the overall process.

¹ At the time of writing, there are “made” Neighbourhood Plans for Bledlow-cum-Saunderton parish and Longwick-cum-Ilmer parish. Neighbourhood Plans are also under preparation, at various stages of completion, for Daws Hill neighbourhood area, Great and Little Kimble-cum-Marsh parish, and Wooburn and Bourne End parish.

Foreword, Executive Summary, and Chapter 1 – Introduction and Context

Very few comments were received in respect of these opening sections. The few comments that were received related to issues which have their own policies or sections elsewhere in the Local Plan document, and accordingly these comments have been incorporated into the summaries of those policies on a best-fit basis.

Chapter 2 – The Big Challenge

- **Historic England** considered that paragraph 2.1 should include a reference to the conservation and enhancement of the historic environment, both to conform with paragraphs 7 and 9 of the NPPF and also as part of a positive strategy for conserving and enjoying the historic environment as required by paragraphs 126 and 157 of the NPPF.
- Some representors questioned whether the Local Plan balances the rural economy with the need to preserve the Area of Outstanding Natural Beauty (AONB) and Green Belt (GB), suggesting there is no evidence that this has been a consideration.

Chapter 3 – Our Vision and Strategic Objectives

- Support was expressed for the vision for the District set out in the Local Plan.
- Some representors suggested that although WDC have met the requirements of being “legally compliant”, in practice this has not been appropriate, rigorous or objective.
- Others suggested that even though WDC states that the Plan delivers its vision and objectives does not mean that it does. It should set out what positive steps the local planning authority and public sector stakeholders will be expected to take to assist private developers to deliver sustainable development.
- Some representors suggested that the strategic objectives of the Plan do not reflect the positive approach to development the NPPF is based on.
- Some developers suggested that there is a clear implication in this part of the Plan that it is based on the assumed primacy of constraints in determining the approach to development across Wycombe District (a “constraints-led” approach). This approach is clearly also evident in other key policies and is fundamentally at odds with government policy.
- Some respondents felt that they are generally supportive of the overall approach but felt that reference needs to be made to the Draft London Plan and the increased pressure that unmet needs from London could have on the District.
- The **Chilterns Conservation Board** questioned the statement that “The Plan delivers the vision and objectives”. In their view, the number one strategic objective of ‘Cherish the Chilterns’ is not delivered by the plan, so the plan is not effective. The plan should be modified by:
 - 1) Deleting proposals for major development in the AONB and
 - 2) Identifying as an infrastructure delivery theme funding for enhancing the natural beauty of the Chilterns and people’s access to it.

- **Historic England** gave their support in principle to Strategic Objectives 1 and 2, the latter as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. However they also pointed out that the National Planning Policy Framework explains that the conservation of cultural heritage (as well as wildlife) is an important consideration in AONBs, and raised issue that there is no mention of cultural heritage (which includes the historic environment) in paragraph 3.7. Also, as not all heritage assets are built and the National Planning Policy Framework refers to the historic environment (distinguishing it from the built environment in paragraph 7) and even defines it, Historic England would prefer Objective 2 be redrafted to read "...the built, historic and natural environment..."
- The **Natural Environment Partnership (NEP)** requested that specific reference is made in the Plan's overall strategic objectives and principles to the NEP's "Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes", stating that the Plan supports and ensures these are recognised and adhered to. They set out specific alterations to the objectives to achieve this end.
- **Aylesbury Vale District Council** suggested that the policies considered to be the "strategic" policies should be made clear, as these are the policies which neighbourhood plans should reflect as required by paragraph 184 of the NPPF.
- Some residents provided a historical perspective on the devolution of power from Central to Local Government, and uses this to suggest that WDC has overstepped its powers by setting out the approach that it has.
- Some residents suggested that the key objectives of the Local Plan are not consistent or compliant with the National Planning Policy Framework (NPPF). Their submission is that the programmes and policies within the Plan are not robust enough to deliver all the key objectives, and they believe that some are based on inadequate information and analysis. They conclude that as a result, the Plan is not deliverable in its current form.

- Some residents felt that the vision in the Local Plan is a long way from what was discussed in the early stages of Plan preparation, and consequently shows ignorance of community vision work.
- Residents also raised some specific issue with some of the individual strategic objectives:
 - That the only strategic objective met in the plan is the one relating to the delivery of housing.
 - That to meet the objective “Cherish the Chilterns” WDC should have reduced their Objectively Assessed Needs (OAN), as other Local Authorities have done.
 - Related, that given the AONB and GB constraints, WDC should have pushed back against the OAN, and that there is a lack of evidence that the OAN has been challenged.
 - That infrastructure proposals for certain sites are inadequate and therefore fails to achieve Objective 5 in the Plan. Consequently residents will be dependent on private cars to access facilities, which does not comply with the principles of sustainable development.
- Some residents suggested there is no need to foster rural business centres, and that this should be removed and economic growth limited to the towns, where it is more appropriate.
- Some residents supported the Plan as it is. Others generally agree with the 8 strategic objectives, and particularly with:
 - Strengthen the sense of place – Maintaining place identity. Agreement with using the Green Belt to keep main settlements separate.
 - Improving strategic connectivity was seen as vital.
 - Providing limited development in larger villages, was seen as a positive as it will contribute to their increased sustainability.

Chapter 4 – The Strategy – Summary of Main Issues

CP1 – Sustainable Development

- Some respondents believed that this policy is a statement of intent that relies entirely on other policies in the Plan, and is therefore unnecessary.
- Some residents believed that the plan as proposed will not deliver sustainable development, while others believed it specifically does not represent sustainable development for Princes Risborough.
- It was also put forward that the policies within the Delivery and Site Allocations Plan should not be carried forward with the Local Plan, as they have not been subject to examination in public.
- The **Chilterns Conservation Board** questioned the statement that the plan delivers its vision and objectives as in their view, the objective “Cherish the Chilterns” is not delivered. They recommended that the policy should be modified by:
 - Deleting proposals for major development in the AONB; and
 - Identifying as an infrastructure delivery theme funding for enhancing the natural beauty of the Chilterns and people’s access to it.
- The **Buckinghamshire and Milton Keynes Natural Environment Partnership (NEP)** do not believe the plan achieves its vision because policies CP10 and DM34 do not follow their principles. The NEP requests that specific reference is made to their visions and principles document, believing that the Plan’s support and recognition of these points is essential for the achievement of sustainable development across Buckinghamshire.
- One developer disputed point 1 of this policy, mainly in relation to housing delivery, noting it depends on developers and other stakeholders to deliver sustainable development. They felt that the Plan should set out a framework for

sustainable development, including identifying where WDC and other public sector stakeholders will provide assistance. They proposed that this point should be deleted.

- The same developer also objected to point 2 of this policy, on the grounds that inserting a qualification to national policy and referencing the objectives and policy of the Delivery and Site Allocations Plan (prepared before the introduction of the NPPF) makes the policy “totally inconsistent” with national policy. Objection is raised to the assumed primacy of constraints in determining the approach to development, on the grounds it is “fundamentally at odds with government policy”. They proposed that the policy text should be redrafted to reflect the approach toward delivering sustainable development in accordance with the approach set out in the NPPF.

Changes proposed by respondents

- Some respondents suggested that the policy should be deleted.
- One developer objected to the policy as worded, and put forward that the policy is replaced with the Planning Inspectorate’s model wording:
“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with policies in this Local Plan (and where relevant with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking account whether:
 - 1) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

- 2) Specific policies in that Framework indicate that development should be restricted.”

CP2 – Overall Spatial Strategy

Balance of the strategy

- Some representors indicated their support for the strategy.
- Some representors suggested the plan has been driven by constraints and therefore the strategy should be more positive.
- Some respondents believed that the strategy is not met by proposals in the plan.
- Some respondents felt that too much emphasis has been placed on housing numbers, and that there needs to clear benefits delivered beyond the meeting of needs.
- Some respondents believed that the strategy should refer to green infrastructure or place more focus on the natural environment.
- Residents believed that a cohesive, regional strategy is needed to accommodate growth over a wider area.
- Some residents believed that the strategy should include measures to control immigration / inward migration, and include controls on second home ownership and buy-to-let.
- One response stated that point 1(a) of the policy imports a test as to sustainability without qualifying what it means, thus enabling the Council to refuse development even in the context of a housing shortfall.
- Some responses suggested that the flooding sequential test should have been applied earlier in the process, including through the Duty to Cooperate, and not after agreement was reached on housing numbers across Bucks.
- One respondent felt that the plan would be redundant if a decision is made to take forward proposals to create unitary authorities within Buckinghamshire.

Objectively Assessed Needs (OAN) / numbers being met

- Respondents raised several issues relating to the OAN and the consequent implications for the soundness of the Plan, including:
 - That the plan does not meet the OAN for housing or employment needs.
 - Questioning if all available land has been identified to meet housing needs / as much of the OAN as possible. Some go further and assert that WDC have not exhausted all available options, and have relied too heavily on Aylesbury Vale DC to take unmet needs.
 - That the plan introduces elements which limit the potential for maximising allocated sites, thus impairing the meeting of needs.
 - That the plan should include some leeway should sites not be delivered as intended.
 - That the strategy should have been based on a lower OAN / WDC should have negotiated a reduced OAN with central government.
 - That WDC should take account of the national OAN when setting their strategy, and that relying on AVDC to take unmet needs is questionable in light of the national OAN.
 - That WDC have not considered the unmet needs of surrounding authorities (surrounding authorities do not make any assertion to this effect).

Green Belt and AONB

- Responses in respect of the Green Belt and AONB broadly fall into two categories, that these areas should be completely sacrosanct and exempted from any sort of consideration, or conversely that there has not been enough consideration in respect of using these areas.

Green Belt and AONB protection

- Several residents strongly felt that Green Belt and AONB land should not be built on.

- Some responses indicated their support for the protection of Green Belt and AONB incorporated into the strategy.
- Other responses took the position that any allocation in the AONB constitutes major development and so is inconsistent with this policy's goals.
- Some believed that the strategy does not go far enough to protect areas where development should be restricted.

Promoting greater use of the Green Belt and AONB

- Some felt it improper to emphasise the protection of the AONB and Green Belt when WDC are unable to fully meet their OAN, and that as a result the strategy should be more positive and not exclude major development or be so restrictive on the assessment of Green Belt purposes.
- Some challenged the thoroughness of the Green belt review, on the grounds that more could be done to meet the District's needs, such as releasing more Green Belt land close to sustainable settlements.
- Some supported the changes to the Green Belt boundaries proposed in the Plan.
- Some suggested that there are exceptional circumstances that would allow major development in the AONB to meet housing needs, or that an incorrect interpretation has been applied to the NPPF on the subject of major development in the AONB.
- Some responses stated that the AONB policy needs to be made consistent with what is set out in the NPPF.
- A point was raised that the sustainability appraisal does not consider reasonable alternatives in terms of sites that are weak in Green Belt purposes in the AONB.
- Some pointed out a perceived inconsistent approach between the Green Belt, AONB and HELAA methodologies.

Where development goes

- Many residents were of a view that brownfield land should be used in the first instance, and greenfield sites should only be considered when this is exhausted.
- Related to that point, some residents suggested that the potential of brownfield sites has not been adequately assessed.
- Some residents suggested that more effort should be made to locate development and housing growth near employment areas, including releasing Green Belt or AONB land for development.
- Some responses expressed that there is limited evidence to support the delivery of employment allocations in terms of land or locations.
- Some responses raised issue with the fact that in their eyes the Plan does not direct most employment to the four main settlements.
- Some residents felt that development should be concentrated around transport hubs.
- Some respondents suggested that instead of focusing 85% of development on the District's four main settlements, the strategy should allow for the growth of all settlements proportionate to their size.
- Some developers suggested that the 85% / 15% percentage split should not prevent additional sites from coming forward.
- Some residents suggested as an alternative to directing 85% of development to the towns, a new settlement could be considered in the broad direction of Thame.
- One resident put forward that the District's built up areas should expand vertically, rather than horizontally.
- Some respondents suggested that the capacity and sensitivity of the historic environment should also be a consideration in the suitability of settlements for growth.

- One resident suggested that The National Trust and Gentry should do their fair share and release some land for development.
- Some residents suggested that other towns within Buckinghamshire could better accommodate growth, for example, Milton Keynes.
- Some responses challenged the deliverability of AVDC housing in VALP, particularly at Aylesbury Town, citing market saturation and infrastructure issues.
- Some felt that the evidence did not robustly demonstrate that employment needs can be met in AVDC.
- Some responses suggested that the process for the selection and rejection of reasonable alternatives for both housing and employment sites was flawed and not in accordance with the PPG guidance.
- Some felt that reasonable options have been excluded from further consideration too early in the decision-making process, and that as a result WDC has not been in a position to weigh in the balance the environmental, social and economic impacts of all the reasonable options.
- Some were concerned that the SA has been used only once sites have been through the Green Belt, HELAA and AONB assessments.
- Some respondents felt that it was essential that the SA include a detailed assessment of 'major' sites within the AONB at a site-by-site level. Failure to do so in their eyes implied that the AONB has been afforded additional protection that is not advocated by the NPPF. Such an approach has unnecessarily forced WDC to appraise moderately and strongly performing green belt sites (within Option D and E of the SA), despite weaker performing sites in green belt terms being available within the AONB (such as land at Penn Road, Hazlemere).
- Some felt that it is unclear for some SA indicators how WDC have reached their conclusions given the clear lack of evidence underpinning the conclusions made e.g. Landscape & Countryside, Biodiversity & Geodiversity, and Heritage.

Area specific

- Some respondents felt that High Wycombe lacks the infrastructure to accommodate the growth proposed.
- Residents felt that Bourne End and Wooburn should not be considered as a settlement belonging within tier 2, which together with Tier 1, takes 85% of the district's housing development.
- A high level of concern was expressed over the level of development being directed to Princes Risborough. Some of this concern was related to the lack of strategic road improvements to support the growth.
- Representations from Marlow supported the strategy and its affirmation of protection for land in the Green Belt and AONB.

Changes proposed by respondents

- Several changes were suggested to the text of the policy:
 - Delete section a) and other references to Green Belt and AONB
 - Remove percentages from 2b) and 2c)
 - Add “including green infrastructure” into para 2.
 - Add a reference to development proposals and delete “allocating sites” in part a i)
 - Add a reference to the prioritisation of brownfield sites.
- Some responses advocated a shift in the focus of the policy to focus development on larger settlements, and development in rural areas to be related to social and economic wellbeing.
- One developer suggested that WDC should allocate the Westhorpe Park site for development as an employment site.
- Some responses stated that WDC should publish their brownfield register.

- One response believed that the policy is not capable of modification, on the grounds that there were inconsistencies and inadequacies in the evidence base (suggesting that the Green Belt and AONB assessments; HELAA; and SA are all flawed) which need to be addressed and then CP2/3/4 reconsidered.

CP3 – Settlement Strategy

General

- The approach to different settlements was supported.
- Some respondents believed that the strategy should include targets for housing delivery for all settlements within the hierarchy.
- Residents felt that it is not sustainable to direct 85% of the district's development to four main areas.
- Some respondents felt that setting out six tiers in the settlement hierarchy is unnecessarily complicated, and that the settlement hierarchy should be rewritten with four categories instead of six, combining tiers 3 and 4, and 5 and 6.
- Respondents felt that the policy is not positively prepared and not justified as it is not based on a strategy which seeks to meet the objectively assessed needs.
- Some developers and other respondents felt that the AONB has been given an undue level of consideration.
- Some respondents believed that the strategy presented is not the most appropriate strategy, when considered against reasonable alternatives.
- Patterns of development which facilitate the use of sustainable modes of travel should form the basis of the settlement strategy.
- Some responses felt that there needs to be a more robust consideration of where growth may be accommodated throughout all settlements in the district.
- Some developers believe that determining the sustainability of settlements should not be a ring-fenced process, with consideration given to geographical

locations. For example, Longwick should be considered in respect of its proximity to Princes Risborough, or Marlow Bottom in respect of Marlow.

- Some developers felt that limiting development to established settlement boundaries is unsound as it makes no account of the potential need for expansion onto adjoining land should all infill opportunities be exhausted. This should be possible for those service villages located beyond the Green Belt.
- Some developers felt that more consideration should be given to major developed sites in the AONB.
- The policy is based on flawed evidence, primarily the Green Belt Part 2 Assessment, AONB assessment, HELAA, and sustainability assessment. Approach taken to the AONB and Green Belt is incorrect and prevented sites from having proper consideration within the HELAA. There is no explanation of what the exceptional circumstances for Green Belt revisions are.
- Some respondents felt that this policy is unsound as it is based on a misinterpretation of Green Belt policy and an inadequate evidence base.

High Wycombe urban area

- Support for High Wycombe being the primary focus for development.
- Observation that while parts of the High Wycombe are an urban area, others are distinctly rural with minimal development. More clarity required on where it is acceptable for development to take place within the urban area.
- Some respondents believe that further development opportunities within this area should be explored.
- Some developers argue that Wooburn Green can accommodate additional growth, and this should be subject to further consideration.
- Some residents felt that Tylers Green should not be identified as a part of the High Wycombe urban area but should be designated as a tier 3 or 4 settlement. Its inclusion as a part of tier 1 is contrary to the principle of policy HW6 regarding avoiding the coalescence of the two settlements.

- Tylers Green residents do not identify themselves as being a part of High Wycombe. The settlement hierarchy report suggests it is linked to Widmer End and Hazlemere, but by virtue of being a part of Chepping Wycombe parish it is more closely linked to Flackwell Heath and Loudwater.

Princes Risborough

- There was some support for Tier 2 designation
- There was a view that the number of homes within the Plan took no account of the option to reduce the level of housebuilding required because of local constraints. The level of local services, particularly employment, should militate against the level of growth that is proposed.

Marlow

- Residents supported development in Marlow being directed to previously developed land and employment being delivered through the regeneration of Globe Park.
- Residents felt that the proposals for Berwick Road and Balfour Place are contrary to this settlement strategy policy (please note, these two sites are not included as proposed allocations within the Local Plan, but are being promoted by a developer).
- Some respondents felt that the Local Plan should deliver more growth at sustainable locations such as Marlow.
- Some responses suggested that Marlow, as the second largest settlement and employment destination within the district, should be taking a greater level of development.

Bourne End and Wooburn

- General questioning and opposition for the designation of Bourne End and Wooburn as a tier 2 settlement and the justification offered in the settlement hierarchy study. Points raised on account of this include:

- The inhabitants of Bourne End and Wooburn see themselves as two separate villages. No consideration given to the individual identities of other communities.
 - Lack of infrastructure, facilities, and services.
 - Flackwell Heath is only designated as tier 3, despite being relatively larger and better connected.
 - Bourne End is considerably smaller than Marlow or Princes Risborough even when taken as a collective.
- Residents strongly felt that Bourne End should be categorised as a tier 3 settlement and the housing allocation reduced accordingly. The categorisation as tier 2 is felt to be misleading as the access to local services is heavily constrained.
 - Residents strongly asserted that aggregating Bourne End and Wooburn as one settlement ignores the wishes of local residents, the physical identity and community identity of the settlements.
 - Some observed that the tier 2 settlement boundary does not fit the parish boundaries.
 - Some residents raised concern that designating Bourne End and Wooburn as tier 2 would encourage more development in future which would strain infrastructure and services.
 - Some residents felt that the methodology for the settlement hierarchy is inconsistent with that used for the 2008 Core Strategy. Bourne End has fewer services and facilities compared to 2008, making the tier 2 designation even less justifiable.
 - Some residents raised an issue that the level of services does not meet all the tests set out for a tier 2 settlement.

- Residents felt that the consideration of Bourne End and Wooburn as a single settlement lacks evidence, and is contradicted by other work being carried out by WDC such as the Slate Meadow draft development brief.
- Some residents pointed out that Upper Bourne End is a community with its own identity, and should be recognised in the settlement hierarchy as a tier 5 or tier 6 settlement.
- Many residents consider the removal of Green Belt sites in Bourne End not justified.
- Developers support the identification of Bourne End as a tier 2 settlement. Suggests that Bourne End and Wooburn could accommodate more growth, such as on the land at Chapman Lane.

Tier 3 and 4 Service Villages

General

- Support for the principle of delivering some development in the higher order service villages.
- Some felt that more housing should be proposed for smaller settlements.
- Some felt that development should be encouraged within villages, with support for a mixed range of housing types.
- Some respondents felt that the distribution of development is unsound particularly in respect of the lower tier settlements as some of these settlements are more sustainable than others and could accommodate a limited level of housing.

Flackwell Heath

- Some representations put forward that Flackwell Heath should be designated as a tier 2 settlement or as a part of the High Wycombe tier 1 settlement, on the basis of its proximity to High Wycombe, good local facilities and transport links, as well as the availability of potential developable land not in the Green Belt, AONB, or flood plain.

Great and Little Kimble

- Support was received for the upgrading of Kimble to a tier 4 settlement.
- One response put forward that more explicit evidence to support the designation of Kimble as a tier 4 settlement is required. Paragraph 4.31 should be revised to reflect the true extent of the benefit that the area receives from transport services.
- One respondent observed that Kimble's upgrade is due to the transport assessment indicator rather than the employment indicator.

Naphill and Walters Ash

- Residents put forward that Naphill and Walter's Ash should be in Tier 5-6 rather than Tier 3-4, as the existing infrastructure and facilities are not conducive to supporting the proposed development in a sustainable manner.

Tier 5 and 6 Villages and Hamlets

- Some responses suggested that the Tier 5 and 6 settlements should be categorised as built up areas in order to maintain their sustainability.
- Some responses further expressed that some of the lower tier settlements are more sustainable than others and could accommodate a level of growth, therefore the manner in which development is distributed is unsound.
- Some responses suggested that more consideration should have been given to smaller parcels of land that do not meet Green Belt functions.
- Some felt that the policy is too restrictive for developments in rural locations, and should allow for more housing in villages.

Changes proposed by respondents

- Various responses put forward changes to the tier that settlements are designated as in the hierarchy, including:
 - Designate Flackwell Heath as a Tier 2 or as a part of the High Wycombe Tier 1 settlement.

- Designate Bourne End and Wooburn as individual tier 3 settlements. Reduce the level of growth allocated to the settlements accordingly.
- Designate Upper Bourne End as a tier 5 or a tier 6 settlement.
- Retain Hedsor as a tier 6 settlement.
- Designate Penn and Tylers Green as a tier 3 settlement, and reduce the allocated housing numbers accordingly.
- Designate Naphill and Walters Ash as a tier 5 or 6 settlement.
- A number of respondents wished for the 2004 Local Plan policy C16 to be retained in relation to Hawks Hill.
- A number of respondents wished for Bourne End to retain its district centre designation in line with Core Strategy policy CS7.
- Better use of existing infrastructure by allocating housing proportionate to its settlement existing size.
- Some responses suggested that the text of CP3 should include a demarcation to indicate that Princes Risborough is a more sustainable settlement than Bourne End and Wooburn, if the latter is not re-designated as tier 3.
- Some responses felt that Bourne End requires a plan to deliver more infrastructure, facilities, and GPs to justify the upgrade to tier 2. Others asserted that WDC should review the designation of Bourne End using a broader range of indicators and carry out the review in a greater depth than current settlement audits.
- Some respondents would like this policy to include a reference to green belt land being removed at Princes Risborough.
- One response suggested that the word “limited” should be deleted from tier 3, points b) and c).

- Respondents suggested that this policy should be expanded to include sites within current and future neighbourhood plans, and encourage rural parishes to undertake neighbourhood planning.
- One response to this policy suggested that we should include a standalone policy for the development of Park Mill Farm, Princes Risborough.
- Another response wanted growth to be allocated at Saunderton, specifically the former Molins factory.

CP4 – Delivering Homes

Housing Target

- A key theme in respect of this policy, and the housing numbers in general, was if WDC had correctly assessed what its “fair share” of housing growth was.
- Developers asserted that the housing target of 10,925 does not respond to the NPPF challenge of meeting the Objectively Assessed Need (OAN), the target should be a minimum not a ceiling.
- Several developers set out alternative OANs and argued their numbers are the correct ones for growth in the district.
- Respondents suggested that the housing target should be more flexible so that it can adapt to change. A target of 10,925 with a contingency supply of 2 is not flexible – 10%-20% flexibility should be applied.
- Some respondents felt that if an allocation delivers less than the identified requirement then there are no reserve sites to be brought forward to meet that shortfall. Reserve sites should be identified.
- Developers suggested that the housing target will shortly be out of date due to new Government OAN methodology (792 dwellings per year).
- Some responses stressed an opinion that getting a plan in place should not be at the expense of meeting identified housing need.
- Some responses suggest that the housing trajectory shows delivery of approx. 300 dwellings per year, this is heading in the wrong direction
- Some responses questioned if Aylesbury could still take unmet housing need, as delivery rates in Aylesbury Vale are being challenged.
- Some respondents felt that the plan housing target will need to be reviewed on adoption.

- Respondents in the wider area suggest that WDC should be securing more growth within its own boundaries before seeking reliance on Aylesbury Vale District Council. Some suggest WDC has not exhausted all options.
- Some developers suggest that the reliance on the AVDC WDC MoU agreement on unmet housing need is questionable in light of the upcoming changes to OAN methodology.
- Some responses (but not neighbouring authorities) suggest that WDC have not considered the unmet needs of surrounding authorities.
- Some responses believed the green belt review does not take account development beyond the plan period unless it is brownfield windfall development. NPPF states boundaries should be capable of being endured beyond the plan period.
- **Wokingham Borough Council** would welcome further understanding of pressure regarding the meeting of the housing need as an HMA as well as impact on the East Berkshire HMA.

HEDNA

- Some responses considered that the Bucks HEDNA significantly underestimates the OAN. The HEDNA uses the Oxford Employment Forecast which is lower than Experian, resulting in planning for a smaller number of homes. There's no justification for this.
- Some responses suggested that there is no evidence for justifying the downward adjustments applied to the official household projection demographic starting point for Wycombe and the wider housing market area.
- Some responses suggested the HEDNA should make assumptions for London's unmet housing need (no official request to take on any needs have ever been received).
- Developers suggested that the market signals uplift should be 40% in line with Government methodology.

- Some responses suggested that there is little evidence that housing backlog has been taken into account for the HEDNA.
- Other responses stated that UPC should be removed from calculations, market signal uplift should be 10%.
- Some responses believed the HEDNA fails to robustly assess affordable housing within Wycombe and the HMA.
- Some responses felt that the HEDNA should use a 5 year migration trend rather than 10 years.
- Some responses suggest that adjustments should be made to household formation rates for 25-34 year olds based on 50% return to 2008 household formation rates.

Housing Distribution

- Some responses believed that a single Housing Market Area (HMA) for the whole of Bucks is fundamentally flawed.
- Some responses suggested that the HMA/FEMA justification and issues have not been fully explained in the evidence.
- Some respondents raise concerns regarding the HELAA, as they thought it had pessimistic assumptions about the housing land supply and underestimated housing delivery rate, and is based on out of date data from 2016.
- Some responses suggest that the density of greenfield sites should be increased, while others suggested there should be higher densities for town centre sites.
- Residents from the wider area felt WDC has not fully complied with the MoU between Bucks, as it has not adequately responded to the GL Hearn Report Critiquing its assessment of availability of land.
- Some residents felt that there are sufficient brownfield sites available around the District and that these should be used in place of green field / Green Belt sites.

- Some residents felt that a greater number of smaller sites should have been identified.
- Some responses suggested that growth should be spread proportionately to the different settlements in the District, or generally that more growth should be allocated at villages.
- A number of residents were against the removal of Green Belt sites and the delivery of potential 1139 dwellings on land removed from Green Belt. There are more site opportunities towards the north of the district outside the Green Belt and AONB.
- Many residents felt that the constraints of the AONB and Green Belt had not been taken into account, and that the OAN should be reduced to account for the constraints.
- Some responses raised concerns that sites have been inconsistently assessed depending on whether they are non-Green Belt and/or AONB or within the AONB and/or Green Belt.
- Some residents felt that the allocation of sites with restrictive covenants are not legally compliant.
- Several alternative sites have been promoted for development (see Alternative Sites section for further detail)

High Wycombe

- A number of responses felt that a greater amount of development should be allocated at Wycombe, either on Greenfield releases or focused on brownfield areas in need of regeneration.
- Some responses felt that WDC should focus on the use of commercial land and improvements on the existing poor quality residential areas as alternative proposals for residential development in High Wycombe.

Princes Risborough

- A great number of residents believed that the scale of development is not sustainable, and that it has been driven by the need to meet government targets instead of the future needs of the existing town.
- Some responses raised concerns that the expansion may not be delivered given reliance upon main expansion area to the west, there is no contingency supply.
- Some believe that the delivery of 2,050 homes by 2033 is over optimistic, as the market will not deliver 2,050 homes in the location of Princes Risborough, there's not enough demand.
- Some responses suggest that there has been a lack of reasonable alternative options for the Expansion Area.
- Both **South Oxfordshire District Council** and **Oxford County Council** raised concerns over potential cross border impacts for transport.
- A number of responses suggested reducing the housing allocation at Princes Risborough to 500-1000 homes, or capping the level of growth to 20% of the existing town.

Marlow

- Residents within Marlow believed that the correct level of housing has been identified at Marlow given environmental constraints.
- Residents in the wider area and developers believed that more housing should be allocated for Marlow.

Bourne End and Wooburn

- Many residents believed that the housing target is excessively large and disproportionate to the size of the village. They felt that the area is unsuitable for 800 homes, which increases the village by almost 40%.

- Residents noted that while less than 1% of the Green Belt land is to be released from Green Belt status, 42% of the land that will be released Green Belt land is within Bourne End.
- Residents suggested that the 800 homes allocation be deleted, and the focus placed on developing on brownfield sites instead.
- Residents felt that Bourne End and Wooburn should not be compared to Marlow and Princes Risborough.
- Residents also felt that Bourne End and Wooburn should not be treated as a homogenous area, as they are separate communities, separated by Slate Meadow.
- One response suggested that policy CP4 is not legally compliant, as the Sustainability Appraisal that supports the Plan failed to consider reasonable alternatives to distribution of some 800 homes to 'Bourne End and Wooburn' and, crucially, the linked release of Green Belt at Bourne End, in breach of Regulation 12(2)(b) of the SEA Regulations.

Longwick

- Some responses felt that the strategy for delivery 300 homes should be identified in Longwick Neighbourhood Plan.
- Some developers felt that nearly all of the 300 homes have planning permission, and more growth can be accommodated here as it is one of the least constrained settlements within the district. Public transport is due to improve as a result of the Risborough Expansion area, therefore Longwick should accommodate at least 300 homes – it should be a minimum not a target.

Lane End

- Residents felt that too much development is allocated in Lane End.
- Residents were concerned by a lack of affordable or social housing proposed in the area.

Rural Areas

- Some responses felt that delivery mechanism for rural areas (Tiers 3 – 6) are limited. Neighbourhood Plans / local communities cannot be relied upon to delivery this growth.
- Some residents felt that the 160 dwellings proposed for the area of Great and Little Kimble are excessive in the context of the local area, and should be reduced to a more manageable figure with less impact on the environment and the community.
- Some responses suggested that a specific number for neighbourhood plans should not be identified, it should be part of the rural areas housing target.
- Some residents felt that the proposed scale of development in Naphill is not appropriate for the area.
- Some responses questioned why no development was proposed in Flackwell Heath.
- Some responses suggested that more development could be placed in rural areas.
- Concern was raised that 940 homes could materially harm the AONB through incremental change.
- Residents suggested that the spatial strategy should follow a more dispersed pattern to allow for development in lower Tiers, including Tier 5 and 6 Settlements which could provide for a significant number of small sites.
- Several alternative site options were put forward (see alternative sites section).

Types of Housing

Affordable Housing

- Residents felt that more / a higher level of affordable housing should be provided, as the need is so severe that it results in the maximum uplift proposed by the Government methodology.

- Some respondents felt that the significant increase in affordable housing between the 2016 HEDNA and 2017 HEDNA have not properly been considered.

Accommodation for older people

- Some responses expressed that there is a need for more retirement homes in Princes Risborough rather than affordable homes due to age demographic.
- Some responses suggested the policy fails to provide an approach for dealing with the need for older people accommodation other than providing more housing.

Housing Mix

- Some respondents want to encourage mixed housing type and style with high quality design. Development should focus on smaller housing type such as 2-bed to 3-bed terraces rather than 4 to 5-bed dwellings.

Delivery

- Some respondents felt that windfall assumptions have been underestimated – consistent supply of large sites which are not included, residential gardens provide a robust supply of housing, a pessimistic approach is taken for office to residential permitted development rights.
- Some responses suggested that a figure of 1,000 dwellings from windfall would be more accurate.
- Some responses suggested that greater clarification for how windfall is calculated should be provided.

CP5 – Delivering Land for Business

Economic Vision and Strategy

- Respondents felt that this policy fails to set out a clear economic vision and strategy for the area, which positively and proactively encourages economic growth, and meeting the objectively assessed needs of the District.

- Respondents acknowledged that the trend in employment in High Wycombe has been negative for several years, and that WDC assume that the way to reverse this trend is to provide more and better office space. They put forward that a more radical and imaginative plan for the broader Frogmoor, Church Street, Chilterns Centre area needs to be proposed, emphasizing residential use over office and retail.
- Respondents supported a precautionary approach being taken to allocating employment land in the District.
- Respondents supported some of Wycombe's unmet employment needs being met in Aylesbury Vale where it is reasonable and sustainable to do so.
- Some respondents felt that WDC should encourage greater employment growth for the District through increased delivery of housing growth. They felt there should be recognition of the importance of housing development in relation to the creation of jobs in the construction industry and the wider economic benefits this brings.

Failure to meet the identified employment OAN of the District

- Some respondents felt that this policy does not provide for suitable and sufficient amounts of employment land.
- One respondent suggested that there is no quantified target for employment delivery or the type of employment uses proposed to meet identified needs. They suggested the policy should include specific reference to the delivery of B1c/B2 and B8 uses alongside the total quantum proposed over the plan period.
- One respondent felt that it is incorrect to assume that B2 and B8 occupier requirements are interchangeable (para. 4.57 LP) "broadly balance each other out". They felt this is a gross overgeneralisation and suggests that their needs can be treated homogenously. Logistics occupiers have heightened locational requirements, particularly with regards to the SRN.
- One resident noted that everything is implicitly prefixed with the term 'limited'. In reality, the provision adds up to not much.

- An observation was made that the evidence base to the Local Plan identifies a clear identified need for B1c, B2 and B8 floorspace, with a lack of certainty as to how this will be delivered through the proposed allocations.
- Respondents had concerns about the approach taken to assessing and planning for employment needs across the District, and the failure of WDC to robustly assess all reasonable alternatives in order to determine the most suitable sites for allocation, as well as the quantum of employment development that it can accommodate within its District boundaries.
- One respondent observed that the evidence base indicates the opposite position to the policy i.e. that there is not the demand for offices the Plan seeks to provide/secure.

Strategic and Local Employment Allocations

- One respondent observed that despite the policy referencing '*strategic employment areas*' none of the sites proposed for allocation will be attractive to the strategic employment market.
- Respondents noted that there is limited evidence to suggest that 21ha of employment land can be delivered through the sites identified for allocation.
- Respondent noted that the Local Plan no longer distinguishes between B class uses on employment sites allocating all sites as being Strategic Employment Sites where all B uses are considered to be appropriate.
- Respondents questioned the weight attached to the Bucks wide MoU in relation to employment land provisions – alleging that the Bucks authorities have not cooperated appropriately on strategic priorities with regard to employment needs and failed to ensure such priorities are properly coordinated and clearly reflected in individual local plans.

Locational points

High Wycombe

- Respondents felt that the houses should be built where the work is in High Wycombe and Aylesbury and/or close to the motorway network - commuter mileage MUST be as low as possible.
- Other respondents felt that the road infrastructure to the east of High Wycombe is not sufficient to support the proposed commercial development sites.
- One developer felt that there is sufficient land across the functional economic market area to accommodate the overall need, without requiring additional employment development at Abbey Barn South.
- One response suggested that the significant shortfall in the supply of sites available for office isn't a sufficient reason to allocate the Office Outlet site for mixed use.

Princes Risborough

- Some responses observed that Princes Risborough does not perform strongly on key commercial drivers for national and regional growth trends.
- Residents put forward that there is no significant industry to provide employment in the town, and that the employment potential that does exist is not being nurtured.
- Residents felt that most new residents would have to commute out of town to work.
- Some responses asserted that safeguarding employment land is essential.
- Some residents felt that as the plan has developed, it has led to existing businesses being threatened, and sites that were businesses less than ten years ago being replaced by housing, so the any economic development is likely to be very limited or result in a reduction.

- Residents felt that residential allocations should be more closely aligned with employment provision and the strategic road network, and this isn't the case in Princes Risborough.
- Residents felt that the small growth of jobs proposed for such a large scale development of dwellings creates a dormitory town resulting in no integration with the original town and no benefits for either community.
- Other residents pointed out that Princes Risborough has no realistic employment prospects because of the distance to M40, the roads not being of a suitable standard for HGVs, and height restrictions on railway bridges making deliveries difficult.
- Some responses felt that businesses were not consulted on the Plan.
- Other responses put forward that there is a need affordable business units in the town.

Marlow

- Some developers felt that the justifications for not building a greater number of new homes in Marlow, with its extensive employment opportunities, does not add up.
- Residents supported the fact that Westhorpe is not being allocated for employment purposes and is being kept in the Green Belt.

Bourne End

- Some responses felt that as no additional land for business has been allocated, residents will be commuters which they consider to be unsustainable.

Additional employment sites suggested:

- One developer put forward Westhorpe Park, expressing it is the most appropriate site within the District to meet regional employment needs because of the strategic road network, and could assist in the delivery of highway improvements. Wording for a suggested policy allocating the site for employment is put forward.

- Another site suggested was White Hill, Wooburn Moor, on the grounds it would either provide additional employment land within the District, and/or reduce the need for the allocation of employment land in a spatially remote adjoining Council area. In addition, it is considered that this site would also provide for a reserve site for future employment land should any of the sites allocated fail to materialise within the Plan period.

General points

- Some respondents felt that the policy needs to be worded more positively and define the terms used such as 'non-business development'.
- Some respondents felt the sequential test for employment sites has not been referenced.
- A view was expressed that WDC should be allowing existing C2 uses to develop in order to support existing businesses or enterprises. There was support for CP5's support for rural enterprises.

CP6 – Securing Vibrant and High Quality Town Centres

General

- The commitment to the enhancement of the town centres in the District and the improvement of the quality of the public realm was welcomed.
- Some felt that further sign-posting to the relevant section/paragraphs of the Delivery and Site Allocations Plan should be incorporated.

High Wycombe

- Representors felt that more emphasis is required in the policy on intensifying development in Wycombe Town Centre. The Town Centre Masterplan is too tightly drawn, and misses key opportunities such as at the Railway Station.

- Representors agreed it is important that the slack in High Wycombe town centre is taken up and there should be a town centre first approach to ensure this happens. A vibrant town centre is essential if people are to be attracted to use it.
- Some responses set out that the retail strategy is based on a poor assessment of the current situation and future trends, and is undeliverable, and therefore this part of the Plan is unlikely to succeed. Concern was raised about a lack of proper evidence-based analysis. A suggested alternative was that WDC should consider encouraging and facilitating the conversion and redevelopment of previously run-down areas as mixed use residential, retail, restaurant and leisure facilities. Areas of the town centre are massively underused and likely to remain so.

Princes Risborough

- Residents expressed the view that Princes Risborough is a small town with no possibilities or desire of major expansion in retailing, therefore little likelihood of job increases. They felt that an attractive and adequate town centre would be spoilt by attempts at expansion.
- Residents felt that there is not a diverse shopping offer in the town, with a number of empty shop units and a need for a new eatery. Generally, respondents felt that the retail within the town is inadequate for the size of the development proposed.

Bourne End

- Residents pointed out the contradiction between the wording of CP6 which defined Bourne end as a district centre with basic food and grocery facilities and a limited range of other shops and non-retail services, and the settlement hierarchy evidence which states that Bourne End has a wide retail offer.

CP7 – Delivering the Infrastructure to Support Growth

Main Issues

Many respondents commented on current infrastructure issues, and on the potential severe impacts of the proposed growth. The main objections raised against the plan proposals were in relation to the perceived inadequacy of infrastructure needs assessments, and ineffectiveness of proposed infrastructure provisions.

General

- Very strong concern was expressed that the current infrastructure provision is inadequate.
- Very strong concern was expressed that future development will exacerbate existing issues.
- It was felt that the correlation of homes, jobs, infrastructure, and interconnections has not been adequately developed by WDC.
- Residents felt the proposals are not fit for purpose.
- Funding and timely delivery were seen as key concerns by residents.
- Residents and other stakeholders felt that there is a profound lack of, and an urgent need for, joined up positive planning between the different key stakeholders (planning, transport, education, flood, health ...) including Bucks County Council and Highways England to maximise the effectiveness of strategic policies and supporting infrastructure.

Topics

Deliverability/ Viability

- Respondents felt that the plan is not NPPF compliant as it does not make clear *“for at least the first five years, what infrastructure is required, who is going to*

fund and provide it, and how it relates to the anticipated rate and phasing of development”.

- Residents raised concerns in relation to third party delivery.
- Developers raised detailed concerns in relation to the accuracy of viability assessments and its impact over sites deliverability.
- Some respondents highlighted that the Community Infrastructure Levy Charging Schedule may need reviewing in light of the plan, to ensure that the current charge will not place an undue burden on both allocated sites and windfall developments.

Transport / Strategic connectivity

- Many respondents raised concerns over the cumulative impacts of the proposals on the strategic road network such as the M40 or A404
- Many were also opposed to plan proposals due to adverse impacts on the A4010.
- Concerns were also raised in relation to cross borders impacts with Oxfordshire and Berkshire
- Many respondents raised objections to the planned growth based on cumulative impacts of the proposals on rail and road capacity in relation to commuting
- Concerns were raised over the lack of necessary improvements to transport infrastructure including timing and funding. Similar concerns were raised in relation to strategic rail proposals.
- Some respondents feared that serious disruption to infrastructure over the Plan period would arise from other projects would be such as Expressway, Heathrow expansion, HS2, East West rail.
- One developer questioned whether the policy for “improved north / south connectivity across Buckinghamshire” is achievable “without causing harm to the AONB” and consider the section part of this criterion unsound.

Transport / High Wycombe to Bourne End Railway line

- Concerns were raised by some respondents in relation to the scheme viability.
- Some respondents felt that better passengers or freight routes already existed or that alternative, cheaper and less disruptive routes should be investigated outside of built up areas.
- There was a strong opposition to the proposal due to potential impacts on residents, on public amenity, as well as biodiversity / wildlife
- Many respondents highlighted a potential conflict between existing policy DM2 and CP7
- One respondent objected on basis of The Human Rights Act 1998 - Protocol 1, Article 1 - Right to peaceful enjoyment of your property

Transport / Local issues

- A significant number of responses from the community highlighted local congestion issues
- Many respondents expressed concerns at the accuracy of the modelling.
- There were strong concerns in responses toward the cumulative impact of developments.
- Some responses assert that the transport modelling shows impacts of school traffic is severe, and that better integration of schools and safer roads plus cycleway/footpath around them could encourage more walking to schools.

Public Transport

- Concerns were raised by residents over insufficient rail and bus capacity to cope with the new developments.
- Residents felt that there was a need for significant investment in public transport, and criticised the accessibility of public transport.

Public Rights of Ways / Bridleways/ Cycling and Walking

- Residents felt that the Plan does not adequately address Public Rights of Way.

Parking

- Residents felt that the Plan will not deliver sufficient parking in town centres, and that the BCC guidance may not be adequate.

Education

- Residents considered that the adequacy of assessments for education, both primary and secondary schools was a key issue.
- Some respondents felt that schools performance needs to be addressed as well as increasing school places, otherwise pupils will continue to go to other schools in Bucks and Oxfordshire.
- Some respondents described the implementation strategy to achieve high quality education as virtually non-existent.
- Proposals for education provision were perceived as inadequate as they are not in walkable distance of new developments.
- Other respondents raised concerns about meeting the needs of adult and community learning.

Health

- Residents strongly felt that Healthcare in south Buckinghamshire is at breaking point already and extra population will add to NHS burden.
- Very strong concerns were raised with regards to the lack of a cogent plan to increase the capacity of GP and dental services, emergency services or capacity and resilience in local hospitals.
- Residents felt that the hospital site must be safeguarded, and expansion of the hospital site added as an option to the local plan.

- Residents raised the health impacts of increased traffic related noise and air pollution as an issue.

Sports and Community facilities

- **Sport England** consider that policy CP7 is vague and does not explain the key facilities that should be delivered, which is due to the lack of a robust and up-to-date strategy for sports and recreation underpinning the local plan.
- Some residents raised concerns that the plan makes no provision for new community halls or meeting places.

Natural and Historic Environment Infrastructure

- The **City of London Corporation** felt that the plan will not adequately deal with visitor pressure on Burnham Beeches, and requested funding towards management (see also CP10)
- Some respondents raised questions relating to specific funding / management for green infrastructure and flood prevention.

Utilities

- Concerns were raised over the capacity of utility networks to cope with added growth. Some network upgrades / reinforcements may be necessary.

Water resources

- Some respondents highlighted the need for a long term approach to water resources management.

Locational Issues

All areas were seen by respondents as unable to cope with growth due to infrastructure capacity or deficiencies. Further details on specific issues are highlighted below and against Chapter 5 in the plan.

High Wycombe area

- Concerns were raised in relation to the impact of Chiltern DC sites and whether CDC infrastructure can be upgraded (e.g. school and GP provision at Holmer Green) to deal with cumulative proposals.
- Residents asserted that it is essential that the Inspector insists that robust traffic studies are completed for HW8 and HW9, and that the results are used to make improvements to local roads to cope with the traffic increase.

Princes Risborough and north of District

Many residents supported the views of Risborough Area Residents Association.

- Many respondents said that the Relief Road:
 - Would not act as a bypass but as a service road.
 - Would not relieve the town centre traffic.
 - Would not in any case address the wider A4010 issues / not aid strategic transport connectivity of the town.
- Residents raised concerns over the deliverability of the relief road in relation to cost, Network Rail agreement, and AONB impacts.
- Many respondents felt that in order for the infrastructure to cope the level of housing would need to be reduced to 1,000 homes.
- Residents expressed a view that the proposed bypass would not create new employment or aid connectivity to employment zones.
- Some residents raised concerns in relation to the road impacts on the Kimble villages.
- Some responses highlighted local impacts on key junctions of the transport network, and at the station area.

- A significant number of respondents were concerned that the flood risk issues relating to groundwater emergence in the Princes Risborough / Monks Risborough / Longwick areas cannot be addressed by SuDS.
- There were concerns that the anticipated water treatment upgrades could not be predicted and that new homes would be adversely affected by the STW odour if located in the buffer, deemed insufficient.
- Respondents felt that the effects of development in Oxfordshire on services in PR have not been assessed.
- One consultant felt that the Plan should fully acknowledge the importance of planning for the works to Grove Lane, Kimble and the associated railway bridge in combination with the housing growth required by Policy RUR6.
- Respondents felt that because the Plan says discussions with BCC are at an 'early stage' regarding the Princes Risborough relief road, WDC has not delivered on its Duty to Co-operate.
- Some residents feel that WDC should include a condition that a significant proportion of the housing proposed at Princes Risborough will not be permitted until the rail infrastructure is upgraded and the relief road is entirely completed.
- A suggestion was put forward for the provision of a Risborough Town Halt at the long-time derelict site adjacent to the railway on Longwick Road, noting that the current station is too far away from the town centre.

Bourne End

Many respondents supported the comments made by Keep Bourne End Green (KBEG) campaign group.

- Many respondents demanded a consistent approach to infrastructure to that undertaken for Princes Risborough.
- Several responses provided detailed criticism of the traffic modelling.

- Respondents also criticised the plan for failing to identify sufficient mitigation measures/schemes at locations already known to experience capacity issues. As a result they questioned the plan's deliverability.
- There was a very strong view that the growth would create significant impacts on Cookham Bridge which is listed, has a weight limit, takes single file traffic and cannot be widened.
- There was strong opposition to building on floodplains considering past local events and the need to mitigate for climate change.
- Residents expressed doubts in respect of the adequacy of flood defence schemes.
- Respondents feared that the water supply and sewerage services are inadequate, and criticised Thames Water past levels of service.
- Many raised concerns in relation to open space deficiency. Respondents felt that the proposal of a country park in Little Marlow would have poor accessibility and does not address the green space deficiency identified by WDC in Bourne End. This would be exacerbated by the perceived loss of BE1 and BE2 for informal recreation.
- Some responses suggested that Hollands Farm BE2 should be removed as a housing allocation as it provides a highly value source of safe unpolluted recreational green belt in a deficiency area, as well as act as floodplain.

Rural areas

- Respondent's concerns in the rural areas focused on adverse impacts of proposals on local traffic and on facilities capacity.

Changes proposed by respondents

- The **Environment Agency** proposed the following changes:
 - After “biodiversity improvements” add “and provision for its long term management”.
 - In paragraph 4.83 of supporting text, amend the last sentence to read “Other policies in our Development Plan provide protection and enhancement of watercourses through the implementation of natural buffers/ corridors”
- One developer felt that the high level policy should be limited to a general strategic statement along the lines of first paragraph.
- Another developer felt that criterion 1c) should be amended by replacing “without causing” by “, whilst avoiding or minimising” before “harm”.
- One consultant suggested that at para 2 e) after “New road infrastructure and public transport to support growth at Princes Risborough” add “and at the Kimbles;”
- One developer put forward that specific reference should be made at point 1 b) to the proposed improvements at Westhorpe interchange given its reference in the economic development topic paper and given it is an integral part of the regeneration agenda for the Globe business park. In the event that WDC continues to allocate the Air Park as its key strategic employment site within the plan, then specific infrastructure commitments need to be made in the policy to demonstrate that accessibility of the site will be enhanced.
- **Chepping Wycombe Parish Council** suggested that the proposal for a school on Gomm Valley should be for a two form of entry Primary School. Include provision of sufficient GP, dentists etc. The spine road should be deleted.
- **Buckinghamshire County Council** found the policy sound but considered that the rights of way point could encompass their role in health improvements – propose amendments to the policy to strengthen the importance of PRoW in encouraging the use of sustainable mode of travel, the health impacts and part of the Green Infrastructure Network.

- Some responses pointed out that the reference to "high speed broadband" is incorrect as it will become outdated technology during the plan period, and the reference should instead be to "ultra-fast broadband" to ensure the Plan is future proofed.
- One response suggested that WDC commit to reviewing CIL on adoption of the Local Plan to ensure that the costs of onsite infrastructure provision are fully reflected in the Council's Charging Schedule.
- Some responses suggested that in order to provide additional road and rail capacity some or all the following are necessary: 1. Enhanced junction at Bisham (A404) - preferably a flyover. 2. Rail link from Bourne End to High Wycombe - a commitment not an aspiration. 3. New or replacement Road bridge across the River Thames at Cookham
- Some respondents felt that the policy should provide more details on infrastructure delivery including funding and phasing
- Some residents felt that bridleways should be part of the planned Public Rights of Way to maintain and improve the existing network to provide attractive and safe routes for recreational riding
- Some residents suggested that consideration be given to opening a light rail link to Thame along the old railway track.

CP8 – Protecting the Green Belt

- Many objections to CP8 arise from community opposition to a particular site that the plan proposes to remove from the Green Belt (for example, BE2, RUR7 etc.). The principal issues raised are:
 - The Plan has not set out sufficient evidence of exceptional circumstances for removing the site from the Green Belt;
 - The Plan has not adequately considered alternatives to the Green Belt sites;
 - The assessment work underpinning the selection of sites from the Green Belt is faulty;

- The Green Belt should not be altered under any circumstances.
- In Princes Risborough, it was pointed out that land in the major expansion area is assessed as strongly meeting Green Belt purposes (though not designated as Green Belt). It is therefore asserted that this land should be placed within the Green Belt and not proposed for development.
- Some developers felt that Green Belt designation should not serve as a precursor that prevents development being directed to the most sustainable locations in accordance with the NPPF. All sites subject to the GB assessment should also have been subject to SA in order to fully appraise the performance of each reasonable alternative with regards to its GB function and sustainability. Sites that may justify release from the Green Belt may not necessarily be the most sustainable option. GB not an SA criteria but a policy one. Using the GB Assessment as the means to select or reject sites is flawed as was shown in the interim Inspector's report for Birmingham (Para 40) which took a similar approach to WDC.
- Related to the previous point, developers put forward that the 5 additional spatial options considered in the SA don't consider releasing additional Green Belt sites without also considering increasing densities across all sites. It is therefore not possible to establish whether the negative impacts on landscape, historic environment, natural resources and transport seen in Option D are as a result of the increased densities in urban areas or release of Green Belt land.
- Furthermore, developers felt the options are presented as an all or nothing scenario, consequently the prospect of releasing Green Belt in only certain types of locations, such as Tier 1 and Tier 2 settlements has not been considered.

CP9 – Sense of Place

- There were not a great number of representations on this policy. A number of responses were supportive.

- Criticism of the policy mainly came from those who felt the Plan proposals did not live up to the aspirations of the policy principles, or would not be effectively monitored.
- Some specific recommendations came from **Sport England** (to refer to Active Design) and from the **Environment Agency** (to add specific wording to the supporting text). Another representation sought to include improvement of existing green spaces and Rights of Way.

CP10 Green Infrastructure and the Natural Environment

- Some respondents noted internal contradiction between its aims and site policies in the plan, in particular in relation to AONB sites or sites near Ancient Woodland.
- **Risborough Area Residents Association** supported AONB protection, but considered that the plan is failing to protect the AONB and its setting in respect of proposals at Princes Risborough. WDC should argue strongly that AONB constraints should reduce the overall OAN, whilst also looking at other development opportunities in the AONB in the south of the District.
- **Chiltern and South Bucks District Councils** considered that there will not be an unacceptable impact on Burnham Beeches as a result of proposals in the Local Plan, provided that the Local Plan and CIL arrangements secure the creation, improvement, and maintenance of Little Marlow Country Park as an alternative green space.
- **City of London Authority** suggested that the Habitats Regulations screening report does not fully take on board the issues coming out of the Wealden DC case regarding in combination effects of increase in numbers of vehicles and their impact on the air quality of Burnham Beeches SAC.

- **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)** welcomed the aspiration for a net gain in biodiversity through the delivery of the Local Plan, but felt that policy CP10 lacks the detail of how it is to be interpreted at application level which makes it effectively undeliverable. Noted that policy DM34 as drafted does not set out mechanisms to secure a net gain, although previous drafts did. The policy is unsound and the plan internally inconsistent as a result.
- **Historic England** requested that the contribution of Registered Historic Parks and Gardens toward Green Infrastructure be recognised as a part of the positive and clear strategy for the conservation, enjoyment, and enhancement of the historic environment.
- The **Buckinghamshire and Milton Keynes Natural Environment Partnership** supported the strategic policy notably in relation to biodiversity net gain but object on the grounds the policy is not effective, citing a need for district-level mapping showing how Wycombe will contribute to the NEP GI vision and principles. An adequate baseline assessment of existing GI (function, location, size, connectivity) needs to take place so that the maximum benefits from GI can be planned for and realised. CP10 needs to address the NEP requirements for biodiversity in local plan. The reference to net gain in biodiversity should be a clear requirement for all development, rather than a requirement for net gains “across the district as a whole over the plan period”. The requirement should be at the scale of individual development proposals not just across the District, to properly meet NPPF requirements. Policy text 3b): it is not strong enough to keep the GI network “under review”; it needs proactive, early, strategic planning; currently this does not adhere to the NEP’s 2016 GI vision and Principles document. There are also several areas of ambiguous wording/ unclear meaning, which threaten the effectiveness of CP10 (see rep for details). The NEP made detailed Changes proposed by respondents (see rep) to policy and supporting text.
- **Environment Agency** believed that point 4 needs to be clarified to set out that the Water Framework Directive is not just concerned with water quality, but is also a quantitative assessment of water bodies that considers ecology and

hydromorphological quality as well as chemical and physical-chemical water quality. This needs to be incorporated into the policy so as to not give a misleading picture of what the WFD is seeking to protect and improve. Changes proposed are:

- In point 3d) add “and blue” to read “Ensuring green and blue infrastructure is planned into new developments”.
- Proposed rewording for point 4: “Working in partnership with the Environment Agency, Natural England and the water companies to protect, manage and improve the water environment and ecology in the District, particularly the qualitative and quantitative status of water bodies which are currently failing to meet the Water Framework Directive (WFD) requirements as set out in the Thames River Basin Management Plan (RBMP).”
- One developer believed that the plan is unsound on the grounds it does not represent the most appropriate strategy and has concerns in respect of deliverability. The green infrastructure areas are considered to be arbitrary, as some land fulfilling green infrastructure functions is not included. They are keen to see that any development adjacent to Marlow Bottom ensures that there are no breaks introduced into the continuous swathe of GI network running to the west of the village.
- Another developer objected to the policy on the basis of the wording “protect” which is against NPPF language “conserve”; furthermore they felt that the policy fails to recognise that there can be exceptional circumstances which would allow major development.
- A third developer expressed the opinion that the policy is unsound; whilst they support the overall policy they object to part 2 of CP10 on biodiversity net gain on the basis that, whilst they understand the policy aspiration, they are concerned that the policy could be used to ensure a net increase on every site. They felt this is too restrictive and could serve to prevent otherwise sustainable development coming forward. They suggest to substitute the wording “Ensure there is a” in CP10 part (2) by “Encouraging a”.

CP11 – Historic Environment

- Developers felt that the policy as drafted is unsound, as it does not differentiate between the levels of significance of designated heritage assets or between designated and non-designated heritage assets.
- One response suggested that a specific site policy should be included for the reunification and restoration of Fawley Court and its registered park and garden.
- Issue was raised with the content of the draft Hedsor Road and Riversdale Conservation Area Appraisal. (These points were also raised as a part of the consultation on the Conservation Area Appraisal, and have been addressed during the process of finalising that document)
- Some support was expressed for the policy as drafted and the principle of conserving the historic environment.
- A number of responses indicated the policy was unsound due to the evidence base for heritage issues being lacking, the majority making specific reference to allocation BE2 Hollands Farm. Some responses pointed to the Conservation Area Appraisal to demonstrate allocation BE2 is contrary to the strategy set out by CP11.
- Another response made reference to site allocation BE1 Slate Meadow, and another gave their issues with CP11 as a lack of consideration given to heritage assets such as ancient trackways and Iron Age finds.
- Further consideration is suggested in respect of the impact of the Princes Risborough expansion on the setting of the Alscot conservation area.
- **Historic England** welcomed the policy as a strategic policy to deliver the conservation and enhancement of the historic environment. Historic England also welcomed the inclusion of items such as the Buckinghamshire Historic Towns Project as a part of the evidence base.

Changes proposed by respondents

- Respondents suggested the inclusion of a reference to “significance” when discussing “character and appearance” in clauses 1 and 2.
- Respondents suggested that the text at paragraph 4.115 be expanded in respect of how heritage contributes to the Wycombe district.
- Respondents suggested the wording of paragraph 4.116 be strengthened by indicating WDC will retain the significance and character of heritage assets equally across the district.
- Respondents sought clarity in respect of paragraph 4.118 and the setting of heritage assets.
- Respondents sought clarity in respect of the context of heritage at risk in policy CP11.
- Residents suggested that a review of the area around the Alscot conservation area needs to be carried out to provide evidence of how to retain the nature of the historic area, including a survey of The Black Hedge.
- One developer suggested the deletion of all references to non-designated heritage assets and the maintenance of a local list of assets of historical or archaeological merit, and the addition of a reference to paragraph 132 of the NPPF.
- One land interested suggested the addition of a policy to support the ongoing restoration and reunification of Fawley Court and its registered park and garden.

Many of those raising issue with this policy in respect of proposed allocation BE2 Hollands Farm proposed the removal of that allocation from the Plan.

CP12 – Climate Change

- Residents felt that the policy is unclear/not specific enough or is repeating matters covered by other legislation.

- It was felt that this policy was introducing further restrictions on development which are unnecessary or unspecified and inconsistent with NPPF
- It was suggested that the policy intent regarding mitigating urban heat island effect is not deliverable considering allocations in the plan
- The policy is not effective when considering the cumulative adverse effects of developing sites in the flood plain. With regard to BE1 and BE2 specifically and climate change, WDC has not provided evidence to justify removing these sites which soaks up water and harmlessly stores water at times of flooding.
- Residents felt the policy is not effective as the plan will result in increases in commuting due to unmatched homes / jobs areas. Concerns were expressed over adverse traffic impacts in relation to air pollution aggravation.
- The impact of future technological developments have not been adequately considered in the Plan. Both in terms of local service provision, transport impact and noise and pollution impact.
- Some residents felt that inadequate provision is made in the Plan for renewable energy.
- The **Natural Environment Partnership's** "standard response to local plans" expectations for mitigation and adaptation to climate change are not captured. The final policy removes previous reference to "detailed design policies and guidance" as a mechanism to promote mitigation and adaptation to climate change.
- One developer queried whether the need to take account of climate change allowances using information provided by the SFRA and through the sequential testing of sites is compliant with the NPPF. They object to the higher water efficiency standards requirement as they felt it is not sufficiently demonstrated by robust evidence.
- Another developer said, in respect of para 5, that there is no explanation of the concept of urban heat islands or how it relates to the evidence base, and suggest this part of the policy is expressed in terms of support for initiatives that

contribute toward the policy's goals. Para 4.128 in supporting text and policy DM34 refer to 25% tree cover in the context of CP12 which they felt is extremely onerous and would have a major effect on housing delivery, and is not supported by the evidence. Para 6's reference to requiring mitigation should be deleted.

- A third developer supported CP12, and specifically the reference to a development strategy that minimises the need to travel by allocating sites and generally directing development to locations with better services and facilities, or where these facilities are capable of being improved.
- Another developer believed that paragraph 5 should be deleted, as there is no evidence to justify the requirement, or assessing the contributing factors and impacts of heat islands. Paragraph 6 should also be deleted as there is no evidence for need, viability, or the deliverability of such standards.

Chapter 5 – site and area specific policies

High Wycombe area

General Points

- Residents objected to reopening the High Wycombe to Bourne End railway line due to health and safety issues relating to existing properties
- The **Environment Agency** suggested wording changes to High Wycombe principles.

High Wycombe Area Principles

- **Historic England** requested that reference is made to the importance of the historic environment
- One respondent suggested that paragraph 5.1.4 should state another key issue for the town is deculverting the River Wye to re-establish an open channel, particularly through the town centre.
- **Bucks County Council** support the principles for High Wycombe, however principles for improving public access could be strengthened to ensure access for all. See specific suggested wording for Changes proposed by respondents.

HW4 – Abbey Barn North

- The developer believes that the site can deliver 150 dwellings rather than 100 when taking into account challenging topography.
- Developers suggested that two elements of the scheme, the widening of the footbridge over the Back Stream and the improvements along the former railway line, should require financial contributions rather than delivery as both are in third party ownership (in the latter case, multiple ownerships are felt to be a barrier to achievability).

- Retention of mature woodland conflicts with highway improvement work. Road realignment will need to go through wooded area behind properties at Deangarden Rise. Wording should say 'minimise the harm' rather than 'retain mature woodland'.
- Some developers put forward alternative sites with fewer environmental constraints that they felt would be easier to deliver than this site.
- Residents were concerned that building on this site will intensify the road and traffic on Abbey Barn and London Road.
- Some residents suggested that financial contributions should be secured for creation of Heritage Centre and Doctors surgery in Ryemead. Others suggested that contributions should go toward primary education within the catchment area.
- Residents believed that the realignment of Abbey Barn Lane through the site will damage the ecological quality of the site.
- Some residents suggested that the site be used for a lower impact use, such as a cemetery.
- Residents felt that the footbridge in Bassetsbury Lane should only permit cycles and pedestrians. No cars should be permitted.
- Some residents were of the view that this land should not be removed from the Green Belt.
- Residents from the wider area felt that the proposed density of site is too low (8.8 dwellings per hectare), low density is not justified.
- Residents felt that scrubland should be developed on rather than chalk grassland.
- Responses pointed out that the site has a high risk of surface water flooding, particularly where there are 2 narrow paths, which were original watercourses. Responses advocated the exclusion of areas of high flood risk, and expressed confusion in respect of potential mitigation.

- **Bucks County Council** supported the recognition the site will contribute to wider London Road/A40 improvements but there is a risk that it will not qualify for delivering the additional school places as the threshold is 100 dwellings. Policy should ensure financial contributions are sought for school provision.
- Some respondents suggested that said financial contributions should be ring-fenced to schools within the catchment of the site and not go into a general pot.
- The **Education Skills Funding Agency** supported the safeguarding of land for school on the site.
- **Highways England** support the plan but expect to see an assessment of the potential impacts on the Strategic Road Network.
- **Scottish and Southern Electricity** suggest that upgrades and a new distribution substation will be needed to support development
- **Thames Water** also suggested new infrastructure will be needed to support development.
- **Natural England** noted that the site is ecologically rich, with deciduous woodland that merges into ancient woodland. Clearing of trees on the site will downgrade the ancient woodland through 'edge affect' impacts. Given the capacity of dwellings it is unlikely development will be able to provide sufficient mitigation for loss of biodiversity.
- Some agencies put forward that the site could be developed for new green space to support new housing allocations in High Wycombe.
- **Berkshire, Buckinghamshire and Oxford Wildlife Trust** (BBOWT) object to housing capacity increasing from 60-90 in the 2016 draft to 100 given the sensitivity of the site. Concerns that the ecologically sensitive parts of the site will not be retained as set out in the Botanical Survey, June 2009. Instead policy now only identifies 'substantial area' and no longer identifies enhancement of chalk grassland habitat, only to retain it. The loss of lowland calcareous grassland Habitat will be contrary to DM13. There is now no mention of a natural reserve or

proposal to manage recreational impacts on the chalk grassland. Changes to the wording of the policy are proposed.

- **Historic England** do not object to the site, confirmed no designated assets on or adjacent to this site.
- **Aylesbury Vale District Council** recognise that the reserve sites have a lot of restrictions and therefore less than half of the site areas are suitable for building, making the use of this land inefficient.

HW5 – Abbey Barn South and Wycombe Summit

- The developer provided a detailed critique of various parts of the policy. These included:
 - Policy should be flexible to allow for a number of mixed uses, recognising the contribution of jobs from various uses. Site is not suitable for small scale offices given the lack of critical mass and poor road connections. “comprising residential, business and associated community uses” should be deleted from HW5. Section 1c) should be deleted entirely.
 - In respect of HW5 2 c), neither WDC nor BCC can confirm the extent of the financial contribution and therefore flexibility should be added in in case the improvement works are delivered by others, are not required, or are not viable.
 - HW5 2 d) – reference to pedestrian / cyclists crossing on Abbey Barn Lane should be listed under other off-site highway improvements
 - HW5 e) – Deangarden Wood is in third party ownership, therefore it is more appropriate to provide financial contributions.
 - HW5 2 f) – there is no flexibility for provision of footpath/cycleway. Delivery may not be possible due to land ownership issues. It is suggested that the wording “which may include” should be added into the policy for flexibility. The proposed footpath/cycleway to Amersham and Wycombe College is not needed given the likely small number of users. Maintenance cost will be disproportionate to the use. 2 f) iii) and 2 g) should be deleted in its entirety.

- HW5 2 h) Contribution to the realignment of Abbey Barn Lane is unknown, therefore the policy should include the words 'and viability' to ensure that there is flexibility.
- HW5 3 a) The importance of retaining The Ride as public open space is recognised, although the south west corner of The Ride does not form part of The Ride itself and retaining it as a Green Space would be inconsistent with the Development Brief.
- HW5 3 c) The former baseball ground was last used in 2015. As such there is no current baseball ground on this site as this has already been relocated. HW5 3 c) should be deleted and replaced with the following "Provide suitable alternative sports provision through a financial contribution to off-site sports facilities".
- Landscape requirements are too onerous and restrictive.
- Indicative housing numbers from paragraph 5.1.28 should be removed so that the application can seek to maximise the number of houses on the site.
- Some developers put forward alternative sites with fewer environmental constraints that they felt would be easier to deliver than this site.
- Residents felt that no amount of offsite highway works will be able to solve the traffic problems and road use intensification on Abbey Barn Lane and London Road.
- Some residents expressed a view that any new bridleways or cycle paths through Keep Hill Wood should preserve the natural woodland appearance.
- Residents from the wider area felt that the proposed density is too low, with an average of 15 dwellings per hectare for the gross site area. The reserve sites have a lot of restrictions and therefore less than half of the site areas are suitable for building making the use of this land inefficient
- Some residents felt that the reserve sites should not be removed from the Green Belt, and that housing need should be met on brownfield sites only.

- **Highways England** expect to see an assessment of the potential impacts on the Strategic Road Network (SRN).
- **Sport England** put forward in respect of part 3(c) that replacement baseball facilities should be of at least equivalent quantity, quality and in a suitable location. The risk of ball strike should be considered if relocated next to residential properties
- **Historic England** note that there are no designated assets within the site but a group of grade II listed buildings at Abbey Barn to the west, and wish for the policy to make clear that there will be no development opposite the farm buildings to protect the rural setting of this farmstead.
- **Thames Water** noted that there may be a need for minor infrastructure upgrades to ensure sufficient treatment capacity is available to serve this development.
- **Scottish and Southern Electricity** noted that it is likely that some high voltage network reinforcement will be required.
- **Bucks County Council** supported the recognition for the site to contribute to wider London Road/A40 improvements and support the need for commensurate financial contribution, secured by planning obligation, to enable the expansion of the proposed school on the Pine Trees (former RAF Daws Hill) site.
- **Aylesbury Vale District Council** recognised that the woodland ride referred to at 3 a) of Policy HW5 limits the capacity of the Abbey Barn South to accommodate more development than the site is allocated for.

HW6 – Gomm Valley and Ashwells

- The developer believes that the site can accommodate a higher number of dwellings and that the indicative numbers should be worded as ‘minimum’.
- Developer supports 1.2 ha of employment use but seeks flexibility for this to be residential use if employment unviable.
- Developer felt that the policy is unnecessarily repetitive and prescriptive, impacting on the deliverability.

- Developer felt that the undeveloped gap being approximately 200 m is too prescriptive, and that this should be decided at application stage.
- Developer felt that the highway requirements, including an equestrian route through King’s Wood”, connecting “Cock Lane with A404 Amersham Road”, “off-site footpath and cycleway provision” and “improved pedestrian crossing facilities”, are unsubstantiated and not justified.
- Developer objected to the requirement to provide ‘significant’ net gains in biodiversity.
- Respondents felt that the policy should specify that the purpose of the link / spine road is not to address wider strategic issues in the transport network. Some went further and suggested that there should be no connection between the Spine Road and Cock Lane, or that the top of Cock Lane should remain single lane but improve cliff edges to make it safer.
- Residents felt that the section of the spine road should be shown as provisional, and that there should be a bus-only route between Hammersley Lane and the spine road.
- Respondents noted that there is no reference in Policy HW7 to the Terriers Farm development accommodating Gomm Valley’s sports pitches, thereby the primary school provision is not appropriately equalised in policy.
- Some developers put forward alternative sites with fewer environmental constraints that they felt would be easier to deliver than this site.
- Residents argued that Gomm Valley should remain as green space with public access, and that development should be located closer to High Wycombe town centre at higher density rather than building on Gomm Valley.
- Residents felt that development will result in further loss to identity between High Wycombe and Loudwater.
- On a related point, residents felt that the individual identity of Tylers Green should be recognised and that it shouldn’t be merged into greater High Wycombe.

- Residents felt that the 200 m gap between the development at Ashwells and that in the Gomm Valley is insufficient to prevent the settlements of Tylers Green and High Wycombe coalescing, and that it should be changed to 500 m.
- Residents felt that traffic issues which already exist on the A40 London Road at AM and PM peak times have not been recognised, and that the capacity improvements at the Gomm Road junction will not address traffic and infrastructure issues on London Road.
- Residents felt that development of Gomm Valley will destroy one of the last unspoilt chalk valleys in the district / undeveloped dry valley in the Chilterns, and that this landscape consideration outweighs the benefits of providing housing and will undermine the role of the Gomm Valley as a wildlife corridor, at odds with CP8.
- Some residents pointed out that the section of spine / link road at the south-eastern corner of the site (connecting Parcels 1 and 2) will cut across a designated Local Wildlife Site.
- Improvements should be made to the railway bridge over Cock Lane, given the existing level of traffic congestion and it being single carriageway.
- Residents in the wider area felt that the density of the development is too low and results in unmet needs been meet in Aylesbury Vale. Delivering housing locally should be optimised before looking elsewhere.
- Residents in the wider area felt that the requirements for green infrastructure, buffers for valuable habits and requirements for tree canopy cover, are luxuries and significantly limit the area of developable land for housing on allocated sites. The option for increasing housing densities should be considered further.
- Residents felt that a single form entry school is inefficient and does not deliver the best education. This should be a two form entry school as it is in the children's educational interests.
- Some residents also felt that the school taking pupils from the Terriers Farm development would introduce more traffic at peak times, while others raised

concerns about health and safety issues arising from construction vehicles while the site is being developed.

- Some residents felt that there must be a bus service through the site, with some respondents suggesting that as a part of the development there should be a contribution for the Carousel 336 bus service.
- Some residents felt that collectively there is too much development planned for the east side of Wycombe, and that the infrastructure will not cope.
- Residents felt that the spine road will result in additional traffic being drawn to the site and through Penn and Tyler's Green, and that no traffic calming measures have been identified for Cock Lane. The claim to have no significant increase is not practically possible. Conflicts with BCC view that "the Spine Road effectively provides an additional route down to the A40 London corridor which some existing traffic on the network may re-divert onto.....' The northern connection to the spine road is not justified.
- **Natural England** noted that this site includes the Gomm Valley SSSI in the southeast, species rich grassland in the north and south and ancient woodland in the centre and south west corner. The site is on the boundary of the Chilterns AONB. It provides a wildlife corridor, connecting the two sides of the Chilterns AONB via King's Wood (Ancient Woodland), and connects Gomm Valley SSSI with Millfield Wood SSSI. The number and arrangement of development parcels need to be reviewed;
 - Parcels 7 and 8 block the wildlife corridor from King's Wood across the site. The new internal road required for these parcels also severs the corridor.
 - Parcel 2 is too close to the SSSI supporting habitat and could be better used as an outdoor nature based teaching area for the new school.
 - Parcels 10 and 11 need to include connected green infrastructure and mitigate for the loss of species rich grassland.
 - Parcel 6 needs buffering to the Ancient Woodland of Little Gomm's Wood.

- The central undeveloped portion of the site should be managed as an extension of the SSSI for the species it supports.
- All development needs to be screened with vegetation to protect the landscape character in the setting of the AONB.
- Policies should be included to implement green infrastructure prior to the grey infrastructure to minimise the time of impacts on the AONB. A management
- Framework and master plan should be developed as part of this policy.
- **Historic England** noted that there are no designated heritage assets on site but that the northern area would be opposite the Grade II listed Katherine Knappen Residential Home, and request an expansion of the northern landscape buffer to ensure sufficient protection for the care home and separation between development sites.
- The **Chilterns Conservation Board** raised the following points:
 - The policy should recognise the site is in the setting of the Chilterns AONB and should apply the advice in the Chilterns Conservation Board's Position Statement on Development in the Setting of the Chilterns AONB.
 - Development will undermine the role of the Gomm Valley as a wildlife corridor linking to the Chilterns Beechwoods SAC and Millfield Wood SSSI, and a green finger linking the AONB north of Wycombe through Terriers Farm, King's Wood, Gomm Valley and out to the AONB east of Wycombe. The proposal should provide bigger and better joined up parcels of green infrastructure.
 - Residential parcel 2 should be deleted because it is visible from a key AONB viewpoint and is too near the chalk grassland SSSI which should have a wider buffer. This land would be better as a forest garden for the new primary school next door.
- **BBOWT** expressed concerns regarding the impact on the SSSI, local wildlife sites and ancient woodlands due to the location and scale of the development,

including the proposed within and adjacent to the site. Have particular concerns on

- The overall level of development;
 - Parcels 1, 2 and 3 – parcel 2 in particular due to close proximity of a local wildlife site, and Parcel 3 in particular if it were to be changed from school use to residential/commercial development. These 3 parcels should be removed.
 - The section of parcel 5 that is to the East of the proposed link road, that was previously indicated as “Areas requiring further work to determine their suitability.....” on the previous Developer’s Preferred Option; This expanded area should be removed as it extends development closer to the SSSI and LWS.
 - Aspects of parcels 4, 5, 6, 7 and 8. Development could potentially disrupt the ecological connectivity between woodlands.
 - The potential link road between Parcel 1 and Parcel 2 (this runs directly through the local wildlife site);
 - The link road between Parcel 6 and Parcel 7, and the link road between Parcels 2/3 and Parcels 4/5.
 - The site lies within the Gomm Valley Biodiversity Opportunity Area. The scale of development is likely to negatively impact the potential to achieve the targets of the BOA.
- **Thames Water** noted that infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development.
 - **Scottish and Southern Electricity** suggested it is likely that some high voltage network reinforcement will be required and distribution substations.
 - The **Oxford Bus Company** observes that the vast majority of the site does not lie within the DfT guidance of being 400 m from the site and therefore are unconvinced this site can be sustainable in bus operation terms. A site of 500 dwellings in terms of bus service operation is poor for service enhancement.

- **Highways England** expect to see an assessment of the potential impacts on the Strategic Road Network.
- **Bucks County Council** suggests adding 'onsite' provision to Transport 4 (iv) '*On-site and off-site footpath and cycleway provision*'.
- **Aylesbury Vale District Council** recognises that the capacity of the Gomm Valley and Ashwells site is limited by the site's characteristics and location which limits the site's effective capacity to that identified in Policy HW6.

HW7 – Terriers Farm and Terrier's House

- Developers note that there is no reference in Policy HW7 to Gomm Valley's sports pitch requirement (Policy HW6) being accommodated on Terriers Farm. The loss of development land within the Gomm Valley required for the primary school is not appropriately equalised by the policy.
- Developers felt that the access through TPO woodland to De Havilland Drive is flawed, and there should only be one access to the site.
- Developers objected to providing vehicular access between site and recreation ground
- Developers felt that the site should not create separation between Hazlemere and Terriers but be seen as the wider urban area.
- The developer objected to barns being required to be integrated into the site.
- The developer suggested that the pond should be reworded as seasonally wet depression
- Developer objected to 15m buffer along Lady's Mile. Should be implemented as a natural tree line and not as a solid block with a regimented or uniform buffer.
- Policy need to recognise there will be hedgerow severance in parts of north-south hedgerow and other field boundaries to allow access. Policy should read 'Where practicable, retain the field boundaries within the site.'

- Developer believes that whilst the Terriers Farm site can accommodate 2 no. formal youth sports pitches, any sports hub should be provided on the adjoining playing fields to the east of the site, with the existing facilities to be upgraded including through CIL and/or a S106 contribution.
- Developer put forward that there is no bridleway within the sites (Lady's Mile is beyond the northern boundary). However, and subject to the normal CIL tests, they are prepared to discuss a possible financial contribution towards any necessary upgrading.
- Residents felt there should be one access point off Kingshill Road, a second access is not suitable due to adverse effect on woodland, recreational and conservation area
- Residents felt there is insufficient mitigation for increased traffic generation. Kingshill Road and Amersham Road are already very busy, especially in peak periods.
- Residents felt that the site needs to be supported by new health, community facilities and local retail facilities.
- Residents object to there being no primary school within the site. Primary school children should be able to walk to school, provision in Gomm valley is not satisfactory some 2.6 miles from the site.
- Residents support the perseveration of green spaces, but felt that future maintenance of green infrastructure is missing
- Residents are concerned about additional traffic that will be generated in the surrounding area including Amersham Road, Kingshill Road, Tower Street, Chadwick Street, Green Road and Brands Hill Avenue. They felt that further off-site road improvements are needed.
- Residents felt that the site has to provide sufficient car parking.
- Residents felt that the density / number of dwellings is too high, especially because a third of the site is a recreational area.

- Some residents seek clarity to whether the 20 dwellings for Terriers House are within or in addition to the allocation of 500.
- **Natural England** noted that this site forms part of the landscape scale wildlife corridor that connects the two sides of the Chilterns AONB via King's Wood (Ancient Woodland), and connects Gomm Valley SSSI with Millfield Wood SSSI. The north-south wildlife corridor through the site should be set at 200m wide.
- The **Chiltern Society** noted that the inclusion of a second vehicular access from the A404 (which would involve loss of some mature TPO'd trees) is not supported by evidence of need.
- **Bucks County Council** sets out that the existing footpath (HWU/46/1) needs improving for increased use from the development and this should include cycling provision. Policy HW6 4a (iii) has provision of an improved walking and cycling route from Cock Lane through King's Wood to the Beech Tree pub. Policy HW7 should do the same in order this development can contribute to the improvement and ultimately link the two allocated housing sites together with a sustainable transport connection.
- The **Chilterns Conservation Board** believes that the major residential parcels on the west and formal open space to the east will undermine the wildlife corridor linking the AONB north of Wycombe at Grange Farm, through Terriers Farm, King's Wood, Gomm Valley to the AONB east of Wycombe. The plan should be changed to give greater priority to protecting and delivering a green corridor and ecological connectivity. Reduce residential areas and address ecological severance to King's Wood caused by the existing A404 and the planned new estate roads.
- **Sport England** believes there is insufficient evidence to determine whether there is sufficient sports provision when taking into account the partial loss of playing field for the car park and changing facilities and the change of use of the cricket pitch to playing fields.

- **Scottish and Southern Electricity** suggest that this allocation will require network reinforcement, as the site is not covered by existing infrastructure. Likely to require multiple distribution substations due to the size of the development.
- **Thames Water** noted that minor infrastructure upgrades may be required to ensure sufficient treatment capacity. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development
- **Historic England** noted that this site partially abuts the Terriers Conservation Area however there is no reference to the conservation area in the Policy. Terriers House is a Grade II listed building and if it is included within the site, then the Policy should require its retention and that of an appropriate setting.
- **BBOWT** were concerned access onto A404 would be through lowland mixed deciduous woodland UK priority habitat. Part of the development lies within the Biodiversity Opportunity Area, concerning no reference has been made to this. HW7 should achieve a net gain in biodiversity. The second access onto the A404 should be removed.
- **Aylesbury Vale District Council** recognises that the proximity of the Terriers Farm/House site to the AONB and its characteristics limit development to the capacity identified in policy HW7.

HW8 – Land at Amersham Road including Tralee Farm, Hazlemere

- Some respondents felt that this allocation displays a lack of consideration to the principle of Localism, including a duty to cooperate failure in respect of Little Missenden Parish Council, and a failure to challenge DCLG on housing numbers.
- Residents are concerned the allocation will bring about the coalescence of Hazlemere and Holmer Green, which should be treated as distinct settlements. This issue is related to both the Green Belt assessment and general planning

principles. There is a related point about the scale of growth relative to the village.

- Respondents raised the issue of the proposed allocation leading to harm to the Green Belt, the retained adjoining Green Belt, and the adjoining AONB.
- Residents were concerned about traffic and other infrastructure impacts, and a failure to coordinate infrastructure planning in respect of the Terriers Farm site and the potential adjoining site located in Chiltern District.
- One respondent raised a possible issue with the potential displacement of a travelling showpeople site in Chiltern District, and a failure to re-provide for this.
- Both main land interests are promoting a piecemeal 'standalone' approach in place of a comprehensive Development Brief led approach.

HW9 – Part of Greens Farm, Glynswood

- Some respondents felt that the allocation would not be acceptable due to impact on the AONB, the Green Belt, and the historic Hughenden Manor landscape.
- Other respondents felt that the allocation is acceptable but the policy needs strengthening with respect to the AONB.
- Concern is raised that the access and local junctions are not adequate to serve the development proposed.

HW10 – Horns Lane, Booker

- Residents felt that the land to the north which was added after the draft plan consultation in 2016 has not been fully consulted on
- Residents felt that the noise mitigation in the policy should address the Air Park as well as the motorway
- **Scottish and Southern Electricity** suggest that low voltage lines will require reinforcement, and that development may require additional network reinforcement and/or alterations.

- **Thames Water** noted that the water network capacity may be unable to support demand from the development, and raise water concerns.
- Residents felt that the high density proposed and proximity to the motorway raises deliverability issues.
- Residents raised concern that the field has been historically prone to flooding.
- Residents felt that access to the site has not been properly considered, The Paddocks is too narrow to serve as an access road.
- Concern that development will have negative impact on hedgerows and wildlife.

HW11 – Clay Lane, Booker

- Residents are concerned that this site could set a precedent that will lead to further encroachment of the countryside.
- Other residents felt that the site should be considered for alternative non-residential use.
- Wider area residents felt that the housing numbers/density on the site is too low.
- Some respondents felt that the concept of a 'gateway' is inappropriate and should be removed from policy wording.
- **Scottish and Southern Electricity** note that the low voltage supply may need to be rerouted if property in southern section of development is to be demolished. Development may require additional network reinforcement and/or alterations.
- Residents felt that access should be taken from Clay Hill, as direct vehicular access from Clay Lane will not be supported by the highway authority.

HW12 – Leigh Street, High Wycombe

- Respondents wish to see that the landmark buildings on this site are retained.
- Respondents felt that the density on this site is ok if it is measured correctly.

- **Historic England** recommends that the Historic Environment Record and Buckinghamshire Historic Landscape Character Assessment should be consulted for non-designated assets, and the Council's Conservation and Archaeological Advisers should also be consulted for their comments.
- **Scottish and Southern Electricity** note that it is likely that a new distribution substation will be required which may require high voltage network reinforcement. However the surrounding networks have not yet been modelled with this additional load and therefore the reinforcement requirements may change.
- **Thames Water** noted that the water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure.
- It is also noted that the wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy is needed.

HW13 – Former Bassetsbury Allotments, Bassetsbury Lane

- Respondents consider that there is no justification for access from Bassetsbury Lane given volume of traffic expected, and are concerned about the traffic impacts of site onto London Road.
- Residents are concerned about the possibility of a change of character for the wider area including loss of tranquillity and fear of crime.
- Some residents felt that the land should be added to the Community Asset register.

- Residents are also concerned about the loss of wildlife area.
- Residents in the wider area believe that the density proposed is too low, and should be increased to contribute to meeting WDC's needs.
- Some residents suggested that WDC need to ensure greater cooperation and collaboration with relevant bodies for this site, including the Environment Agency, Natural England, the Chilterns Conservation Board and the UK Biodiversity Action Plan Steering Group for Chalk Rivers. This is to ensure the health and sustainability of the Rye chalk stream is maintained and to evaluate whether the planned development should be approved or whether the meadow and adjacent Rye stream deserve some level of protection, given the rarity of the cray fish the stream support.
- Other residents suggested that something to the effect of the above would be accomplished by undertaking an ecology study and environmental impact assessment. There was particular enthusiasm to ensure that the environment, ecology and the water quality are maintained.
- **Warren Wood Residents Association** raised strong concerns in relation to the lack of assessment of water quality in relation to the site and impacts of development on the nature reserve and chalk stream. Concerns also raised in relation to the Chilterns AONB, Keep Hill Local Wildlife Site and Deangarden Woods. No SA has been undertaken for the site. WWRA believes that the potential negative impact on the local nature and ecology outweighs the scale of the planned development. Concerns about the potential to open a through road in the long term joining Kingsmead to Bassetsbury Lane.
- The **Ryemead Forum** believes the site should be used to deliver a Heritage and Environmental centre to be used by community groups. There are groups wishing to access and use land now and within 5 years will have deliver the plan they have for the land. Land needs to be put on community asset register.
- The **High Wycombe Society** felt that there is no justification for the provisions of policy HW13 relating to access to the site. Section 3 is non-committal, implying that access may be along Bassetsbury Lane *or* across the old railway

embankment from the recent development known as Wye Dene adjoining London Road. On the other hand, section 4 implies that the access would be from Bassetsbury Lane. Bassetsbury Lane is narrow and sinuous and there has been a fatal accident at the junction with Chestnut Lane. Access from Wye Dene is preferred. There are several possible points of access, across the old railway embankment which is quite low along this stretch. The crossing need not interfere with pedestrian/cycleway use of the railway alignment required by High Wycombe Sustainable Development Principle 4(c).

- Residents felt this is a relatively small site and one which, by its location and scale, is particularly suited to small-scale affordable housing. It would be appropriate to require most housing on this site to be affordable.
- **Thames Water** felt that the water network in this area may be unable to support the demand anticipated; local upgrades to the existing infrastructure may be required ahead of the development.
- **Scottish and Southern Electricity Network** noted that developing this site may require low voltage reinforcements
- The **Environment Agency** felt that the SFRA level 2 is not sufficient to be sure that the site passes the second part of the Exception Test. The flood risk modelling is not of sufficient quality to be sure this is possible. Therefore the site may be undeliverable.

Changes proposed by respondents

- Change Policy HW13(3) to read:
 3. Ensure that a safe means of access is provided linking the proposed development to the London Road:
 - a. If possible, from the north across the old railway line, in which case the use of the railway alignment for cycleway/pedestrian use shall not be compromised;

b. Or, if that is not possible, from Bassetsbury Lane, in which case a capacity assessment shall be carried out of the London Road junctions with Chestnut Avenue and Bassetsbury Lane.

- This will ensure that the most appropriate access is provided.
- AND Add a new section 13(1) (re-numbering the later sections as necessary) to read:
 1. Provide mainly affordable homes.
- This will provide certainty that this site makes an appropriate contribution to the stock of affordable homes (subject, as usual, to the physical conditions of the site and to viability, as referred to in paragraph 6.30(iv) of the Plan).

HW14 – Highbury Works/ Hazlemere Coach Works, Chestnut Lane

- Residents are concerned that the suggestions for access to the site are unclear. Development proposals should take advantage to create new access points off Chestnut Lane and Pheasants Drive where it will be possible to provide better visibility and safer access.
- Scottish and Southern Electricity Network felt that the site is unlikely to require low or high voltage network reinforcement, but that the surrounding network has not been modelled for this additional load and therefore may require additional network reinforcement and/or alterations. They identify that low voltage overhead lines cross the centre of the site and will require diversion if works are in the vicinity.
- **Thames Water** does not envisage concerns with the proposed development site based upon foul flows being connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the public sewer.
- **Affinity Water** highlighted that major network reinforcements are likely to be needed in this area to cope with water supply.

HW15 – Land to the rear of Hughenden Road

- Residents are opposed to the site being developed due to unacceptable land take impact on existing properties
- The **Chiltern Society** suggested that the site requires a 10m buffer, not 8m, and evidence is not provided to show this is unachievable here. Even if such evidence were to be provided, any reduction in the buffer must not fall below 8m without rendering the principle of development wholly unsound.
- **Thames Water** and **Scottish and Southern Electricity Network** both state they need to understand proposed numbers to make an assessment
- The **Environment Agency** is concerned that point 3 requesting an 8 metre buffer for ecological enhancement is not consistent with adopted DM15 point 4 which seeks to provide or retain a 10m buffer between the top of the river bank and the development.
- The EA is also concerned by point 5 of the policy and para 5.1.110 stating that balconies would extend out of the buffer strip, as this would further reduce any biodiversity value. This is not consistent with DM15 which states that planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.
- The policy should mention the flood risk sequential approach required within the site for development considering the various levels of risk across the site.
- **Buckinghamshire County Council** recommended that the site should not be allocated due to high risk of flooding from all sources and the impact this has on the viability of development here. Although the site passed the sequential test, the ST focused on fluvial flooding even though all sources should be considered and therefore they are concerned that the high risk of groundwater and surface water flooding has been overlooked. The level of risk is similar to that of “Kingsmead depot, London Road, High Wycombe”, which failed the Exception test. In the ST report HW15 is not subject to the ET as it does not fall within flood

zone 3, however considering climate change allowance and the remodelling of the river Wye currently being undertaken by the EA, this could change in the future.

- BCC felt that the recommendations made by Jacobs in the level 2 would be hard to achieve and would place a burden on the developer. The site does not have housing numbers associated however given the level of risk the number would be low. The level of work required to demonstrate that the site is developable could make it undesirable to developers
- BCC as highway authority felt it may prove difficult to provide satisfactory access to this site unless sufficient land is available on Hughenden road to construct a radii access and achieve the requisite visibility splay onto an A road.
- If it is decided to keep the site. BCC has the following recommendations:
 - If the EA remodelling or the river Wye or site specific fluvial modelling with allowance for climate change shows the site to be within flood zone 3, the ST and ET should be carried out again
 - Point 4 should be worded stronger and link to the recommendations for the site specific FRA in the level 2 SFRA
 - Para 5.1.111 should have stronger wording as the site is at risk not “may be at risk”
 - Adequate access is provided onto Hughenden Road to meet mandatory visibility splays on an A road.

HW16 – Wycombe Air Park, High Wycombe

- Deliverability not sufficient or robust evidence to demonstrate that the relevant infrastructure to support the site can be delivered. Given its isolated location, remote from the M40 Handy Cross junction, it is not consistent with achieving sustainable development. The Council's evidence base, which does not support the Air Park as a preferred site for large scale employment use, nor in terms of its release from the Green Belt. It also does not reflect the need to protect the AONB. There is limited evidence to suggest that the quantum of development

envisaged (and absent from the policy text) can be delivered on account of the continued operation of the Air Park (Health and Safety concerns), the landscape impact and green infrastructure improvements required and the considerable enhancement to the local highways network to support the Air Park Expansion area.

Transport issues

- Respondents support inclusion of reference to a travel plan, however the scale of the site and proximity of the site may still impact the operation of the strategic road network at the Handy Cross junction. Proposals must demonstrate that the site will not impact the SRN and if necessary provide suitable mitigation if in fact it will have an impact.
- Respondents have reservations on how the site can be served by sustainable transport, including bus routes and walking/cycling from residential areas to the north of the M40.
- Respondents suggest that the policy is amended to specifically include a reference to improvement that the development would need to support through site specific developer contributions.

Green Belt/ AONB issues

- Residents felt that residential development on this side of the M40 constitutes urban sprawl of High Wycombe beyond the clear physical barrier of the motorway. It sets an undesirable precedent likely to lead to further encroachment into the open countryside. References to residential densities that create a 'gateway' to Booker from the north are inappropriate.
- The Airpark is inset from the Chilterns AONB and in the setting of the AONB. The policy text fails to recognise or refer to this.
- Concern that employment uses, once the site is removed from the Green Belt, could involve buildings of significant bulk and height.

- Some of the land which it is proposed to remove from the Green Belt is simply adjacent land that has been 'included' for no obvious or good reason. There is the vague suggestion that it may be suitable for outdoor sporting activities.
- Concern that if approved this proposal would change the character of the area, destroy the effectiveness of the Green Belt in this locality and modify the landscape in relation to future planning.
- Assessment of the cumulative effects of HW11, HW16, HW17 and RUR11 on the Chilterns AONB and against SA objectives should be undertaken, and whether they constitute major development to which NPPF para 116 would apply.

Gliding issues

- Members of Booker Gliding Club welcome the two clarifications:
 - 1) which now includes gliding as an integral part of aviation activities at the Air Park para 3b
 - 2) the requirement for development to demonstrate that they do not compromise or limit the operation of the aviation users, including gliding, at the Air Park.
- Consider that the description of the airfield is too simplistic. For example, the plan states that there are 3 runways, this is incorrect. The gliders take off and land in the same direction as power traffic but use an area of grass rather than a defined runway, this is for safety reasons as gliders are unable to 'hold' or 'go round' while waiting for a runway to clear. The removal of the marked area is bound to reduce the ability of the gliding club to operate safely and to capacity, thereby depriving both local residents and visitors to the district of a recreational activity.
- Without the specific allocation of the Dashwood field to the north of the airfield boundary to gliding operations, the south side development will remove the ability of the gliding club to operate in a Northerly direction.

- Some responses consider that the map used in Figure 19 is insufficiently detailed.
- Some responses ask that WDC restore the airfield landing area to its current size by removing the south-west 'triangle' set aside for 'Employment' in map HW16.
- The gliding club strongly objects to the withdrawal of protection for sporting facilities.
- The gliding club objects to the withdrawal of reference to gliding in the plan for the area originally designated HW 15 in the 2016 version of the Local Plan.
- While the club is broadly supportive of additional housing, it believes that in the interests of harmonious future relations with occupants of the proposed housing site on Horns Lane, policy requirement 1 should be extended to include mitigation measures for aircraft noise. Aircraft will approach to land directly over the proposed development. The houses will be right in the undershoot area and any aircraft that fail to make the runway will land amongst them. Gliders are the same as aircraft with engine failure. They are not able to extend their glide to the airfield if the approach is misjudged or affected by meteorological conditions. Building houses on this site whilst continuing aviation at Wycombe Air Park will put lives at risk.
- The gliding club provides access to aviation careers for young people which they would otherwise struggle to achieve, it has produced airline pilots, engineers etc., the skills they learn and the confidence they build are invaluable. It also provides employment for local people.
- The plan is missing a comprehensive risk assessment that would sufficiently balance the projected benefits generated by the change of use.
- It is simply not possible to develop the south of the Air Park without impacting and limiting the operation of the gliding club. The remaining area of grass is insufficient for safe landing by gliders.

Air Park Growth Plan issue

- It is unclear what the full impact of taking the land adjoining the Air Park out of Green Belt will have on the airpark's growth plans and long term plans to grow commercial air traffic. Especially if it is allowed in the longer term as part of the expansion, to extend their runway by 400m to enable larger private and/or commercial aircraft to land, or if allowed to increase its opening hours.
- Concerns about the implementation of flight technology which could enable the Air Park to take larger commercial now with the airpark expansion following the council's plans to release land out of greenbelt.
- Safeguards should be put in place over the Air Park to ensure that future runway expansion doesn't go unchecked, and that capping/limiting flight numbers by the landlord WDC should continue.
- There is insufficient evidence that indeed this plan will lead to significant change in employment opportunity by this change in land use of part of the airfield. The reasoning that the mere closeness to a small airfield enhances a site for high tech business use is not proven.

HW17 – Land Adjoining High Heavens Household Recycling Centre, Off Clay Lane

- Respondents believe that the evidence is not there to support its identification as a preferred site for employment nor for its release from the Green Belt or delivery, isolated location, site fully within the AONB. Not an appropriate location for major employment development.
- Respondents believe that the removal of the site from the Green Belt is immaterial as the access road to the site would still be in the Green Belt and consequently development would still need to demonstrate exceptional circumstances. Boundary of the site should be amended to include the access road to the site to ensure deliverability.

- Respondents would like to see that the cumulative impacts of development in this vicinity are assessed.

HW18 – Cressex Business Park

- Respondents were pleased to see the commitment to improving and regenerating the facilities at Cressex Business Park.
- Respondents felt that it is important that the traffic issues are addressed as otherwise the activeness of this facility could be diminished.
- **Highways England** strongly supports Wycombe District Council's commitment to work with partners to address infrastructure constraints to ensure new development can be accommodated.

HW19 – Office Outlet Site, High Wycombe

- The developer believed there is no reason why the Council consider the site to be available for mixed-use commercial development. The site has not been promoted by the site owner for such.
- The developer considered that the evidence base has not considered the existing retail use of the site. This existing use clearly has an impact on the ability of the site to accommodate additional uses both in terms of physically accommodating redevelopment in the form envisaged by the Policy HW19 and critically in terms of the viability of an office led redevelopment. In relation to viability, the developer pointed out that the Council does not say in its evidence base what level of retail development would be acceptable or policy compliant.
- The developer noted that there is no timescale associated with any redevelopment of the Hospital and no certainty that such a redevelopment may ever happen. As redevelopment proposals cannot be advanced before any Hospital proposals it effectively sterilises the site.
- The developer noted that in safeguarding land for a bus lane or left turning traffic the Council has not evidenced any such requirement or the amount of land-take required for this safeguarded land.

- It is felt that the policy requirements combine to form an unrealistic set of expectations for this site. The proposals for the site are not suitable, available or achievable.
- A petition has been signed by 859 people supporting the site being allocated for use by the hospital.
- Residents consider it is important that new usage of the site is traffic neutral compared to the existing site, in that it creates no more traffic than the current use and in a similar pattern.

HW20 – High Wycombe Town Centre – former Local Development Order area

No responses received.

HW21 – Land at Queensway, Hazlemere

- Residents felt the site and the adjacent allotments should be protected for recreational use.
- Residents felt that the site should not be used for a burial ground considering the adjacent allotments are used to produce food.
- Alternative sites including former Bassetsbury Allotments suggested for cemetery use.
- Residents are concerned that no AONB impact assessment has been undertaken for this site
- The **Chilterns Society** felt that the AONB status is given insufficient recognition. The Policy will as a result fail to ensure an appropriate form of development. Seeking a change to incorporate a requirement that any development must conserve and enhance the natural beauty of the AONB; this might be done by supplementing 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.”

- The **Chilterns Conservation Board** noted that a cemetery use would only be appropriate if it conserves and enhances the AONB. A new cemetery is likely to involve buildings, car parking, formalised tree planting, paths, benches, headstones and plaques. A natural burial ground with a less formal character is likely to be more appropriate, and use of planting which links to wider ecological woodlands including the woodland west to the A404 and via the golf course to the important expanse of Chilterns Ancient Woodland at Penn and Common Woods. CCB recommendation – mention AONB in policy as well as green belt; insert requirement for proposals to conserve and enhance the AONB and enhance ecological corridors.
- **Affinity Water** suggested that major network reinforcements will likely be needed in this area to cope with all of the proposed Local Plan developments, and that each developer will need to contribute accordingly to the cost of these upgrades.

Marlow

Marlow Area Principles

- Respondents felt that specific sport and leisure improvement opportunities should be identified by the Plan, or at least action plans and strategies to identify these facilities.
- Respondents felt that ecological enhancement of the Thames or Green Infrastructure should be mentioned.
- Reference to riverbanks and Thames Path National Trail should be added to tourism.

MR6 – Land at Seymour Court Road

- Residents are concerned that this allocation is opening up development to a promoted site to the north.
- Residents raised that the site allocation does not relate to the Parish of Great Marlow, assumption has been made it relates to Marlow Town.
- Respondents felt that the proposal is unsustainably low in numbers, and will not fulfil the affordable housing for the area.
- Residents felt that development would constitute ribbon development.
- Some respondents are unclear as to how habitats in the Medmenham Biodiversity Opportunity Area (BOA) could be improved with proposal.
- Residents felt that development would only exasperate existing pressure on infrastructure such as highways, health facilities, and schools.
- Scottish and Southern Electricity Network felt that the proposal would be unlikely to require high or low voltage network reinforcement. The surrounding network has not been modelled for this proposal and therefore may require additional network reinforcement and/or alterations. One low voltage overhead line crosses

the site area and will require diverting if it remains in close proximity to planned development

- Residents are concerned footpaths to the AONB would likely be blocked by development.
- Residents felt it is not sufficient to simply 'retain' the public footpath in its current state, they must be improved as part of policy
- Residents felt that the site would increase flood risk.
- One respondent noted that although the allocation is small and not major development, the site currently provides a successful transition between the urban edge of Marlow and the open AONB countryside.
- One respondent pointed out that the policy wording is not consistent with NPPF and CRoW Act duty which requires development in AONB to conserve and enhance, not just limit impact.
- Residents felt that development would spoil surroundings

MR7 – Globe Park

- The Newtown Pit was promoted for allocation as a temporary car park for a period of 5 years to address the parking issues of Globe Park.
- Respondents are pleased to see the commitment to improving and regenerating the facilities at Globe Park. Globe Park Business Park and the adjacent Marlow International both have vacant office space, and it makes sense to realise the full potential of existing Business Parks by regenerating Globe Park.
- Respondents welcomed the work WDC is undertaking to improve accessibility from the A404 at the Westhorpe junction, including improvements to the A404 northbound exit slip road, as well as to improve the wider operation and role of the A404 between the M40 and the M4.

Princes Risborough

Main Issues

General Points

Issues with the Plan for Princes Risborough can be grouped according to the various interests represented: developers / land interests; community and amenity groups; and statutory bodies, authorities and agencies, including Duty to Cooperate bodies. Proposals for the major expansion of the town have generated a number of inter-linked issues for the settlement which are summarised here. Some of these issues also arise under the individual policies but the main treatment of these is here.

Community / residents' associations, action groups and amenity groups

Local community associations and action groups have campaigned actively against the scale of development proposed for Princes Risborough. Some assert that WDC has not engaged effectively or meaningfully with the community. The messages propagated by these groups have been taken up by a large number of residents' representations. Some of these messages may be valid: others are not entirely correct or demonstrate misunderstanding of the planning framework.

There is an issue of process in that many assert that WDC have refused to listen to the community, failed to engage adequately or respond to the Risborough Area Residents Association's petition. It is felt that WDC failed to consult adequately on the allocation of land to the rear of Poppy Road.

Princes Risborough's place in the spatial strategy and response to meeting OAN

- Residents felt that the scale of growth is disproportionate to the size of the town;
- WDC's overall spatial strategy is inappropriate – more growth should go at Marlow / High Wycombe etc. (or even Stokenchurch); brownfield not maximised; reasonable alternatives not adequately explored;

- WDC should have challenged their OAN to central Government and asked for a reduction in the context of the major constraints of the AONB and Green Belt.

Sustainability and social cohesion

- Residents believe there is an overall lack of sustainability / WDC have not followed sustainability principles.
- The major expansion proposed for Princes Risborough is not proportionate, sustainable or deliverable.
- Concern was raised about the potential lack of integration across the railway line, with some believing it is not capable of resolution; the Right of Way crossing at Westmead should be preserved.
- Concern that increasing population will result in an increase in crime and create security issues.
- The Plan would cause the coalescence of Princes Risborough and Longwick – the buffer area is inadequate.
- A lot of concern that the character of the town and community cohesion are at risk through too much / too rapid growth;
- There was concern about a lack of adequate retail provision in the context of growth. The Town Centre will suffer; complex land ownerships in the Town Centre mean that Town Centre policies unlikely to be delivered.
- Some residents believe that Princes Risborough will get the most growth, but the lead funding.

Environmental issues

- Concern was raised about the impact on heritage, including the Alscot Conservation Area.
- Concern was raised about the overall impacts on countryside, landscape and wildlife (failure to protect the Green Belt is also frequently cited here, sometimes in the context of the PR11 allocation).

- Residents considered the adverse effects on the setting of the Chilterns AONB to be unacceptable. Impacts on the Chilterns AONB, the setting and views from the AONB over the town, particularly from Whiteleaf Cross and the Ridgeway National Trail.
- Concern about the expansion area being at risk of flooding and groundwater issues and these not being adequately addressed by the Plan – development should be steered away from here.
- Concern was raised about the light pollution from development, including sports pitches.
- Concern was raised at the loss of productive farmland.

Infrastructure

- Concern about overall impacts on infrastructure (including schools, GPs, leisure provision etc.); current infrastructure is inadequate; some representors either unaware that Plan requires development to deliver infrastructure or have a lack of confidence that it will be delivered; alternatively the Plan has not provided enough detail about infrastructure provision.
- Representors noted a potential discrepancy between the affordable housing targets for Princes Risborough and the rest of the District.

Economic prospects

- Residents felt that the plan fails to address the economic challenges or strike a balance between homes and jobs in the town.
- Concern was raised about a lack of employment prospects leading to increased transport impacts as people travel further afield for work.

Traffic and transport

- Residents were concerned that growth would make existing traffic / congestion problems worse locally.

- Residents felt that the Plan has not taken account of wider traffic growth associated with development elsewhere in Buckinghamshire and Oxfordshire.
- Residents felt that the Plan does not address wider traffic issues generated along the A4010 at High Wycombe and Aylesbury, particularly the Pedestal roundabout on the approach to High Wycombe.
- Residents consider that the proposed relief road is inadequate / inappropriate / will decrease footfall in town centre. Many would prefer a 'proper bypass', or a 'true bypass', with some favouring option 17 for the relief road.
- Residents felt that local lanes used for all sorts of recreation should be protected.
- Concern was raised about a lack of parking, both in town centre and at railway station. Town centre car parks should not be decked.
- There was also a concern that existing overcrowding on railway services will be exacerbated and lack of confidence that further rail capacity will be found.
- Concern was also raised about the lack of provision for horse riders to safely access and use Rights of Way.
- There was concern that traffic issues will be intensified by HS2 construction traffic.
- There was also some concern about the potential impact on bus services.
- The **Environment Agency** asked that watercourses be listed specifically in the Principles for Princes Risborough; an addition to PR4; consistent treatment of watercourses in the Concept Plan; additions to / strengthening of PR7, PR10 and PR11; use of clear spans over watercourses (PR8). The de-culverting of the stream in PR16 is supported. PR7 and PR11 should mention flood risk sequential approach within the site.
- **Natural England** would like to see green infrastructure networks established in advance of development, to be confirmed by a new policy. They consider the southern section of the relief road to be major development in the AONB – more detail is required to give comfort on necessary mitigation. Not compliant with

NPPF 115. NE also assert that the Plan is not legally compliant, but do not say how.

- **Historic England** requested that the reference to 'preserve' is replaced with 'conserve'. PR7 should include text from 5.3.102 and 5.3.103 as policy.
- **Sport England** requested that the principles and requirements of development at Princes Risborough should be informed by a needs assessment prepared according to their guidance. Consequently they assert that the requirements are not justified or not specific enough (touching policies PR3, the Concept Plan, PR7 and PR15).
- **Buckinghamshire County Council** sought clarity on delivery of secondary school places (CIL compliance); seeking a walking and cycling route along the Crowbrook corridor (PR4); further improvements for walking and cycling through PR7; concerns regarding PR10 (BCC sent an update after the end of the publication period clarifying their position); seeking clarity on preferred access to PR11.
- **South Oxfordshire District Council** requested an addition to PR7 to assess any cumulative / cross-boundary traffic effects and identify any mitigation in partnership.
- **Network Rail** stated that the Plan needs to be clearer that Wades Park and PR31 crossings of railway are preserved by means of an underpass and a footbridge respectively. Additions to PR7 requested to clarify the timing, delivery and funding of these. Representation refers to MoU agreed between Network Rail and WDC.
- **Thames Water** commented that minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development, and that where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered. An odour impact assessment may be required from

developers in the vicinity of the sewage treatment works in the main expansion area.

- The **Chilterns Conservation Board** is concerned to minimise impact on key viewpoints such as Whiteleaf Cross and Brush Hill (and from the Ridgeway National Trail) by reducing housing numbers and densities in the main expansion area, limiting the extent of the expansion area, and increasing the strategic buffer around the settlement boundary. They also object to any new road infrastructure through the Chilterns AONB, as being major development, and to the housing allocation to the rear of Poppy Road. They seek contributions to AONB facilities and land management to compensate for increased visitor numbers to the AONB. At the same time, they propose that the railway station site should include more measures to boost tourism and the day visitor experience.
- **Risborough Town Council (PRTC)** would have preferred a lower quota of new housing for the town but accept that there is a heavy requirement on Princes Risborough in terms of growth. They are keen to maximise the opportunities presented by the proposals and ensure that appropriate measures are in place to achieve a sustainable expansion. They seek assurances on the phasing, timing and delivery of infrastructure. They would have preferred a full bypass for the town but recognise that the provision of the relief road will alleviate traffic in the town centre and create opportunities for regeneration and improvement.

Developers / land interests

- Landowners within the proposed area of comprehensive developer are keen to emphasise the need to deliver early in the plan period. They assert that there are viability issues created by the cumulative burden of requirements for: the growth of Risborough; the core policies; and some development management policies. Land value assumptions are too low. Cash flow to deliver infrastructure will be an issue. Land take of the relief road should be minimised. Consequently they are seeking more flexibility in the Risborough policies to mitigate perceived uncertainties here.

- Developers maintain that more detail on the phasing and delivery of the major expansion is needed, to maximise housing delivery in advance of the completion of the relief road. WDC should expedite its current work on more detailed planning guidance in the form of the Capacity and Delivery Plans.
- A number of alternative sites in and around Princes Risborough are proposed from those whose land is not promoted by the Plan. To strengthen their case, they have taken a number of approaches including: challenging WDC's analysis of need and supply; emphasising the need for flexibility in the Plan; the ability to deliver early, or earlier than other sites; and their role in delivering infrastructure.

Principles for Princes Risborough

- Community comments on the principles tend to focus on how the proposals do not deliver adequately against the principles, or militate against them.
- Land interests have a few comments on the principles, but there is no overall theme identified.
- Authorities record some suggested changes and additions to the principles.

PR3 – Area of Comprehensive development including relief road

Residents are generally opposed to the scale of growth proposed for Princes Risborough, expressing concerns about infrastructure capacity and delivery, and opposition to the relief road (and other issues summarised above under the Princes Risborough settlement summary). More detail about issues with the proposed relief road are summarised under PR8.

- Residents felt that more work should be done to understand flood risk and mitigation in the expansion area and along the relief road.
- Residents felt that being able to deliver 2,200 homes within the plan period seems very optimistic.
- Residents put forward that the railway line is a significant barrier for development of the town and the number of crossing points will be reduced. The introduction of an underpass is problematic in terms of flooding and safety and security concerns.
- Residents felt that the Area of Comprehensive Development should not include Flint Cottage, land to the rear of Poppy Road or Culverton Field. The boundary should only extend as far as the proposed developable area of the land to the rear of Poppy Road (see figure 32).
- **Princes Risborough Town Council** sought detail on how the infrastructure can be delivered in the early stages of the plan.
- **Sport England** felt that the reference to sports facilities is vague.
- The **Environment Agency** felt that the strategic flood risk assessment is not sufficient to be sure that the relevant sites pass the second part of the exceptions test, therefore the Princes Risborough Expansion area may be undeliverable.
- The **Chilterns Conservation Board** advocates a lower number of homes to allow lower densities and the removal of 3-storey development, to protect views;

no development east of Mill Lane (including sports pitches), to protect views; plan should refer to the CCB statement on Development Affecting the Setting of the Chilterns AONB.

- **Oxfordshire County Council** puts forward that major development at Princes Risborough should fund any measures necessary to mitigate impacts on the highway network within Oxfordshire.
- **Bledlow-sum-Saunderton Parish Council** are broadly supportive of PR3 but have concerns which echo those of the community on the scale of development; unattractiveness to business development; lack of strategic infrastructure; impacts on AONB and its setting.
- One developer seeks the following changes: Table 15 should be corrected as policy PR3 refers to all three allocated sites (i.e. it includes PR11 and PR16). (*So in the table, 'PR3' should be replaced with 'main expansion area'*). Land at Park Mill Farm should separately introduced into PR3 (in the same way as Land to the rear of Poppy Rd and Land at Princes Risborough Station). PR3 (4) should state that the relief road should be provided for within the Area of Comprehensive Development and not by it. PR3 (4)(a) should be deleted or amended to make it clear that the delivery of any development within the Area of Comprehensive Development is not dependent on the completion of the relief road along its entire length. Figure 25 should be amended to identify Park Mil Farm, land to the Rear of Poppy Road and land at Princes Risborough station as a separate allocations.
- One developer suggested that in respect of tables 15 and 16 an explanation / reference should be made in respect of quantum of housing proposed and appropriate reference to the work that has informed any assumptions for delivery in the plan period. If PR3 is proposing allocation of specific parcels within the plan period then they should be identified in the policy. The quantum of housing development should be defined at 1(a), 2(a) and 3(a) or reference specifically made to Tables 15 and 16. 1(c) and 1(d) should provide for subsequent policy reference to define the infrastructure specifically being sought.

- Another land interest suggested that the text ‘to be taken forward on a comprehensive basis’ should be removed from PR3 and replaced with ‘to be delivered in accordance with the Concept Plan and Infrastructure Delivery Plan’.
- Promoters of alternative sites assert that their land should be included within PR3.

PR4 – The main expansion area development framework (includes Concept Plan and fixed points)

- Community objections gathered under this policy are generally opposed to the location of growth north of the railway line, citing impacts on the natural environment, heritage and flood risk; loss of farmland; and problems of integration across the railway line. One representation said that the area around the Pyrtle stream should be protected as a wildlife green space in the plan, with no public access to it.
- **Sport England** felt that the reference to sports pitches is unjustified. This in reference to the text supporting the Concept Plan which comes under PR4.
- The **Environment Agency** seeks a change to PR4 (6) to add “which shall include the enhancement of the watercourse and its riparian corridor.” Other watercourses within the site should have a similar green corridor to that allocated along the Crowbrook stream. 5.3.36 should include ecological enhancement of the watercourse and its riparian corridor.
- **Network Rail** seeks a change to PR4 (9) to add clarifying text to read “Pedestrian and cycle crossings of the railway via footbridge or underpass”.
- **Buckinghamshire County Council** suggested PR4 (6) should include walking and cycling provision along the east-west green corridor.
- One developer says that Figure 26 (Concept Plan) should be removed entirely from the Plan and PR4 should reference Policy map 14 (and any other subsequent references to the Concept Plan), with appropriate amendments / additions. If the Concept Plan is not removed from the plan the policy and / or

supporting text should make it absolutely clear that the specific land-uses depicted on it are illustrative and that no weight should be given to them when determining planning applications.

- Another developer requests that the Concept Plan should be renamed Indicative Concept Plan. Higher and medium density housing area should be more clearly distinguished.
- Another developer seeks clarification to the following parts of the policy: paragraph (1) should define the neighbourhoods being proposed; (9) should clarify that this relates to proposed 'pedestrian and cycle crossings of the railway'. 5.3.38 should be clearer on the intention to close the Westmead level crossing Public Right of Way. Figure 26 (the Concept Plan) should provide for a gateway feature when entering the expansion from the north (B4009).
- It was suggested that the green gap between Princes Risborough and Longwick needs to be revised in the context of recent grant of planning permission here.
- In one developer's opinion the alignment of road and location of northern primary school as illustrated on the Concept Plan are not in the optimum location and should not be fixed there. Requirement for primary schools to be either side of the A4129 is contradictory to the policy for not crossing a main road, as in the future the A4129 will be a 30mph road and the relief road a 40 mph road (making it the more difficult road to cross). High density housing zone immediately facing the Crowbrook stream corridor on the west should be amended. Specific policy amendments suggested.
- One land interest asserts that the land north of Mill Lane should not be excluded from the main expansion area.

PR5 – Settlement Boundary and Strategic Buffer

- Objections gathered under this policy sought greater protection for Longwick and views from the AONB by increasing the width of the buffer between the expansion area and the village. Some felt that outdoor sports uses within the buffer were inappropriate. Owners of small countryside plots within the buffer object to this policy on the basis that it prevents them from developing the plots. The settlement boundary should only extend as far as the proposed developable area of the land to the rear of Poppy Road (see figure 32).
- **Longwick cum Ilmer Parish Council** support the principle of the buffer to protect the village from coalescence.
- The **Chilterns Conservation Board** felt that the strategic buffer should be increased to fulfil aim of avoiding coalescence with Longwick and address the visual impact of the expansion from the AONB escarpment.
- Parties with land interests outside the designated expansion area and within the buffer object to this policy.
- Land interests felt that PR5 is too restrictive and contrary to the NPPF. It is not legally compliant in respect of the Sustainability Appraisal published for the draft Area Action Plan for Princes Risborough in 2016.
- Land interests within the expansion area suggest that the boundary should be indicative at this stage, to remain flexible through the preparation of the detailed master plan.
- It was suggested that the green gap between Princes Risborough and Longwick needs to be revised in the context of recent grant of planning permission here.

PR6 – Main expansion area development principles

- There were very few direct objections to PR6 in itself – criticism of the policy was more focused on how the Plan fails to deliver against the principles. A number of form letters generated by local campaigns cited PR6 but it is not clear from the representations whether or how the policy needs to change.
- **Bledlow cum Saunderton Parish Council** were supportive of the principles but unconvinced that severe negative impacts can be avoided on views to/from the Chilterns AONB.
- It was pointed out that the strategic buffer in PR5 goes beyond the principles proposed in PR6 (which is limited to referring to separation with Longwick).
- Further clarity was sought on “by day and night” in terms of views from the AONB.
- A change was sought to the reference to heritage assets to distinguish between designated and non-designated assets.
- Concerns over a potential conflict between the aspiration of a high quality scheme delivered in a timely manner with the provision of self-build and custom-build homes.
- Concerns re the viability of the criteria in points 7 and 8.
- The policy should be named ‘strategic development principles’, to distinguish it from more specific matters covered by PR7.

PR7 – Development requirements

- Residents expressed doubt that existing infrastructure would cope and concern that development would not deliver all required infrastructure, or not deliver it soon enough, especially transport infrastructure; that hospital capacity was not catered for; that existing infrastructure should be properly maintained first; that there are existing issues in the quality of education at Princes Risborough and these will be exacerbated; that development should provide more GPs, dentists, teachers and police officers; seeking comfort on refuse disposal, water supply and sewage treatment; seeking more commitment on walking/cycling links to the wider area.
- More specific comments sought further requirements, including: housing for key workers and local people; more self-build plots; more affordable market housing for young people close to the town centre, including one and two bed apartments; preservation of the railway level crossing at Westmead; more provision of youth services and facilities; increased library capacity; more faith space; a sixth-form college; a new railway station on Longwick Road; a light rail service to Thame; broadband upgrade to 'ultra-fast'; a cinema.
- **Campaign to Protect Rural England** were concerned that pedestrian and cycle connections to key destinations (e.g. railway station, town centre) should be maximised to reduce the severance impact of the railway line; environmental standards should be equivalent to those secured at Kingsbrook Aylesbury; agreement should be reached with the County Council on transport provisions (roads, bus links) for the enlarged area.
- The **Risborough Area Residents Association** felt that the proposals do not allow for the social infrastructure necessary for any significant form of expansion for Princes Risborough. The town needs better healthcare facilities and an integrated plan for sports and recreation in the town. Increasing the capacity of the sewage treatment works will increase the footprint of the odour buffer and incur expense for Thames Water, possibly requiring the relocation of the works, which would create substantial delay. There is a lack of detail on many of the

infrastructure improvements required, and a lack of commitment from the Council to support them – a definite timetable is needed.

- The **Summerleys Road Residents Group** felt that space for self-build / Community Land Trust development should be allocated to Summerleys Road residents as a compensatory measure.
- One resident suggested that the lack of wheelchair-accessible footpath provision is a breach of the Disability Act 2004
- **Princes Risborough Town Council** suggest more detail is required on the phasing of the delivery of infrastructure. There must be a broad mix of housing types both for sale and social/affordable rent, including Help to Buy, starter homes, self-build and in particular emphasis on homes for local people via 'Community Land Trusts'.
- **Sport England** felt that the reference to sports facilities is not justified
- **Historic England** suggested that the requirements set out in paras 5.3.102 and 5.3.103 should be inserted into the text of policy PR7.
- The **Environment Agency** seek a change to the policy to include a point about the flood risk sequential approach for development within the site. PR7(4) should include "river corridors" as well as dark skies and views from the AONB. PR7(21) should be strengthened to incorporate a minimum 10m wide buffer zone either side of any watercourse and ecological enhancement of watercourses and their riparian corridors, in accordance with policy DM15.
- **Great and Little Kimble cum Marsh Parish Council** believed that the policy and supporting text should be clearer in expressing the importance and timing of delivery of the replacement railway bridge at Grove Lane (suggested text supplied); PR7(21)(b) should include protection of Smoky Row/Little Kimble.
- **Longwick cum Imer Parish Council** suggest PR7(2)(f) should include measures to deter through-traffic on Owlswick Lane and Stockwell Lane.
- The **Chilterns Conservation Board** felt that the policy should add a requirement to fund enhancements to visitor facilities, rights of way and habitat

management at Whiteleaf and Brush Hill to accommodate increased visitor pressure from the expansion area.

- **Scottish and Southern Electricity Networks** suggested that the policy should include a clause stating that it is the responsibility of the appointed developer to formally agree diversions of existing infrastructure prior to applying for planning permission (also applies to PR11 and PR16).
- **Thames Water** suggested that water treatment capacity in this area may be unable to support the demand anticipated from development: TW welcome the opportunity to work closely with WDC and the developer to plan for needs in a timely way. Strategic drainage infrastructure is likely to be required. The developer or WDC should liaise with TW to consider whether an odour impact assessment is required within 800m of the sewage treatment works.
- **Network Rail** seek a change to PR7(6)(c) to add text requested setting out the delivery mechanism and conditioning of the footpath diversions and underpass / footbridge.
- **South Oxfordshire District Council** suggested adding supporting text to assess cumulative impact of development in Wycombe district and adjacent authorities and identify mitigation in partnership with relevant authorities as necessary.
- **Natural England** requested an addition to the policy that green infrastructure projects are implemented in advance of grey infrastructure and housing
- **Buckinghamshire County Council** noted that the development will generate a need for 3.4 forms of entry for primary schools, not 3.6. PR7(21)(a) should incorporate a walking and cycling route; PR7(21)(c) and (d) should include an improved surface; PR7(21)(e) should include a surfaced walking and cycling route.
- One of the land interests puts forward that in PR7(6)(c) the justification for a footbridge is not clear and it is not deliverable due to land ownership; PR7(21)(e): a 10m safeguarded strip is sufficient, based on previous appeal decision.

- One developer asserts that PR7 is draconian and inflexible and will work against the delivery of new housing on the timescales envisaged. PR7 should be modified as follows:
 - Should be titled 'Specific Development Principles' and introduced as intended to 'guide' development rather than operate as mandatory requirements.
 - PR7(1) – Council should not be sole arbiter of housing need, mix and tenure;
 - PR7(2) – clarification that an alternative route to the A4010 does not need to be fully funded or complete before development can proceed;
 - PR7(6)(c) – similarly, that footpath diversions and railway crossings do not need to be provided before development can proceed;
 - Confirmation that development can proceed in conjunction with the delivery of infrastructure and the two will not always be perfectly aligned;
 - PR7(21) – remove reference to Concept Plan and remove clause (21)(f).
- Another developer put forward the following suggested changes:
 - PR7(19) – the Council should prepare a site specific FRA rather than developers preparing as-hoc Assessments;
 - PR7(21) – the green infrastructure should be planned 'broadly in accordance' with the Concept Plan;
 - PR7(22) and 5.3.121 – the level of broadband available is determined by network providers and this ought to be acknowledged;
 - PR7(23) – the provision of on-site energy facilities should be subject to viability;
 - The target of 40% affordable housing should be subject to viability;
 - Funding of the bus service extension to Longwick would need to be funded separately;

- The requirement is for 2 x 2 FE schools while the expansion generates a need for 3.6 forms of entry. The funding for this extra capacity would need to come from the County Council;
- The requirement that the buffer to the biodiversity sites should be 'at least one field depth' is crude and should be refined.
- The owners of former Molins Sports Ground object to policy PR15 and hence also require the deletion of PR7(15) which depends on it.
- One of the land interests suggested the following changes:
 - PR7(1)(a) to refer to viability assessment;
 - PR7(3) remove 'grid';
 - insert PR7(6)(c)(iv) to say the Westmead crossing PRoW to be closed, provide diversion of the route via Longwick Rd / Mill Lane;
 - PR7(11) to be deleted or make clear that this will be collected through CIL receipts.
 - Supporting text to PR7(5)(5.3.81) – 15 minute requirement for the bus service is unrealistic and should be removed.
- Another land interest challenged the Plan's assertion at 5.3.74 that the proposals are viable in the context of the cumulative policy burden. Relief road is supported in principle and the phased approach to delivery; further work on phasing needs to be completed.
- It was suggested that the green gap between Princes Risborough and Longwick needs to be revised in the context of recent grant of planning permission here.
- One group of landowners observe that land safeguarded for the relief road along the B4009 runs alongside the representors' properties. More detailed, adequate information should be provided about the relief road here for the landowners to comment on.

PR8 – Provision and safeguarding of transport infrastructure

- The relief road is a controversial proposal for most sections of the community. A significant number of representations would prefer a ‘proper bypass’ or ‘true bypass’ and assert that the relief road will not be adequate for the forecast traffic flows (some representations assume that traffic modelling has not taken account of growth in the wider area when this is not the case). Overall, community groups (a) object to the very major development of Princes Risborough and (b) oppose the rationale of the relief road, arguing either that a ‘proper’ bypass is required or alternatively no major road infrastructure would be required in the context of less development here.
- Residents felt that the requirement for major new road infrastructure is not justified and the relief road proposal is not sound, sustainable or legally compliant. A ‘do nothing’ option should have been investigated, including the use of ‘smart’ technology.
- It is claimed that the relief road proposals are not the most appropriate strategy in terms of:
 - transport and cost efficiency;
 - harm to the Green Belt and AONB;
 - congestion and safety issues around the railway station;
 - direct impacts on Summerleys Road residents. Option 17 would be a better solution for Summerleys Road and reduce severance in the main expansion area;
 - impact to amenity uses of country lanes by walkers, cyclists and horse riders;
 - impacts on the access to the Princes Estate;
 - severance issues within the new development;

- wider issues along the A4010 at High Wycombe and outside Aylesbury.
- It is claimed that Option 17 is affordable in the context of value generated by the development. The preferred routing for the southern section is driven by the need to access land to the rear of Poppy Road (PR11) and does not sufficiently recognise the status of Green Belt, AONB, and local ecology. The traffic modelling is deficient, and the proposals do not show strategic alignment with the wider transport network.
- Residents felt that the overall approach to the relief road is not aligned with national strategies – either option 17 should have been progressed or a more strategic intervention to take traffic away from the A4010.
- Other representations suggest that limited improvements to the existing road network are all that is necessary (“making best use of existing”). There is also a school of thought which argues that recent innovations in transport such as driverless cars and improved real-time traffic information could significantly reduce future traffic demand – and therefore the requirement for new road infrastructure should be kept subject to review when more is known about emerging trends. Some suggest that a more sustainable and incremental approach could be taken, with a longer view to getting a wider bypass in place.
- Some groups are particularly concerned with the impact of the section of the final preferred route of the relief road that runs between Picts Lane and the A4010 close to Culverton Farm. They are concerned about road safety and the impact on the use of the country lanes for leisure purposes: rambling, cycling and horse riding. The proximity of the national cycle route (NCN57) and the Ridgeway National Trail intensify these concerns. Provision for safe crossing should be made of the relief road by pedestrians and cyclists at its junction with Picts Lane, and calming measures such as a reduced speed limit, on local residential roads, including Shootacre Lane.
- The **Summerleys Road Residents Group** are directly impacted by the route of the relief road, which will require widening of the carriageway here and the replacement of a railway under bridge with a wider span and greater headroom. They oppose the routing of the relief road here and are worried about road

safety, increases in noise and vibration (including from HGVs), impacts on air quality, and safe egress from their driveways. A noise-reducing surface should be required.

- There is concern that the route of the relief road past the railway station will lead to more congestion here and further concerns about safe access to the station by pedestrians and cyclists.
- There is support for the southern alternative which avoids Shootacre Lane and Picts Lane from the **BANG** action group, while they maintain an in-principle objection to the scale of growth at Princes Risborough. However, this alternative crosses a field in the AONB at Culverton Farm and in the vicinity of the Pyrtle stream which is also a concern for the public in terms of environmental harm. Community groups either oppose the route here or seek firmer commitments in terms of environmental mitigation, landscaping and so on. Some express a preference for routeing via Shootacre Lane as being less harmful.
- There is concern about the use of the relief road / A4010 for ambulance traffic between the hospitals at High Wycombe and Stoke Mandeville. New or changed junctions should be designed in such a way as to deter drivers using unsuitable rural and village roads through the AONB at peak times.
- There is a lack of confidence from the community that the new road can be funded or delivered. There is also concern that the road design and the forecast traffic flows will replicate the problems of severance that are currently experienced with the A4010 through town centre.
- A number of representations assume that construction traffic for HS2 will be using the new road. The quality of evidence on land costs and Part 1 claims questioned.
- The **Environment Agency** felt that PR8(4) should state that any crossings of watercourses should be by clear span bridge rather than culverts.
- **Great and Little Kimble cum Marsh Parish Council** suggest the policy and supporting text should be clearer in expressing the importance, and timing of delivery, of the replacement railway bridge at Grove Lane.

- The **Chilterns Conservation Board** advocates that the new road section within the AONB should be deleted (as likely to constitute major development) and a solution sought which avoids this. Any works within the AONB should be addressed with a substantial AONB ecological mitigation package.
- **Natural England** consider the new road section within the AONB is major development, while at the same time asserting that insufficient evidence has been provided to undertake the major development test. The exact location of the road and any associated grey and green infrastructure needs to be specified to show compliance with NPPF 115.
- Land interests ask that policy should set out the sequencing of sections of the relief road (based on clear evidence). Flexibility is sought on the alignment of the road and the specification of the cross-section, to minimise costs and environmental impact. There needs to be greater clarity on how off-site transport infrastructure contributions are to be secured and how it is to be delivered.
- Respondents assert that through dense residential areas the speed limit should be 30mph maximum and use noise-reducing surface. Other amendments to policy and supporting text are suggested, to assist with integrating the road into the landscape.

PR9 – Princes Estate expansion

- Community objections to this policy (and PR10) highlighted the unsuitability of Princes Risborough for business expansion and the lack of a match of homes with jobs within the town. Objections go on to say that this will cause further pressure on transport systems and lack of patronage of local facilities and shops.

PR10 – Land North of Lower Icknield Way

- Local objections to this policy focused on the unsuitability of the road approaches to the site which include a railway under-bridge and an awkwardly placed junction, particularly for long vehicles. The need for the site was questioned, and its transport sustainability questioned. It was pointed out that locating development ostensibly related to Princes Risborough outside the

settlement boundary and beyond the buffer, seems also to be wholly at variance with the sentiments and objectives set out in the text accompanying Policy PR5 about establishing a firm boundary to the town and providing a firm basis for protecting the countryside from unnecessary encroachment.

- The **Environment Agency** considers that the strategic flood risk assessment is not sufficient to be sure that the relevant sites pass the second part of the exceptions test. Therefore this site may be undeliverable; PR10 (5) – stream buffer should be strengthened by reference to DM15 and the 10m buffer required by that.
- **Longwick-cum-Ilmer Parish Council** object to this allocation on the grounds that it is totally unsuitable, particularly in respect of highway issues.
- **Buckinghamshire County Council**'s comments relate to early feedback on the site and does not acknowledge later, more positive, advice received from the County Council.

PR11 – Land to the rear of Poppy Road

- Residents are concerned that the site was not subject to proper consultation and that they were not adequately informed of the proposals in advance of the Publication version of the Plan. Many object in principle to the release of the land from the Green Belt (exceptional circumstances not justified / assessment of meeting GB purposes faulty) and any development within the AONB. Others suggest that the relief road alignment was changed at the southern end with the primary objective of releasing this land by creating an access to it. Other representations emphasise that access from Wycombe Road would be problematic. The location of the site is more remote from the town's services.
- Residents also believed that the development of the site is inappropriate in the context of the Pyrtle Spring, a chalk headwater, in terms of ecological impact, water quality and flood risk. It is suggested that the site should be preserved as an ecological conservation area; however others maintain that public access to the wildlife areas would be unsafe and inappropriate.

- Important species may be present such as Great Crested Newt. There is also concern about the impact on views from the AONB and the Ridgeway National Trail.
- The capacity of the site to deliver the indicative number of homes is questioned (it should be fewer). If the site is removed from the Green Belt, the revised Green Belt boundary should be aligned with the boundary of the developable area so as to further protect the wetland area.
- The **Environment Agency** considered that the strategic flood risk assessment is not sufficient to be sure that the relevant sites pass the second part of the exceptions test. The EA believes the site may be undeliverable, and requests that the policy include a point about the flood risk sequential approach for development within the site. PR11 (1) reference to stream buffer should be stronger with reference to policy DM15 and the 10m buffer required by that.
- The **Chilterns Conservation Board** believed that the allocation should be deleted.
- **Buckinghamshire County Council** puts forward that access to the site should be taken from either the lowest classification of road or that with the least flows within the network hierarchy.
- **Scottish and Southern Electricity Networks** suggest the policy should include a clause stating that it is the responsibility of the appointed developer to formally agree diversions of existing infrastructure prior to applying for planning permission.
- **Thames Water** note that local upgrades may be required to the existing water network infrastructure.
- Land interests here support the allocation but assert that the main vehicle access should not need to depend on the delivery of the relief road, which would prevent early delivery of the site. The site should be brought forward as soon as possible. The site has capacity for more dwellings than indicated by the Plan. For the avoidance of doubt the policy should state that the site is being removed from the Green Belt.

PR12 – Town centre traffic and public realm enhancements

- Community concerns for the town centre principally focused around the provision of adequate parking and retail in the context of the growth of the town. Some felt that the current one-way arrangement on the High Street should be returned to two-way operation. Opening up the other end of Park Street would improve traffic circulation and make the town centre more legible.
- Many are opposed to decking the current council car parks, particularly the Mount in the context of the nearby church and town centre conservation area. Alternatives proposed by the community seem unlikely to be feasible or deliverable. There is a sensibility that the town is in competition with places like Wendover and Thame and that there should be more free parking available to support the vitality of the town.
- Certainty was sought on the process and timetables for implementation, particularly on the timing of the traffic management measures in the context of the delivery of the relief road. If they can't be introduced until the relief road is complete, this could be a long way into the future.

PR13 and PR14 – Town centre sites

- Some residents felt that the town centre would not be capable of expanding to meet new demand / the town centre policies are not adequate to meeting demand from the proposed growth. The Plan should demonstrate guaranteed investment in the town centre before any significant growth. Objectors were seeking certainty or commitment that these sites would be developed, in the context of multiple land interests here – some called them 'aspirational and unrealistic'. It was suggested that substantial additional retail, pubs and restaurants on the ground with additional apartments above and parking underground could be delivered here. Additionally, PR14 should actively pursue the movement of the fire station to the new development area and the

redevelopment of the site for prime retail at ground level with residential above and underground parking.

PR15 – Molins sports ground

- One resident supported the site owner’s proposals for residential development (as part of an alternative to major expansion).
- **Sport England** welcomed the principle of bringing the site back into use, but felt that more evidence of the demand for facilities should be established. However, they also state that without suitable evidence and a surplus of facilities no sites should be lost in whole or in part, or their use prejudiced.
- The promoters of the land maintain that the policy is ineffective as the land is not available. They proposed an alternative policy which allocates the land for residential development.

PR16 – Land at Princes Risborough Station

- Most local objections were related to route of relief road via this site (but more relevant to PR8). It was felt that there needs to be clearer provision for safe cycle and pedestrian access to the station from the south and Shootacre Lane.
- The **Environment Agency** felt that the strategic flood risk assessment is not sufficient to be sure that the relevant sites pass the second part of the exceptions test, therefore this site may be undeliverable; 5.3.215 is not consistent with policy DM15 of the WDC DSA DPD (with reference to de-culverting of stream). The EA supports the proposed de-culverting of the stream.
- The **Chilterns Conservation Board** felt that the policy is a missed opportunity to provide a gateway to the Chilterns AONB, and suggest WDC add measures to boost the tourism and day visitor experience e.g. cycle hire, information centre, signage and interpretation.
- **Thames Water** noted that local upgrades to the existing water network infrastructure may be required.

- **Network Rail** advised that some land within PR16 is within their control, so any development of this area would be subject to railway and regulatory approvals and agreement between relevant landowners.

PR17 – Princes Risborough delivery of infrastructure

- Residents felt that the relief road should be delivered in the first phase to meet the recommendations of the Jacobs Options Assessment Report. There is an overall aspiration that infrastructure should be delivered before housing. Staged delivery of the relief road will incur greater costs. Objectors questioned the ability of the Town Council or WDC to achieve the necessary coordination to carry the proposed Plan through, with the result that only piecemeal changes would be achieved during the Plan period. Firmer assurances are sought with regard to the timing and delivery of promised schools, public realm works etc. Synchronising the relocation of Sumitomo and the closure of the Aylesbury line to deliver the early works required for the relief road seems unlikely.
- **Great and Little Kimble cum Marsh Parish Council** suggested modifications to the policy and supporting text to reinforce the importance of delivering a replacement railway bridge at Little Kimble, to protect the Kimbles and working in partnership with adjoining Parishes.
- The **Education and Skills Funding Agency** seek clarity on paragraph 5.2.225 and the revision of the CIL R123 list and the interrelationship between CIL and s106 to avoid double-charging.
- **Natural England** proposes an additional requirement for green infrastructure projects to be implemented ahead of grey infrastructure and housing. Some land interests expressed doubt that comprehensive equalisation could be achieved in practical terms. Additional work is required on viability, infrastructure, programming and phasing. A flexible approach is needed to allow development to come forward in stages. More clarity is needed on the CIL 123 list review. The requirement for applicants to prepare a detailed phasing and infrastructure delivery plan for the whole expansion area was challenged. However, there was

some enthusiasm for land interests to be engaged on the preparation of more detailed planning guidance.

Bourne End and Wooburn

Principles

- Most representations on the 'Principles for Bourne End and Wooburn' were focused on the perceived failure of the proposed allocations (BE1 & BE2) to achieve the principles set, along with concerns expressed about the deliverability of the transport measures identified, rather than comments directed at the principles per se. The principles themselves are generally supported.
- **Historic England** have recommended adding a principle re the historic environment (similar comments are made re other area principles as well).
- The **Environment Agency** asked for Point 1(a) (which states "make the most of the areas of Thames-side setting") to also refer to the River Wye setting, as this is also important.
- Further specific points raised include:
 - 2a) Flooding will worsen by building on floodplains
 - 4a) Only the section of former railway from Cores End Road Bourne End to Willows Crossing has been declared a public right of way
 - 5c) The 'eastern link road' is unadopted track, most of which is too narrow for a main road without demolishing dwellings at the junction with Cores End Road. A new link road will increase congestion at Cookham Bridge
 - 6a) right to buy has resulted in loss of affordable housing – Lincoln House Brookfield Road recent example
 - 7) Vitality and viability of Bourne End and Wooburn village centres will not be maintain if proposals go ahead.
 - 8) will result in increased air pollution and not mitigate climate change

BE1 – Slate Meadow

- Developers asserted that the flood risk sequential approach has been correctly followed and that the Environment Agency have incorrectly identified that SFRA level 2 is based on out of date evidence. A detailed modelling report was prepared in July 2016 (*Slate Meadow, Bourne End: River Wye - Hydrology and Hydraulic Modelling Report*) and the Environment Agency Modelling Team confirmed that the HR Wallingford modelling “*has been deemed acceptable*”.
- One developer suggested that the site off Whitepit Lane should be developed instead of Slate Meadow. Residents advocated the use of brownfield land instead.
- Residents asserted that Slate Meadow provides an important separation between the settlements of Bourne End and Wooburn Town, and suggested the deletion of the site as an allocation or a reduction in the number of dwellings to 75 homes.
- Residents believed that flood risk has not been adequately addressed, that it should not be left up to the developer, and development should not be taking place on a floodplain, citing extensive flooding events in recent years.
- Residents were of a view that there is inadequate infrastructure to support development. They feel that the roads are already congested, that there is not enough parking, and that schools and healthcare provision is oversubscribed.
- Residents are concerned that traffic leaving Stratford Drive (especially at school time) is already at dangerous level and risks the safety of young children. A sole exit at Stratford Drive serving Slate Meadow is felt to not be sufficient. Some residents suggest that the scale of development should be reduced to match the capacity of transport and the road infrastructure.
- Residents believed the site is not large enough for 150 homes, suggesting the development capacity is limited due to village green on part of site.
- Some respondents thought that the scale of development is out of proportion with the rest of the settlement.

- Residents believed more affordable housing should be provided for local people rather than large executive homes
- Residents felt that development will obliterate the views to the hillside immediately to the north; and any undeveloped break between Bourne End and Wooburn.
- Residents felt that the village green is an important habitat for local wildlife.
- Residents expressed concern that if medical provision is located at Slate Meadow it will be less accessible than its current location.
- Some residents felt that public transport links should be established between the site and Bourne End village centre.
- Some residents felt that WDC has failed to take into account the historic environment.
- The **Education and Skills Funding Agency** supported the safeguarding of land for schools
- **Thames Water** noted that water and wastewater network capacity may need local upgrades.
- **Scottish & Southern Electric** confirmed the area is not currently covered by existing infrastructure.
- **Highways England** would expect to see an assessment on the strategic road network
- **Bucks County Council** supported the approach for provision of primary education. Development of the site should also provide financial contributions to the new bridleway along with providing a connection.
- The **Environment Agency** suggested that the policy should say make the most of Wye setting / the Wye is an asset and the river itself should be enhanced as well as its buffer / corridor.

BE2 – Hollands Farm

- Respondents indicated that, as part of a wider objection to the settlement hierarchy report and the plan strategy, Bourne End should be recognised as a lower tier settlement with less capacity for growth. There are related points that the extent of GB removal at Bourne End is disproportionate compared to other settlements and that the SA fails to adequately consider alternatives (rendering both the SA and the Plan unlawful).
- Representors strongly believed that Green Belt sites should never be developed as DM GB Policy in both NPPF and WDLP say that allowing development in the GB is unacceptable in principle.
- Some residents, accepting that Green Belt can be reviewed as part of the Local Plan review, expressed there are no exceptional circumstances to justify removing this site from the GB. (Or for some objectors, no justification for any GB sites.)
- Some felt that the Green Belt assessment of this site is flawed – when judged against the Arup/WDC criteria this site performs more strongly against GB purposes than suggested.
- An alternative assessment of housing supply across the district has been submitted supporting the proposition that the balance WDC has struck between unmet need and supply is therefore tilted away from releasing this site (and perhaps other sites).
- Residents felt that development of this site would result in an unacceptable loss of separation between (variously) Bourne End / Wooburn / Cores End / Hedsor / Harvest Hill & Hawks Hill / Upper Bourne End. This issue is related both to GB purposes and more general settlement pattern / landscape concerns, and the issue also overlaps with objections to the settlement hierarchy and objections to the deletion of 2004 LP Policy C16 (for Hawks Hill and Harvest Hill).

- Residents felt that development of this site would result in an unacceptable impact on the rural landscape and the enjoyment of the countryside, the loss of farmland, and the loss of biodiversity.
- Residents felt that development of this site would result in an unacceptable impact on the Hedsor and Riversdale Conservation Area.
- Some respondents were of the view that the site (or parts of the site) are subject to unacceptable flood risk.
- Residents were concerned that there is / will be inadequate infrastructure to support growth. This is mainly in terms of transport, health and education, and there will be an unacceptable impact on existing infrastructure as a consequence. The traffic pinch point at Cookham Bridge is insuperable. Some representors recognise that additional population could support existing local shops and facilities but only if there is increased parking in the centre of Bourne End, otherwise the harm would outweigh any benefits.
- In relation to the eastern link road on Hollands Farm respondents either:
 - believed that whilst alleviating some traffic, it would not reduce the effects caused by BE1 and BE2 themselves
 - did not believe the relief road would be sufficient in relieving the local highway network as it would link the two worst pinchpoints in the village.
- **Keep Bourne End Green** believed that there is no certainty over the delivery of the new primary school on BE2 as the United Reformed Church who owns this part of the site does not want to see the land developed.

BE3 – Health facilities in Bourne End and Wooburn

- Some responses expressed that a new health facility should be placed on an employment area in Bourne End, not on Slate Meadow or Hollands Farm.
- Some residents were unsure whether this proposal involved the closure of existing facilities in Bourne End (Pound House and Hawthornden Surgeries).

- Some felt that merging existing surgeries into one purpose-built building is unsound strategy.
- Some respondents suggested that the use class would raise significant flood risk issues as well as access issues.
- Some responses pointed out that as no site has been formally identified for the health centre they were unable to comment on the implications for dwelling numbers/density on BE1 and BE2 as a result, or how deliverable the site will be.

Rural Areas

Principles for the rural areas

General issues

- Some respondents felt that the proposals for rural areas do not support the objective to “Cherish the Chilterns”.
- Some respondents felt that there are no proposals in the plan to support rural areas principles 1 and 4.
- Residents felt that there is a need to respect the special character and sense of places of villages and hamlets.
- Residents felt there is a need to protect the AONB along with other environmental assets including landscape and biodiversity value, and avoid damaging works.
- Residents expressed their desire to see proposals that respect the particular character and sense of places of villages and hamlets, especially Lane End.
- Residents wanted to see more support for rural enterprise and diversification by allowing farms within the AONB.
- The **Chilterns Conservation Board** is concerned about the 940 homes proposed in the rural areas. Most of it is in the AONB, this quantity of development could harm the AONB.
- Some respondents felt that smaller settlements should be increased by a small amount to assist their sustainability and reduce the need for large areas of new housing in a limited number of areas. WDC is encouraged to consider this approach.
- Respondents suggested there needs to be a joined-up strategy for the rural economy, and one which extends beyond farms and forestry.

- Some respondents felt that the principles for the Rural Areas fails to demonstrate regard to conserving and enhancing the natural beauty of the AONB which the Council are required to do under the Countryside and Rights of Way Act 2000 section 85 – shouldn't adopt the same approach to rural diversification in a designated area as a non-designated area.
- **Historic England** considered that it would be clearer to simply say “conserve and enhance designated and non-designated heritage assets and their settings”
- **Buckinghamshire County Council** said that by specifying country lanes in principle 4 b 3 iii, it might exclude other roads where safer walking cycling and horse riding is needed. Point III in their view should say “enable safer walking, cycling and horse riding on country lanes, or where appropriate, seek alternatives along verges along other rural roads.”

Lane End

General Points for Lane End

- Respondents felt that there is a significant demand for affordable housing in the village which recent developments have not provided and is unlikely to be delivered by the proposed allocations.
- Residents felt that in recent years Lane End has absorbed several new developments with no infrastructure improvements. Consequently, any more development in this location would be completely contrary to the rural area principles, which clearly states that villages will be protected from losing the very structure which defines them.
- Residents were concerned about the cumulative traffic impacts of the developments.
- Respondents argued that great weight should be attached to conserving the landscape and scenic beauty of the AONB and sites over 10 dwellings should not be allocated.
- One developer noted that the settlement hierarchy identifies that Lane End does not perform well against the test for higher order facilities (no secondary school, dentist, leisure centre or library).

RUR1 – Land south of Finings road, Lane End

Impact on environment

- Respondents felt that the allocation contradicts the aim to cherish the Chilterns and would be detrimental to the AONB.
- Respondents felt that the site should not be developed as it is valuable in terms of its natural and historic environment as well as having strong landscape character and high biodiversity.

- Some respondents accepted that the site might be developed, but suggested due to its sensitivity it should be allocated for fewer than 10 homes.
- An objection was received citing impacts on Ancient Woodland: the woodland is dependent on its surroundings and cannot be seen in isolation. The 15m buffer would be wholly inadequate, as it would not be of sufficient quality and would not prevent the public causing damage. It is also unlikely to be delivered in advance of the development.
- Respondents felt that the site is a rich habitat for wildlife and protected species, and should be considered for SSSI status. The site has provided secluded grazing for fallow, roe and muntjac deer that maintain the woodland by grazing seedlings that otherwise would change the character of the beechwood. The tussocky grass provides shelter for voles, shrews and mice, foxes, badgers, weasels, kites, sparrow-hawks, kestrels, buzzards, tawny owls, nuthatches, goldfinches and tree creeps, barn owl and hazel dormouse. Light disturbance, noise and domestic pets will disturb this vital resource for wildlife.

Access and traffic

- Residents were concerned over the safety of the access road and vehicular access onto the B482, which was seen as an accident blackspot as the access would be on a blind bend.
- Residents were also concerned about the potential increase in traffic.

Flooding

- Many were concerned that the development, which is on higher ground, would exacerbate drainage/ flooding issues due to the position of the proposed dwellings.
- Residents raised the issue of existing surface and groundwater flood risk due to springs and poor soil drainage.
- In addition to the potential flooding issues, an issue was raised that the complex hydrology of the site which effectively irrigates the ancient woodland could be

disturbed, risking the woodland, and also disturbing the natural recharge of the aquifer and nearby protected sites, including a SSSI, and protected species.

Rural business

- Residents felt that the loss of a working field runs against supporting rural enterprise and diversification by allowing farms within the AONB.

Site boundary

- There were concerns that the site has no defensible boundary to the south to prevent further ribbon development.
- Respondents were also concerned that proposed the tree barrier would limit the new residents' right to light, and there are concerns that it would be removed , impacting the landscape dramatically

Character

- Objection was received to two measures being omitted from the 2016 draft plan iteration of the allocation:
 - The requirement to preserve the conservation area setting using a 25m buffer.
 - The requirement to reflect the special character, layout and form of adjoining residential areas.
- Residents were concerned that as the site is the highest area near and overlooking the village any building higher than a single storey would dominate the surrounding landscape. It is asserted that this would go against maintaining the rural character of the village.
- Residents were concerned that development will compromise the Lane End conservation area or the setting of the listed White Gable Cottage.

Affordable housing

- Residents were concerned that the site would not deliver affordable housing.

Infrastructure

- Respondents were concerned about the capacity of supporting infrastructure in terms of local schools, medical facilities, public transport, recreational facilities, car parking

Other points

- The developer argued that the southern boundary of the site does not extend to the existing built limits of the settlement and therefore the site area should be extended in line with the existing settlement boundary. They argued that the site's capacity should be increased to at least 32 homes. The southern boundary of the allocation in their view should extend to the existing built limits of the settlement and the developable area should extend southwards in line with the existing settlement boundary to the east. They put this forward as an alternative to removing land from the Green Belt elsewhere in Land End.
- Another developer asserted that the allocation is major development in the AONB and should be restricted. If this allocation is argued to be a landscape-led allocation then the uplift in terms of quantum proposed in the plan compared with the evidence supporting the AONB statement (June 2016) is flawed and not supported by evidence.
- The **Chilterns Conservation Board** objected to the allocation on grounds that it fails para 115 of the NPPF in terms of the need to give great weight to conserving and enhancing the natural beauty of the AONB. The site comprises attractive rural pasture land. The site is in a sensitive location between ancient woodland and conservation area and is valuable in terms of natural and historic environment. It also has a strong landscape character. Residential development near the wood will create disturbance and the 15m buffer proposed will not safeguard this. There is no defensible boundary to prevent development pressure for development of the rest of the field. Any improvements to the access on Finings Lane and introduction of footways to the village would affect rural character.

- **Scottish and Southern Electricity Network** noted that the surrounding network has not been modelled for this additional load and therefore may require additional network reinforcement and/or alterations or even a new distribution substation and associated high voltage reinforcement.

Changes proposed by respondents

- If the allocation is taken forward respondents suggest the following changes:
 - The density should be reduced.
 - The boundary to the Ancient Woodland should be extended to 20 metres.
 - The southern boundary should be delineated as a continuation of the line of the boundary between Little Acorns and the Oakwood Close development.
 - No street lighting should be allowed on the development.
 - The development should be designed so that there is no possible expansion of roads into the rest of the Golden Guff.
 - The tree boundary envisaged should not be planted within the confines of the new properties, but beyond the clearly delineated gardens, so as to protect it from any inclination of householders to thin the trees and shrubs on their property.
 - The tree boundary should shield the rest of the Golden Guff from light from the upper floors of the development, which should be no more than two storeys high, and should be regarded as inviolate, so that no clearing, thinning or removal can take place at the urging of the householders.
 - The fringes left vacant to the north and east of the site should be separated from the residential area by a fence and planted up with native shrubs and trees to encourage wildlife and create the rural patchwork of hedges and trees that the Wycombe District Plan has previously described as fundamental to the character of the village.

RUR2 – Land between Chalky Field and Marlow road, Lane End

- Residents felt that the allocation would be inappropriate major development in the Area of Outstanding Natural Beauty.
- Residents felt that the allocation would be visually damaging in the landscape or in the setting, and visually intrusive from a number of vantage points from the AONB and the open countryside, with specific concern raised about damaging a beautiful line of site view. It was felt that any potential screening could not mitigate this impact
- Several issues were raised in respect of the biodiversity impacts of the proposals, including the loss of important trees, hedge or other vegetation, the loss of important wildlife habitats and a wildlife corridor, the related harm to rare plants or animals.
- Concern was raised in respect of the loss of traditional field patterns and high-quality agricultural land.
- Concern was raised in respect of perceived adverse impacts on a SSSI.
- Concern was also raised in respect of light pollution, particularly an increase in sky glow and glare which would reduce night sky visibility in the surrounding area and have ecological impacts on nearby habitats.
- Residents felt that the proposed allocation will lead to an increase in traffic issues including congestion, safety and air pollution. Some suggested that traffic calming measures and rerouting opportunities for through traffic should be added.
- Residents were concerned about parking and the impact that additional parking on the streets around the development site might involve, particularly in respect of road safety.
- Residents pointed out that there was no mention of affordable housing.

- Residents felt that the proposed allocation will not be compatible with the existing character of the area and conservation area, or the existing pattern of development.
- Residents felt that the proposed development will breach the existing settlement boundary, increase exposure of the urban edge and contribute to urban sprawl which is recognised as being a major contributor to climate change
- Residents raised several issues around amenities, including the loss of open spaces, the impact on the existing natural features and contours, the lack of private amenity space, the potential impact on existing public rights of way, and the impact on the surrounding countryside.
- Residents were concerned that the existing sewers in the area are inadequate.
- Concern was raised in respect of the risk of flooding or creation of flood risk
- Residents were concerned for the viability and vitality of Lane End and the potential adverse effect on the rural economy and community.
- Concern was raised in respect of the strain on local amenities such as schools and GP surgeries, which are claimed to be oversubscribed with long waiting lists.
- Concern was raised in respect of a lack of public transport provision and the consequent dependence on car journeys, and resulting environmental impact.
- One resident was concerned that there was no mention in the 2016 draft or this 2017 plan about the High Pressure Gas installation which borders the site or the gas pipeline running underneath the site. No reference about improving the Thames Water infrastructure, so the regular sight of sewage tankers lining up all night at Lane End Pumping Station is unresolved.
- One developer put forward that the quantum of development proposed is not supported by the evidence in the AONB statement, and that the site represents major development in the AONB and should be restricted.
- One developer questioned the appropriateness of the allocation when considering other sites in the district that had not been allocated might be

preferable alternatives. They raise the issue of the site's location at the edge of Lane End, feeling that the visual sensitivity of the site has been underplayed despite views on the approach to Lane End and overlooking from properties and allotments to the north. Development would be an urbanising influence on the surrounding designated landscape, and would affect the character of the approach to the village. The presence of services, capacity of the existing entrance, surface water risk across the site, location within 500m of a SSSI buffer, and the SA assessment of the site having limited accessibility to services were all raised as points against the development.

- Some suggested that this allocation should also include the development proposed at site allocation RUR1.
- **Thame Water** noted that the wastewater network capacity in the area may need to be upgraded to support the development, and that developers should undertake a drainage strategy. There may be existing public sewers crossing the site - this would require an agreement with Thames Water; if development is proposed within 15m of pumping station it may require noise / odour / vibration assessments to ensure no adverse amenity impacts on new residents.
- The **Chilterns Conservation Board** objected to the allocation for 27 dwellings on the grounds that development would not conserve or enhanced the landscape and that it would represent urban encroachment beyond the south eastern edge of Lane End. Concern was raised that the lack of a defensible boundary could lead to pressure in time to develop the whole field.
- **Scottish and Southern Electricity Network** noted that there was no high or low voltage infrastructure within the boundary. They suggest there may be a need for some low voltage network reinforcement or network alterations.

RUR3 – Land at Sidney House, Lane End

- Some residents suggested that the redevelopment of the site would be desirable, assuming it would remain as affordable housing.

- One developer acknowledged that the site's Green Belt function is diminished by its location adjacent the M40, but that as it is within the AONB it would be major development, which should be restricted. Concerned that no housing number is given.
- One developer argued that this site should be weighed against site allocation RUR1 and the preference to preserve the Green Belt boundaries. RUR1 could have its allocation increased in exchange for deleting this allocation and leaving the land in the Green Belt.
- **Scottish and Southern Electricity Network** were unable to determine what reinforcement might be required due to the unknown number of homes proposed. Multiple low voltage underground cables cross the development which will need disconnecting/ diverting; site contains an 11kV distribution substation and multiple high voltage cables. These may need to be diverted and the substation relocated if they interfere with the proposed development.
- **Thames Water** were unable to make an assessment without proposed numbers.

Little Marlow

RUR4 – Little Marlow Lakes Country Park

- Developers questioned the deliverability of the allocation due to a multiplicity of ownerships, and the resultant rights conferred on the private owners.
- Some developers questioned if it is necessary for the land to be designated as a country park given there is an existing pattern of formal and informal recreational uses on the land, including many footpaths.
- One developer felt that the scale of the allocation represents an over-provision when considering the levels of growth proposed by the plan as a whole.
- Developers proposed alternatives for the site, including the allocation of a portion of the west of the site for commercial uses, which could deliver a formal access to the country park, and the allocation of the former Newtown Pit for formal outdoor recreational use with car parking.
- Support for the policy as drafted was received from a number of members of the community and community groups, including the Little Marlow Lakes Country Park Community Partnership.
- Support was received from community groups for the exclusion of commercial / business development on the western side of the site.
- Some residents voiced their support for the conversion of the former Lexmark offices to residential.
- Residents recognised the biodiversity and ecological value of the allocation.
- One resident highlighted the need for additional permissive paths and limited cycle tracks through the country park.
- Some representors raised the point that the use of the Little Marlow Country Park as open space supporting growth at Bourne End is unsound, not effective or not justified, given that the main mode of access would be by car.

- One resident stated the allocation of a country park will not be required as the new housing at Bourne End would not be delivered.
- **Chiltern District Council** and **South Bucks District Council** supported the creation of a country park to alleviate pressure on Burnham Beeches, provided that proper arrangements for the delivery and maintenance of the country park can be secured.
- The **City of London Corporation** observed that that the allocation will not absorb 100% of the potential additional footfall and consequently requested that the site is promoted strongly to Bourne End residents as an alternative to Burnham Beeches.
- One respondent suggested the inclusion of a reference to the AONB within the policy text.
- One respondent suggested the inclusion of a reference in the policy text to the flood risk sequential test for any development within the allocation.
- One resident suggested the use an undefined area of the site “between Little Marlow and the A404” for housing growth as an alternative to growth at Bourne End.

Longwick

RUR5 – Longwick-cum-Ilmer Parish

- There were not a great number of representations commenting on the specific policy for Longwick (RUR5). Most comments referencing Longwick are in the context of overall growth proposed for Longwick, Princes Risborough and the Kimbles.
- Residents voiced some concerns, including that 300 homes at Longwick is too great a number, and that this number is a fait accompli as most sites already have planning permission.
- Concern was raised about the lack of supporting infrastructure proposals.
- Concern was raised about the risk of coalescence with Princes Risborough.
- Some residents sought clarity on the definition of 'large-scale'.
- Some residents felt that there was a need for rat-running measures along Bar Lane, Longwick.
- Residents wished to secure the preservation of the Shoulder of Mutton as a public house.
- Developers felt that the policy should require a minimum of / at least 300 homes and omit 'maximum', that the policy is too explicit on number of homes and should be more flexible.
- One developer felt that sites should be allocated by a neighbourhood development plan or a Sites Allocation Development Plan Document.
- Developers felt that the references to directing development to small sites and restricting large scale sites should be deleted, as small and large scale are not defined.
- One developer suggested that para 4 should be deleted (no justification supplied for this).

- Some developers suggested alternative / additional sites.

Kimble

RUR6 – Great and Little Kimble-cum-Marsh Parish

- Developers questioned the reliance on a neighbourhood plan to bring forward such a large quantum of development, and the perceived limited justification for upgrading the settlement from tier 5 to tier 4, citing inconsistencies in the evidence.
- Developers questioned if 160 dwellings is an appropriate figure, both in terms of delivery through a neighbourhood plan, and if this should be a minimum figure as the parish is unconstrained and could accommodate a greater number of houses.
- Developers considered that including a stipulation that development should be restricted to small sites will make some sites unviable, and will restrict the delivery of affordable housing. This could be better achieved through the development of larger sites (say up to 30 dwellings).
- Developers argued that there has been no consideration of reasonable alternatives to a range of small sites, such as large sites that incorporate extensive green infrastructure. The latter option could result in overall less environmental impact and should be a matter for detailed site selection.
- One response highlighted the area's sensitivity and the need to ensure the Plan is in line with the NPPF para 115. It was stressed that it is not acceptable for the Local Plan to require a Parish Council to make allocations in a neighbourhood plan which are likely to harm the AONB, biodiversity and designated historic assets. A neighbourhood plan would not be in conformity with the Local Plan if it failed to do so, and yet a Parish Council is, like the District Council, subject to the duty towards the AONB in the Countryside and Rights of Way Act 2000. Policy should make it clear that the NP needs to respect national policies on Green Belt and AONB in selecting sites. No detail has been provided around the location of development or the mitigation measures proposed and consequently the Plan is not consistent with Para 115 in the NPPF.

- Residents felt that the housing number is too high, and should be reduced as the area lacks the services and facilities to cope with the increase. The area is also highly sensitive in landscape terms, with the lowest option (4) in the Landscape Sensitivity and Capacity Study for Kimble likely to be significantly too high given the wider non-landscape impacts (therefore not considered in the landscape study) which limit the suitability of Kimble to grow, including the heritage and biodiversity impacts.
- Residents felt that the inadequacy of the railway line and service and the challenge it presents to supporting an enlarged community needs to be recognised. Issues raised include that the line is single track and is currently working at almost capacity. Also, this line will be severed between Little Kimble and Aylesbury for a long period of time while construction of HS2 is carried out near Marsh level crossing. The local plan must have a binding obligation on Chiltern Railways and Network Rail to provide a substantially more convenient and more regular service to Little Kimble station before any large scale development is permitted in the area.
- Some residents were concerned about the long-term possibility of an uninterrupted suburban ribbon development between these villages and Aylesbury.
- One respondent felt that the policy wording needs to be clearer to provide sufficient guidance to those preparing a neighbourhood plan, including specific wording to refer to deliverability and developability of sites to guarantee the local plan objectives can be delivered. Specific points include:
 - Need more detail to justify Kimble's position in the settlement hierarchy, especially given its late change.
 - To be clear that there is 'some' public transport, not 'good' public transport.
 - The provision of infill housing for local residents should be emphasised.
 - Define what is meant by 'large scale development'.
 - Policy text should provide more flexibility to enable the NP to judge the most appropriate selection of sites.

- The policy should also be amended to acknowledge that neighbourhood planning is a discretionary activity and cannot be required to perform a specific function.

Naphill and Walters Ash

RUR7 – Land off Clappins Lane, Naphill

General

- Residents felt that the number of dwellings proposed is too high and that the number of dwellings proposed should be reduced.
- Residents expressed that the development will not generate affordable housing.
- Residents felt that the allocation of the site will not meet the Local Plan's strategic objectives, including conserving the AONB and mitigating climate change.
- Residents felt that development of the site would represent disproportionate growth to the villages of Naphill and Walters Ash.

Infrastructure

- There was concern that the proposal would exasperate existing infrastructure such as highways, health services, sewage, local facilities, and schools.
- Some residents highlighted that Clappins Lane is a narrow lane, without footpaths. The widening and creation of pavements is not supported by the landscape and topography. It is unsuitable as an access road.
- **Affinity Water** noted that major water network reinforcements will likely be needed to cope with proposed development.
- **Scottish and Southern Electric Networks** noted that the site is unlikely to require high voltage reinforcement, but is likely to require low voltage reinforcement. Surrounding network may require additional network reinforcement.
- **Thames Water** suggested that the wastewater network capacity may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required. The developer will need to

consider whether an odour and/or noise and/or vibration impact assessment is required as part of the promotion of the site.

- Residents felt that development of the site would increase flood risk in the area.
- One resident suggested that a one way traffic system should be considered from Speen Road to Stocking Lane/Coombe Hill towards Hughenden.

Green Belt/AONB

- Some respondents argued that the proposals failed to recognise the landscape impact of development on the AONB, would constitute major development in the AONB, and that the site's landscape assessment contradicts evidence on landscape character.
- Residents felt that the proposal was based on a flawed assessment.
- Residents were concerned that development of this site would merge the two settlements of Naphill and Walters Ash.
- Residents felt that the site has been incorrectly identified as being built up on three sides, rural lane to the south should not be viewed as being built up.
- Residents felt that exceptional circumstances have not been demonstrated to justify development of this site.
- Residents were concerned the site could set a precedent and allow for other small developments to be considered acceptable in the Green Belt and AONB in Naphill and Walters Ash, or elsewhere in the District.

Environment

- Residents were concerned that development of the site would be destructive to habitats currently present on the site, including roe deer, badgers, bees, and kites
- Residents felt that development of this site would harm the nearby Regional and Local Biodiversity and Geodiversity Site

- Some residents were unsure how the off-site element of criteria 5 will be achieved.
- Residents were concerned that development of the site and the removal of trees (particularly one Oak tree near the proposed access) will be detrimental to local wildlife,
- Respondents felt that the field must be preserved as a link to the Site of Special Scientific Interest (SSSI) and Special Areas of Conservation (SAC) Naphill Common and Little Stocking Wood.

Changes proposed by respondents

- One resident suggested that the site should be allocated as Country Park instead of housing.

Stokenchurch

RUR8 – Land South of Mill Road, Stokenchurch

- The developer supported allocation of 100 dwellings, asserting it is not major development in the AONB.
- One developer felt that 'Comprehensive development' should be deleted. The northern section is in separate ownership, this should be allowed to be developed ahead of the salvage yard, otherwise too much uncertainty for delivery.
- The developer supported locating the main access between existing road and 1 Wormsley Crescent.
- One response pointed out that while primary and secondary accesses are identified on figure 48 they are not identified in writing. This contradicts other sections of the plan where access has been identified within the policy wording and on a plan. This should be included to ensure the plan lays out the most appropriate strategy.
- One respondent felt there is insufficient justification for why this site isn't major development. Unclear why 140 dwellings is considered 'major' development in the AONB whereas 100 isn't.
- Some residents asserted that development of this site would be major development in the AONB.
- The **Chilterns Conservation Board** raised the following points: that the site is detached from the centre of Stokenchurch, scope for residential development only for previously developed part of site, development beyond previously developed area is not supported. A firm defensible boundary should be established, site lacks a boundary to prevent future development at present.
- The **Chiltern Society** felt that the AONB site assessment fails to identify why it isn't major development. Implying that this quantum of development is

acceptable in the AONB will also invite speculative applications on edge of Stokenchurch and Lane End.

- **Bucks County Council** sought a change to figure 48 which shows pedestrian routes to and from the site, these are not existing public rights of way and should therefore be worded 'potential new footpaths'.
- **Thames Water** and **Scottish and Southern Electric Networks** both were of a view that development of this site is likely to require upgrades to existing water and electricity infrastructure
- Some respondents suggested that the allocation should be deleted, or significantly reduced, confining development to the western edge.
- Alternatively, or additionally, some suggested splitting the allocation into 2 or 3 discrete parcels, and phasing them over the full Plan Period.

RUR9 – Land at Wood Farm

- The developer supported the allocation but felt the site should be larger given its location outside of the Greenbelt and next to one of the largest settlements in the district. They suggested the current size of the development is not viable and provides little incentive for the site to come forward.
- The developer proposed a change in numbers to 75-90 houses (3.5ha). They asserted this wouldn't be major development in AONB given site of Stokenchurch. Proposal back up by a Landscape and Visual Appraisal. Land to west is flat and enclosed therefore allocated should be extended westward with new landscape tree belt boundary.
- In respect of para 5.5.65, the developer believed that the assessment ignores the modern commercial buildings immediately adjacent to the land when describing its "scenic and rural position". This area was considered in Stage 2 AONB site assessment as suitable for redevelopment, this should be brought forward with appropriate landscape strategy for mitigation.

- Other developers suggest that sites outside of the Green Belt should be given greater preference than releasing Green Belt sites.
- **Scottish and Southern Power** noted that this allocation will likely require infrastructure upgrades for electricity.
- **Thames Water** did not envisage water supply and waste water supply concerns.

RUR10 – Land to the rear of Stokenchurch Business Park, Ibstone Road, Stokenchurch

- One developer considered that this development is ‘major development’ within the AONB, and is not required as alternative sites such as Westhorpe Park are available. There are outstanding queries associated with site access and no solution or scheme identified in the Plan.
- Respondent considered that this allocation would have an urbanising influence on the surrounding designated landscape. In addition, it is considered that whilst there is a hedgerow structure in place, the employment development within the site would be clearly visible above the hedgerow in views from the public right of way running through the wider AONB.
- It was put forward that the delivery of the site is uncertain when considered against other alternatives, citing evidence supporting the Local Plan e.g. PBA and Boyer Commercial Report to support this statement.
- One developer considered that the employment floorspace within the allocation at Stokenchurch Business Park should be increased. Standard plot ratio (45%) is applied to the site results in 13,050 sq m of floorspace. Local Plan requires additional parking on this site to accommodate for the expanding Business Park, but even if this is factored in, by applying the plot ratio it is clear that a higher amount of floorspace can be provided at this stage than assumed in the HEDNA. Local Plan should take a consistent approach to applying the plot ratios.
- Respondents considered that the site is too large, and suggested that a smaller site may be acceptable.

- Respondents felt that the wording of the policy is not consistent with NPPF and Countryside Rights of Way Act duty, which require development in AONB to conserve and enhance, not just to limit impact.
- Respondents suggested the removal of B8 uses from the policy, as these would be likely to involve large warehouses with a greater landscape impact (potentially constituting major development), and draw unsuitable HGVs through access via the Chilterns Business Park. Likewise the triangle of farmland north of the track should be removed as buildings here would be visible from the footpath and open countryside.
- Residents stressed that the access should not be through the rural green lane and footpath.
- Residents suggested the recent permitted development for conversion to residential of long-vacant offices at Stokenchurch also raises a question-mark about the commercial attractiveness and viability of new business development here.
- Respondents wanted the scheme to include a contribution towards enhanced walking and cycling provision.
- Respondents supported the commitment to work with partners to address infrastructure constraints to ensure new development can be accommodated. Important that any identified mitigation for this site have a reasonable prospect of delivery within the timescales of when the growth is planned.
- Residents felt that extra parking would be essential here.

Other Rural Areas

RUR11 – Land at Heavens Above, 16 High Heavens, Marlow Bottom

- Residents felt that there would be an unacceptable impact on AONB / adjoining Ancient Woodland, and that a more appropriate use for the site would be to enhance biodiversity.
- Respondents felt the site's capacity was overstated.
- Respondents felt that the location was unsustainable with respect to access to shops and services etc.

RUR12 – Uplands

- Residents broadly agreed to the principle of removing the site from the Green Belt.
- Residents felt that the site needs to be supported by public transport opposed to just walking connections, as not all of the residents might be able to walk to the nearest existing bus stops.
- **Historic England** welcomed the requirement for the retention and reuse of the Listed Building in a sympathetic way, although they suggested there should be a reference to significance in the wording of the policy.
- Utilities operators indicated that capacity improvements for both water supply and wastewater management may be required to support development; there is unlikely to be a need for high voltage network reinforcement but there may be some need for low voltage reinforcement.
- In all three cases, the utilities operators recommended these issues are dealt with by developers engaging with them through the planning process in order to assess proportionate need for upgrades and the contributions required toward the same.

Chapter 6 Delivering the Strategy, Development Management

General points

- It was felt that the policies are expressed as requirements – the development industry wish for more flexibility. One developer describes the whole DM chapter as superfluous as all matters should be determined in accordance with the NPPF.
- The most significant issue that was expressed was around meeting the housing needs of older people.

DM20 – Matters to be determined in accordance with the NPPF

- Views expressed by respondents in respect of this policy included that:
 - The whole policy is superfluous.
 - It should also include Green Belt issues.
 - It should also include non-designated heritage assets.

DM21 – The Location of New Housing

Note – There were several substantive representations as to whether or not a particular site should be allocated which were submitted against this policy. However these issues have been addressed in relation to the strategic CP policies and/or the specific site allocation policies. This is because DM21 is a Development Management policy addressing future planning applications for these sites - it is not a policy that decides whether an individual site should be allocated for development.

- Several representors sought greater flexibility on windfall sites in lower tier settlements.

- Several representations from the care sector considered that DM21 (and related policies) do not adequately meet the need for older persons housing.

DM22 – Housing Mix

- Several developers considered the requirement for self-build to be unjustified and/or too inflexible.
- One group of land owners put forward their site for a self-build development.
- It was felt by some representors that the policy should reflect the need for first-time buyers and elderly people wishing to downsize, and that it should include specific requirements for housing for elderly people (see also comments on DM21)
- One response recommended that the plan incorporate a specific policy linked to DM21, DM22, and CP4 which provides housing for older people.

DM23 – Other Residential Uses

- Some concerns were raised re clarity and detailed comments from the fire service about site design issues.

DM24 – Affordable Housing

- The development industry generally prefers/expects AH to be calculated by unit numbers, and sought a change to bring the policy into line with this preferred approach.
- Respondents felt that the policy encompasses a wide range of specialist accommodation including sheltered housing and extra care. They pointed out that these have different viability characteristics but have not been not tested in viability work and this will prevent the delivery of specialist housing for older people for which there is a recognised need. Extra care accommodation should be excluded from this policy and fall under DM23 instead.

- Some respondents noted that there is no mention of Starter Homes although it is acknowledged that this is an emerging policy area and therefore subject to uncertainty but suggest adding a sub-section to cover the issue.
- Some respondents felt that the policy needs to be clear whether figures are net or gross with regard to demolitions.
- Policy should refer to units not GIA:
 - The use of GIA leads to uncertainty for developers in terms of the scale of AH that will need to be delivered. The policy does not have the necessary clarity to support predictable and efficient decision making and will result in delays for viability arguments on all major development sites.
 - No indication as to what GIA includes e.g. garages, basements?
 - A GIA approach is likely to have an impact on the mix of affordable homes proposed and the size of affordable homes. The HEDNA requirement is based on units. By adopting this approach the policy has limited control over the number of affordable houses delivered.
 - The approach has the potential to confuse affordable housing calculations for larger phased developments in which details are to be determined through future reserved matters applications.
 - The fact that CIL uses internal area is of no relevance as it does not follow the same mechanisms or legislation and the two are not inter-related.
 - The Council needs to produce evidence to support the claim in the Plan that using units would lead to high proportion of small AH units and large market units.
- The policy should provide tenure mix and house type and sizes. The tenure mix should be determined by the conclusions of the most up-to-date HEDNA in-line with Paragraph 50 of the NPPF.
- There is not sufficient certainty that the Council will support the full diversity of rented AH. The policy should be clarified to indicate that all affordable rented

housing models, including rent to buy, will be supported where these meet local needs.

- The policy should state that provision should ‘normally be on site except for specific circumstances’. An allowance for off-site affordable housing will be required where it is not possible to provide an on-site contribution.
- Remove requirement for higher level of AH on sites with an existing use value (euv) of greenfield and employment sites. Concerns about including Class B category and sui generis uses in the 40% band.
- Allocated sites should require 30% affordable housing in light of the quantum of on and off site infrastructure that is required through site allocation policies.
- The Viability Assessment has not adequately assessed the increase in CIL rates from 1 August 2017 but has instead been based on those in the November 2012 Charging Schedule; it has also not properly considered alternative scenarios.
- Policy wording should refer to the need to check the AH provision against a viability assessment at application stage on a case by case basis.
- Support was expressed for the policy because of difficulties in recruiting new staff as they can’t afford to live in the area.
- Residents questioned what is defined as affordable, as in their view nothing is affordable in Marlow, Bourne End etc. House costs are out of reach to local people. Should be designated giving preference to local people.

DM 25 – Rural Exceptions Affordable Housing

- Support was expressed for this policy because of difficulties in finding fire personnel who can afford to live in the area.

DM26 – Criteria for Traveller Sites

- Developers welcomed the assumption by WDC that anyone assessed in the GTANA as “unknown” in terms of the planning definition of a traveller is a traveller.

- Several issues were raised in respect of the evidence, including that ORS used a flawed methodology not consistent with national policy, that they had a poor level of response when conducting interviews, and did not take full account of need, current decisions, or inward migration.
- As a result of the above, it was argued that the need figures are too low and the plan using them as a target is not positively prepared. It was argued that the number of pitches to be delivered over the plan period should be revised, including some elements of existing need that the respondent felt had not received due consideration.
- Developers considered the rationale for a 3km area around Marsh unclear and not justified as it includes households identifying with settlements outside of the 3km area. No evidence provided to justify the assertion that more pitches will overwhelm the settled community, particularly once housing growth to be delivered by the Great and Little Kimble Neighbourhood Plan takes place.
- The 3km area has not been positively prepared and is not consistent with national policy as it unduly separates long-established families living on caravan sites from those living in bricks and mortar, rather than reading both groups collectively as a community. It should therefore be removed.
- One respondent argued that additional provision should be made within the Wycombe Local Plan to accommodate 16 travelling showperson plots which are within a site in Chiltern District which is adjacent Tralee Farm, and may be lost if Chiltern and South Bucks District Councils allocate the site for development.
- **Historic England** suggested the policy text should include wording that aims to protect the significance of heritage assets.

DM27 – Housing for Rural Workers

- One respondent objected to the wording of part 3 (b), suggesting it needed to be quantified so that interpretation of what may or may not be ‘the foreseeable future’ is clear and applied consistently.

DM28 – Employment Areas

- Some responses queried whether any of the sites proposed for allocation should be considered 'Strategic' on account of them only meeting local needs in the evidence.
- Some felt that the policy is overly restrictive and does not provide the necessary flexibility to comply with para 22 of NPPF. The policy needs to set out the circumstances against which the loss of employment land will be considered appropriate. This could include assessments as to how long a site has been vacant, periods of marketing and the consideration of the benefits.
- It was pointed out there are other uses not within the B Class uses which support Strategic Employment Areas – such as cafes, banking facilities - the policy needs to be amended to reflect this.
- Representations suggested that specific sites identified are not suitable for their designation. These include:
 - 1) Kingsmead Business Centre
 - 2) Former De La Rue site (now Carey's site) Coates Lane/ Hughenden Avenue
 - 3) Glory Mill (remove the remaining vacant land).
 - 4) Office Outlet (formerly Staples)
- One further comment seeks additional coffee shops/cafes to serve the employment/out of centre retail along London Road.

DM29 – Community Facilities

- This policy was supported by the **Campaign for Real Ale**, and generally by other community groups, although the **Chiltern Society** object on the basis that it doesn't go far enough.
- Developers objected on the grounds the policy was not flexible enough.

- **Sport England** raised concern that the policy does not follow their preferred approach of separate policies for sports and recreation buildings vs other community facilities.

DM30 – The Chilterns Area of Outstanding Natural Beauty

- Representations were received in respect of this policy from the **Chilterns Conservation Board**, and endorsed by the **Natural Environment Partnership**. They believe the policy has deteriorated from the June 2016 draft, on the grounds that it:
 - Does not give great weight to AONB (NPPF para 115)
 - Does not mention the second test for major development: the public interest test (NPPF para 116)
 - Turns the clear instruction in the NPPF that major development in the AONB ‘should be refused’ into a positively worded ‘will only be permitted...’
 - Now contains the caveat “where possible” in relation to enhancing the natural beauty of the AONB (this not what the CRoW Act 2000 sec85 says, it is “conserve and enhance”, not “conserve and where possible enhance”)
 - Weakens the status of the AONB setting by adding “not a significant adverse impact on the natural beauty of the AONB”
 - Fails to benefit from the joint cooperative work by the Chilterns AONB Planning Forum to create a model policy for the Chilterns AONB
- The Chilterns Conservation Board suggests substituting the wording of the policy with that of a model policy.
- Other respondents generally support the policy but some recommend minor changes.
- No comment was received from Natural England.

- The promoter of the Wycliffe site thinks there should be an exemption to the exceptional circumstances test for PDL.
- Some respondents felt that a more permissive approach to the AONB would reduce the need for housing at Princes Risborough.

DM31 – Development Affecting the Historic Environment

- Developers felt the policy as drafted is not consistent with national policy, specifically paragraphs 132-135 of the NPPF.
- Developers would like a distinction between designated and non-designated heritage assets, with reference to the amount of weight to be afforded to different classes of designated heritage assets set out in the policy, and reference made to the separate test for non-designated heritage assets.
- One respondent suggests that all reference to non-designated assets should be omitted as national policy is sufficient.
- One respondent felt the reference to “great weight” is pejorative and inappropriate, as the amount of weight should be determined by the decision maker. Apportioning this to all assets dilutes their importance.
- Residents supported the inclusion of a policy concerning development affecting the historic environment.
- Some responses sought amendment to remove inconsistencies with national policy in relation to the difference between designated and non-designated assets, and the different weight given to them.
- One response suggested the inclusion of additional controls on shopfronts to improve the historic environment.
- **Historic England** welcomed the policy, but felt it is not sound as it does not comply with national policy. The reference to designated heritage assets is incorrect and is not consistent with the glossary of the NPPF, and the policy as

drafted does not give any guidance on how the effects of a proposal will be assessed, or what is permissible.

- Historic England considers that the first part of the policy should seek to protect designated heritage assets, the second part requiring understanding of heritage issues and the avoidance, minimisation, or mitigation of harm.
- Historic England considers that the fourth part of the policy is too weak. Policy should be guiding developers and decision makers on how to respond to a proposal and include criteria on how to assess the significance of the impact of works on each relevant type of heritage asset.

DM32 – Landscape Character and Settlement Patterns

- **Campaign to Protect Rural England** expressed concern in respect of the age of the Wycombe District Landscape Character Assessment referred to in the policy.
- Respondents raised concerns that the policy requires too much subjective interpretation and that it should be more closely aligned to NPPF 113 in respect of a hierarchy of landscape sites.
- A number of residents including the **Bourne End Residents Association** and **Hawks Hill Widmoor Residents Association** object to the omission of the 2004 Adopted Local Plan Policy C16 from the plan and ask for it to be incorporated into DM32, on the grounds the omission of the C16 policy requirements from the Local Plan as drafted is not sound.

DM33 – Managing Carbon Emissions: Transport and Energy Generation

Transport

- The Highways Authority are generally supportive but seek two enhancements to the policy: a) unequivocal policy backing that allow for the protection and

improvement of public rights of way and b) whilst they welcome the requirement to “make provision for alternative vehicle types and fuels” they felt the District should be more explicit in its requirement especially around Electric Vehicles.

- There were few other comments on the transport/parking sections of this policy although there were several comments, included with objections to local site allocations, that there is “never enough parking in new development”.

Energy

- Many disparate views were expressed. Some felt these requirements should be deleted. Others that the requirements do not go far enough.

DM34 – Delivering Green Infrastructure and Biodiversity in Development

- The **Natural Environment Partnership** and other environmental groups raised concern that the policy conflates GI and biodiversity assets, and does not explicitly or effectively ensure a net gain in biodiversity.
- Developers and community groups in AVDC area, objected to the policy on the grounds that the tree canopy cover requirement will have too great an impact on development capacity, reducing viability and increasing unmet need.
- The Revive the Wye Partnership raise an issue on the grounds that the policy does not sufficiently reflect and elaborate on the importance of a continuous chain of Green Corridor Opportunity Areas along the River Wye corridor, depicted in Figure 11 of the DSA, with particular reference to the need to deliver Corridor Opportunity Areas and enhanced (non-motorised) access in line with Policy DM11.

DM35 – Placemaking and Design Quality

- No objections to the policy overall, but various comments on detailed aspects:
 - **Historic England** recommended an addition to point 2 ‘natural and built context [adding] *and historic character*’.

- **Bucks County Council** suggested an additional clause under point 3 saying “Break down physical barriers and exclusions imposed on disabled people through informed design of facilities, buildings and places.”
- **Sport England** recommended that the policy or supporting text should explicitly refer to their ‘Active Design’ policy and guidance.
- One developer suggested that point 1 of the policy should be stated as an aspiration, not a policy requirement.

DM36 – Extensions and Alterations to Existing Dwellings

- One response to this policy voiced its support for the policy as drafted, particularly in respect of extensions respecting the character and appearance of the existing property and area and that they should be subservient in scale to the original dwelling.

DM37 – Small Scale Non-Residential Development

- Very few comments were received in respect of this policy. Detailed comments were received in respect of garish shopfronts and excessive lighting of businesses. One developer comment was received in respect of security shutters.
- Suggestion for a policy guiding the levels of night-time lighting, in particular LED lighting and “blue light”.

DM38 – Water Quality and Supply

- **Affinity Water** and **Thames Water** supported these requirements.
- **Thames Water** requested, for clarity, that the policy title is amended to state ‘Water Quality, Wastewater Infrastructure and Supply’. It is considered that this better reflects the contents of the Policy.

- The **Environment Agency** commented that this policy does not include wording about sewer network capacity issues and working with the sewage undertaker.
- The **Natural Environment Partnership** requested an addition to the last sentence of Para 6.163 after “SUDs which contribute to removing pollutants” the words “and which are designed to maximise the opportunity to benefit biodiversity ...”

DM39 – Managing Flood Risk and Sustainable Drainage Systems

- One developer commented on the impact of these requirements on small scale and brownfield development.
- Resident objection to allocated sites being excused from the sequential test.
- Detailed changes were suggested by **Bucks County Council** as the local level flood authority, the **Environment Agency**, **Thames Water**, the **Natural Environment Partnership**, and the fire service.

DM40 – Internal Space Standards

- Several developer responses were received objecting on the grounds there is insufficient evidence to support the policy.
- One resident’s association voiced their support for the policy.

DM41 – Optional Technical Standards for Building Regulation Approval

Water efficiency

- The **Environment Agency**, **Thames Water**, and **Affinity Water** all voiced their support.

Accessibility

- Developers expressed opinions that the policy is not supported by sufficient evidence.
- The fire service suggested that the policy should include “a requirement for the installation of automatic fire suppression systems be included for Category 2 (accessible and adaptable) and Category 3 (wheelchair user) dwellings as occupants will face greater risk to life in the event of fire.”
- The Housebuilders Federation are of the opinion that the requirement for all new dwellings to comply with Part M4(2) standard and 20% of market homes and 30% of affordable homes to be wheelchair accessible and comply with Part M4(3) is very high, compared to national statistics set out in reports which are referenced by the Planning Practice Guidance.

DM42 – Managing Development in the Green Belt

- Respondents are of the view that the policy’s elaboration on the NPPF is contrary to the NPPF.
- Respondents felt it is not correct to refer to “appropriate” development in the Green Belt; the NPPF refers to development which is “not inappropriate” which conveys a different meaning. The policy should be reworded to be consistent with national policy.
- Acknowledgement from Bledlow cum Saunderton Parish Council that the relevant design management policies (DM42 – 44) have had clauses inserted that clarify the role of Neighbourhood Plan policies in these issues.
- One response suggested amendment to the definition of infilling to include plots at the end of a row.

DM43 – The Replacement or Extension of Dwellings in the Green Belt (including outbuildings)

- One developer considers that the policy as drafted is not consistent with the NPPF, legislation, or established case law.
- One response considers that volume calculations will be burdensome and onerous for all involved.

DM44 – Development in the Countryside Outside of the Green Belt

- Developers felt that the policy is too restrictive and not compliant with the NPPF, specifically that it will restrict the delivery of housing at the edge of settlements.
- One representation seeks more flexibility on the uses permitted within DM44(1)c – ‘employment [adding] *and related uses*’ and/or the retention or replication of current LP C12 re ‘major developed sites in the countryside’.
- Supported by Great & Little Kimble cum Marsh Parish Council who confirm that it will bring forward a Neighbourhood Plan for the purpose of shaping the future development of the Parish in line with the principles of Policy DM44, as required by Policy RUR6.

DM45 – Conversion of Existing Buildings in the Green Belt and other Rural Areas

- **Historic England** would like to see the addition of a criterion to Policy DM45 requiring any proposals to retain any features of architectural or historic interest.

DM46 – HS2 Safeguarded Land

- No comments received

DM47 – Princes Risborough to Aylesbury (PRA) safeguarded land

- One representation states that this policy is not justified as no plans to twin track the line have been put forward.
- **Aylesbury Vale District Council** and **Oxfordshire County Council** are both in support of the policy as drafted.
- Great and Little Kimble cum Marsh Parish Council also support the policy and will take it on board when developing their neighbourhood development plan.

Duty to Cooperate

While the Duty to Cooperate bodies have not raised any strategic issues through the preparation of the Local Plan (see the separate report, Wycombe District Local Plan and the Duty to Cooperate, for details of our engagement with these bodies), several non-DtC bodies and representors have suggested that our Local Plan has not fully addressed the requirements of the DtC.

- Several respondents have suggested that WDC have not met the duty to cooperate.
- Non-Duty to Cooperate bodies raised concern that wider strategic engagement has not been demonstrated particularly with Buckinghamshire County Council, Chiltern District Council, Network Rail, South Oxfordshire District Council, Royal Borough of Windsor and Maidenhead, and Highways England.
- Related to the previous point, some representors have also suggested that evidence of joint-working emerging from the Duty to Cooperate is lacking.
- Given the links, some representors expressed a need for the Plan to demonstrate open dialogue with wider range of authorities including Reading, Slough, Royal Borough of Windsor and Maidenhead, and London. The named authorities did not express this view.
- Further engagement with Royal Borough of Windsor and Maidenhead required to ensure growth of sub-region not undermined. Some representors go further and assert that there has been a lack of cooperation with Windsor and Maidenhead and South Oxfordshire.
- Suggestions that cross-boundary sites have not been appropriately assessed through the Duty to Cooperate.

Sustainability Appraisal

Several representors raised issue with the Sustainability Appraisal of the Local Plan as a part of their responses. Where their comments related to particular policies,

their comments have been incorporated into the overall comments for those policies, but are also reproduced below for completeness.

- The process for the selection and rejection of reasonable alternatives for both housing and employment sites is flawed and not in accordance with the PPG guidance.
- Reasonable options are excluded from further consideration too early in the decision-making process, so the Council has not been in a position to weigh in the balance the environmental, social and economic impacts of all the reasonable options
- The SA has been used only once sites have been through the Green Belt, HELAA and AONB assessments.
- Green Belt designation should not serve as a precursor that prevents development being directed to the most sustainable locations in accordance with the NPPF. All sites subject to the GB assessment should also have been subject to SA in order to fully appraise the performance of each reasonable alternative with regards to its GB function and sustainability. Sites that may justify release from the Green Belt may not necessarily be the most sustainable option. GB not an SA criteria but a policy one. Using the GB Assessment as the means to select or reject sites is flawed as was shown in the interim Inspector's report for Birmingham (Para 40) which took a similar approach to WDC.
- SA must include a detailed assessment of 'major' sites within the AONB at a site-by-site level. Failure to do so implies that the AONB has been afforded additional protection that is not advocated by the Framework. Such an approach has unnecessarily forced the Council to sustainably appraise moderately and strongly performing green belt sites (within Option D and E of the SA), despite weaker performing sites in green belt terms being available within the AONB (such as land at Penn Road, Hazlemere).
- The 5 additional spatial options considered in the SA don't consider releasing additional Green Belt sites without also considering increasing densities across all sites. It is therefore not possible to establish whether the negative impacts on

landscape, historic environment, natural resources and transport seen in Option D are as a result of the increased densities in urban areas or release of Green Belt land.

- Furthermore, the options are presented as an all or nothing scenario, consequently the prospect of releasing Green Belt in only certain types of locations, such as Tier 1 and Tier 2 settlements has not been considered.
- A number of developers assert that their sites should have been assessed in the SA, but have not.
- The SA is not based on site specific evidence across numerous key areas but instead takes an un-evidenced and broad-brush approach to each site and therefore fails to ensure that it identifies the likely significant effects of the release from Green Belt, this goes to legal compliance and also to compliance with the NPPF.
- Some developers have undertaken their own SA assessments, scoring the sites differently. Consequently they argue that some of the scoring in the SA is incorrect and there is no justification for certain sites being chosen or omitted.
- It is unclear for some indicators how the Council have reached their conclusions given the clear lack of evidence underpinning the conclusions made e.g. Landscape & Countryside, Biodiversity & Geodiversity, and Heritage.

Process

A large number of representors raised the issue that WDC as an authority has not prepared the Local Plan in a way that truly reflects local feeling or takes account of the views of the public. Particular issues raised in relation to the overall Local Plan process include:

- That the process of engaging the public does not accord with the Council's adopted statement of community involvement.
- That the Local Plan does not accord with national policy as set out in paragraphs 17 and 155 of the NPPF which requires the process to be community-led. Others

cited the general message set out in the Government's Housing White Paper to "build the right homes in the right places".

- That the Local Plan is a fait accompli, with numbers decided in advance which were not revised as a result of public feedback, nor has the plan substantially changed based on the feedback.
- That the iterative nature of the plan preparation means that people wrongly assumed their comments on earlier stages would carry forward; particularly in this respect issue was raised that people needed to comment again to have their views taken into account.
- That specifically no account has been of a petition signed by 4,000 people (presented as approximately 50% of the Princes Risborough electorate), and that in their opinion the inspector would not be made aware of it by WDC.

Some land owners expressed that in order to be compliant with the statement of community involvement, their sites should have been considered as a part of the Local Plan as a part of a process of positively preparing the plan

Other issues raised in respect of the Local Plan process included:

- That there was no point in holding a consultation if the intent is to not change the plan to reflect the feedback received.
- That the repeated nature of consultations was intended to wear down the resistance of local people.
- That some site allocations or amendments to previous site allocations were not consulted on prior to the consultation on the "final" Local Plan document.
- That the plan document is too complicated, long, or confusingly worded for the general public to interact with and develop an informed opinion of.
- Access to information has not been provided as the Plan is difficult to understand. (Aarhus Convention/ [Council of Europe Convention on Access to Official Documents](#))

- Localism as defined in the Localism Act 2011 in Plan-making have been neglected by the WDLP in the treatment of objections by residents
- In relation to Princes Risborough WDC have not met the requirements of the Section 20(5)a of the Planning and Compulsory Purchase Act (2004) and adopted the process of involving the community in line with WDC's Statement of Community Involvement – 2012 . Lack of clarity re whether representations from earlier stages have been considered
- Instead of 'involving', 'consulting', and 'informing' as levels of engagement, WDC have simply 'informed' the public and hasn't taken account of local views.
- Residents have not been properly notified
- That some parts of the plan document are not present in the publication Local Plan, and therefore that consultation is premature.
- That more clarity is required in respect of how certain groups have worked with WDC and potentially influenced the development of the plan.
- That there was not enough notice given for some Local Plan events.
- That overall, the level of consultation throughout the process had been "poor at best", and treated as box-ticking rather than true engagement.

One issue was also raised in respect of the reporting of the regulation 18 draft plan consultation summaries, where comments duly made had not been logged.

Alternative Sites

Sites that have previously been assessed (Existing sites)

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
ASH4/ 0469	Land east of Grove Lane, Little Kimble			SRD0182	YES – HELAA	Rejected at stage 2, significant landscape constraints	Developer: site was overlooked, landscape impact is not severe. Public: none	Landscape visual assessment note
ASH13/ 0920	Land at Culverton Hill, Princes Risborough	YES		SPR0087	YES - GB	Recommended at part 1 by ARUP. Fails part 2 stage 1 (encroachment), no landscape	Developer: utilise sustainable sites, provide housing, open space and community park. Public: none	Site appraisal, GB review, concept plan

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
						assessment carried out.		
ASH17/ 0954	Land at Oak Tree Road, Marlow	YES		SMA0085 and SMA0086	YES - GB	Fails part 2 stage 1 (encroachment)	Developer: GB/access issues can be overcome Public: supports site's exclusion due to separation and landscape impact	Site appraisal, masterplan, highways design, concept plan options, community investment statement, GB review, AONB assessment, housing need

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
								technical review,
ASH18/ 0966	Heath End Farm, Flackwell Heath	YES		SWC007 0	YES - GB	Fails part 2 stage 1 (merging and encroachment)	Developer: GB issues can be overcome. Public: none	Site appraisal, GB review, landscape study
ASH19/ 0966	Land at Chapman Lane, Bourne End	YES		SBE0048	YES - GB	Fails part 2 stage 1 (merging and encroachment)	Developer: GB/landscape issues can be overcome. Public: none	Site appraisal, GB review, landscape study
ASH20/ 1033	Land at Ellis Way (part 1)		YES	SLE0026	YES – AONB (combined site)	Passed stage 1 and 2, failed	Developer: Site can be delivered. Public: support	None

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
						stage 3 (eco concerns)	sites exclusion on ecological grounds	
ASH21/ 1108	Land at Ellis Way (part 2)		YES	SLE0026	YES – AONB (combined site)	Passed stage 1 and 2, failed stage 3 (eco concerns)	Developer: Site can be delivered. Public: support sites exclusion on ecological grounds	None
ASH22/ 1128	Little Studdridge, Stokenchurch		YES (part)	SSC0039 and SSC0050	Yes (part) - AONB	Passed stage 1, failed stage 2 (beyond settlement)	Developer: site can contribute to affordable housing. Public: none	Basic site appraisal
ASH28/ 0845	Land north of Mill Lane, Monks Risborough			SPR0073	YES - HELAA	Rejected at stage 2, severe flooding constraints	Developer: flooding issues can be mitigated. Public: object to	Flood risk assessment, drainage

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
							site on basis of high numbers, infrastructure pressures, and flooding	layout, concept layout
ASH30/ 1005	Land off Church Road, Lane End		YES (part)	SLE0029	YES (part) - AONB	Passed stage 1 and 2, failed stage 3 (landscape and settlement form)	Developer: site can contribute to C2. Public: none	Concept plan
ASH32/ 0948	Land off Kingsley Drive, Marlow Bottom	YES		SMB0011	YES - GB	Fails part 2 stage 1 (encroachment)	Developer: site has not been properly assessed, should re-	Site appraisal, GB assessment (full study), concept and

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
							investigate. Public: none	delivery document, LVIA
ASH34/ 0801	Land off Wood Farm (eastern portion), Stokenchurch		YES	part of SSC0049	YES - AONB	Passed through to stage 3, failed landscape assessment	Developer: issues raised at stage 3 of AONB assessment can be mitigated Public: none	None - claim issues can be mitigated
ASH35/ 0924	Land off Penn Road, Hazlemere	YES		SHZ0030	YES - GB	Passes part 2 stage 1, fails step 3 (major dev in AONB)	Developer: GB/landscape issues can be overcome. Public: support site's exclusion from allocation	Landscape and visual matters report, GB review, AONB review, site appraisal, masterplan,

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
ASH29/ 0959	Land at Old Moor Lane, Wooburn Moor	YES		SWG002 6	YES – GB	Fails part 2 stage 1 (merging and encroachment)	Developer: site suitable for GB removal. Public: none	Site appraisal, services, drainage, surface water drainage, utilities, traffic impact, parking, masterplan, access, GB review
ASH33/ 1165	Land off Holtspur Avenue, Wooburn Green	YES		SWG002 8	YES - GB	Fails part 2 stage 1 (merging and encroachment)	Developer: site has not been assessed for GB	LVIA, Concept plan, Landscape analysis, GB review (their

Site reference/ Rep number	Site address	Where site has previously been assessed			Site specific assessment ?	GB/AONB previous assessment conclusion	Comments from reps	Evidence from reps
		GB	AONB	HELAA				
							removal properly. Public: none	site + review of all), development framework document (site appraisal)
ASH37/ 1269	Wycliffe Centre, Horsleys Green	YES	YES	SRD0144	YES - HELAA			

Sites that have not previously been assessed (New sites)

Site reference/ Rep number	Site address	GB	AONB	Settlement Tier	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASH1/ 0025 and 0869	Land at Whitepit Lane, Wooburn	YES	NO	2	Will pass GB Pt2 Step 1 therefore need to assess GB Pt2 Steps 2 &3	None	None
ASH2/ 0247	Land north of Marlow Road, Lane End	YES	YES	3	Will pass GB Pt2 Step 1 therefore need to assess GB Pt2 Steps 2 &3	None	None
ASH3/ 0392	Monks Mill, Bledlow	NO	NO	6	N/A	None	None
ASE1/	White Hill, Wooburn Moor	YES	NO	2	Will pass GB Pt2 Step 1 therefore	None	None

Site reference/ Rep number	Site address	GB	AONB	Settlement Tier	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
0392					need to assess GB Pt2 Steps 2 &3		
ASH5/ 0559	Land at Lower Icknield Way, Longwick	NO	NO	4	N/A	Archaeological desk-based assessment	Developer: site should be included in LcINP area
ASH16/ 0944	Binders Industrial Estate, Cryers Hill	YES	YES	5	Will pass GB Pt2 Step 1 therefore need to assess GB Pt2 Steps 2 &3	HELAA, Green Belt review (their site only)	Developer: PDL site, should be removed from GB and developed for housing. Public: none
ASH23/ 1129	Land at Seymour Court Road (Merlaue Rise), Marlow	YES	YES	2	Will pass GB Pt2 Step 1 therefore need to assess GB Pt2 Steps 2 &3	Housing need review and critique of evidence base, local facilities and services, GB review, site	Public: widespread objection to site

Site reference/ Rep number	Site address	GB	AONB	Settlement Tier	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
						appraisal, flooding (forthcoming), engagement summary	
ASH24/ 1129	Land north of Berwick Road, Marlow	YES	YES	2	Will pass GB Pt2 Step 1 therefore need to assess GB Pt2 Steps 2 &3	Housing need review and critique of evidence base, local facilities and services, GB review, site appraisal (incomplete), engagement summary	Public: widespread objection to site
ASH25/ 1258	Land south of Lower Icknield Farm, Princes Risborough	NO	NO	2		Site appraisal (minimal)	Developer: site should be included in expansion area boundary for self-build opportunity

Site reference/ Rep number	Site address	GB	AONB	Settlement Tier	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASE3/ 1244	Land at Westthorpe Park (Area 1), Marlow	YES	NO	5	Falls within site assessed in GB Part 2 as BL001 - however this did NOT have a full landscape assessment	Transport review, landscape and visual analysis, LVIA, site appraisal, GB review (their site and others), SA	Public: support for country park allocation
ASE4/ 1244	Land at Westthorpe Park (Area 2), Marlow	YES	NO	5	Falls within site assessed in GB Part 2 as BL001 - however this did NOT have a full landscape assessment	Transport review, landscape and visual analysis, LVIA, site appraisal, GB review (their site and others), SA	Public: support for country park allocation

Site reference/ Rep number	Site address	GB	AONB	Settlement Tier	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASE5/ 1244	Land at Westthorpe Park (Area 3), Marlow	YES	NO	5	Falls within site assessed in GB Part 2 as BL001 - however this did NOT have a full landscape assessment	Transport review, landscape and visual analysis, LVIA, site appraisal, GB review (their site and others), SA	Public: support for country park allocation
ASE6/ 1244	Land at Westthorpe Park (Area 4), Marlow	YES	NO	5	Adjoins site assessed in GB Part 2 as BL001	Transport review, landscape and visual analysis, LVIA, site appraisal, GB review (their site and others), SA	Public: support for country park allocation

Site reference/ Rep number	Site address	GB	AONB	Settlement Tier	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASE7/ 1244	Land at Westthorpe Park (Area 5), Marlow	YES	NO	5	Adjoins site assessed in GB Part 2 as BL001	Transport review, landscape and visual analysis, LVIA, site appraisal, GB review (their site and others), SA	Public: support for country park allocation
ASE2/ 0912	Land at Newtown Pit, Marlow	YES	NO	5	No previous assessment but see PP 17/06833/FUL	GB review (comments), site appraisal, concept plan	Developer: Initially provide parking for Globe Park, then develop into outdoor/indoor adventure park. Public: support for country park allocation

Changes proposed by respondents to allocation sites (Allocation sites)

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASH8/ 0801	Land at Finings Road, Lane End (larger area)	RUR1	SLE0017	Larger area – previously unassessed boundary	Previously assessed as a larger boundary, this is a new boundary	Site appraisal	Developer: larger area is better in line with topography
ASH9/ 0801	Land at Wood Farm, Stokenchurch (larger area)	RUR9	SSC0034/ SSC0045	Larger area – previously unassessed boundary	Previously assessed as separate sites	None	Developer: other parts of PDL should be included in allocation as well as adjoining field

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASH10/ 0875	Former Molins Factory Site (larger area)	Policy 3 (BcSNP)	SRD0126	Larger area and higher density	Planning commentary on PDL in GB and major development in the AONB	Site appraisal, GB review, masterplan,	Developer: higher density can be achieved on the site as well as on PDL
ASH12/ 0917	Former Molins sports ground, Monks Risborough	PR15	SPR0057	Use for housing	Previous appeal. Key issue is our approach to major development in the AONB.	Site appraisal, GB review, scheme drawings, landscape and visual report, transportation technical	Developer: sports use are not viable. Flooding issues can be overcome

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
						note, design statement	
ASH14/ 0924	Burleighfield House, Loudwater	DM21	SLW0031	Larger area – previously unassessed boundary	Adjoining larger area previously assessed in GB Pt 2 SLW0025. Site (or at least the part of the site proposed for development) is PDL.	Site appraisal, GB review, LVIA baseline summary, arbo technical note, eco technical note, masterplan,	Developer: GB/Landscape issues can be overcome with larger site footprint.

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASH15/ 0924	Land at Green Farm, Glynswood	HW9	SHW0633	Larger area – previously assessed boundary	Previously assessed in this boundary.	Site appraisal, eco note, LVIA, outline access and transport strategy, heritage and views assessment, surface water drainage note, visual analysis report,	Developer: Right-most section should be included to provide open space on the site

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASH6/ 0785	Remaining vacant land at Glory Mill, Wooburn Green	DM29	SWG0020	Change allocation to housing	In the town. Housing vs employment.	None	Developer: PI agreed site was not suitable for employment uses
ASH11/ 0860	Land north of Hughenden Avenue	DM29	SHW0555	Change allocation to housing	In the town. Housing vs employment.	Design concept/sketches	Developer: site available and deliverable
ASH36/ 0824	Land at Amersham Road, Hazlemere (part)	HW8	SHZ0035	Larger boundary and more development on site as part of allocation	Previously assessed as part of a larger boundary, not been assessed in isolation	Ecological report, illustrative masterplan, access technical note	Developer: larger site area to be include as part of allocation. More of site utilised for development

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
ASH7/ 0801	Land at Hawks Hill, Bourne End	BE2/DM12	SWC0092	Include as part of BE2 housing allocation	Assessed as part of HF	Site appraisal, masterplan options	Developer: site could balance BE2 tenure. Public: none
ASH31/ 0953	Land off Shootacre Lane, Princes Risborough	PR3/PR8	SPR0085	Larger area, use for housing development	Assessed with this boundary in GB review – failed part 2 stage 1 (all purposes)	Vision document/site appraisal, accessibility appraisal, housing needs	Developer: utilise whole site for development. Public: objection to use of land for relief road

Site reference/ Rep number	Site address	Policy reference	HELAA reference	Proposed change to WDLP Reg. 19 allocation	GB/AONB initial assessment of further work required	Evidence from reps	Comments from reps
						technical review	

NB – The below sites were promoted as part of the consultation, however there was no map provided with the submission and so it is unsure which of the above categories the sites are part of:

Site reference	Rep number	Site address	Settlement	Use
ASH26	1324	Land at the Swilley, Wash Hill, Bourne End	Bourne End and Wooburn	Housing
ASH27	1343	Land at Bledlow Road, Saunderton	Saunderton	Housing

