

CHAPTER 10 - LANDSCAPE AND NATURE CONSERVATION

L0: POLICY FRAMEWORK

The Objections

1294/16 *Environmental Records Officer, Bucks County Museum*

Summary of Objections

- (a) Add 'international' before 'national' in paragraph 10.06(ii) to reflect support for international nature conservation designations.

Inspector's Reasoning and Conclusions

10.0.1 The objection by the ERO at the Buckinghamshire County Museum has been met by PIC 10/3. The addition of the word 'international' is appropriate in the light of EC conservation directives, past and future, and the modification is accordingly endorsed.

RECOMMENDATION

- LN00/1 Modify paragraph 10.06(ii) in accordance with PIC 10/3.

L1: THE CHILTERN AREA OF OUTSTANDING NATURAL BEAUTY

The Objections

0379/32 *Sport England*
0526/21 *Chepping Wycombe Parish Council*
0543/5 *Richard Pushman*
0571/19 *Laing Homes Ltd*
0842/2 *Lance Adlam*
0842/2 *Mr P Langston*
0874/5 *National Farmers Union*
0917/2 *M J Seddon*
0937/3 *Miss P M Kimber*
0956/2 *R Lawton*
0956/4 *R Lawton*
0995/3 *Mr Edward Morton*
1006/8 *Mr D Giles*
1125/3 *Buckinghamshire Chilterns University College*
1207/6 *Residents' Action Group on Gomm Valley*
1293/5 *Naphill & Walter's Ash Residents Association*
1293/19 *Naphill & Walter's Ash Residents Association*
1319/15 *Ministry of Agriculture, Fisheries and Food (now DEFRA)*
1475/3 *Mr D V Barker*
1541/2 *P Tapping*
1578/2 *M J Jeanes (Group) Ltd*

1695/6 Mr A Rush

1798/4 Buckinghamshire County Council – Environmental Services Department
1944/2 Mr D J Palmer

PIC 10/4 Objections

1006/10 Mr D J Giles

PIC 10/5 Objections

1319/20 Ministry of Agriculture Fisheries and Food (now DEFRA)

PIC 10/13 Objections

0368/14 Chiltern District Council – Planning Department
1115/9 Chilterns Conference

Summary of Objections

- (a) The Buckinghamshire Tree and Woodland Strategy should be endorsed in the Local Plan, and reference should be made of the Chilterns AONB management plan.
- (b) L1 should be amended to take account of the AONB's role in meeting recreational demand.
- (c) L1 should include provision for the protection of the AONB from development outside of the AONB, but which would be conspicuous from it.
- (d) L1 should require development to enhance the environment and protect villages from over-development.
- (e) The policy should be redrafted to allow for development in such parts of the AONB where this would not materially damage the special character of the AONB.
- (f) The wording of L1 is inconsistent with LS2 of the Structure Plan and PPG7.
- (g) The policy should not obstruct the building of new agricultural buildings.
- (h) The AONB should have its own chapter in the Local Plan, and should be identified as a premier and overriding policy.
- (i) AONB and Green Belt policies should be in the same section of the Plan.
- (j) There should be a legal responsibility on organisations who undertake works in the AONB to do so in a manner which does not conflict with the purposes of the designation.
- (k) Policy L1 is too restrictive and seeks arbitrarily to limit the scale of development in the AONB.
- (l) The Policy should preclude use of prefabricated flint panels.
- (m) The Policy needs to be clarified regarding settlements which are not covered by the Green Belt but are covered by the AONB, to avoid the confusion of L1 being thought to apply only to open spaces and not to settlements.
- (n) The Policy should be amended to be less restrictive on major development, and 'major' defined to avoid confusion.

- (o) No housing should be permitted in the AONB.
- (p) Major residential development may be appropriate in AONBs in certain circumstances. Amend paragraphs 10.07-10.09a.
- (q) The word 'adopted' should be used in paragraph 10.09b rather than 'approved'
- (r) Gomm Valley should be included in the AONB.
- (s) Green Farm, High Wycombe (AS36); Land adjacent to Culverton Manor and Farm, Princes Risborough (AS60); Rectory Farm and Monks Risborough School (AS62). These sites should be deleted from the AONB to allow for residential development.
- (t) Land adj. Hill Farm, Marlow Bottom (AS61); land between M40 and B482, Stokenchurch (AS106). These sites should be deleted from the AONB.
- (u) Wellesbourne, Terriers (AS146). Delete site from the AONB to allow relocation of Buckinghamshire Chilterns University College.

Inspector's Reasoning and Conclusions

10.1.1 The many objections to Policy L1 and to the designated extent of the Chilterns AONB are very varied and the Pre-Inquiry Changes are numerous. For these reasons, the objections are addressed individually although, in a number of cases, they cannot be supported because the future designated extent of the AONB is for the Countryside Agency to propose and for the Secretary of State to confirm. It is not for the LPA to determine.

- (a) This objection has been conditionally withdrawn in the light of PIC 10/11 and the proposed inclusion of paragraph 10.09b and paragraphs 10.30a-e and Policy L7A which relate to Woodlands. These changes are endorsed since the policy coverage now relates to a wider area than the AONB which is only partly afforested.
- (b) This objection has also been conditionally withdrawn in the light of PIC 10/4 and the proposed insertion of paragraph 10.09a which stresses the recreational functions of the AONB. This is also reflected in the wording of Policy L1(1) and is endorsed since, although recreation is not a statutory function of the AONB, the available evidence shows that it is nevertheless locally a most important one.
- (c) This objection is effectively met by the wording of Policy L1(4). This wording remains unchanged from the Deposit version of the Local Plan. It is justified on the analogy with conservation areas, although these are locally rather than nationally determined. It would be possible to compromise the natural beauty of the AONB by development that impinges on views out of, into and across its designated extent.
- (d) It is not a requirement of statute law or policy guidance that development should 'enhance' the AONB. Enhancement of landscape quality and the appearance of buildings may come about as a result of development but cannot be prescribed as a policy objective. Policy L1 is concerned with the qualitative aspects of appropriate development that is otherwise acceptable in a rural area or settlement.
- (e) It is not possible to categorise certain parts of the AONB as more suitable for development than others are. The tests of acceptability are set out in Policy L1(1-4) which derives from advice contained in PPG7. Other policies of the Plan relate to appropriate or otherwise acceptable development in the Countryside and Green Belt; to that extent development may be facilitated but is all (where relevant) subject to Policy L1
- (f) This objection is met by PIC 10/5 which proposes the modification of Policy L1(1) and the deletion of the word 'very' in relation to the 'special attention' given to the conservation of the natural beauty of the area. Policy L1 and its supporting text, as proposed for modification by PICs 10/4, 10/5 and 10/13, appear to be consistent with

- PPG7 advice and Ministerial Statements and any reference to the PPG is unnecessary
- (g) Policy L1 is not intended to restrict the erection of farm buildings over and above the limits which may be set for such development within Chapters 8 and 9 of the Local Plan. The essential points of the Policy are to restrict inessential or unjustified major development in the AONB and to secure the seemly design and siting of rural building such that the area's essential landscape character is not needlessly compromised.
 - (h-i) It is not desirable to differentiate the landscape conservation aspects of general development control as between land inside and outside the AONB. This is merely a matter of degree since both AALs and LLAs (see Policy L2) are themselves worthy of protection from insensitive development. Conversely, in the AONB and Green Belt there are differing standards of what constitutes acceptable (as distinct from insensitive) development and their physical extent is determined by different procedures.
 - (j) The LPA and the Local Plan cannot impose legal obligations upon developers or any other organisation except in the course of exercising powers conferred on the authority by the relevant planning legislation. Planning permission (where required) may be made subject to relevant conditions, legal agreements or undertakings but these arise in the case of specific applications which will be determined in accordance with the Plan.
 - (k) It is a matter of long-standing national policy, most recently expressed in PPG7, that most forms of development (the definition of which at present mainly excludes agriculture and forestry) are severely restricted in the countryside. Since the designation of the AONB is confined to rural areas and small settlements, it follows that it places no novel limitations on development. Policy L1 is mainly directed at largely qualitative control on what are otherwise acceptable forms of development in such rural areas.
 - (l) The preclusion of certain specific building materials in Policy L1 is far too detailed and prescriptive for a Local Plan policy. PICs 10/5 and 10/13 propose that Policy L1(2) be modified to require that new building in the AONB should be 'in sympathy' with the local landscape and with traditional styles of buildings. This is endorsed as a reasonable design benchmark, not specifically requiring (or implying) any slavish adherence to vernacular forms of architectural expression.
 - (m) The peculiar restrictions on most forms of development within defined Green Belts are intended to maintain its essential planning functions. These are defined in PPG2 and are mainly applicable outside settlements. Only if development is then held to be appropriate does its impact upon the openness of the area fall to be considered. Policy L1 is largely a qualitative test and broadly assumes that the intended development satisfies the other relevant policies of the Plan as well as PPG advice. The wording of Policy L1 might with advantage be modified to make its application somewhat clearer.
 - (n-p) The objections (n) and (p) are substantially met by the altered wording of paragraphs 10.08a and 10.09 as proposed by PICs 10/4 and 10/13. These modifications are endorsed since there may well be situations where social housing, the subject of Policy H12, may be authorised in or very near settlements within the designated AONB but outside the Green Belt. In such situations, the largely qualitative design controls and criteria envisaged by Policy L1(1-2) would come into play. Major development, of whatever character, would have to satisfy the content of Policy L1(3)(a-c). It would not be appropriate to impose stricter limits on residential development (as urged by objection (o)) than are envisaged in PPG7. It is impossible to define 'major development' for the purposes of Policy L1(3) simply because issues of 'need' and 'impact' will usually need to be very carefully balanced; setting a comparative test is thus more helpful than the imposition of an absolute threshold.
 - (q) This objection is largely semantic since the future status of the 1999 Chilterns Buildings

Design Guide is scarcely in doubt. Clearly it will be cited as supplementary planning guidance (SPG) in the determination of future applications and appeals. As a matter of fact, the publication was 'approved' by the Chilterns Conference, of which the LPA is one of several constituent members. It follows that the LPA cannot unilaterally 'approve' the document but may quite properly 'adopt' it, in common with some or all of the other Chilterns Conference members, for development control purposes.

- (r-u) It is not possible either to propose or effect the inclusion or exclusion of land from the AONB since this is for the Secretary of State in future periodic review of its boundaries.

10.1.2 The conclusions on the wording of Policy L1 and its now lengthy supporting text are set out above. It will be obvious from the many references to the Policy's individual paragraphs that their numbering is found necessary in the interests of brevity and accuracy. The point has been made before that all Policies of the Local Plan, where they contain two or more paragraphs, ought to be numbered. This would serve to allow references, for example in planning decision notices, to be more closely related to the reasons for refusing planning permission or for the imposition of conditions. In the interests of consistency, the individual sub-paragraphs of policies (generally containing criteria) should be indicated by lower case letters in brackets (a-n) rather than a mixture of large and small Roman numerals. This convention has been used in proposing certain modifications to the wording of Policy L1.

10.1.3 The first paragraph of Policy L1 should be slightly reworded in the interests of clarity and by reference to the 'public enjoyment' of the AONB, which bears on its recreational function. The use of the word 'conservation' is appropriate since it now connotes 'preservation and enhancement' (which accurately reflects the objectives stated in section 1(2)(a) of the National Parks Act 1949. The expression 'built environment' is not legally defined; presumably what is meant is 'operational development' or 'building operations' as distinct from material change of use. This qualification is not necessary since the context clearly envisages the erection or extension of buildings. Conversely, the insertion of the word 'building' before 'styles' is necessary in the interests of clarity. Minor modifications are also proposed to Policy L1(1) and (2) again in the interests of clarity. As already noted, PICs 10/3, 10/4 and 10/13 are endorsed with very minor exception of the retention of the word 'adopted' in paragraph 10.09b.

RECOMMENDATIONS

- LN01/1 Modify Policy L1 and its supporting text in accordance with PICs 10/3, 10/4 and 10/13 but retain the word 'adopted' in relation to the Chilterns Design Guide in paragraph 10.09b.

- LN01/2 Further Modify Policy L1 to read as follows:

POLICY L1

(1) IN CONSIDERING PROPOSALS FOR ANY DEVELOPMENT WITHIN THE CHILTERNES AONB, SPECIAL ATTENTION WILL BE PAID TO THE CONSERVATION OF ITS SCENIC BEAUTY AND TO ANY WILDLIFE INTEREST. DEVELOPMENT WILL NOT BE PERMITTED IF IT IS LIKELY TO DAMAGE THE SPECIAL CHARACTER, APPEARANCE OR NATURAL BEAUTY OF THE LANDSCAPE OR THE FUTURE PUBLIC ENJOYMENT OF THE AREA.

(2) WHERE OPERATIONAL DEVELOPMENT IS ACCEPTABLE, IT SHOULD BE OF THE HIGHEST QUALITY; ITS DESIGN SHOULD BE IN SYMPATHY WITH THE LOCAL LANDSCAPE AND LOCALLY TRADITIONAL BUILDING STYLES.

(3) MAJOR DEVELOPMENT WILL NOT BE PERMITTED EXCEPT WHERE IT IS PROVEN TO BE IN THE PUBLIC INTEREST AND WHERE NO SUITABLE ALTERNATIVE SITE IS AVAILABLE, EITHER WITHIN OR

OUTSIDE WYCOMBE DISTRICT. SUCH PROPOSALS WILL BE ASSESSED HAVING REGARD TO:

- (a) THE NEED FOR THE DEVELOPMENT, IN THE LIGHT OF NATIONAL CONSIDERATIONS AND THE IMPACT OF AN ADVERSE OR FAVOURABLE DECISION UPON THE LOCAL ECONOMY;
- (b) THE COST OF AND SCOPE FOR SUCH DEVELOPMENT ELSEWHERE OUTSIDE THE AONB OR FOR MEETING THE NEED FOR IT IN SOME OTHER WAY; AND
- (c) ANY DETRIMENTAL EFFECTS ON THE ENVIRONMENT AND THE LOCAL LANDSCAPE AND THE EXTENT TO WHICH SUCH EFFECTS MAY BE AVOIDED OR MITIGATED.
- (4) DEVELOPMENT WILL NOT BE PERMITTED WHICH, ALTHOUGH NOT ITSELF LOCATED WITHIN THE AONB, WOULD HAVE A DEMONSTRABLY DETRIMENTAL EFFECT ON ITS SPECIAL CHARACTER OR APPEARANCE.

L2: AREAS OF ATTRACTIVE LANDSCAPE (AAL) & LOCAL LANDSCAPE AREAS (LLA)

The Objections

0379/31	<i>Sport England</i>
0872/11	<i>Government Office for the South East</i>
0874/3	National Farmers Union
1260/40	<i>Marlow Society</i>
1806/2	Country Landowners Association

PIC 10/6 Objections

1739/9	Lord Carrington's Grandchildren's Settlement
2063/16	Wycombe Summit Ltd + Wycombe Option Ltd

Summary of Objections

- (a) The requirement for proposals to 'conserve and enhance' should be properly justified. The criteria used to define AALs or LLAs and the special qualities of each site should be detailed in the text.
- (b) 'Adverse impact' should be deleted, along with the whole of the second part of the policy.
- (c) Development should be required to respect, enhance and conserve landscape quality.
- (d) 'Resist' is not strong enough and is too imprecise.
- (e) Use of additional designations such as AALs and LLAs is unhelpful. Use of the concept of Countryside Character might be better.

Inspector's Reasoning and Conclusions

10.2.1 The objection that the expression 'conserve and enhance' in Policy L2 should be changed is partly met by PIC 10/6. However, the effect of this change would be to retain the word 'conserve'. This is inappropriate because its usual connotation is that of preserving or enhancing (something). The comparison with the statutorily-determined need to 'preserve or

enhance' the 'character or appearance' of designated conservation areas is obvious. The use of the simple word 'preserve' is to be preferred. There may well be cases where development within AALs and LLAs may remove ugly features or buildings but these may best be dealt with on a case by case basis, obviously with careful regard to chapter 2 policies. Although it is true that the individual characteristics of both types of area are detailed in Appendix 12, it would be helpful to detail the criteria that have been used to identify such areas in the Local Plan.

10.2.2 The effect of PIC 10/6 would be to remove the word 'resist' and to alter the second part of the Policy to indicate that development in conflict with the objectives of designating both AALs and LLAs will not be authorised. This is an essential arm of the Policy since without it there would be no specific justification for withholding planning permission and hence no *raison d'être* for the Policy itself. Any requirement to 'respect, enhance *and* conserve the landscape quality of such areas would be inappropriate. Conservation, as already concluded, embraces both preservation and enhancement. The application of this test to locally-determined landscape designations would be excessive since it would in fact exceed that which is laid down for conservation areas, with statutory justification.

10.2.3 The Local Plan recognises a three-tier system of landscape identification, with appropriate levels of protection in the course of development control. The AONBs are designated by the Countryside Agency, the AALs are identified in Policy LS3 of the 1996 Bucks Structure Plan and defined by the Local Plan whilst the LLAs designation is at the discretion of the LPA. The tenor of the advice in PPG7 is to resist 'a multiplicity of (unnecessary) local countryside designations'. In the case of Wycombe District, both the AAL and LLA designations have been applied very selectively, with commendable restraint and only where both necessary and appropriate. Inspection suggests that they have been accurately identified and applied to areas where short to medium term urbanisation is improbable (unlike AONBs where major or extensive development is to be avoided in the longer term).

RECOMMENDATIONS

- LN02/1 Modify Policy L2 and supporting text in accordance with PICs10/6 and10/19.
- LN02/2 Further Modify Policy L2 to read as follows:

POLICY L2

(1) THE DISTRICT COUNCIL WILL EXPECT DEVELOPMENT PROPOSALS WITHIN AALs AND LLAs TO PRESERVE THEIR INDIVIDUAL LANDSCAPE QUALITIES. DEVELOPMENT PROPOSALS THAT WOULD HAVE AN ADVERSE IMPACT UPON THEIR RECOGNISED CHARACTER OR APPEARANCE WILL NOT BE PERMITTED.

(2) THE INDIVIDUAL AREAS WHICH HAVE BEEN DESIGNATED FOR THE PURPOSES OF THIS POLICY ARE LISTED (AND LOCATED) IN APPENDIX 12 AND IDENTIFIED ON THE PROPOSALS MAP. THE REASONS FOR DESIGNATION INCLUDE THE FOLLOWING:

- (a) EXTENSIVE AREAS BETWEEN THE CHILTERNs AONB AND THE URBAN EDGE;
- (b) RIVERSIDE MEADOWS AND WOODED AREAS OVERLOOKING THE THAMES;
- (c) PROMINENT HILLSIDE AREAS OVERLOOKING THE RIVERS THAMES AND WYE;
- (d) SIGNIFICANT OPEN COUNTRYSIDE AREAS SEPARATING URBAN AREAS;
- (e) PROMINENT UNDEVELOPED HILLSIDES WITHIN OTHERWISE URBAN AREAS;

- (f) ENCLOSED LANDSCAPES THAT RETAIN A PRIMARILY RURAL CHARACTER.

L2(1): LOCAL LANDSCAPE AREA – ABBEY BARN NORTH

The Objections

0506/15 Bassetsbury Area Protection Group
0571/7 Laing Homes Ltd
1264/1 Stephen Robert Cooper

Summary of Objections

- (a) Site should be designated a Local Landscape Area.

Inspector's Reasoning and Conclusions

10.2.1.1 These objections relate to the area of Housing Allocation H2(i)(a). This is the subject of detailed consideration earlier in this report. The recommendation was then to designate all but the safeguarded land (3.1 ha net) as a Policy L2 Local Landscape Area meeting the thrust of these objections.

RECOMMENDATION

- LN02.1/1 Designate as Policy L2(1) LLA in accordance with earlier recommendation.

L2(2): LOCAL LANDSCAPE AREA – ABBEY BARN SOUTH

The Objections

1264/3 Stephen Robert Cooper

Summary of Objections

- (a) Site should be designated a Local Landscape Area.

Inspector's Reasoning and Conclusions

10.2.2.1 This objection relates to the area of Housing Allocation H2(i)(b). This is the subject of detailed consideration earlier in this report. The recommendation was then to delete the allocation in accordance with PIC3/4 and PIC M/1. In view of the area's potential for longer term development and lack of obvious landscape quality, it would seem inexpedient to make an immediate Policy L2 designation.

RECOMMENDATION

- LN02.2/1 No modification.

L2(3): LOCAL LANDSCAPE AREA – GOMM VALLEY

The Objections

See Appendix 10A

PIC 10/6 Objections

0376/54 Axa Equity and Law Life Assurance Society Plc

Summary of Objections

- (a) Gomm Valley, including Ashwells should be designated either a Local Landscape Area or Area of Attractive Landscape.
- (b) Concern that the development of the Gomm Valley would put at risk the LLA covering Gomms Wood and Kings Wood. Gomm Valley should be retained as open countryside and protected.
- (c) The inclusion of the Gomm Valley as an LLA in PIC 10/6 should be deleted.

Inspector's Reasoning and Conclusions

10.2.3.1 This objection relates to the area the subject of detailed considerations elsewhere in this report, principally section 3.2.4. The recommendation was then not to allocate the land for mixed-use development. Although the valley is an attractive landscape of high quality, it has long been recognised as having potential for longer term development. It would seem inexpedient to make either Policy L2 or L3 designations that might prejudice that role.

RECOMMENDATION

- LN02.3/1 No modification.

L2(4): LOCAL LANDSCAPE AREA – GRANGE FARM

The Objections

0837/20 Hazlemere Parish Council
1337/19 Gordon Hooper

Summary of Objections

- (a) Delete safeguarded land designation and replace with Local Landscape Area or Strategic Gap designation.

Inspector's Reasoning and Conclusions

10.2.4 This objection relates to the area the subject of detailed consideration earlier in this report. The recommendation was then not to allocate the land for housing. In view of its inclusion within the 1990 AONB designation, which gives greater protection than an LLA, it

would be quite inappropriate to designate it under Policy L2 (or any other provisions) of the Local Plan.

RECOMMENDATIONS

- LN02.4/1 No modification.

L2(5): LOCAL LANDSCAPE AREA – TERRIERS FARM

The Objections

0837/19	<i>Hazlemere Parish Council</i>
0839/17	Grange Action Group (David J Wainman)
1186/5	Miss P Densham
1337/18	Gordon Hooper

Summary of Objections

- (a) The site should be identified as a Local Landscape Area.
- (b) The landscape value of Terriers Farm should be afforded greater recognition.

Inspector's Reasoning and Conclusions

10.2.5 This objection relates to the area the subject of detailed consideration earlier in section 3.2.4 of this report. The recommendation was then to allocate the land for housing. It would therefore be inappropriate to designate it under Policy L2 (or any similar provisions) of the Local Plan.

RECOMMENDATION

- LN02.5/1 No modification.

L2(6): LOCAL LANDSCAPE AREA – HEAVENS LEA, BOURNE END

(AS40)

The Objections

0360/1	Mr P Laws
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Summary of Objections

- (a) The site should be deleted from Policy L2.

Inspector's Reasoning and Conclusions

10.2.6 I deal with a related objection concerning inclusion in the Hawks Hill/Harvest Hill Policy Area in section 8.16. I concluded that the area is an attractive space that plays a significant structural role at the approach to Hawks Hill. It meets the criteria set out in Policy L2(2) and its designation as LLA is accordingly supported.

RECOMMENDATION

- LN02.6/1 No modification.

L2(7): AAL – LAND BETWEEN CHALPIT LANE AND SPINFIELD LANE, MARLOW (AS129)

The Objections

1027/4 Cala Homes (South) Ltd

Summary of Objections

- (a) The land should not be allocated as an Area of Attractive Landscape.

Inspector's Reasoning and Conclusions

10.2.6 The area would appear to meet the criteria set out in Policy L2(2) and its designation as AAL is accordingly supported.

RECOMMENDATION

- LN02.7/1 No modification.

L3: GREEN SPACE

The Objections

0379/30 Sport England
0872/12 Government Office for the South East
1193/19 *Environment Agency*

PIC 10/7 Objections

0872/38 Government Office for the South East

Summary of Objections

- (a) Green spaces as stepping stones for the movement of wildlife should be mentioned, along with PPG9.
- (b) Specific reference to playing fields and pitches should be made in Policy L3 and on the proposals map.
- (c) The term 'resist' is too imprecise.
- (d) 'Will not be permitted' does not allow for development where loss, fragmentation or reduction in size of an open area could be mitigated.

Inspector's Reasoning and Conclusions

10.3.1 Policy L3 is carried forward from the Wycombe District Local Plan and has been in place for some time. Its intentions are clear; they are to protect significant areas of open land within settlements for purely urban design reasons (whether or not these areas have an active

recreational function) and also to protect open areas in rural settlements where these have recreational, amenity or nature conservation functions. The former are identified as Policy L3 areas on the 1:10 000 (and larger) scale Proposals Maps and Insets; the latter are not. This distinction would seem partly to have been forced on the LPA because of limitations of scale and quite possibly because rural settlements have not always been the subject of a detailed survey. This is not an entirely satisfactory situation, especially within conservation areas where a Policy HE8 survey has not been undertaken or in Policy GB4 settlements in the Green Belt. In both these cases, considerable development pressure may be exerted and Policy L3 may accordingly have to be invoked. No doubt the LPA will wish in due course to clarify these aspects of policy coverage.

10.3.2 PIC 10/7 would have the effect of protecting the nature conservation value of open areas within rural settlements. Despite the fact that such open areas are not specifically identified, the modified wording would meet the objection and is endorsed as a reasonable application of the Policy. As the LPA rightly points out, playing fields and pitches (in urban areas at least) are given adequate protection by Policy RT3 and presumably by inclusion in the 'Local Cultural Strategy' as and when adopted. The objection relating to the use of the word 'resisted' has been overtaken by the deletion of the relevant paragraph by PIC 10/14. This has been balanced by the presumption against development having adverse impacts upon Policy L3 areas generally. The Policy recognises that, in a minority of cases, such adverse impact might be offset by the substantial retention of open space or by its replacement elsewhere. This is essentially the formulation adopted by Policy RT3(1)(b) and is accordingly endorsed.

RECOMMENDATIONS

- LN03/1 Modify Policy L3 and its supporting text in accordance with PICs 10/7 and 10/14.

L3(1): GREEN SPACE – DOWNLEY	(AS23)
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The Objections

1201/6 *Mr C G Hamilton, Clerk to Downley Parish Council*

PIC 10/7 Objections

0579/27 Michael Lambert
0579/24 Michael Lambert

Summary of Objections

- (a) (1) Gosling Grove, (2) Downley Middle School Playing Fields, (3) Plomer Green Avenue and (4) Selwood Way should all be designated as Policy L3 Green Spaces.
- (b) Objection to the addition to the Proposals Map of Policy L3 designation for the small greens which are part of housing estates in Plomer Green Avenue and Selwood Way (PIC M/34 and PIC M/35). Addition serves no planning purpose and Green Space designation should be deleted.

Inspector's Reasoning and Conclusions

10.3.1.1 Downley is a very extensive and mainly residential area at the extreme north-west corner of the urban area of High Wycombe. It is very elevated at about 160 m AOD at its

highest point and the area lies between radial routes A40 and A4128. Much of its development is visibly post-war and some housing has clearly been added over the past 20 years. The area has a certain secluded character since it can only be approached by car from the two radial routes to the south and east and then only by a limited number of road connections. Its character is enhanced by being grouped around the formerly detached village of Downley, now designated as a conservation area that includes the large open space of Downley Common to the north. This area is accessible over a very wide system of public rights of way that also penetrate the urbanised area of Downley.

10.3.1.2 The effect of implementing PICs 10/7 and 10/14, together with PICs M/33-35 (inclusive) would be to add three Policy L3 areas within the residential areas of Downley. These have all been inspected and their designation is endorsed for the following reasons:

(a) PIC M/33 Gosling Grove

This is an open area of about 2000 sq m within a very extensive and recent residential area laid out around a series of dead end roads that all terminate in shared surface vehicle accesses on the Essex Design Guide model. It is an entirely logical extension of the comparably-sized but much more generously planted open space to its east. The area would fulfil all the urban functions that are envisaged by Policy L3(1), the more so since it would be easily and safely accessible from most of the dwellings that surround it. It also provides a good setting for the County First School and playing field that adjoin it to the south and it accordingly fully justifies its Policy L3 designation.

(b) PIC M/34 Selwood Way

This is an open area of about 1000 sq m that is enclosed by a loop at the end of a lengthy dead end access road serving about 40 dwellings. It is grassed and evidently well maintained. It provides a focus for the surrounding dwellings and is attractively planted with some five or so ornamental street trees that appear to be reaching maturity. Its loss as landscaped open space would reduce the attractively spacious character of what is a relatively densely developed urban area and for this reason alone it fully justifies its Policy L3 designation.

(c) PIC M/35 Plomer Green Avenue

This is a triangle of open land that extends to about 1250 sq m at the intersecting arms of Plomer Green Avenue. The Avenue would appear originally to have been a dead end road system serving 35-40 semi-detached houses. One of the dead end roads has been later connected to form part of the local distributor system serving the western part of the greater Downley area of recent years. Immediately to the west is an extensive district centre. The open land forms the centrepiece and focus of the immediate housing. It is grassed and attractively planted by six ornamental street trees, including some very fine semi-mature Norwegian Maples. It appears to be well used for informal games and generally fully justifies its Policy L3 designation.

RECOMMENDATION

- LN03.1/1 Modify the Proposals Map in accordance with PICs M/33-M/35 (inclusive).

L3(2): GREEN SPACE – TURNERS FIELD, DOWNLEY

(AS141)

The Objections

0579/1 Michael Lambert

Summary of Objections

- (a) Turners Field should be designated as Green Space for its contribution to amenity, recreation, landscape and nature conservation.

Inspector's Reasoning and Conclusions

10.3.2.1 This is an extensive area of about 6000-7000 sq m that is somewhat anomalous in character. It is located within a very large street block that is served by a number of dead end roads, including Selwood Way, the subject of objection L3(1) above. It is totally landlocked and without formal public access although it is fair to say that some informal use for leisure is evident on inspection. It is roughly the same size as the fenced-in school playing field to the west, from which it is separated by a public footpath. Presumably its use as a school playing field extension was made difficult or inconvenient by the presence of this evidently very long-standing public right of way leading south from Downley Common. It has a single locked and gated access from a short dead end road serving five dwellings, also known as Turners Field. It performs no very obvious Policy L3 urban design function, being simply secluded backland, and there would seem no very obvious local deficiency of public open space in the area since it is adjacent to the extensive common land enjoying secure Policy GB2, L1 and HE8 protection.

RECOMMENDATION

- LN03.2/1 No modification

L3(3): GREEN SPACE – HATTERS LANE SECONDARY SCHOOL

(AS32)

The Objections

0818/4 Buckinghamshire County Council – Land & Property

Summary of Objections

- (a) Object to Green Space designation for land to Hatters Lane frontage – should be part of the surrounding Established Residential Zone designation.

Inspector's Reasoning and Conclusions

10.3.3.1 The prominent bulk and extent of Hatters Lane Secondary School and its very large playing fields are very readily visible from Hatters Lane. The frontage road functions as an important district distributor linking the main radial routes A4 and A404 to the east and north of High Wycombe. It is accordingly fairly heavily trafficked by vehicles. The school and grounds are currently the subject of comprehensive improvement and adaptation. These works include most attractive planting, hard and soft landscaping and the laying out of parking spaces; presumably for the buildings' intended dual use for adult education. The wide street frontage open space, designated integrally as Policy L3 Green Space, provides a good setting for the school buildings and lends a degree of interest to the otherwise suburban street scene.

RECOMMENDATION

- LN03.3/1 No modification

L3(4): GREEN SPACE – WELLESBOURNE, TERRIERS

(AS146)

The Objections

1125/1 Buckinghamshire Chilterns University College

Summary of Objections

- (a) Green Space designation needs to be removed if the College is to fulfil its important local educational and economic role.

Inspector's Reasoning and Conclusions

10.3.4.1 The Policy L3 designations around the various educational establishments (as in the L3(3) designation just considered) have been made without including any existing buildings. The effect of these designations has been judiciously to safeguard the immediate settings and open aspect of these buildings. These are important urban design considerations and well worthy of support. Policy L3 clearly provides for exceptions to be made in the case of necessary development. With respect to educational buildings, this would seem to allow future ancillary building or other development to take place.

RECOMMENDATIONS

- LN03.4/1 No modification.

L3(5): GREEN SPACE – GOMM VALLEY

The Objections

0549/2 Maurice Young

Summary of Objections

- (a) L3 should distinguish between Green Space of moderate value and those of significance to the conservation of biodiversity within the district. Gomm Valley should be designated one of the latter.

Inspector's Reasoning and Conclusions

10.3.5.1 This objection relates to the area the subject of detailed considerations elsewhere in this report, principally section 3.2.4. The recommendation was then not to allocate the land for mixed-use development. Although the valley is an attractive landscape of high quality, it has long been recognised as having potential for longer term development. It would seem inexpedient to make either Policy L2 or L3 designations that might prejudice that role.

RECOMMENDATION

- LN03.5/1 No modification.

L3(6): GREEN SPACE – REAR OF 42-80 KINGSMEAD, HIGH WYCOMBE

(AS124)

The Objections

0270/1 Mrs Louise Groom
0390/1 Mr B Groom
0858/1 Mrs V E Frost & Mrs J Barrows

0939/1	Neil Morley
0986/2	Mr & Mrs M J Unwin
1009/3	Mr J E Pickering
1049/1	Mr R G Lewis
1066/1	Mrs Carol-Ann Cafferty
1149/1	Kim Rose
1313/1	Mary Whitmore
1438/4	Mr Paul Hussey
1459/1	D R Smith
1565/1	C J Humphry
1569/1	Tracy Morley
1606/1	A S Jackson
1996/1	G Harding

Summary of Objections

- (a) The designation of this site as Green Space is in conflict with the planning permission granted in 1995 for its use as residential curtilage. The land should be redesignated as residential curtilage.

Inspector's Reasoning and Conclusions

10.3.6.1 These objections to Policy L3 designation raise substantially the same issues as those raised by the objectors further along Kingsmead Road. For that reason, both groups will be considered together (see L3(7)) and the same recommendation will be made in both cases.

RECOMMENDATION

- LN03.6/1 See LN03.7/1-2 below.

L3(7): GREEN SPACE – 80-112 KINGSMEAD ROAD, HIGH WYCOMBE

(AS2)

The Objections

1188/3	Simon Wingrove
2098/1	Mr P J Sullivan
2099/1	Mrs S A Sullivan

Summary of Objections

- (a) Green Space designation contradicts the principles of residential use that has previously been granted planning permission on this land.

Inspector's Reasoning and Conclusions

10.3.7.1 Over much of Kingsmead Road, the former railway formation runs very close to the frontage housing. Indeed, the overall distance across the single track right of way and the depth of residential curtilage scarcely exceeds 40 m in some cases. The difference between the levels of trackbed and back gardens varies considerably owing to the falling gradient of the railway and its need to pass under the road bridge at Abbey Barn Lane and over the former railway bridge at Spring Lane. Where the railway and back gardens are at roughly the same level behind Kingsmead Road, several of the latter have been extended. This effectively blocks the previous right of way of the abandoned railway. The available evidence indicates that this transfer was authorised either by the former British Railways Board or Railtrack. In most cases,

planning permission has been granted for the requisite change of use.

10.3.7.2 What is now at issue is the interim planning status of the former railway land at rear of 42-112 Kingsmead Road, whether this has been converted into garden ground or not. The local objectors resist any designation of the railway land as Policy L3 Green Space since they point out that this is inconsistent with its existing or authorised use as residential. They would therefore call for its allocation as Policy H14 residential land. The LPA point out the intention of using the trackbed for some future transport use. The recommended policy position (see T11-12) is to safeguard the entire abandoned railway for a local transport use, consistent with the advice of PPG13. It is of little moment whether any interim and ancillary residential uses are authorised, provided that no substantial operational development takes place, as has been the case in the past (eg at Willow Close). Given the safeguarding of local transport functions under Policy T11, the best course would appear to be to delete the Green Space notation at rear of 42-80 Kingsmead Road. The H14 frontage allocation may be extended over the railway land, as it has been at Boundary Road, but it would still remain subject to Policy T11 restrictions.

RECOMMENDATIONS

- LN03.7/1 Modify the Proposals Map by the deletion of the Policy L3 designation at rear of 42-80 Kingsmead Road and substitute a Policy H14 residential allocation.
- LN03.7/2 Modify the Proposals Map by the deletion of the Policy L3 designation at rear of 82-112 Kingsmead Road and substitute a Policy H14 residential allocation.

L3(8): GREEN SPACE – WYCOMBE MARSH

The Objections

1679/14 Mr & Mrs Brant, Kingsmead Road Caring Residents

PIC 10/7 Objections

1679/6 Mr & Mrs Brant, Kingsmead Road Caring Residents

Summary of Objections

- (a) Objection to the deletion of the allotment Green Space designation and amended boundary to include the north allotments at Wycombe Marsh. Concern at the impact of development on the wildlife and ecology of the site.

Inspector's Reasoning and Conclusions

10.3.8.1 This objection relates to the larger Wycombe Marsh development area (Policy H5A) and, in the view of my conclusions earlier in the report, a Policy L3 designation would be inexpedient in the interests of securing comprehensive redevelopment. Provision for alternative allotment gardens is available and the scheme as a whole should create the opportunity to make attractive green corridors along both branches of the River Wye.

RECOMMENDATIONS

- LN03.8/1 No modification.

L3(9): GREEN SPACE – BOURNE END TO HIGH WYCOMBE DISUSED RAILWAY LINE

The Objections

0526/18 *Chepping Wycombe Parish Council*

Summary of Objections

- (a) Objection to the loss of designated Green Space which may be required for an extension of the busway (referred to in Policy T11).

Inspector's Reasoning and Conclusions

10.3.9.1 This objection makes the same general point as many of those in relation to Policy T11; that is the retention of the substantial surviving parts of the railway trackbed. This, as reported earlier, is fully consistent with PPG13 advice. However, the precise future use of the abandoned railway is a matter for the Bucks CC Local Transport Plan. This is because the emergent planning policies of Wycombe DC are merely to safeguard the railway route's integrity for some (as yet unspecified) form of local transport use. It is inherently most probable that this will take the form of long distance footpath, cycleway and bridleway. If that happens, it may well form a linear open space as envisaged by PPG17. Nevertheless, it is conceivable that some other more intensive transport use, such as LRT, might be selected. It would therefore be premature to designate the whole or substantial lengths of railway line as Green Space.

RECOMMENDATION

- LN03.9/1 No modification.

L3(10): GREEN SPACE – FLACKWELL HEATH LIBRARY SITE

The Objections

0526/4 *Chepping Wycombe Parish Council*

PIC 10/7 Objections

0526/37 *Chepping Wycombe Parish Council*

Summary of Objections

- (a) In view of recent proposals to relocate the library in redundant school buildings, this pleasant green amenity area is no longer required for a branch library and should now be designated as a Green Space.

Inspector's Reasoning and Conclusions

10.3.10.1 This area is the subject of consideration elsewhere in this Report (see CF8). There it is recommended that the previous allocation of the land for a branch library was to be deleted but that a residential allocation was not favoured. The essence of the Parish Council's continuing objection is that the area should be designated under Policy L3 since it

demonstrably performs an open space function. This is supported, for reasons given later (in CF8), notwithstanding the somewhat arbitrary 1000 sq m threshold for designation. It is accordingly recommended that the land be so designated and that a complementary revision of the text at paragraph 10.13 be made.

RECOMMENDATIONS

- LN03.10/1 Designate the Library site at Flackwell Heath as Policy L3 Green Space.
- LN03.10/2 Modify the Proposals Map accordingly.
- LN03.10/3 Modify the supporting text to Policy L3 by the insertion of the word 'generally' after the words 'although 0.1 hectares is' in paragraph 10.13.

L3(11): GREEN SPACE – CEMETERY EXTENSION, WOOBURN

(AS19)

The Objections

1646/9 John Dalton

Summary of Objections

- (a) Green Space designation should extend over the cemetery extension.

Inspector's Reasoning and Conclusions

10.3.11.1 On inspection, the proposed Policy L3 designation was found to be an area of steep open hillside overlooking the River Wye Valley at Cores End. It has been fenced off and provided with a rough gated access track and vehicle turning space. The intention is clearly to use it as an extension to the established cemetery which runs down the hillside towards the A4094 road between Bourne End and Wooburn Green. The area of land in question is very prominent in view from both the Policy L2 LLA on the opposite hillside and also from the wider expanse of Policy L2 AAL on the same slope. Apart from the other considerations in this case, including the prematurity of applying an L3 designation to land not yet actively in an open space use, the designation is primarily an urban one and the objection site lies within the defined Green Belt around Bourne End.

RECOMMENDATION

- LN03.11/1 No modification.

L3(12):GREEN SPACE – HAWKS HILL & HARVEST HILL

(AS39)

The Objections

1208/1 Sally Lloyd Parry

Summary of Objections

- (a) Site should not be designated as Green Space, but should be subject to the usual provisions of Policy C16.

Inspector's Reasoning and Conclusions

10.3.12.1 I deal with a related objection concerning the C16 Policy area in section 8.16 of my report. Bearing in mind the Council's criteria for assessing L3 open spaces and the previous Local Plan inspector's recommendation, I concluded that the value of this private undeveloped area was not sufficient to justify continued designation.

RECOMMENDATION

- LN03.12/1 No modification.

L3(13): GREEN SPACE – LAND AT HAWKS HILL, BOURNE END

(AS 69)

The Objections

0838/1 Mr R Overall

Summary of Objections

- (a) Delete L3 designation from this site.

Inspector's Reasoning and Conclusions

10.3.13.1 I deal with a related objection concerning the C16 Policy area in section 8.16 of my report. Bearing in mind the Council's criteria for assessing L3 open spaces and the previous Local Plan inspector's recommendation, I concluded that the value of this private undeveloped area was not sufficient to justify continued designation.

RECOMMENDATION

- LN/3.13/1 Delete the notation

L3(14): GREEN SPACE - HEAVENS LEA, BOURNE END

(AS40)

The Objections

0360/2 Mr P Laws

Summary of Objections

- (a) A Policy L2 designation, combined with Policies L3 and C16 effectively confers Green Belt status on the land. The Policy L3 designation should be deleted from the site.

Inspector's Reasoning and Conclusions

10.3.14.1 I deal with a related objection concerning the C16 Policy area in section 8.16 of my report. I concluded that this site is rightly designated as an L3 space: it is large enough, it is an attractive open area within the wider AAL, it forms an important structural role at the edge of the C16 policy area and appears to have some ecological value. The two policies are intended to meet different purposes and have to be considered concurrently if any development proposals were to come forward.

RECOMMENDATION

- LN03.14/1 No modification

L3(15): GREEN SPACE – SLATE MEADOW, WOOBURN GREEN

The Objections

0483/6 Wooburn Parish Council
0730/3 Mrs Dinnie Hawthorne

Summary of Objections

- (a) Objection to the temporary nature of Safeguarded Land designation. The site should be designated as Green Space.

Inspector's Reasoning and Conclusions

10.3.15.1 In view of my earlier recommendations regarding this area (see section 3.2.6) a Policy L3 designation would appear to be inappropriate. The site is one of the few areas outside the green belt that is available to meet future development needs. While some green space alongside the river might be appropriate for L3 designation if development takes place, the exact extent of such an amenity area could only be determine when full details of a scheme are known.

RECOMMENDATIONS

- LN03.15/1 No modification.

L3(16):GREEN SPACE – LAND AT WELL END FARM, BOURNE END

(AS77)

The Objections

0959/1 Millgate Homes & Mr J Nicholson
1486/1 Raymond Jack Williams
1739/1 Lord Carrington's Grandchildren's Settlement
2080/1 Prince & Princess Emanuel Galitzine

Summary of Objections

- (a) The southern part of the paddock should not be designated under Policy L3, but should be designated as suitable for residential development.

Inspector's Reasoning and Conclusions

10.3.16.1 It is relatively uncommon to find significant areas of open land within the urban areas in Wycombe District that are designated under both Policies L3 and HE8. Moreover, the land subject of the objections comprises much of an autonomous conservation area and is also sandwiched between the AONB to the north and the Thames Flood Plain to the south. Not only does it lie between Policy H15 and H16 residential areas to east and west but also between the inner edges of the defined Green Belt. The existence of the Well End Conservation Area is of

particular significance since, despite objectors' claims to the contrary, it is separate from both the Conservation Areas of Abbotsbrook and Bourne End proper. In the absence of a Policy HE8 Area Character Study, it is difficult to determine the precise reasons for the designation of the Conservation Area. It is reasonable to surmise however that its essential special character resides in the tightness and antiquity of the street scene along Marlow Road and the distinctive features of the still isolated Well End Farm, a listed building, and its adjacent expanse of agricultural land (OS field nos: 6107, 6400, 7600 and 6472 totalling 7.7 hectares).

10.3.16.2 The Policy L3 designation clearly performs an urban amenity function in a visual sense, despite being quite inaccessible by the general public on foot. It also performs the more specific function of providing a good setting for Well End Farm. This last fact is acknowledged by the objectors. They also distance themselves from the suggestion of the Inspector reporting on the 1993 Inquiry, to the effect that acceptable access to a southern area of housing development might be contrived somewhere beside the listed building group. This view is noted and agreed. The key issue therefore is whether the retention of the whole of the erstwhile farmland, with its prominent backdrop of riverside trees, is of the essence of the character of the area. From an urban design point of view it may reasonably be concluded that it is. It would also be perverse to allocate as yet unbuilt land for housing and prematurely to designate it as a Policy H15 area when no previous urban character has been established. Although the vestigial open space might provide some form of setting for the listed buildings, it would not provide the fuller setting as recognised by the original designation of the wider area.

RECOMMENDATION

- LN03.16/1 No modification

L3(17): GREEN SPACE – LAND OFF QUOITINGS DRIVE, MARLOW

(AS91)

The Objections

0704/1 Berkeley Homes (Chiltern) Ltd
0840/37 Marlow and District Chamber of Trade & Commerce

Summary of Objections

- (a) The land does not fulfil any of the criteria for Policy L3 Green Space designation and should be designated as a Policy H14 residential area.

Inspector's Reasoning and Conclusions

10.3.17.1 I have dealt with an objection concerning the residential allocation of the site in section 3.2.5. The 'paddock' area of the site provides an important link in the chain of green spaces in this part of the Conservation Area, particularly with regard to the unbroken green area between west street and the new flats at Quoittings. However, I consider the western part of the site, notated 'scrub' on the objector's plan CgMs01, has far less significance in the overall open space network and has limited value as private open space. What role it has as a setting for the town centre is outweighed by the benefit of providing more housing in a relatively accessible location within the urban area of Marlow. I therefore recommend a modification to the boundary of the green space.

RECOMMENDATION

- LN03.17/1 Modify the Proposals Map to exclude the area notated 'scrub' on Drawing CgMs01, Appendix 1 to the objector's representation No. CG/2485/P0001 from the designation as open space to which Policy L3 applies.

L3(18): GREEN SPACE – BERWICK ROAD, MARLOW

(AS9)

The Objections

0840/39 Marlow and District Chamber of Trade & Commerce

Summary of Objections

(a) Reinstate previous designation for residential development on allotments.

Inspector's Reasoning and Conclusions

10.3.18.1 In the light of my conclusions in section 3.2.6 of the report, the Policy L3 designation appears to be justified and to accord with the relevant criteria of the Local Plan.

RECOMMENDATION

LN03.18/1 No modification

L3(19):GREEN SPACE – LAND ADJACENT SEYMOUR COURT ROAD, MARLOW (AS63)

The Objections

0840/43 Marlow and District Chamber of Trade & Commerce

Summary of Objections

(a) All or part of this land could be designated for residential development.

Inspector's Reasoning and Conclusions

10.3.19.1 In the light of my conclusions in section 3.2.6 of the report concerning an objection for a housing allocation, the Policy L3 designation appears to be justified and to accord with the relevant criteria of the Local Plan.

RECOMMENDATIONS

LN03.19/1 No modification

L3(20):GREEN SPACE – PRINCES RISBOROUGH SCHOOL

(AS122)

The Objections

0350/2 Princes Risborough School

0350/3 Princes Risborough School

Summary of Objections

- (a) If Green Space designation were to replace Green Belt designation on the site, an exception to Green Space policy should be made in respect of development at Princes Risborough School to enable extension of facilities to meet a proven need.

Inspector's Reasoning and Conclusions

10.3.20.1 Princes Risborough School is of mainly post-war construction and is located on high ground on the extreme south-eastern edge of the town. It stands at the north-eastern corner of extensive level playing fields which are adjoined on two sides by open agricultural land within the Chilterns AONB and Metropolitan Green Belt. The adjacent urban area is entirely residential. A slight oddity of the local layout is that the two vehicle accesses to the school complex are somewhat tortuously contrived through the ends of residential dead end roads. This is not entirely a convenient or desirable arrangement and the available evidence suggests that the school authorities would like to arrange wholly independent access from a main framework road if this were possible. By contrast, pedestrian access for schoolchildren is very well arranged; there being a safely segregated footpath approach from the north, leading all the way to the edge of the town centre. The south-east edge of the school grounds is defined by the long-distance Icknield Way, the subject of Policy RT15 (The Ridgeway Path).

10.3.20.2 The existing school curtilage (the buildings and the playing fields) is roughly bisected by the defined inner edge of the Green Belt. The school governors would like to provide indoor recreational accommodation within the playing fields. To secure planning approval would require there to be proved 'very special circumstances' as the Green Belt only excludes those buildings that preceded its definition. Their preference is to adjust the boundary so that it excludes the entire curtilage and to designate the playing fields as Green Space. The LPA does not oppose development within the school curtilage for purely sporting activities. In all the circumstances, it would seem preferable to use the occasion of the Local Plan's adoption to modify the Green Belt boundary. It is anomalous to divide a composite planning unit such as a secondary school and playing fields by such a boundary. It would be preferable to control future appropriate development by Policy L3(2) and thereafter to rely on the policy content of PPG17 to resist further diminution of the available open space.

RECOMMENDATION

- LN03.20/1 Modify the Proposals Map by defining the Policy GB2 boundary as outside the curtilage of Princes Risborough School and designating the excluded Green Belt area as Policy L3 Green Space.

L3(21): GREEN SPACE - 55-57 EASTWOOD ROAD, STOKENCHURCH

The Objections

0673/1 D J Vaughan

PIC 10/7 Objections

2114/1 Mr M R Chadwick

Summary of Objections

- (a) Delete Green Space designation and include in Established Residential Zone.

- (b) Objection to the deletion of Green Space designation in PIC 10/7.

Inspector's Reasoning and Conclusions

10.3.21.1 External inspection of the site subject of the objections revealed that it is a small area of virtually landlocked open space on the southern urban fringe of Stokenchurch. It is accessible only along a metre-wide pedestrian way between two groups of post-war estate houses. Its condition would appear to be overgrown and its only future function would seem to be some very limited form of communal use eg as an area of allotment gardens or as children's playspace. It would probably have no significant development potential since it lacks direct vehicular access. It would most appropriately be included within the adjoining Policy H14 established residential zone in view of its urban edge location and the type of activity it might conceivably support in the future.

RECOMMENDATION

- LN03.21/1 Modify the Proposals Map in accordance with PIC 10/7.

L4: INCIDENTAL OPEN SPACE

The Objections

1293/18 Naphill & Walter's Ash Residents Association

Summary of Objections

- (a) Strengthen wording of policy to effectively resist inappropriate infilling housing on areas of open land in Naphill and Walters Ash.

Inspector's Reasoning and Conclusions

10.4.1 The purpose of Policy L4 is in many ways comparable to the application of Policy L3 within rural settlements. In other words, the LPA rightly conclude that incidental open space generally less than 1000 sq m in area (the threshold that is introduced by PIC 10/8) may often have urban design significance but whose size precludes its being shown on the Proposals Map. Policy application will necessarily be on a case by case basis. It is intended to apply to open land within the *visible* public realm, but possibly not accessible or of immediate use by the public. The objection however clearly envisages its potential application to spaces between buildings such that infilling development would generally be precluded. Not only is Policy L4 quite obviously *not* intended for this purpose but PPG3 (paragraphs 69-71) specifically provides for such a form of development in suitable rural situations. To alter the wording of the Policy in this way might be held to be contrary to the tenor of the policy guidance.

RECOMMENDATION

- LN04/1 Modify paragraph 10.16 in accordance with PIC 10/8 (but see also LN03.10/1).

L5: THE RIVER THAMES AND THAMES VALLEY

L6: THE RIVER WYE AND MINOR WATERCOURSES

The Objections

0055/1	William John Pressney
0197/1	Mr & Mrs McGarel Groves
0379/29	<i>Sport England</i>
0475/3	Upper Thames Sailing Club
0475/4	Upper Thames Sailing Club
0475/5	Upper Thames Sailing Club
1193/26	<i>Environment Agency</i>
1193/27	<i>Environment Agency</i>
1193/28	<i>Environment Agency</i>
1200/16	<i>English Nature</i>
1632/4	G R Curtis
1632/6	G R Curtis
1676/1	Richard Clive Collier

PIC 10/9 Objections

0376/55 AXA Equity and Law Life Assurance Society Plc

Summary of Objections

- (a) Riverside development should respect the existing character of long stretches of both banks of the river, not just that of the buildings surrounding the local site. Amend paragraph 10.21 accordingly.
- (b) Paragraph 10.22 should reflect that Policy RT9 also addresses the recreational use of the river and the valley.
- (c) Policy L5 should mention buffer zones, public access and the requirement to obtain Land Drainage Consent from the Environment Agency. 'Designated' in part 2 should read 'designed'.
- (d) Wording should be added to the policy to highlight the nature conservation importance of the river environment.
- (e) Include headwaters of River Thames in the Princes Risborough area and Hambleden Stream.
- (f) Paragraph 10.18g should include the Environment Agency's requirement for a 5-metre buffer zone around a pond and a buffer zone of at least 8 metre wide on both sides of a watercourse. It is not clear in paragraph 10.19 why the Rivers Pang and Wye are considered to share a catchment area.
- (g) Concerned at the effect that proposed development at Wycombe Marsh could have on the amenity value of (and water levels in) the River Wye.
- (h) Policy should enhance public access to rivers and riverbanks by requiring the provision of appropriate car parking and additional slipways or moorings.
- (i) Alter line 4 of paragraph 10.25 to 'equivalent to...twice the height...'
- (j) The provisions of this policy should also include the River Thames. Policy should state that a greater buffer than the statutory 8 metres to the river may be required, and that opportunities will be taken to reinstate an appropriate buffer zone on redevelopment of a site.
- (k) Policy L6 should refer not only to the River Thames, but also the Rivers Pang, Wye and Thame.

Inspector's Reasoning and Conclusions

10.5.1 The objections to both Policies L5 and L6 will be considered together since the LPA put forward PIC 10/9 that would have the effect of amalgamating the two in favour of a combined Policy L6 'River Environments'. Since the objections and the proposed alterations to the text are numerous, the same approach as with Policy L1 will be taken; to review the individual objections in turn. In considering these objections to the component Policies, it should be borne in mind, firstly, that the River Thames in particular is the subject of specific Structure Plan Policies W2 and W3 and policy guidance in RPG3 (Regional Planning Guidance for the South East). Secondly, as far as Wycombe District is concerned, the course of the Thames is entirely through areas designated as having a very fair degree of policy protection and the river's recreational potential is also safeguarded by a number of Chapter 12 policies. Some of the objectors may have been inclined to take an unnecessarily narrow view of the overall policy protection of the development plan.

- (a) Riverside development will be judged by Policy L6 against (a) river ecology (b) landscape character and (c) possibly enhanced public access. Together with the relevant provisions of Policies RT11-14 (inclusive) it is difficult to see how a more holistic approach to policy formulation could be taken.
- (b) It is certainly possible that the application of Policy RT9 (Camping and Caravanning) may be of some relevance to riverside sites. However, there is no direct reference in that Policy to riverside locations and hence no very obvious need for a cross-reference. If the objector means Policy RT19 (Little Marlow Gravel Pits), then this is a discrete and site-specific policy that will almost certainly be the subject of SPG in due course (and hence additional consultation (see RT19)).
- (c) The LPA take the view, which is supported, that it is not necessary and very possibly confusing to itemise all the relevant consents which may be required for riverside development. The unfortunate use of the word 'designated' has been avoided as a result of PIC10/9 and the objection has therefore been met to that extent.
- (d) The nature conservation aspects of riparian development has been met by PIC 10/9 and the wording of Policy L6(1), which is accordingly endorsed.
- (e) The headwaters of the River Thames and other watercourses are now referred to in the supporting text at paragraph 10.18 as a consequence of PIC 10/9.
- (f) The general safeguarding of an 8-metre buffer zone is mentioned only in the supporting text at paragraph 18g and the reasons for it are there set out. Policy L6(2)(b) makes reference only to an 'adequate buffer zone' and this would seem to be as prescriptive as the Policy should be. If the Environment Agency requires any other dimension to be kept clear, this will no doubt be established case by case during statutory consultation. The catchment area point cannot be supported since the wording of paragraph 10.19 was apparently scrutinised and implicitly approved by both English Nature and the Environment Agency.
- (g) The effect of the development of Wycombe Marsh on the River Wye was the subject of considerable debate at the Local Plan Inquiry. The relevant conclusions are site-specific and are accordingly set out elsewhere (see H5A and S2).
- (h) Access to the river and the provision of car parking and slipways is essentially a matter for Chapter 12 and the recreational aspects of the Local Plan (see RT12-14 (inclusive)).
- (i) This objection is met by PIC 10/9 which is endorsed in this respect as in others.
- (j) Policy L6 would apply to all the rivers in Wycombe District, specifically including the Thames. The LPA's approach to the retention or the increase of riverside buffer zones is supported as being essentially pragmatic ie the matter will be determined case by case and with the advice of the Environment Agency. A rigid requirement in every case to provide an 8-metre zone would not only be onerous; it might also act against the design merits of specific development schemes where a lesser dimension might be

aesthetically or locally justified or necessary.

- (k) The inclusion of the Rivers Pang, Wye and Thame and the application of Policy L6 to them is clearly set out in paragraphs 10.18 and 10.19 of the supporting text.

RECOMMENDATION

- LN05/1 Modify Policy L6 and its supporting text in accordance with PIC 10/9 and delete Policy L5 with consequential re-numbering of the succeeding Policies.

L7: COMMUNITY WOODLAND, PRINCES RISBOROUGH

The Objections

0087/2	Council for the Protection of Rural England (Mid-Chiltern District)
0345/6	<i>Bryant Homes Technical Services Ltd, David Wilson Estates Ltd, Lovell Partnership Ltd</i>
0513/1	Mark Scales
0841/5	Lance Adlam
1200/18	<i>English Nature</i>
1294/14	<i>Environmental Records Officer, Bucks County Museum</i>
1898/3	<i>Princes Risborough Area Heritage Society</i>

Summary of Objections

- (a) The proposed woodland would not control the spread of northwards development. In order to provide adequate separation of settlements and prevent further urban sprawl, The woodland should be twice the proposed size.
- (b) Would exacerbate the sense of loss of open fields in views from the AONB.
- (c) The issue of a landscape buffer should be dealt with in the context of development principles for the site, and not as a national or strategic policy designation. Objection to the preclusion of development on the site prior to the woodland being created.
- (d) Use of the allotments would be affected, contrary to Policy RT18.
- (e) Woodland could be ecologically damaging to streams, flora and fauna in the vicinity. In particular, the proposed area of woodland includes part of Longwick Bog (a Bucks Alert Map Site and SINC), which could be seriously damaged by the planting of trees.

Inspector's Reasoning and Conclusions

10.7.1 The LPA have resolved to delete the Oak Tree Farm component of housing allocation H2(2)(c) and accordingly reduce the extent of the retained allocation from 45.0 to 26.2 ha as a result of PIC 3/4. In consequence, the Policy L7 land allocation for the Community Woodland at Princes Risborough is no longer needed as a buffer zone to the new housing area and PIC 10/10 would have the effect of deleting the allocation and its supporting text. The LPA say that the three objections that have not been conditionally withdrawn need not be given further consideration since they relate either to the principle or the method of establishing woodland in this sensitive location. Since PIC3/4 is elsewhere supported in this report, it is logical to endorse PIC 10/10 as being entirely consistent. The outstanding objections need not be further considered since they are, in effect, supported as a result of this modification.

RECOMMENDATION

- LN07/1 Delete Policy L7 and its supporting text in accordance with PIC 10/10.

L7A: WOODLANDS

PIC 10/11 OBJECTIONS

0376/56 AXA Equity and Law Life Assurance Society Plc

Summary of Objections

- (a) Delete Policy L7A as Policy L9A will adequately deal with the nature conservation aspects.

Inspector's Reasoning and Conclusions

10.7.2 The omission of a specific policy in relation to woodland protection was the subject of objection by English Nature. Policy 7A is fully supported by this body who have conditionally withdrawn their objection. PIC 10/11 is endorsed as being in accordance with the advice of PPG9 since it recognises the very substantial area of Wycombe District and the AONB that is afforested and the fact that not all forest areas are covered by other Chapter 10 policies. Additionally and importantly, the new Policy takes full account of locally-prepared nature conservation surveys such as the 1998 Bucks Tree and Woodland Strategy. The remaining objection is not upheld since it would be somewhat unwise to rely on Policy 9A alone for comprehensive woodland protection in the case of certain rural development proposals.

RECOMMENDATION

- LN07/2 Insert Policy L7A and supporting text in accordance with PIC 10/11.

L8: NATURE CONSERVATION (STATUTORILY PROTECTED SITES)

L8A: NATURE CONSERVATION (STATUTORILY PROTECTED SITES)

L9: NATURE CONSERVATION (NON-STATUTORILY PROTECTED SITES)

L9A NATURE CONSERVATION (NON-STATUTORILY PROTECTED SITES)

L10 OTHER NATURE CONSERVATION AND BIODIVERSITY FEATURES

APPENDIX 13: SITES OF NATURE CONSERVATION INTEREST

Objections to Policy L8

0595/1 Berks Bucks and Oxon Wildlife Trust
1193/21 Environment Agency
1193/22 Environment Agency
1200/21 English Nature
1200/23 English Nature
1200/25 English Nature

Objections to Policy L9

0158/66	High Wycombe and Marlow Green Party
0595/3	Berks Bucks and Oxon Wildlife Trust
0872/13	GOSE
0922/1	House Builders Federation
1200/26	English Nature
1207/9	Residents' Action Group on the Gomm Valley
1294/5	Environmental Records Officer, Bucks County Museum

Objections to Policy L10

0595/2	Berks Bucks and Oxon Wildlife Trust
0595/7	Berks Bucks and Oxon Wildlife Trust
1193/24	Environment Agency
1200/27	English Nature
1200/28	English Nature

Objections to PIC 10/12

0376/57	Axa Equity and Law Life Assurance Society PLC
0595/19	Berks Bucks and Oxon Wildlife Trust
1200/46	English Nature
1579/32	Oxford Land Limited

Objections to Appendix 13

0483/7	Wooburn PC
1193/13	Environment Agency
1193/23	Environment Agency
1200/30	English Nature
1294/7	Environmental Records Officer, Bucks County Museum
1646/3	Mr John Dalton

Objections to PIC A13/1

0595/1	Berks, Bucks and Oxon Wildlife Trust
1193/13	Environment Agency
1193/21	Environment Agency
1193/22	Environment Agency
1193/23	Environment Agency
1200/25	English Nature
1294/7	ERO Bucks County Museum
1646/3	Mr John Dalton

Objections to PIC A13/2

0376/58	Axa Equity and Law Life Assurance Society PLC
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Summary of Objections

- (a) There should be more information available on nature conservation and biodiversity in the district. Mention should be made of the UK Biodiversity Action Plan and the

developing Bucks Biodiversity Action Plan. Biological Notification Sites (BNSs) should be afforded more protection by the Local Plan.

- (b) Clarify hierarchy of nature conservation designations.
- (c) Special Areas of Conservation (SACs) are sites of European importance and should be referred to in the policy. National Nature Reserves (NNRs), SACs and candidate SACs should be included in Appendix 13 and on the Proposals Map.
- (d) Paragraph 10.36 could be expanded to contain more information about Local Nature Reserves (LNRs).
- (e) Detailed objections to the wording of the Policies and their supporting text: various amendments suggested.
- (f) Criterion (c) of Policy L8A should be deleted and a separate species policy included.
- (g) The definitive list of Biological Notification Sites (BNSs) and Sites of Importance for Nature Conservation (SINCs) should be made available before the policy can be agreed. If a definitive list is not possible, listings of BNSs and SINCs and their current status should be included in the plan and shown on the Proposals Map.
- (h) 'Kept' should replace 'maintained' in paragraph 10.38.
- (i) Policy L9 and its supporting text are contrary to parts of Planning Policy Guidance Notes (PPGs) 9 and 12.
- (j) Regionally Important Geological (and geomorphologic) Sites (RIGS) should be mentioned in the policy.
- (k) Detailed objections to the wording of the Policy and its supporting text – amendments suggested.
- (l) Policy L9A should only apply to SINCs that are identified on the proposals map
- (m) Policy L9A is contrary to PPG9 because it gives the same weight of protection to local sites as it does to other sites of substantive importance.
- (n) There should be more information available on nature conservation and biodiversity in the district. Mention should be made of the UK Biodiversity Action Plan and the developing Bucks Biodiversity Action Plan. Biological Notification Sites (BNSs) should be afforded more protection by the Local Plan.
- (o) Wildlife corridors and stepping stones should be identified in the Local Plan.
- (p) Direct reference should be made to paras 16 and 23 of Planning Policy Guidance (PPG) 9. The word 'management' needs to be incorporated into L10.
- (q) Reference should be made to English Nature's Natural Areas Strategy, which is of direct relevance to the application of Policy L10.
- (r) Alteration to the wording of the Policy is required to encourage creation of new landscape features.
- (s) Appendix 13 should be renamed.
- (t) Reference should be made in the Appendix to the holding of information by the Environmental Records Centre.
- (u) Spelling errors in some site names and the omission of two sites need to be corrected.
- (v) Appendix 13 should contain criteria that will govern the determination of planning applications in SINCs and BNSs, especially the former since they have no statutory force.

- (w) References to 'environmental assessment' in Policies L8A and L9A are not appropriate since it weakens the principle of not allowing development on designated sites.

Inspector's Reasoning and Conclusions

10.8.1 As with the objections to Policy L1, those relating to Policies L8-10 and Appendix 13 are very varied. Accordingly, the objections will be addressed in turn, using the lower case letters against which they have been summarised. Two general points need to be made. One is that Local Plans need to have policies for all nature conservation sites (PPG 9: paragraph 25) and should also indicate SSSIs, NNRs, SPAs and SACs on the relevant Proposals Maps as well as 'sites of local nature conservation importance' (ibid). The obvious implication is that any sites of international importance *should* be indicated and that sites of local importance *may* be indicated. It is therefore a matter for the LPA's discretion which *local* sites need be shown. The second point is that some objectors have said, in passing, that there should be better cross-references as between the Proposals Maps and the Written Statement. This view is certainly endorsed; the LPA may wish to indicate and number the individual sites on the former and to include the 100-m National Grid Reference of each site in Appendix 13 of the latter.

- (a-b) References are now made to the UK Biodiversity Plan and to the Bucks Biodiversity Action Plan in the Written Statement. Since these are clearly matters of fact, these revisions are endorsed. It would be helpful to express the somewhat confusing hierarchy of designations in the Local Plan; perhaps the best place would be in Appendix 13, which is the subject of extensive proposed change.
- (c-d) There is a proposed reference to Special Areas of Conservation (SACs) and candidate SACs in paragraphs 10.35 and 10.38 (PIC 10/20) and these are to be shown on the Proposals Maps. This is endorsed as reflecting the European dimension of these areas that were previously designated as Sites of Special Scientific Interest (SSSIs) under national legislation.
- (e) National Nature Reserves (NNRs) need not be specifically identified since they are all based on SSSIs and enjoy protection and identification in Appendix 13 and the Proposals Map for this reason.
- (f) There would seem to be particular purpose served by the inclusion of additional information regarding Local Nature Reserves (LNRs) beyond their listing and location in the Local Plan; this being a feature carried forward from the 1995 Wycombe District Local Plan.
- (g) It would be premature to indicate emergent designations such as Sites of Importance for Nature Conservation) SINCs, Biological Notification Sites (BNSs) and Regionally Important Geological and Geomorphological Sites (RIGS) for the reasons advanced by the LPA. They are nevertheless included in Appendix 13 by PIC A13/3 and it is clear that Policy 9A will apply to them where this is appropriate.
- (h) The use of the word 'maintained' rather than 'kept' (in paragraph 10.38) is supported because it connotes the keeping up to date as well as the physical location of the records in question.
- (i) PPG 9 (paragraph 24) certainly encourages the protection of sites of local nature conservation interest. However, Policy 9A should perhaps not specify emergent designations such as County Wildlife Sites (CWSs) for the simple reason that they are not shown on the Proposals Map. A modification of the Policy is accordingly suggested.
- (j) The effect of PIC 10/20 would be to refer to RIGS in the supporting text to Policy L9A. This is endorsed but specific reference in the Policy formulation is premature pending the completion of the review of these sites; interim protection is given to them.
- (k) Policy L9A carries forward the protective approach contained in the adopted development plan; it is in line with the advice of PPG 9 with regard to sites of

substantive importance such as RIGS and BNSs. The precise application of the Policy is a matter for the LPA on receiving competent advice from English Nature, Bucks CC and other authoritative bodies.

- (l) SINC's will enjoy interim protection under Policy L9A but they cannot be immediately identified on the Proposals Map for the reasons already given.
- (m) The wording of Policies L8A and L9A clearly differ, as does the map identification of sites covered. The Local Plan makes a distinction between statutorily and non-statutorily sites and thus follows the advice given in PPGs 9 and 12.
- (n) This objection is largely met by the combined effects of PICs 10/12, 10/15, 10/17 and A13/1-3 which are all mainly endorsed. The interim level of protection given to BNSs by Policy L9A seems appropriate for the reasons advanced by the LPA.
- (o) Wildlife corridors and ecological stepping stones are difficult to define but easy to recognise. It would probably unduly complicate the detail of the Proposals Map to attempt to show them even if they were clearly defined. Moreover, many protected linear features such as disused railway lines (Policy T11-12) and cycle routes (Policy T17) may very well serve the same purpose. However, it may be appropriate to reflect the relevant advice of PPG 9 in the formulation of Policy L9A in particular.
- (p) There is no need specifically to refer to advice contained in PPG 9 since it is implicit that adopted Local Plan policies follow national guidance unless circumstances otherwise dictate. The word 'management' has been inserted in Policy L10 by PIC 10/12 and is supported.
- (q) The objection relating to English Nature's Natural Areas Strategy has been met by PIC 10/12 and amendments to paragraph 10.42 which are endorsed as offering helpful advice to applicants.
- (r) The LPA and the Local Plan have no advocacy role in nature conservation. The main purpose of Chapter 10 policies is to reflect national and regional guidance and to identify sites that are the subject of statutory designation and to provide policy protection to other sites that are not subject to such formal designation.
- (s) Since the apparent intention is to append a list of both areas and sites of nature conservation interest, it might be helpful to rename Appendix 13 as proposed by A13/1.
- (t) Reference is now made in the text of Appendix 13 to the Environmental Records Office.
- (u) The relevant spelling errors and site omissions have now been corrected.
- (v) The criteria that will be applied to the consideration of development proposals within non-statutory sites are now contained in Policy L9A.
- (w) The references to 'environmental assessment' does not imply any weakening of planning policies; merely that additional information may be required in order to assess any development proposals that may be permitted subject to conditions, agreements or undertakings.

10.8.2 The effect of the various PICs, which are endorsed as being in line with PPG 9 and PPG 12 guidance, has been to meet most of the objections to Policies T8-10. The remaining objections may partly be met by minor modification of the policy wording and by substantial recasting of Appendix 13. It is important to keep a sense of proportion when assessing the likely future impact of all the nature conservation policies. Firstly, they are essentially *countryside* policies. That is to say, the sites to which they primarily relate are mainly in rural locations. Here the tenor of planning guidance is severely to restrict most forms of operational development. Secondly, unlike in urban situations of restraint like conservation areas (where the LPA will usually determine planning applications quite independently), guidance will almost always be sought from outside expert agencies. Thirdly and lastly, given the nature of such

specialist advice, it would be virtually impossible to specify the criteria that will apply to the determination of applications, whether they be for (comparatively rare) instances of operational development or (more commonly) for changes of use for (eg) rural recreational activity.

RECOMMENDATIONS

- ❑ LN08/1 Modify Policy L8A and supporting text in accordance with PICs 10/12 and 10/15.
- ❑ LN08/2 Modify Policy L9A and supporting text in accordance with PIC 10/12.
- ❑ LN08/3 Modify Policy L10 and supporting text in accordance with PIC 10/12.
- ❑ LN08/4 Further modify supporting text in accordance with PIC 10/15.
- ❑ LN08/5 Further modify supporting text in accordance with PIC 10/17.
- ❑ LN08/6 Modify Appendix 13, in accordance with PICs A13/1-3, to read as follows:

APPENDIX 13 – AREAS AND SITES OF NATURE CONSERVATION INTEREST

Map Ref	Name of Area or Site	Status	OS Grid Ref	Area (ha)
Special Areas of Conservation				
L8	NA	None Confirmed	NA	000
L8	Chiltern Beechwoods	Candidate SAC	NA	000
Sites of Special Scientific Interest				
L8a1	Aston Rowant Aston Rowant Woods	National Nature Reserve (part) Within Chilterns Beechwoods	SU 000 000	00.0
L8a2	Bolter End Sand Pit		SU 000 000	00.0
L8a3	Bradenham Woods	Within Chilterns Beechwoods	SU 000 000	00.0
L8a4	Buttler's Hangings		SU 000 000	00.0
L8a5	Coombe Hill		SU 000 000	00.0
L8a6	Ellesborough and Kimble Warren		SP 000 000	00.0
L8a7	Fayland Chalk Bank		SU 000 000	00.0
L8a8	Fern House Gravel Pit		SU 000 000	00.0
L8a9	Frieth Meadows		SU 000 000	00.0
L8a10	Gomm Valley		SU 000 000	00.0
L8a11	Grangelands and Pulpit Hill		SP 000 000	00.0
L8a12	Hollowhill and Pullingshill Woods		SU 000 000	00.0
L8a13	Homefield Wood		SU 000 000	00.0

L8a14	Lodge Hill		SU 000 000	00.0
L8a15	Millfield Wood		SU 000 000	00.0
L8a16	Moorend Common		SU 000 000	00.0
L8a17	Naphill Common		SU 000 000	00.0
L8a18	Rodbed Wood		SU 000 000	00.0
L8a19	Swains Wood		SU 000 000	00.0
L8a20	Temple Island Meadows		SU 000 000	00.0
L8a21	Turville Hill		SU 000 000	00.0
L8a22	Widdenton Park Wood		SU 000 000	00.0
L8a23	Windsor Hill		SP 000 000	00.0
L8a24	Wormsley Chalk Banks		SU 000 000	00.0
Local Nature Reserves				
L8b1	Brush Hill		SP 000 000	00.0
L8b2	Chairborough Nature Reserve		SU 000 000	00.0
L8b3	Prestwood Picnic Site		SU 000 000	00.0
L8b4	Sands Bank		SU 000 000	00.0
L8b5	Warren Nature Reserve		SU 000 000	00.0
L8b6	Whiteleaf Hill		SU 000 000	00.0
County Wildlife Sites (CWSs).....Policy L9A will be used to protect sites of substantive nature conservation and geological value [as wording in PIC A13/2]				

- LN08/7 Modify Policy L9A in accordance with PIC 10/20 and further modify Policy L9 to read as follows:

POLICY L9

(1) DEVELOPMENT THAT WOULD HARM THE NATURE CONSERVATION OR GEOLOGICAL INTEREST OF THE WHOLE OR ANY PART OF COUNTY WILDLIFE SITES OR OTHER SITES OF SUBSTANTIVE OR ASSOCIATED NATURE CONSERVATION AND GEOLOGICAL IMPORTANCE, SUCH AS RIGs, BNSs AND SINCs WILL NOT BE PERMITTED.

(2) THE COUNCIL MAY REQUIRE AN ASSESSMENT OF THE ECOLOGICAL EFFECTS OF DEVELOPMENT AND IT WILL ONLY BE PERMITTED ON OR NEAR SITES WHERE ADVERSE EFFECTS UPON THEIR NATURE CONSERVATION INTEREST ARE SATISFACTORILY MITIGATED BY MEANS OF APPROPRIATE CONDITIONS OR THE CONCLUSION OF A MANAGEMENT AGREEMENT WITH THE APPLICANT.

L11: LANDSCAPE AND NATURE CONSERVATION - POLICY OMISSIONS

The Objections

1193/25	<i>Environment Agency</i>
1200/22	<i>English Nature</i>
1200/24	<i>English Nature</i>
1200/29	<i>English Nature</i>

Summary of Objections

- (a) There should be policies to cover the promotion of biodiversity targets for habitats and species.
- (b) The mention of the production of Biodiversity Action Plans is a significant omission from the Plan.
- (c) The Plan should include a policy which aims to identify suitable sites for designation and management as Local Nature Reserves (LNRs).
- (d) The Plan should include a specific policy that gives woodland significant protection from development.

Inspector's Reasoning and Conclusions

10.11.1 These objections mainly relate to matters already covered in considering the many objections to Policies L8-10. It is not the function of LPAs actively to promote biodiversity; it is merely to ensure that the use of land and buildings within its jurisdiction does not seriously harm areas that are significant from the point of view of biodiversity. Biodiversity plans are now referred to in paragraph 10.33a. The process of finding and designating future LNRs is not for the LPA; the function of the Local Plan is to indicate their presence and put in place policies for their protection. The effect of PIC 10/11 has been to introduce Policy L7A which specifically covers the subject of woodland protection throughout Wycombe District.

RECOMMENDATION

- LN11/1 No modification