

Table relating to comments made on the Wooburn & Bourne End Neighbourhood Plan NDP 6th Draft			29 August 2020
NP Policy or paragraph	Comment by Wycombe planners; Bucks Highways & Catesby estates	West Waddy response	WBEPCC comments and actions in bold
Section 1: The Neighbourhood Plan process so far & next steps	<p>Catesby Estates: In the first instance, we wish to raise a procedural objection. The previous version of the Neighbourhood Plan was produced in 2014 under a different strategic policy framework ahead of the examination or adoption of the Wycombe Local Plan. It is therefore a materially different version of the consultation document. It is our opinion that is so different that the current draft is an entirely “new” document and should undergo significant consultation before proceeding to Regulation 14.</p> <p>Catesby Estates would welcome further discussions with the Neighbourhood Plan Steering Group to discuss the objections we have to the current consultation version of the WBENP. This consultation would ensure any site specific policies are deliverable. Currently, Policies WBE/HF1-HF7 are objected to in the strongest terms.</p>	<p>As the Neighbourhood Plan will need some fairly significantly amendments in order to address the comments that have been made, I agree that there should be another round of public consultation prior to submission to Buckinghamshire Council. Failure to do so might ultimately be deemed a procedural error by any examining Inspector.</p> <p>I agree that you should undertake discussions with all three bodies that have made comments on your draft Neighbourhood Plan to demonstrate your ‘positive and proactive’ approach to consultations.</p>	<p><i>We agree and will do so</i></p> <p><i>Action: once clear on changes to engage the different parties</i></p>
Forward & vision	<p>Catesby Estates: Role of the Neighbourhood Plan and Development Brief</p> <p>The WBENP Forward seeks to clarify the purpose and role of a Neighbourhood Plan. There is reference to “it will also ensure that Development Briefs contain appropriate conditions to address the impact of their specific development”. The role and purpose of both the Development Brief and the Neighbourhood Plan is unclear here.</p> <p>The Development Brief is a Supplementary Planning Documents (SPD). SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As set out in the National PPG, they should also not add</p>	<p>Paragraph 5.4.19 of the Wycombe Local Plan already commits to the production of a development brief for the Hollands Farm site. In this situation, I consider it appropriate for the Neighbourhood Plan to identify particular issues and concerns that should be addressed in the forthcoming Development Brief. However, as Catesby Estates state a Development Brief is a Supplementary Planning Document (SPD) which should build upon and provide more detailed advice or guidance on policies</p>	<p><i>We will review to ensure that we make clear that these are non-strategic but address local issues</i></p> <p>Action: <i>review wording to ensure that policies and development brief are clearly separated</i></p>

	<p>unnecessarily to the financial burdens on development (Ref: Paragraph: 008 Reference ID: 61-008-20190315).</p> <p>In addition, paras 2.3.1 of the WBENP states “and proposes certain additional policies to address the issues and concerns that arise from these and other developments”. This is reiterated at section 3.4.1. The Neighbourhood Plan is required to be in accordance with the wider objective and aspirations of the strategic plan, in this case the adopted Wycombe Local Plan and therefore it is not the role of the Neighbourhood Plan to add new strategic requirements of allocations, which were subject to robust interrogation at the examination of the Local Plan.</p>	<p>in an adopted local plan, but should also not add unnecessarily to the financial burdens on development.</p> <p>I agree with Catesby Estates that the Neighbourhood Plan is required to be in general compliance with the Wycombe Local Plan’s strategic policies, and therefore it is not the role of the Neighbourhood Plan to add new strategic requirements. However, within the parameters of Local Plan policy BE2 it is possible to give further guidance on the implementation of particular matters providing the effect would not be to subvert the policy.</p>	
<p>Number of houses to be delivered on allocated sites</p>	<p>Catesby Estates: There are continual references throughout the draft WBENP to a variety of housing numbers for specific sites. These largely relate to Slate Meadow which was an allocation through the previous Local Plan which now benefits from planning consent and Hollands Farm and Windrush House, both allocations in the current Local Plan.</p> <p>The numbers referenced in WBENP are indicative capacities and are not maximum numbers. It is our recommendation that the housing numbers are removed or explicitly referenced as “indicative” to prevent the confusion that they are a target or cap on the number of houses to be delivered within the parish. To suggest there is a target or cap would be contrary to the Wycombe Local Plan and fail the basic conditions requirement.</p>	<p>I agree with Catesby Estates that the number of homes should either be left out or explicitly referenced as “indicative” as indicated in Table 20 of the Wycombe Local Plan.</p>	<p><i>We agree</i></p> <p>Action: <i>review wording wherever housing numbers are quoted to reference as indicative.</i></p>

<p>Local Infrastructure</p>	<p>Catesby Estates: There are repeated assertions regarding the local infrastructure, for example phrases such as:</p> <ul style="list-style-type: none"> - “the road system is at capacity”, - “[development] will inevitably affect road congestion and exacerbate parking problems” (2.3.1), - “it is obvious that more housing means more traffic on our roads with all the attendant issues of congestion which will impact air quality” (8.3). - “schools and medical and dental practises are also at capacity” <p>We wish to understand the evidence to support these statements, for instance are there specific highways junctions of concern; times of day; days of the week where traffic is considered a specific concern or bottleneck. Equally, school capacity is very fluid depending on demographics and is influenced by many factors including catchment areas; Ofsted result etc. The latest statistics for Clayton Primary School for instance suggest there were only 334 students enrolled compared to 345 places in 2020 (www.gov.uk). Also, Bourne End Academy had 626 students enrolled with capacity for 830 in 2020 (www.gov.uk). We would therefore be grateful for more detail on school intake and catchment areas could provide more clarity to the issues around infrastructure.</p> <p>It is our opinion that the WBENP would benefit from an explanation of the infrastructure being provided by new development. For example, the Local Plan recognises school capacity will be an issue as a result of new development and therefore Policy BE2 includes provision of a new primary school on the Hollands Farm site. The WBENP also includes reference to Community Infrastructure Levy but only in reference to the NP. The remaining 75% of CIL generated by all new development is to raise funds for local infrastructure and the WBENP does not currently acknowledge those projects identified for CIL funding.</p> <p>In addition, at the planning application stage, Section 106 obligations may be used to obtain local infrastructure</p>	<p>I agree that evidence is required to justify the assertions made about infrastructure capacity problems. The reports prepared as background evidence for the Wycombe Local Plan ought to provide much of the necessary evidence in this respect.</p> <p>The addition of references to infrastructure provision from new development would be helpful.</p>	<p><i>We agree and need to identify where we can obtain the required evidence. Some will come via a survey monkey to prove public support and some from specific studies or publicly available information. We may need ask West Waddy to investigate what is already available and to analyse and reference it. KBEG have some reports including the Motion study</i></p> <p>Action: <i>identify with West Waddy what they can do for us in this respect.</i></p>
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improvements, where such improvements are necessary to allow the development to go ahead

Action: We will reference this. However, we have a lot of school places that are currently filled from other parts of Bucks so the system is fluid.

Action: We will explain what is planned

We agree
Action: we will identify the BC CIL projects in WBE Parish.

<p>Public Transport</p>	<p>Catesby Estates: Furthermore, please also note at section 1.2, page 8 there is no reference to the planned increased rail service at Bourne End station to a half hourly service or opening of the Elizabeth Line at Maidenhead which will increase the rail capacity in the area. There is also currently no detail provided on existing public transport provision, timetable or routes.</p>	<p>I agree that given the importance of promoting sustainable transport, some analysis of public transport provision and aspirations for its improvement would be a welcome addition to the Neighbourhood Plan, especially as one of the basic conditions of a neighbourhood plan is that it is required to contribute to sustainable development.</p>	<p><i>We agree</i> Action: 1. <i>Obtain rail and bus timetables</i> 2. <i>Ask bus company about smaller eco buses</i> 3. <i>Develop questions for survey monkey for evidence</i> 4. <i>write a new section on this</i></p>
<p>Neighbourhood Plan period</p>	<p>Catesby Estates: For the avoidance of doubt, it should be recognised in the Introduction (as it is elsewhere in the draft WBENP) that Neighbourhood Plans do require review. As recognised in section 4.1, there will be a new Buckinghamshire Local Plan in next 5 years therefore the Neighbourhood Plan may need updating to respond to changing circumstances.</p>	<p>I agree that it would be helpful to make reference to the potential need for review when the next Buckinghamshire Local Plan is produced [Published programme:- Reg.18 consultation Spring 2022; Reg.19 consultation Spring 2023; Examination Autumn 2023; and adoption by end 2024].</p>	<p><i>We agree</i> Action: <i>write new section to cover when we will commence a review eg after defined period and/or BC review depending on which is sooner</i></p>
<p>Vision</p>	<p>Catesby Estates: At section 3.3 there is an overarching Vision. Bullet point number 5 seeks to set out the aims regarding the historic environment however, the current wording states heritage assets must be “maintained and preserved”. This wording is not in accordance with the Listed Building and Conservation Area Act 1990 (as amended).</p> <p>Alternative wording could be “to have special regard to the conservation of heritage assets” or, using the NPPF para 16 wording “have a positive strategy for the conservation and enjoyment of the historic environment so that they can be enjoyed for their contribution to the quality of life of existing and future generations”. This wording can reflect national policy more accurately and allow for balanced approach to heritage assets, as set out in national planning policy.</p>	<p>In my view the most appropriate replacement words for the vision in relation to heritage assets would be to replicate the words in paragraph 184 of the National Planning Policy Framework (NPPF) which states that: <i>‘These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.’</i></p>	<p><i>We agree</i> Action: <i>rewrite using NPPF wording</i></p>

<p>Policy WBE/PD1 – Protecting Green Belt</p>	<p>Wycombe planners: National policy sets out the circumstances in which the GB boundary can be changed – the plan cannot require that there is agreement with the Parish Council in circumstances where a review may be required.</p> <p>Catesby Estates: The proposed policy seeks to control Green Belt release which is a strategic plan making matter. It is not in accordance with the wording of the NPPF and accordingly, does not meet the basic conditions and should be deleted.</p>	<p>Agree that Green Belt is a strategic planning issue. However, para 136 of the NPPF states that: <i>‘Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.’</i> The NP might want to make reference to this, should any future Green Belt reviews be deemed necessary.</p>	<p><i>West Waddy (WW) remarks helpful</i> Action: review current policy wording and NPPF words per WW</p>
<p>Policy WBE/PD2 - Maintain Separation Between Settlements In Wooburn And Bourne End Parish</p>	<p>Wycombe planners: The policy needs to clarify what type of protection this is? Local Green Space designation? Those areas also need to be shown a map.</p>	<p>I agree with this comment that the policy needs to clarify what type of protection this is and to clearly identify the areas on a map. Local Green Space designation would seem the most appropriate provided these areas do not involve extensive areas of land and meet the criteria for the designation of Local Green Spaces set out in paragraph 100 of the NPPF. Policies for managing development within Local Green Space should be consistent with those for Green Belts. See paras 99 – 101 of the NPPF.</p> <p>Please note with respect to this & other Council comments on the policies in the Neighbourhood Plan, that the Government’s Planning Practice Guidance has the following advice on how policies in a neighbourhood plan should be drafted:</p> <p><i>‘A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when</i></p>	<p>Actions:</p> <ol style="list-style-type: none"> 1. <i>Define settlements for consistency</i> 2. <i>Explain what separates each settlement</i> 3. <i>show settlements and what separates them on map</i> 4. <i>Develop questions on survey monkey as evidence that separation is importance to residents</i>

		<p><i>determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.’ (Paragraph: 041 Reference ID: 41-041-20140306)</i></p>	
<p>Policy Wbe/Pd3 Good Quality Design</p>	<p>Wycombe planners: What is meant by respect? Be in keeping? Reference to features and plot widths etc. should include where they are present. They may not all be consistent</p> <p>Provide sustainable drainage and porous / permeable surfacing for driveways – can we do this? Should cross refer to suds reqts</p> <p>Catesby Estates: Creating good places and achieving Sustainable Development is a balance between often conflicting demands and policies. Whilst we support most of the aims of Policy WBE/PD3, the current drafting of bullet point 4 and 5 is a concern. Whilst it is agreed that sufficient parking should be provided on development sites, there should be an element of flexibility for proposals to reflect different circumstances. We therefore propose draft policy WBE/PD3 is amended to;</p> <ul style="list-style-type: none"> - “where possible, parking provision should comply with this Neighbourhood Plan policy or with the Buckinghamshire County Council Parking Guidance. - “Provide sustainable drainage and porous/permeable surfacing for driveways where possible” 	<p>I agree that a form of words that gives greater clarity than ‘respect,’ should be used. ‘Be in keeping,’ is a possible revision. I agree that reference to features and plot widths etc. should include where they are present.</p> <p>The Wycombe Local Plan already requires all development proposals to include SuDs in policy DM39 & paragraph 6.202. Cross reference could therefore be made to these requirements in the NP & emphasise the importance of this including driveways where they need planning permission.</p> <p>The issue of parking standards is considered in the section of the table responding to transport comments.</p>	<p>Action: <i>revise words and request WW to review and amend to make compliant</i></p>
<p>Policy Wbe/Pd4 - Residential Infill, Conversion of Offices to Residential Properties And</p>	<p>Wycombe planners: Cannot apply to office to residential, this is a PD right. Can only be removed using Article 4 directions which will be in place from July 2020 covering</p>	<p>Wycombe now has Article 4 directions that mean that change of use from office to residential now requires planning permission at various business parks including Millbourne Road, Bourne End & Bourne End Business Park. This came into effect</p>	<p>Actions</p> <p>a) <i>Remove conversion of office from policy and establish new permitted</i></p>

<p>Backland Development</p>		<p>on 20.7.20. Elsewhere conversions will continue to be permitted development. N.B. From 1 September, new PD rights come into force allowing for the demolition of office spaces <1,000sqm and <18m tall and their replacement with new residential blocks or homes not exceeding the same size restrictions.</p>	<p><i>development policy</i> b) <i>Tighten car parking standard to cover impact of conversion of offices</i></p>
<p>Policy WBE/Pd5 - Heritage Assets</p>	<p>Wycombe planners: Doesn't add anything that isn't already national policy or DM31 of the new Local Plan</p> <p>Catesby Estates: Section 5.3 considers heritage. As there is a significant legislative context provided by the Listed Building and Conservation Area Act 1990 and guidance provided in the NPPF, it is suggested this is an unnecessary section and should be deleted with the reader directed to NPPF Chapter 16.</p>	<p>My view is that with several conservation areas; a substantial number of listed buildings & many undesignated heritage assets, conservation is a significant issue in Wooburn & Bourne End & that it would be a major gap if the NP did not contain a policy relating to this matter. However, the policy needs to add something that is not already in the Local Plan policy. I would suggest it does this by making reference to key matters identified in the Conservation Area Character surveys & Conservation Area Appraisals. Also, any important undesignated assets where identification in the NP would ensure that planning decisions have regard to their historic significance. Paragraph 197 of the NPPF states that: '<i>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</i>'</p>	<p>Actions a) <i>review conservation assessments to identify if anything would add to DM31.</i> b) <i>"harden" NPPF paragraph ?</i></p>

<p>Policy Wbe/Pd6 - Parking Standards for All New Developments</p>	<p>Wycombe planners: Comments same as before. Actually reduces parking provision as no visitor parking required. What is the justification?</p> <p>Buckinghamshire Council Highways: Wooburn and Bourne End falls within Zone B based on population and accessibility – see appendix 1 of BCC Parking Guidance. It would be inconsistency with the methodical approach set out in the guidance to put Zone C.</p> <p>The Highway Authority will not acknowledge or abide by the NDP’s stance that a site correctly identified within Zone B shall actually provide parking according with Zone C standards (and that also disregards the requirements for between 1 and 10 dwellings)</p> <p>To proclaim that using Zone C standards “...must apply to all development regardless of size...” would be detrimental to the parking provision as it does not require unallocated parking spaces (the main difference with the requirements for 10 or more dwellings). I’m sure this is not the intention. For consistency I would recommend you refer to both sets of standards, particularly as Hollands Farm will be relevant for this.</p> <p>Catesby Estates: In a similar vein to policy WBE/PD1, Policy WBE/PD6 is objected to as currently drafted. Bourne End is a sustainable settlement where new residents should be encouraged to use non car modes of transport. There is no evidence to support the suggestion that residents require double the normal standards of parking spaces. Furthermore, it is considered that the result would be a poorly designed development with too heavier emphasis on parking and large areas of hardstanding. Policy WBE/PD6 should be deleted.</p>	<p>In order to justify an alternative to the Buckinghamshire Countywide Parking Guidance it would be necessary to have some very strong evidence to exceptionally justify it. In transport terms I consider it to be logical that Wooburn and Bourne End are considered together and therefore that with regard to parking standards it is logical that the area should fall within zone B. Pursuing a different standard would also be likely to fall foul of the requirement for the neighbourhood plan to be in general conformity with the strategic policies contained in the development plan for the area. I would therefore recommend dropping the proposal to use parking guidance for zone C.</p>	<p>Actions</p> <ul style="list-style-type: none"> a) <i>Must be in conformity no exceptions</i> b) <i>Consolidate all parking policies</i>
<p>Policy Wbe/Pd7 - Replacement or Conversion of Garages To Living Space</p>	<p>Wycombe planners: Is this not already taken into account?</p>	<p>Hopefully it is, but I do not think it is explicitly set out in the Wycombe Local Plan, and therefore the addition of this policy will ensure that consideration is given to this matter. It is therefore the type of local policy that is appropriate in a Neighbourhood Plan.</p>	<p>Action: <i>Consolidate under one parking policy</i></p>

<p>Policy WBE/PD8 – Dropped Kerbs in Wooburn & Bourne end Parish</p>	<p>Buckinghamshire Council Highways: The dimension of 2m conflicts with the tolerance that Transport for Buckinghamshire currently use (i.e. maximum of 4.5m for dropped kerbs serving shared accesses) and will therefore not be the case in the construction of the vast majority of private vehicular accesses. It is strongly advised that reference to 2m is removed from this proposed policy.</p>	<p>The aspiration of this policy to limit the loss of off-street and on-street parking spaces is sound, but it is also important to ensure that the 2 metre limit for dropped kerbs is practical. I would therefore recommend liaising with Buckinghamshire Highways over this matter. If you are able to provide any examples of 2 m width dropped kerbs this would be helpful evidence in supporting your case.</p>	<p>Action: Consolidate under one parking policy</p>
<p>Policy Wbe/Pd9 - Electric Vehicle Charge Points - New Developments</p>	<p>Wycombe planners: Check compliant with Air Quality SPD</p> <p>Not sure why this focuses on street parking it would make more sense to apply to off street. Air Quality SPD requires all minor development to provide charging points and more for majors – so no need for policy</p> <p>Catesby Estates: As currently drafted Policy WBE/PD9 is undeliverable from a practical implementation point of view. We therefore recommend the following wording; “all new housing development within the parish should have provision for electric vehicle charging points for multiple users”. Catesby Estates support the inclusion of electric charging points on all new dwellings and in communal areas of parking where possible.</p>	<p>Table 3 of the Air Quality SPD requires for minor residential development (less than 10 dwellings): ‘Residential (C class uses): 1 charging point per dwelling with dedicated parking (32 amp) or 1 additional dedicated charging point per 10 spaces (unallocated parking) or part thereof and ensure appropriate cabling is provided to enable increase in future provision.’</p> <p>If you consider more guidance is required, I would recommend discussing this issue with the Wycombe planners.</p>	<p>Action: follow government requirements</p>
<p>Policy Wbe/Pd10 Flooding and Drainage</p>	<p>Wycombe planners: This is already a requirement for national policy. Policy is repetitive and should be removed.</p>	<p>I agree that the requirements of policy Wbe/Pd10 already forms part of the guidance in the NPPF and Wycombe Local Plan policy DM39 on Managing Flood Risk & Sustainable Drainage Systems and therefore the policy should be removed. Given the importance of flooding issues in the Wooburn & Bourne End area you might, however, wish to add some text about particular local problems, which</p>	<p>Actions</p> <ul style="list-style-type: none"> a) remove Policy but keep section b) provide explanation of NPPF and state PC will rigorously enforce the WDC policy and NPPF guideline

		could potentially be addressed through CIL & S106 funding.	
Policy Wbe/Pd11 Access and Layout of New Infrastructure Developments	Wycombe planners: Doesn't appear to add anything to what is already required in our Local Plan? See policy DM2 of the DSA	I do not agree with the Council that policy Wbe/Pd11 does not add anything to policy DM2 in the Delivery & Site Allocations DPD. DM2 is primarily focused on requiring transport assessments and promoting sustainable transport, whereas policy Wbe/Pd11 is primarily concerned with providing adequate access and parking facilities for publicly accessible services such as schools, medical facilities & shops. You have also highlighted that there are existing problems with this issue & that the Clinical Commissioning Group does not seem to be giving adequate consideration to this issue. The policy therefore seems appropriate for inclusion in a Neighbourhood Plan to me. The provision of specific examples where there are existing problems would help to strengthen your case.	Action: <i>Provide evidence</i>
Policy Wbe/E1 Environmental and Biodiversity Policy For Wooburn and Bourne End Parish	Wycombe planners: This is not a policies but a series of intentions, this should be moved to the implementation and monitoring section.	I agree with the Wycombe planners that this is not a policy but a series of intentions, and therefore should be moved to the implementation and monitoring section of the plan. However, this would result in there being no biodiversity policy in the Neighbourhood Plan. This does not seem appropriate given that the Central Chilterns Chalk River Biodiversity Opportunity Area runs through the designated Neighbourhood Plan area (even incorporating the northern and western parts of the Holland Farm site) & the	Actions <ol style="list-style-type: none"> 1. <i>Turn the Policy into a Statement of Intent</i> 2. <i>Move Chalk stream section in beginning and add into this section</i>

		<p>emphasis given both in the NPPF & the Wycombe Local Plan policy DM34 to achieving a net gain in biodiversity. I would therefore recommend the drafting of a policy focusing on the particular opportunities for biodiversity protection and enhancement within the Neighbourhood Plan area. Has anyone done any survey work? Have you done a data search for the parish with the Buckinghamshire & Milton Keynes Environmental Record Centre? Have you got any areas where you have aspirations for habitat improvements, such as along the River Wye or creating chalk grasslands on the overlooking valley slopes? I also note that your Inventory of Parish Amenities includes details of ancient woodland and special trees. I would recommend detailing these in your biodiversity policy.</p>	
<p>Strategic Environmental Assessment (SEA)</p>	<p>Wycombe planners: This is the responsibility of the LPA not the neighbourhood forum, this needs to be reflected in the supporting text. The Screening Opinion has concluded SEA is not required.</p>	<p>I agree that this point should be made.</p>	<p>Action: WDC have completed tis on our behalf. Remove the supporting evidence and reference the WDC review.</p>
<p>Policy Wbe/A1 - Safeguarding Community Facilities and Public Houses Policy Wbe/A1 - Safeguarding Community Facilities and Public Houses</p>	<p>Wycombe planners: Agreement from the PC is not consistent with national planning policy and therefore doesn't meet the basic conditions. Community facilities are protected by policy DM29 of the new Local Plan.</p>	<p>I agree that the words 'without the agreement of the Parish Council,' are not appropriate in the policy, as Buckinghamshire Council has to take into account all material planning considerations in determining planning applications & cannot be bound by the views of other bodies, though it must take them into consideration. While Local Plan policy DM29 does provide strong protection for community facilities, I consider that the</p>	<p>Action: Retain but modify to reference WDC policy DM29 and make statement of intent for PH&L to monitor</p>

		identification of specific community facilities for protection & listing them in the Inventory of Parish Amenities is appropriate for the Neighbourhood Plan.	
Policy Wbe/A2 - Support of Community Facilities	Wycombe planners: This is not a policy but a series of intentions. This should be moved to the implementation and monitoring section.	I agree with the Wycombe planners comment that this is not a policy but a statement of intent.	Action: <i>move to implementation & monitoring section</i>
Policy Wbe/A3 - Designated Local Green Spaces	<p>Wycombe planners: You need to list the names of the LGS designations in the policy itself, these then need to be identified on the policies map. It is not clear from the policy whether this applies to green spaces designated in DM10 of the DSA or only additional ones.</p> <p>Some of these are very small and either Ancient Woodland, PRoW or Common Land which also benefit from other protections</p>	<p>I agree that the policy itself should list those areas that are to be designated as Local Green Spaces (LGS) and a map should also be provided on the same page identifying their location, so that anyone reading the Neighbourhood Plan can instantly identify where they are located. You can cross refer to your evidence in Appendices C & D of the Inventory of Parish Amenities. I agree that you need to make it clear whether you are intending to apply the LGS designation to green spaces designated in policy DM10 of the Delivery & Site Allocations Plan or only additional ones. If the former you will need to systematically assess them in order to ascertain whether they also satisfy the criteria for LGS in paragraph 100 of the NPPF.</p> <p>The guidance in the NPPF does not prevent the designation of areas that are very small; or protected as Ancient woodland; Common Land etc as LGS. LGS is a different type of designation meaning that 'policies for managing development' 'should be consistent with those for Green Belts,' (NPPF para 101). The key criteria for designation is that the area is</p>	<p>Action: <i>Rewrite section to reference DM10 and these existing LGS designated under the policy in this Parish. Then advise the Policy to cover green spaces that are not covered in DM10 and list each space - cross reference these new LGS for evidence and mapping.</i></p> <p><i>Statement of intent to monitor changes to DM10 and if areas are removed they will be reviewed and adopted as LGS if they remain "demonstrably special to the local community".</i></p>

		demonstrably special to the local community.	
Policy Wbe/A4 - Safeguarding Green Spaces	Wycombe planners: This is not a policy but a series of intentions. This should be moved to the implementation and monitoring section.	I agree with the Wycombe planners comment that this is not a policy but a statement of intent.	Action: Consolidate as part of preamble WDC Policy and make part of Statement Intent as WBE/A3
Policy Wbe/A5- Safeguarding the Wdlp Designated Green Spaces in Wooburn Green and Bourne End Against Future Changes by The Unitary Authority	Wycombe planners: This policy should not aim to constrain future policies in a future document, updated policies will need to be based on appropriate evidence.	The Neighbourhood Plan cannot constrain future policies in a new Local Plan for Wycombe. All those sites which meet the criteria for Local Green Space should be designated now in the Neighbourhood Plan. Although this would not completely protect sites from future changes in designation, Buckinghamshire Council would need a strong reason for removing LGS designation from sites that had been given this designation in a Neighbourhood Plan. It would be significantly less likely than removing the Green Space designation that the Council has itself given to sites in the Delivery & Site Allocation Plan.	Action: Consolidate as part of preamble WDC Policy and make part of Statement Intent as WBE/A3
Policy WBE/HF1 - DEVELOPMENT BRIEF FOR HOLLANDS FARM	Wycombe planners: This is not a policy and cannot be required in any case Catesby Estates: There is no formal policy requirement in Policy BE2 for a Development Brief for the Hollands Farm site however, Catesby are working with the parish council and local authority to develop this SPD. This policy should be deleted.	Paragraph 5.4.19 of the adopted Wycombe Local Plan is explicit that 'a development brief will be prepared for the site [Hollands Farm] to address these issues in more detail.' The issues are described in paragraph 5.4.19 as: 'There are a number of issues and constraints that will need to be carefully taken into account in the development of this site. These include the proximity of the Hedsor Road and Riversdale Conservation Area, nearby heritage assets, an area of fluvial flood risk in the south west corner of the site, and some surface and groundwater flood risk. Any development will need	Action: Identify whats in the DB and then rewrite policy to enforcement of it.

to be carefully integrated with and connected to the village and the traffic impact arising from the development addressed.'

It therefore accords with the strategic policies of the Local Plan for the Neighbourhood Plan to make reference to the need for a Design Brief.

It also fully accords with the NPPF which states in paragraph 124 that: *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'*

Paragraph 125 states that: *'Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.'*

To achieve good design paragraph 126 encourages the use of design guides and design codes. The glossary to the NPPF states that a Design Code is: *'A set of illustrated design requirements that provide specific,*

		<p><i>detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.’ A Design Code is therefore essentially the same thing as a Design Brief.</i></p> <p>It is therefore appropriate and consistent with national and adopted local policies for the NP to make reference to the need for a Development Brief/Design Code and to specify the key things that will need to be addressed, potentially providing further guidance than that contained in the Local Plan, providing it does not conflict with the Local Plan policy requirements for the development site.</p>	
<p>Policy Wbe/Hf2 - Pedestrian and Bicycle Access to The Station</p>	<p>Wycombe planners: Policies must be deliverable, rather than a wish list to include this you must show how it is deliverable. In any case a requirement needs to be set in policy and not specified for development brief.</p> <p>Catesby Estates: This is undeliverable by the developer as it requires land in third party ownership. Improvements to sustainable transport modes and encouraging new residents to use non-car means of transport will form part of a future planning application. This policy should be deleted or amended to require a planning application to include details of how new residents will be encouraged to use sustainable methods of travel.</p>	<p>The aspiration of this policy to create a footpath and cycle route along the shortest route from Hollands Farm to the railway station, which fully accords with national and local policy to encourage development by sustainable transport. However, to be deliverable some indication of its intended route and what needs to be done to achieve it needs to be provided. It may then be possible for the Hollands Farm development to contribute towards its creation as Local Plan policy BE2 2d) specifically requires development of the site to <i>‘provide and enhance footpath and cycle links to the village centre.’</i></p>	<p>Action: <i>Review once we have identified land owner</i></p>

		<p>In the Wheatley Neighbourhood Plan the inspector has given his support to a policy which seeks to create a Green Route stretching from one end of the village to the other.</p> <p>In principle therefore I consider that this could be an acceptable proposal subject to further work on the exact route to be followed.</p>	
<p>Policy Wbe/Hf3 Shops/Convenience Store</p>	<p>Wycombe planners: There is no justification for this requirement.</p> <p>The Council is supportive of a small community shop although the site itself may not be the most appropriate location. The Garibaldi pub have supported the idea of a local shop within the pub. There are significant advantages of co-locating facilities. However, the Garden Centre – Flowerland already boasts a food hall, with ambient, chilled and frozen products, including a small butchery counter and essentials (bread, eggs, milk, fruit and veg). This is sited towards the back of the complex, with access via the houseplant, pet and stationery zones.</p> <p>The policy implies a much larger development of shops, where there is no justification and unlikely to meet the town centres sequential testing.</p> <p>In any case a reqt needs to be set in policy and not specified for development brief.</p> <p>Catesby Estates: The requirement for a convenience store at Hollands Farm is referenced at section 7.6 and then reiterated at Hollands Farm site specific policy ref: WBE/HF3. There is no requirement in the Local Plan Policy BE2 for a convenience store on the Hollands Farm site. Furthermore, Chapter 7 of the NPPF supports town centre uses such as A Class shops in existing retail centres. There is no evidence to support the location as sequentially desirable for a convenience store or shop and this would conflict with para 86 of the NPPF.</p>	<p>The Council state that they are supportive of a small community shop in the locality. This is as much retail as is likely to be possible in the locality. Anything larger would conflict with Government policy that seeks to encourage retail provision in town centres. I agree therefore that this policy needs to be modified.</p>	<p>Action: <i>Remove policy make an aspiration</i></p>

	<p>It is also noted that the inclusion of a convenience store would conflict with the Neighbourhood Plan vision which seeks to support “Amenities that support the economic health of the Green, The Parade and local businesses are seen as integral to the community are thriving”. Policy WBE/HF3 should be deleted.</p>		
<p>Policy Wbe/Hf4 Protect Hillside of Hollands Farm</p>	<p>Wycombe planners: Repetitive of BE2, no need to repeat. In any case a requirement needs to be set in policy and not specified for a development brief.</p> <p>Catesby Estates: The proposed wording conflicts with the adopted Local Plan Policy BE2 wording which states “Maintain a sense of separation between Harvest Hill and the new development site”. This is quite different to the proposed WBENP wording “must not allow development up the hillside” and is contrary to the Local Plan and should be deleted.</p>	<p>As Figure 38 in the Local Plan shows reduced density on the hillside, to have a policy which states ‘the Development Brief must not allow development up the hillsides,’ is in conflict with the strategic policy and does not therefore meet the Basic Conditions for a Neighbourhood Plan. A policy which identified a specific feature that was worthy of protection, such as the view from the gate at the top of Heaven’s Lea, while allowing some lower density development on other parts of the hillside, could in my view be put forward as consistent with the policy. This would need to be supported by appropriate evidence.</p>	<p>Action <i>Meet to look at the views that need to be protected. Make part of the Hawks Hill/Widmoor character assessment,</i></p>
<p>Policy Wbe/Hf5 Parking</p>	<p>Wycombe planners: See POLICY WBE/PD6 – no need to repeat policy or cross refer to other policies</p> <p>Catesby Estates: As set out above, there is no evidence to support why there must be a deviation from Buckinghamshire County parking policy. This is sustainable location and it is not clear why additional parking standards are required to make any development acceptable.</p>	<p>I agree that there is no need to repeat policy or cross refer to other policies in this part of the Neighbourhood Plan.</p>	<p>Action: <i>Remove policy</i></p>
<p>Policy Wbe/Hf6 Bus Service and Routes on New Link Road</p>	<p>Wycombe planners: Can’t write policies for development brief, only for planning applications.</p> <p>The justification for this needs to be set out and it is really an issue for Highways to determine.</p>	<p>I agree that the NP cannot write policies for the development brief. The policy itself therefore needs to be in the Neighbourhood Plan. Potentially this is a sound policy, provided it is backed up by robust evidence. Demonstrating locations where there is no bus layby</p>	<p>Action: <i>Re-write and get evidence of bus route etc</i></p>

	<p>Catesby Estates: The adopted Local Plan Policy BE2 currently states “Provide a link road through the site linking to the Cores End Road roundabout and Ferry Lane” and “Provide a redirected bus service and enhanced provision through the site”. It is unclear why additional policy wording is necessary and this should be a matter of detail suitable in the Development Brief.</p>	<p>in the vicinity which causes traffic problems and potential pinch points along the route of the link road, such as at either end could be used to back up a policy requiring highway improvements to serve buses.</p>	
<p>Policy Wbe/Hf7 Open Space</p>	<p>Wycombe planners: No need to repeat policies, as above needs to be a policy for planning applications not the development brief.</p> <p>This may not be appropriate for the neighbouring properties – other policies set out the reqt for open space, the location will be dependent on the types of open space e.g. sport facilities would not be appropriate here</p> <p>Catesby Estates: As per above, Catesby objects to the wording of this policy regarding the hillside and recommend it is deleted or if necessary, Policy BE2 is reiterated; “Maintain a sense of separation between Harvest Hill and the new development site”.</p>	<p>As stated above, the Neighbourhood Plan cannot prevent development on the hillside, but could demonstrate the need for particular types of open space, which could be accommodated in particular parts of the site. For example, a pedestrian link & viewing area in the vicinity of the Heaven’s Lea viewpoint. This needs to be backed up by appropriate landscape evidence.</p>	<p>Action: remove</p>
<p>Policy Wbe/Hh1 - Preserving the Character Of Hawks Hill And Harvest Hill Area</p>	<p>Wycombe planners: See previous email. There appears to be no justification, evidence from the old Local Plan is not considered up to date. A new character appraisal is required if this policy is to be maintained.</p> <p>Catesby Estates: object to part 1(b) of the policy and would recommend this is amended to allow more flexibility, for instance “any proposals that require highway improvements or other changes must seek to mitigate lost features such as trees or hedgerows through re-provision which supports the landscape characteristics of the area”. This would allow a more balanced approach to any future proposals but ensure the objective of preserving the character of this area of Hawks Hill and Harvest Hill is preserved.</p>	<p>While the evidence from the earlier Local Plan and the Inspector’s findings respecting this designation are pertinent, they do need to be brought up to date. This can be done partly through using the Council’s landscape character assessment, but I also consider it to be important to carry out field work both to bring the evidence up to date & to provide more detailed evidence not available in more broad based studies such as the Council’s Landscape Character Assessment. In this respect evidence of damage through inappropriate development is as pertinent as evidence of features that are of value and therefore continue to merit protection.</p>	<p>Action: request West Waddy to prepare a character assessment and justification for the policy</p>

		<p>A policy to protect the character of the Hawks Hill & Harvest Hill Area is also supported by the NPPF with its emphasis on a landscape character approach stating that: <i>'Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development,'</i> (para 125) and that <i>'Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'</i> (para 70)</p> <p>Catesby Estates miss the point that loss of the character of the semi-rural narrow lanes by widening the roads cannot be addressed by planting replacement trees, as it is the narrow lanes and enclosing banks themselves which create the distinctive local character.</p>	
<p>Policy Wbe/Sm1 - Implementation of Slate Meadow Development Brief</p>	<p>Wycombe planners: This is not written as a policy. Need to be much more specific.</p>	<p>I agree. The policy needs to state exactly what it is requiring from planning applications with distinct criteria that they can be judged against. Please note that the Neighbourhood Plan will have more weight than the Development Brief, as once it is adopted and then kept up to date it will form part of the Development Plan along with the Wycombe Local Plan and any future Buckinghamshire Plan that replaces the Wycombe plan.</p>	<p>Action: review West Waddy guidance to re-write the policy accordingly</p>

		<p>The Government's Planning Practice Guidance states that: <i>'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.'</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306</p>	
<p>Policy Wbe/Sm2 - Slate Meadow Site Entrance</p>	<p>Wycombe planners: This is the role of the highways DM team and it cannot be required that developers work with stakeholders – this will have been one as part of the development brief work.</p>	<p>The Planning Practice Guidance states that in preparing Neighbourhood Plans a qualifying body may wish to consider what infrastructure needs to be provided in their neighbourhood area and that <i>'how any additional infrastructure requirements might be delivered,'</i> may be important considerations to consider. (Paragraph: 045 Reference ID: 41-045-20190509). In my view therefore mitigation measures relating to the Slate meadow entrance are pertinent topics for the Neighbourhood Plan to consider, but the plan needs to clearly identify the problems that the developer needs to address.</p> <p>The Council's own Statement of Community Involvement encourages developers of major schemes to engage in community consultation prior to the submission of an</p>	<p>Action: review West Waddy guidance and re-write the Policy – may also require evidence ?</p>

		application. There is therefore no need to refer to it in the Neighbourhood Plan.	
Policy Wbe/Sm3 - Upgrade the Access to and From Stratford Drive And Brookbank to Signal Controlled Traffic Lights	Wycombe planners: Duplicates policy BE1 of local plan	A specific measure such as the installation of signal-controlled traffic lights, would not normally be required in a development plan, but rather a requirement that safe access is provided with suitable mitigation for any potential problems. Policy BE1 already does this, so I agree with the Council's comment.	Action: review BE1 and also West Waddy's guidance. We may re-write Policy as a road safety measure to mitigate change in risk due to the impact of the development
Policy Wbe/Sm4 - Implement A Clearway (Double Red Lines) On A4094 Between Cores End Roundabout and Wooburn Town	Wycombe planners: Duplicates policy BE1 of local plan	A specific measure such as the implementation of a clearway, would not normally be required in a development plan, but rather a more general requirement about traffic movement. Policy BE1 requires financial contributions towards <i>'Measures along the A4094 to ensure the routes resilience, providing an appropriate balance between through movement and local access journeys.'</i> I think this probably goes as far as can be justified at the present time & therefore agree with the Council's comment.	Action: review BE1 and also West Waddy's guidance. We may re-write Policy as a road safety measure to mitigate change in risk due to the impact of the development
Policy Wbe/Sm5 Slate Meadow Cycle Path	Wycombe planners: This is a traffic management issue and not controlled by planning AS above	Policy BE1 requires a financial contribution towards: <i>'ii. If appropriate upgrade the pedestrian crossing east of Stratford Drive to a signal controlled crossing.'</i> As your policy WBE/SM5 simply requires a 'safe crossing for cyclists,' without specifying precisely how it is achieved, this seems to me to be entirely appropriate, especially as the crossing is in a key location on the route from Slate Meadow to the station and village centre.	No action required ?

