

HAZLEMERE NEIGHBOURHOOD PLAN

2022 - 2033



RESPONSE TO EXAMINERS QUESTIONS

Examination Ref: 01/DH/HNP

Submitted by Hazlemere Parish Council and Buckinghamshire Council under the Neighbourhood Planning (General) Regulations 2012 (as amended).

January 2023

Questions for both Buckinghamshire Council and Hazlemere Parish Council (2)

I would prefer a joint response to these 2 questions but if that cannot be successfully achieved then independent responses should be submitted by the two Councils.

1. Buckinghamshire Council, in its Regulation 16 response, raise a significant number of issues regarding whether or not the HNP meets the Basic Conditions and I set out some of the concerns in my questions to the Parish Council below. I consider it would be helpful if the outstanding issues between the two Councils could be satisfactorily resolved, even at this comparatively late stage in the plan preparation process and suggest that the two parties seek to address the outstanding issues between them. Can the Councils confirm that they will jointly address these outstanding matters?

A meeting between Buckinghamshire Council (BC) and Hazlemere Parish Council (HPC) was held on Tuesday, 24th January 2023 with the objective to resolve as many matters as possible.

In this joint response, responses from HPC are in red; responses from BC are in blue.

2. Paragraph Reference ID: 41-009-20190509 of the Planning Practice Guidance (PPG) on Neighbourhood Planning advises that 'where a neighbourhood plan is brought forward before an up-to-date local plan (i.e. the Buckinghamshire Local Plan) is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local plan and the final development plan'. Could the Councils confirm that such discussions have taken place and summarise the conclusions that were drawn?

HPC and BC have engaged in the neighbourhood plan project throughout its duration. The NP is one of many coming forward in the county in advance of the new Local Plan for which there remains no firm timetable for completion. With only the built-up area of the village lying outside the Green Belt, the scope of the plan is narrower than many others and therefore no indicative housing figure has been requested or provided.

The main matter of disagreement between the two councils in terms of the NP scope is in respect of the Amersham Road/Tralee Farm site (Policy HAZNP5). HPC considers that the policy intent and wording are clear in updating adopted Policy HW8 and is aware that such an approach is not uncommon in neighbourhood plan making. BC has wished to proceed with that update through its own means, using a development brief of 'SPD' status. It therefore comes to a different judgement on the validity of the policy.

BC Response to 1 and 2.

The responses in this document need to be read alongside BC reg16 responses for completeness.

Buckinghamshire Council was created as unitary authority in April 2020, replacing Buckinghamshire County Council, and the District Councils of Aylesbury Vale, Chiltern and South Bucks, and Wycombe. For the Hazlemere parish area, there is an up-to-date Local Plan: the Wycombe District Local Plan, adopted in July 2019, and the Delivery and Site Allocations Plan, adopted in June 2013.

Buckinghamshire Council has worked with HPC to support the Neighbourhood Plan preparation, although there has been limited engagement between the Councils. The NP needs to be in general conformity with the strategic policies of the development plan for the Wycombe area. Following adoption of the Wycombe District Local Plan, BC has progressed with its scheduled Development Brief for the HW8 site, in response to planning applications and appeals, to provide clarity on how comprehensive development can be achieved. BC has raised a number of issues in its response to early drafts of the neighbourhood plan and is pleased to see that some policies have been updated in light of these. BC offered to meet to discuss remaining issues, but HPC has chosen to press on with regulation 16.

Matters of disagreement

Whereas HPC states that the main matter of disagreement between the Councils relates to HAZNP5, BC is of a view that there remains several main matters of disagreement between the two councils, as highlighted in BC reg16 response. In particular:

- BC and HPC have a different interpretation of which policies are strategic. This has led to HPC not taking into account issues of non-conformity raised (e.g. DM34). HPC has not taken up offers to meet where this issue could have been ironed out. BC raised this issue most recently at Reg 16: “The NDP refers to strategic policies as only those contained in policies CP1 to CP12 – this is incorrect. Strategic policy is defined in the NPPF glossary. The CP policies are all strategic. Strategic policies also encompass Strategic Housing sites policies HW7 and HW8 and strategic policy HW20 which relate to a new cemetery provision for the urban area; DM34 is a strategic policy as it is an umbrella policy for DM10 to 14 in the Delivery and Site Allocations policy; so is DM31 on the historic environment. All CP policies in the Wycombe Plan relate to the NDP + HW7 and HW8 +DM34 etc. So, the core policies will have implications for all the policies – there is a strategic thread running through the whole plan where any policy relates to these core policies. Reference has been made to HW20 which allocates land at Queensway, Hazlemere, for a new cemetery, but erroneously classifying it as non-strategic.”
- BC is concerned that where policies are seeking to “encourage” a particular element rather than “require” from developers, this does not help the decision taker in enforcing what is exactly expected of a developer. For example, if a developer doesn't provide the housing mix that is "encouraged" there is no breach of policy so the scheme can't be refused for that reason - so the policy is ineffective. Both BC and HPC would welcome Modifications from the Examiner to strengthen the policies concerned.

- Under HAZNP2, BC remains concerned that the designation of “Amersham Road Space” as a Local Green Space under HAZNP2 is directly contrary to the transport requirement of strategic policy HW7 Terriers Farm and Terriers House, clause 4a ii), in the WDLP: *“Providing two vehicle accesses into the site which connect through the site, including an access onto the A404 Amersham Road opposite De Havilland Drive”*. The site is already a Green Space under DM12. The site is the subject of planning application 21/07002/FUL Erection of 418 dwellings, associated parking, landscaping, open space, formal sports pitch provision and diversion of PROW, along with vehicle and pedestrian access from Kingshill Road and Amersham Road (A404).
- BC remains concerned that the Local Amenity Space designation seeks to protect extensive tracks of land which are already in the green belt.
- BC and HPC have a different interpretation of what HAZNP2E) is seeking to achieve. See points raised under response to question 10.
- BC has no further comments to make on HAZNP4 but refers the Examiner back to the reg16 response.
- BC and HPC have a different interpretation of what policy is required for the site Land off Amersham road. BC does not support a policy replacing HW8. BC remains of a view that HAZNP5 does not meet the basic conditions and should not be part of the NDP as it stands. See previous comments made at reg16 and in this document.
- Further points are raised under the response from HPC to questions 5 to 18 where necessary.

Matters of agreement

- Policy HAZNP1 reads more as a statement of aspiration than a tool against which to assess whether a planning application is acceptable. BC agrees with the Examiner that Policy HAZNP1: Delivering Homes for First Time Buyers and Downsizers requires a modification to clarify its intent. BC understands that the intent of the policy is to secure smaller properties for first time buyers and people who wish to downsize and would be supportive of an amended wording which reflects this.
- In relation to HAZNP2 clause C and D, BC understands that HPC wish to protect green spaces in the local area. BC is of the view that Local Amenity Space is not a designation under the NPPF, has no statute and would not stand up to scrutiny. NDPs do not have powers to designate green spaces which are not local green spaces; hence our suggestion in our reg16 response to either leave those green spaces already protected under DM12 as is, or for those which are not currently protected under DM12, that these should be assessed against the Local Green Spaces criteria- this may result

in some of the proposed sites not being allocated at all if they do not meet the LGS criteria at para 102 of the NPPF.

- BC and HPC came to agree during the meeting on 24.01.23 a way forward in relation to the element of HAZNP2 which relates to Local Green Spaces and Local Amenity Spaces. The shared understanding is that those sites described at policy HAZNP2C and D, and at Appendix A of the NP need to be amended as follows:
 - Those sites which are already protected by DM12 of the Delivery and Site Allocations Plan should remain as existing – this means not re-designating them as Local Green Space or Local Amenity Space. This requires modifications through the plan to reflect this.
 - Those sites which benefit from no protection currently and were proposed to be designated as Local Amenity Spaces should in fact be designated as Local Green Spaces, provided they meet the criteria of NPPF paragraph 102. Sites which are already protected by the Green Belt should not be included. BC and HPC have agreed that for completeness of showing the local green infrastructure network, the policies map can be amended to show both the existing DM12 Green spaces of the adopted Delivery and Site Allocations Plan and the new LGS designated through this neighbourhood plan, so long as this is made clear in the key. If this is not appropriate on the policies map, then this can be shown on the Green Infrastructure Plan. Modifications will need to be proposed throughout the plan, on maps and appendices to reflect this.

Please note in the event that the Examiner is not minded to follow this approach, the BC objection to proposed LGS Amersham Road Space still stands.

- If the examiner is minded to agree with the HPC on HAZNP5 subject to modifications, BC is neutral in relation to keeping those parts of the policy which simply duplicate verbatim clauses of HW8.
- BC is pleased that the omission of HW8 2c) is proposed to be corrected. However the improvements need to encompass on and off site to ensure the full requirement is met. It is therefore recommended that the clause is kept verbatim.

Questions for Buckinghamshire Council (2)

3. According to the Buckinghamshire Council's Local Development Scheme the Buckinghamshire Local Plan is to be prepared between 2022 and 2024, with the Examination in late 2024 into 2025. Could the Council confirm what progress has been made on this document and whether or not a more detailed timetable for its preparation has been agreed?

This is the published timetable. The Local Plan for Buckinghamshire is at an early stage. The Council has undertaken an Attitudes Survey in 2021, and three call for sites in 2022. The Council is looking to undertake a consultation on vision and objectives for the Plan in the spring 2023, followed by a consultation on Approaches in the autumn 2023. The timetable is subject to any changes that the government is

proposing to make through the NPPF prospectus consultation and the Levelling Up and Regeneration bill.

4. Reliance is placed, by HPC, on Appendix A to the HNP (Hazlemere Green Infrastructure Network) to justify the designation of 'local amenity space', 'local green space' and 'local nature recovery'. Is BC satisfied that this evidence is accurate?

The evidence seeks to designate sites which are already designated under other policies (DM12, Green Belt, site specific policies). Designating a site for more than one reason is not usually a problem. In fact the whole concept of Green Infrastructure reflects multi-functionality. Policy DM11 is of relevance here as this area was mapped as part of the evidence supporting that policy. Although the mapping Hazlemere PC has done adds to the understanding of the sites. However,

In addition to the comments made under the "Matters of agreement" section above under question 2, BC has the following additional comments to make:

- It is unclear if the identification and assessment of green infrastructure has been undertaken in line with a recognised, or otherwise appropriate, methodology.
- The evidence is incomplete (some sites have no text under the analysis section)
- The Local Amenity Space designation does not exist in national policy / law. It is therefore difficult to envisage that sites would be effectively protected from development if this were to go ahead.
- The test for Local Green Spaces need to be amended to reflect the NPPF "proposals for inappropriate development on a Local Green Space will only be allowed in the very special circumstances as set out in NPPF paragraphs 149 and 150, as per para 103".
- Proposal for "Amersham Road Space designation" directly seeks to prevent the delivery of the transport clause on strategic site HW7 Terriers Farm and Terriers House of the adopted WDLP.
- Sites identified as "Local Nature Recovery" are aspirational; they are not listed under HAZNP2. Therefore it is unclear what weight should be accorded to them. Please note that Buckinghamshire council is involved in the Buckinghamshire and Milton Keynes Local Nature Recovery Strategy (statutory requirement from the Environment Bill), which will set out biodiversity priorities and identify existing habitats and biodiversity areas as well as locations suitable for delivering outcomes and actions identified by the LNRS. Work on the Local Nature Recovery Strategy (LNRS) for Buckinghamshire is ongoing. Buckinghamshire Council is the responsible authority for this work. The LNRS will take some time to complete and will involve working with many stakeholders (including Parish Councils), and once it is complete it will almost certainly be linked to Buckinghamshire wide policy. Although it is helpful for the Parish Council to research and identify areas of value for nature conservation or protection for ecological enhancement. It is not helpful for them to use terminology reserved for specific functions, or to try and pre-empt the outcomes of a larger piece of work.

The policies map needs to be carefully reviewed to match the text. At the moment it shows land in the green belt as another proposed category (when appendix A does not list any current green belt site as proposed to be re-designated). For example, it shows the two proposed "local nature recovery" erroneously as local amenity

spaces. Also the key refers to policy HAZNP2i and 2ii whereas the policy says 2C and 2D. A modification is necessary.

Questions for Hazlemere Parish Council (14)

5. The Regulation 16 response from Nexus Planning (on behalf of Inland Homes Ltd) raises a number of issues regarding the content of the HNP and in particular policies HAZNP1 (first time buyers and downsizers), HAZNP2 (green infrastructure), HAZNP3 (zero carbon buildings) and HAZNP5 (Amersham Road/Tralee Farm). Could the Parish Council provide a brief response to the comments made by Nexus Planning?

On HAZNP1, HPC chose not to frame the policy as a requirement (needing the evidence of a Housing Needs Assessment) but as encouragement to developers to consider providing smaller types of homes that have tended not to be provided when occasional windfall or plot redevelopment schemes have been delivered in recent years, as explained in the supporting text. It is our understanding that not every development plan policy needs to set out specific development management requirements; some signal more general desired outcomes of policy like this one.

On HAZNP2(A) HPC notes that the Local Nature Recovery Zone proposal in the Pre-Submission version of the policy was deleted from the Submission version. It considers the final drafting of the policy to better fit the emerging national approach to Biodiversity Net Gain (BNG) and requiring a sequential approach to the location of BNG off-site delivery seems a reasonable requirement to make, acknowledging that the NP cannot be expected to have the detailed evidence base to be any more specific – this is better left to the planning application stage.

HAZNP2 Clause E (not D as quoted in the representation) of that policy serves two related purposes. As far as its first part relating to tree felling is concerned, HPC notes that the NPPF (§131) espouses the importance of trees in defining local character and in mitigating climate change and was specifically updated in 2021 to require that ‘existing trees are retained wherever possible’. The requirement of ‘retained wherever possible’ would naturally assume that trees should be left in situ or moved to places on the same site rather than cut down or removed.

Adopted policy DM34(2)(b) – a non-strategic policy and therefore not a requirement of the ‘general conformity’ basic condition – follows the same approach in its mitigation hierarchy. HAZNP2 Clause E is considered consistent with both the NPPF and DM34 in also allowing for applicants to demonstrate why tree loss is unavoidable and to propose mitigation measures. As with all policy matters, it is taken as read that the policy can only be engaged by a proposal requiring planning permission and therefore does not seek to bring into planning control proposals that do not require permission.

The second purpose of HAZNP2 Clause E in respect of tree canopy cover is explained in §5.15. In principle, the policy is not required to be in general conformity with SPD advice and can come to a different view if reasonable. The policy requirements in relation to canopy cover reinforce the requirement in the NPPF §131 that “new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-

planted trees. There are many methods, used in isolation or in combination, in which the level of canopy cover can be achieved within the specified time period:

- A. Existing trees on the development site are left in situ. The best solution as existing trees are likely to be mature (in which case already enabling mitigation and adaptation to climate change through sequestration of carbon, combatting of flooding and providing natural cooling services);
- B. Existing trees are moved but maintained on the site. This is possible for any size of tree, hedge or shrub which can be moved using a unique root ball, frame and crane technique (Ref: <https://www.ruskins.co.uk/tree-moving>);
- C. Middling to mature trees are transported in and planted as necessary to provide the level of canopy cover after ten years of growth;
- D. Younger trees from species that are suited in type and form to the character of the Parish and that can achieve the rate of growth to contribute to effective canopy cover in much less than 25 years are incorporated. Examples Alder, Lombardy Poplar, Hazel, Common Beech, Silver Birch and Willow.
- E. In combination with B), C) and D) above there would need to be a plan for the long-term maintenance of the newly planted trees.

If the examiner is so minded, HPC will support a modification to the policy and/or supporting text to be more specific in respect of securing canopy cover within 10 years and to indicate the range of tree species that could be selected to meet the policy requirement.

In relation to comments on HAZNP3, see the answer to Q11. As with BC it appears that Nexus Planning (on behalf of Inland Homes Ltd) misunderstands that the policy does not require that the PassivHaus standard is met, rather it is incentivised with the provisions of clause C operating for those buildings that do not meet the standard.

In relation to comments on HAZNP4, see the answer to Q12.

For HAZNP5 see other related answers below. The general point, as highlighted in the supporting text and in the Basic Conditions Statement, is that it is possible for a timely NP to update the provisions of an adopted strategic allocation policy provided in doing so it does not undermine the core principles of that policy. With the time lapse, this policy updates some detailed design matters that are more likely to lead to a successful scheme that are not considered to undermine its delivery or viability in any way. HPC sought to work with both developers and BC to use the NP in this way but both chose not to engage positively. The proposals in the policy have been formulated by HPC with the advice of Neil Homer, our Neighbourhood Plan Consultant and Penelope Tollitt, member of the TCPA policy board, a Design Council Expert, a director of POS Enterprises, and past Chairman of the RTPi England Policy Panel. Penelope is a professional planning consultant with extensive knowledge of the HW8 site and its planning history from her role as Head of

Planning at former Wycombe DC when the Local Plan was being drafted and adopted.

6. The Regulation 16 response from Buckinghamshire Council (BC) confirms that policy DM22 of the Local Plan addresses the issue of dwelling size and tenure on larger sites. Therefore, is it the intention that policy HAZNP1 (first time buyers and downsizers) would apply only to sites of below 10 dwellings? Also, how would a decision maker know how to interpret the word 'encouraged'? Can HPC consider how to improve the clarity of this policy?

It is correct that the intention of the policy is to apply to all schemes not covered by DM22, almost all of which are expected to be on infill and small windfall sites within the built-up area. It was not considered necessary to draw that distinction between the operation of the two policies, but HPC will support a modification to the policy wording and/or its supporting text if recommended by the examiner.

HPC is keen to encourage a positive housing outcome and has phrased the policy in this way to avoid making a specific policy requirement. It notes that many adopted and made Local and Neighbourhood Plan policies use such wording to give weight to desired outcomes in the planning balance when weighed against other policy requirements.

BC considers that the wording "encourage" is ineffective and cannot be used to refuse a proposal.

7. Policy HAZNP1 (first time buyers and downsizers) refers to the Wycombe District Housing Intensification Supplementary Planning Document and the Wycombe Residential Design Guide but I could find no references to these documents in the supporting text to the policy. Could additional wording be formulated, for insertion into the supporting text, regarding the function, status, relevance and timescale of these documents?

HPC considers that the supporting text of §5.7 covers this matter. However, the examiner may recommend a modification of that paragraph as follows:

"5.7 The policy is consistent with Policy DM21 of the Wycombe District Local Plan, which supports housing on 'windfall' sites within settlement boundaries. It also connects the provisions of Policy DM35 directly to the Housing Intensification Supplementary Planning Document (SPD) and the Residential Design Guidance adopted by Wycombe District Council in 2011 and 2017 respectively. and which is especially All are relevant to guiding proposals for infill schemes to prevent 'town cramming' with over-development in urban areas like Hazlemere. HPC may bring forward further guidance to the SPD for sites within Hazlemere depending on demand."

8. In paragraph 5.6 there is reference to the relationship between homes for first time buyers and homes within Bands A-C of the Council Tax. What evidence is this 'relationship' based on, is it sufficiently justified and how will the decision maker know about Council Tax bands?

As the policy is not making a requirement for such provision, the reference in §5.6 is to advise applicants on the type of new homes encouraged by the policy. Those home types typically fall within those Council Tax bands and they therefore provide a useful proxy indication of the desired outcome without requiring a disproportionate research effort. It is considered that most applicants will be familiar with the relationship between the bands and house types to avoid the need to be more specific about bedroom numbers or gross internal floor area however HPC will listen to any modifications requested by the Examiner.

The planning department does not have access to or any expertise in council tax housing bands, their use or imposition. We do work to the nationally described space standards for dwellings and this should be the baseline worked to if one is required.

9. In the Regulation 16 response from the Chiltern Society (ID ANON-4CAQ-T8KE-5) there is a reference to the Terriers Farm development, which it is claimed has ‘a significant impact on open space in the Parish’. Can the Parish Council confirm that it is satisfied that the HNP satisfactorily addresses the issue of ‘protecting and improving green infrastructure’?

HPC is under no obligation and has chosen not to make any policy provision in relation to that part of the Terriers Farm site allocation in its area (Policy HW7 of the adopted Local Plan). However, its mapped Green Infrastructure Network for Policy HAZNP2 has identified the Recreation Ground adjoining the site.

10. In the Regulation 16 response from BC it is suggested that policy HAZNP2 (green infrastructure) does not meet the Basic Conditions and I agree that, in particular, sub-section E does not appear to be justified. Could the Parish Council consider all the comments of BC regarding this policy and consider appropriate modifications that will ensure that the Basic Conditions are met?

See the answer to Q5.

In relation to HAZNP2 clause A:

- The development management team do not want to be arguing points at appeal where there is no evidence to back up why a particular off site location is more suitable for BNG than the site suggested by a developer, if there is no baseline to work from then how would we be able to argue our point?

In relation to HAZNP clause E:

- When balancing the benefits of a development against the loss of trees, provided the canopy cover and bio net gain are achieved through the proposal then DM could allow for the removal of some trees.
- The NPPF wording can be reiterated. The aspiration could even be defined more closely relating to the quality or location of trees. However, it is not possible for a policy to stop the felling of trees, that is down to legislation relating to Tree Preservation Orders, Conservation Areas and Felling licences.
- A more useful proactive aspiration would be for the parish council to work with BC to actively review trees and their TPO status in the parish. Furthermore,

the PC could look to complete an iTree study to gain a more detailed understanding of the tree resource and its value.

- The specified time period in relation to the canopy cover is 10 years. It would be very difficult to achieve at least 25% canopy cover in such a short period of time. It would be appropriate to remove the 10 year time requirement and instead include a requirement to ensure that the planting conditions are sufficient to achieve the required growth.
- Movement of trees may be possible, however, it is incredibly expensive to move a large tree and the chance of long term survival decrease massively as the size of the tree increases as larger trees require more of their root system to be lost and older trees are less able to respond to such loss.
- The species of tree is just one factor in achieving a given canopy cover in a specified time span. Other factors include, but are not limited to, the number of trees planted, the tree size at planting, the shape (habit) of trees, the growing environment (especially access to large volumes of aerated and well-watered soil). Common Beech are not a particularly fast growing species, however, it is not particularly advantageous to have all fast growing species, as those which grow fast tend to be shorter lived and are structurally weaker.

Although the matter is not prompted by the examiner in his Q10, HPC wishes to draw to his attention the continuing misunderstanding of BC of the intent and structure of clauses C and D, as highlighted in its Reg 16 comments. HPC has gone to great lengths in the supporting text to the policy (§5.12 and §5.13), and in the Basic Conditions Statement to explain how the respective Local Green Space and Local Amenity Space designations have been derived primarily from the Local Plan DM12 designations. In choosing to redesignate some DM12 sites that it considers meet the NPPF §102 tests for Local Green Space status, it felt obliged to retitle the remainder as Local Amenity Spaces to avoid confusion with the very similarly titled 'Green Spaces' of DM12. Policy DM12 is non-strategic and therefore capable of being replaced by this NP policy in this way. There is not a requirement for either the NPPF or the Local Plan to provide a specific policy hook for Local Amenity Spaces, though the status is entirely consistent with NPPF §99 and DM12, albeit with a new name. HPC is however minded to amend this approach following the meeting with BC on 24/01/2023 as detailed above.

See answer to question 4.

11. BC has made a number of observations in its Regulation 16 response regarding policy HAZNP3 (zero carbon buildings). Could the Parish Council respond to all the matters raised by Buckinghamshire Council?

See the answer to Q5 in relation to the BC misunderstanding of how the policy is intended to operate. HPC draws to the attention of the examiner the BC decision on 31 October 2022 to approve the Ivers Neighbourhood Plan (INP) to proceed to its referendum. The INP referendum plan contains an almost identical policy to HAZNP3, with which BC determined met the basic conditions in its decision. HPC therefore considers it inconsistent for plan making in the county, that having made

the INP determination, BC officers wish to continue to object to this identical policy. HPC encourages the examiner to approach the matter in the same way as with the INP.

The examiner may also be aware of the [Inspector's report](#) to Bath & NE Somerset Council on its Local Plan Partial Update of 13 December 2022 in which he dismisses those same NPPF and Building Regulations concerns (stemming in part from the Written Ministerial Statement (WMS) of 2015) on a very similar policy proposal in that plan. He observes that the WMS has 'clearly been overtaken by events' (§84) and its relevance 'significantly reduced', noting that '...the planning system must support the transition to a low carbon future in a changing climate' (§85). It is hoped this decision sends a clear signal to planning authorities, PINS, neighbourhood plan examiners and other stakeholders (notably developer objectors) that the Government has deliberately allowed for such discretion in local planning policy making until such a time that its national standards are finalised and adopted.

In noting the content of the INP however, HPC observes that Policy HAZNP3 incorrectly refers to 'post construction' rather than 'post occupancy' and does not contain an equivalent to the appendix added to the INP (as recommended by the examiner) to set out the Post Occupation Evaluation reporting process. HPC will support any similar modifications if recommended by the examiner.

12. Policy HAZNP4 relates to sustainable transport but BC raises three issues in its Regulation 16 response, regarding parts (b), (e) and (f). What is the Parish Council's response to the suggestions made by BC?

HPC considers the requirement of HAZNP4 clause B to be reasonable to prompt applicants to address the issue of car dependence in their transport assessment documents. It seeks to bring greater emphasis to this matter than is given in existing development plan policy but does not need to be unduly prescriptive or measurable in detail. Importantly it makes a policy connection with the defined green infrastructure network of Policy HAZNP5.

HAZNP4 Clause E is drafted as a policy and not a supporting statement, again drawing attention to the importance of development schemes being supported by their promises of local infrastructure improvements in a timely way. It is not considered unreasonable to prompt applicants and the planning authority to agree and commit to such a principle in the absence of Policy CP7 addressing the phasing or timing of infrastructure. This is an especially important issue for this Parish facing the development of two very large sites at either end of the village in the coming years. Should the examiner recommend modifications to improve the clarity of the policy wording to aid its implementation then this will be supported by HPC.

'Accessibility' is explained in §5.31 though it is accepted the policy wording may not be clear enough in referencing 'standards'. The examiner may therefore wish to recommend the following modification to HAZNP4 clause F:

"... within the development ~~meet best standards of accessibility~~ are accessible in their design and layout, so that ..."

BC has no additional comments to make. Please refer to our response at reg16.

13. In its Regulation 16 response, BC raises a number of concerns regarding policy HAZNP5 (Amersham Road/Tralelee Farm). Could the Parish Council respond to each of the points raised? I note that it is confirmed by BC that a Development Brief for the site has recently been published. Are the contents of the Brief adequately reflected in policy HAZNP5?

In response to the BC claim that “As currently written, this policy does not comply with the basic conditions”, HPC has added an appendix for clarification that takes the text of HW8, and HAZNP5, and provides a clause-by-clause commentary on which areas of the policy are updated, clarified, or repeated.

The policy in WDLP is an up to date Local Plan for decision-taking; in relation to the detailed design matters, BC has produced a Development Brief in September 2022 which sets out the preferred approach for the site.

In terms of duplication, HPC has taken the view that the neighbourhood plan needs to be user friendly, and so included those parts of HW8 which remain unaltered in HAZNP5, rather than expect the reader to read across two plans. This is a stylistic choice, and HPC will follow the direction of the examiner on this point. A further response is not included below on the points of duplication, beyond the explanatory text alongside both policies in the appendix.

With regard to HAZNP5 transport proposals, HPC is firmly of the view that from a place shaping perspective, having an active travel link (not vehicular) to Wycombe Road would be greatly preferable. This would make the quickest and easiest way to access community facilities and the bus stops, access that could only be made by foot or cycle, and thus reinforce HPC’s view that finding alternatives to the private car is an imperative given the declared climate emergency.

HPC is also concerned with the quality of this key connection via Wycombe Road from a design perspective. As part of the process of preparing the Neighbourhood Plan, HPC took high level design advice on how to integrate the site into the surrounding neighbourhood. This concluded that it would not be possible to meet the standards set out the new National Model Design Guide and Code, given that the plot width of 20 Wycombe Road is only 12m. It was also advised that had 20 Wycombe Road fallen within Wycombe District, the Housing Intensification Supplementary Planning Document would have applied, which would have required greater width to achieve good levels of natural surveillance.

With that in mind, HPC concluded that it may just be possible to achieve an active travel only access, and leave room for some innovative, probably single storey, dwellings, to achieve the natural surveillance. This would have been an unusual form within the parish, but might have provided for some affordable or accessible housing units.

However as 20 Wycombe Road is not within the Parish, it was not possible to include this within the Neighbourhood Plan, and no further work was therefore undertaken.

Given that this part of the site is not within the control of HPC, and in the light of the Highway Authority not raising any objections on grounds of highway safety, HPC

believes it would be unreasonable to hold the position that vehicular access is not possible. However, HPC remains of the view that if vehicular access is to be achieved, additional land is required to make the access route wide enough to accommodate some innovative form of development to address the issue of surveillance, to allow any subsequent planning application to conform to the standards set out in:

Clauses 100, 104 and 105 of National Model Design Guide;
Clauses 50i, 59i and 63iv of the National Model Design Code Part 1;
Section M.1.i Clause 22, Section M.1.ii Clause 26, Section M.2.i Clause 34 and Section P.3.i Clause 144 of the National Model Design Code Part 2;
Clauses 92b, 92c, 110b and 110c of the National Planning Policy Framework;
Q2.2 of the Wycombe District Council Housing Intensification Supplementary Planning Document; and
Clauses 8.3 and 8.8 of Secured By Design Homes 2019

If the examiner is also of the view that it is unreasonable to state that access must be only for active travel in this location, he may wish to recommend inserting at the end of B(1):

“and the Wycombe Road.”

Clause 2 a) of HW8 policy does not specify “vehicular” access. BC sees the link to the north as essential to accessing facilities in Holmer Green. Clause 2b sets out the requirement for walk and cycle access onto Wycombe road. The policy does not specify 20 Wycombe road. The details will come forward as part of the planning application process.

HPC is grateful for the opportunity to include a further paragraph to explain why additional parcels are included to bring the policy up to date. The examiner may therefore wish to recommend the following paragraph to be inserted after 5.33:

“A small parcel of land in the southern corner of the site, fronting the A404 and adjacent to existing woodland behind Badger Way, has been included within the policy red line of HAZNP5. HW8 made reference to the potential of bringing this land into the site. This land is included within the Bellway application, and it is therefore reasonable to assume that there are no barriers for this land assembly to take place.”

See below regarding the uncertainty linked to adding the land; this is best dealt with by keeping clause 1 e)

The comment regarding the lack of conformity because of the removal of the text of 1(e) overlooks the fact that HAZNP5 includes the land referred to in the 1(e) within the red line, which also reflects the red line within the Bellway planning application. The comment regarding vehicular access to Wycombe Road is dealt with above.

The outcome of the Bellway application is unknown. In the event of the application falling away, or the land changing ownership, the removal of the text in 1e) would result in creating a lack of clarity in relation to this area of land. BC therefore is of a view that the clause should be kept verbatim.

HPC is grateful that it has been pointed out that HW8 2(c) includes reference to improving access to existing bus routes, which is omitted from HAZNP5 B(3). The

examiner may therefore wish to recommend inserting a new clause after B(3), lifting the text from HW8 2(b), but inserting 'off site' for clarification – to read:

“Improve off-site access to existing bus routes”

BC is pleased that the omission is proposed to be corrected. However the improvements need to encompass on and off site to ensure the full requirement is met. It is therefore recommended that the clause is kept verbatim.

Clause 3(b) of HW8 was not included in the policy as it was thought to duplicate requirements already in DM34. However, if the examiner is of the view that it is clearer to include this within HW8, he may wish to insert a new clause after C(7), lifting the wording of 3(b) but clarifying it in line with the wording of HAZNP5:

“provide protection and future management for the green infrastructure identified above”.

It is not clear which infrastructure is referred to by the words “identified above”. As such this weakens the policy, opening it to interpretation and debates from developers as to what they need to protect and provide future management for.

It is suggested that C(1) is a new addition. This is not the case. It is clarifying what is included at 3(a).

BC disagrees with this statement. The exact wording proposed in C(1) is new. This is a matter of fact. HPC agrees that C(1) has been altered from the original text.

It is suggested that part C(2) adds additional detail to 3(d). This is not the case. It is simply clarifying the policy by referencing the off-site features in a way that is unambiguous. The illustrative diagram is illustrative and therefore it would be wrong to construe whether the link can accommodate the multifaceted functions required for surface water management. However, if the examiner believes the policy needs clarification on this point, he may wish to insert, at the end of C(2):

“accommodating surface water management alongside other biodiversity functions”

C(3) replaces 'field boundaries' with 'hedges' for clarification, given that the policy is about Green Infrastructure.

Field boundaries could include trees and hedgerows. If amended the wording should reflect this.

C(4), C(5) and C(6) are providing clarification on the site specific requirements of DM34, and C(6) is additional providing clarification on the site specific requirements of DM32. It is best practice for site specific policies to be explicit if there are site specific implications of the criteria-based policies. In addition, as this is a different plan, it aids readability.

It is suggested that C(5) risks non-conformity if it sterilises too much land for development. Strategic open space is required on the site, including land for a MUGA / NEAP. The land on the north-east edge of the site is flatter than land in the 'valley', and it would be more pragmatic for this to be located on the flatter land. It

also provides flexibility to the developers regarding the location of the MUGA / NEAP. There is no requirement in HAZNP5 for more open space to be provided than that required by the final development plan regarding strategic open space.

BC disagrees with this interpretation and has set out its preferred approach in the Development Brief. To note, the requirements for strategic sites set out in the development plan through policy DM16 are a minimum.

It is suggested that C(7) may not conform in relation to the mitigation hierarchy. It is not clear how this could possibly be the case, given that the policy is explicit about the need for on-site GI provision. However, if the examiner is of the view that it could be read that the off-site requirements could be taken to be provided at the expense of on-site requirements, he may wish to insert text at the end of paragraph 5.67:

“For the avoidance of doubt, the off-site Green Infrastructure requirements in Clause C(7) are additional to, and not to be in place of, the on-site requirements elsewhere in the policy.”

HPC notes the objection to the argument that HW8 is out of date because it was prepared on the basis that land was also to be allocated in the Chiltern and South Bucks Local Plan. It is not clear what is referred to when BC states that ‘given that the plan was adopted recently in August 2021’. The Wycombe District Local Plan was adopted in 2019, before the withdrawal of the Chiltern South Bucks Local Plan. It is therefore a statement of fact that the Wycombe Local Plan was prepared on the basis that the adjacent land was identified for allocation in the emerging plan.

It is a matter of fact that the WDLP was adopted in August 2019. There was a typo in BC reg16 answer.

It is requested that the diagram accompanying HAZNP5 is modified to align with the diagram that accompanies HW8. This is to misunderstand the purpose of policy HAZNP5 – there is not strategic disagreement with the allocation of the land for housing, and the Neighbourhood Plan is simply seeking to bring the diagram up to date. This is set out in more detail below, in response to the comments.

It is noted that the plan in HAZNP5 ‘does not match’ the plan for HW8. This goes to the heart of what HAZNP5 is seeking to achieve, and HPC is grateful for the opportunity to set it out.

HPC has clear strategic objectives (separate from the Neighbourhood Plan) to ensure that residents in the Parish feel integrated into the community. HW8 falls (except for the access to Wycombe Road) within the Parish, and HPC has always wanted to ensure that they are able to be fully integrated into the community.

HPC did not want the site to be removed from the Green Belt, but once the Wycombe Local Plan was adopted, HPC accepted that development was to take place on the site. Some residents in the Parish have not accepted this, and would like to stop development from taking place. This is not the position of HPC, and at no stage has HPC sought to use the Neighbourhood Plan as a means of frustrating development.

Given that the objective is to ensure the whole development integrates with the Parish, HPC has always had concerns about the ‘southern parcel’ and its isolation

on the 'wrong side' of the space designed to achieve a 'sense of separation', running down the dry valley of the site. They raised this during the consultation phase of the Wycombe District Local Plan, but it was deemed that the physical layout of the site – with the dry valley – provided a clear rationale for locating the space to provide a 'sense of separation' in that location, that over-rode the convenience of the administrative geography.

To note, policy clause 1a) does not specify where spatially the sense of separation should be achieved. This is only suggested in the supporting text. In response to consultation comments and HPC and the community position, this position has been amended in the development brief. The DB shows that the sense of separation is to be achieved through land to the north, and that the central valley is to provide multiple uses in relation to surface water management and open space. The link below is to the development brief

[HW8 Land off Amersham Road including Tralee Farm Development Brief FINAL \(buckinghamshire-gov-uk.s3.amazonaws.com\)](https://www.buckinghamshire.gov.uk/s3.amazonaws.com/HW8_Land_off_Amersham_Road_including_Tralee_Farm_Development_Brief_FINAL)

A public space that is designed to fulfil a sense of separation will, by definition, have reduced levels of surveillance, because to do otherwise would mean the space would not achieve the 'sense of separation'. In addition, the site is large enough to trigger the need for the provision of 'strategic open space' in the Wycombe Local Plan, and it is clear that the central valley is the location where it is envisaged that this is located.

See above.

The size of the space and reduced surveillance does not mean it would be unsafe during the day – there are many public spaces which have limited surveillance during the day but which are quite safe. However, in hours of dark, it would be likely that most women would not regard it as safe, and children would also be asked by parents to avoid crossing it at these times.

This would be of no concern at all, if the southern part of the site was connected into Holmer Green, via the development of the adjacent site to the east.

However, with that site falling away, it means that the southern part of HW8 is isolated in terms of active travel in the winter during early morning as well as in the afternoon and evening, and even in the summer, later in the evening, it is likely to feel less safe, when the number of people using the space begins to reduce.

The southern parcel of land is not only constrained by this barrier to the north. In addition, HW8 does not require a pavement alongside the A404, and any connection to Badger Way would also have to be across open space.

It is quite clear, therefore, from the diagram accompanying HW8, that the southern parcel was envisaged to be connecting into Holmer Green – that this is the 'masterplan' that was in the mind of Wycombe District Council in drawing up the policy.

BC envisages that, functionally, the whole of HW8 will be accessing local services in Holmer Green, thus the importance of active travel links throughout the site and the need for comprehensive development.

All HPC is seeking to achieve, therefore, through HAZNP5, is a layout that will allow them, in the future, to properly integrate all the future residents of the site, including those on the southern part of the site, into the Hazlemere community, rather than having an isolated community that is not integrated into either Hazlemere or Holmer Green.

The 'strategic' layout of HAZNP5, therefore, simply 'moves' the large area of open space that is required to provide the 'sense of separation' and be large enough to meet the strategic open space requirements of the final development plan, from following the dry valley dividing the site, to the north eastern boundary, which is also the parish boundary and the former boundary between Wycombe District and Chiltern District.

This change could also have been facilitated by a development brief, which would have been another appropriate vehicle to update HW8. HPC had hoped to have dialogue with BC over the preparation of the development brief. An initial discussion was held, but the Inland Homes planning application for the northern part of the site was taken to planning committee before a draft brief had been shared with the parish, let alone public consultation held or a brief finalised.

BC progressed the Development Brief to inform the outcome of planning applications on the site, and the subsequent Inland Homes appeal.

See response above in relation to the final Development Brief. Note that HPC and the community were consulted on the development brief in June/July 2022 (including 3 public exhibition events)

Responding to that, HPC included the HW8 site within the neighbourhood plan. HPC would have been very happy to discuss the emerging policy with BC, but no opportunities were afforded for this to take place. HPC also asked if the public consultation on the Neighbourhood Plan and the Brief could be co-ordinated, but that was not possible.

BC disagrees with this statement. HPC did not appear to be willing to discuss the NP policy / plan and moved through the NP process very swiftly.

Before finalising the brief, BC met with the Buckinghamshire Council Ward Councillors.

The need for community safety through good standards of design, including natural surveillance, has been a long-standing principle in good design for many years, and is reinforced by the Governments publication of the National Model Design Guide and National Model Design Code.

It is worth noting that the report of the Inspector hearing the recent appeal by Inland Homes does not make any reference to these recent national documents.

Returning to the final matters under 'basic conditions', it is asserted that the diagram fails to take into account the landform and ecology. No further information on how

this failure is manifested, and given that the green infrastructure link follows the line of the dry valley, and the policy makes specific reference to the valley (in the same way that HW8 does), and considerable reference to the needs of GI, HPC disagrees with this comment.

Finally, dealing with the small point of the woodland area on land fronting Amersham Road which is adjacent to HW8, and which is included within HAZNP5, which is considered to be an error. The error was on the part of the District Council, because, as can be seen from the screenshot from Google Maps Satellite below, there is no woodland on this piece of land.



It has been helpfully pointed out that paragraph 5.37 refers to land 'to the north', and 'land to the south'. It is suggested that this should be east and west. If the examiner believes clarification is helpful, HPC would prefer 'north east' and 'south west' as more accurate descriptions.

It is suggested that paragraph 5.38 is in error, and that the Wycombe Local Plan does not include 20 Wycombe Road. HPC agrees that Wycombe Local Plan could not allocate 20 Wycombe Road because it was not in Wycombe District, but in Chiltern District. Paragraph 5.38 states "although the red line of HW8 included 20 Wycombe Road, the policy could not allocate this land as it was in the adjacent Chiltern District". This is a statement of fact. The red line on Fig 14 includes the land at 20 Wycombe Road, but it was not showing that the land was allocated. 20 Wycombe Road is not allocated as part of policy HW8. HPC included this text so that readers of the Neighbourhood Plan were clear that it was not within the allocation. HPC therefore disagrees with the comment that 5.38 is incorrect.

HPC is of the view that although HAZNP5 presents a different interpretation of HW8, it is largely consistent with the Development Objectives of the Land off Amersham Road including Tralee Farm Development Brief finalised in Sep22.

14. Is the HPC satisfied that the provision of a pavement as set out in B4) of policy HAZNP5 (Amersham Road/Tralee Farm), is justified?

Yes. It is included in the planning application for the Bellway part of the site. There is no footway provision on this part of the A404. Without it new residents on the southern part of the site would not be able to walk or cycle safely from their homes, along the A404, to the rest of Hazlemere, and would have no choice but to walk north to Wycombe Road, potentially making the journey too long to be attractive for active travel, and compelling them to use the car instead.

15. The representation from Thames Water proposes the inclusion of additional text with regard to proposed water/waste-water infrastructure and surface water drainage. What are the views of the Parish Council on such a modification?

HPC considers these matters are already adequately addressed elsewhere in the development plan and by national policy and guidance.

16. Could the Parish Council confirm that all the owners of the proposed local green space were advised of the proposed designations, having regard to the advice in the PPG on Open space, sports and recreation facilities, public rights of way and local green space (see PPG Reference ID: 37-019-20140306), and that no objections were received?

Owners of proposed local green space were consulted with during all stages of the neighbourhood plan. One objection from Nexus Planning representing the Ernest Cook Trust was received at regulation 16 in relation to HAZNP2 and Local Green Spaces; this has been addressed by earlier comments.

17. A number of Regulation 16 respondents refer to the potential highway safety issues in relation to the Amersham Road/Tralee Farm development site (policy HAZNP5). Is the Parish Council satisfied that the requirements (as set out in the policy) are justified and achievable?

HPC notes the concerns with the access onto the A404. HPC notes that although HAZNP5 includes a second vehicular access off the A404, whereas HW8 shows only one, BC has not indicated that this is a point of non-conformity.

HPC notes that in the Wycombe Local Plan it is advised to keep any access away from 'the steep bend on the A404', it is assumed on the advice of the Highway Authority. But HPC also notes that in the final development brief, a second vehicular access is indicated, in the location that the Bellway planning application indicates the second access. However, in the absence of any formal highways advice, HAZNP5 indicates the second vehicular access about 50-60m further east, away from the bend. The location is indicative, and any access included with any planning application would need to be assessed by the Highway Authority.

18. The monitoring and review of plans is an important component in the plan-making process, in order to ascertain whether or not the policies are effective. I could find no reference in the HNP to the monitoring of the policies or to the future role of the Parish Council in this process. I would welcome the views of the HPC as to why this issue has not been addressed in the HNP, and if appropriate, how it might be addressed?

HPC has limited resources. As set out in §6.2 it will seek to monitor how well BC implements the policies of the plan but has made no specific process for doing so beyond its current review of planning proposals on which it is consulted.

Appendix – clarification of HW8 and HAZNP5

POLICY HW8 – LAND OFF AMERSHAM ROAD INCLUDING TRALEE FARM, HAZLEMERE	
<p>The site as shown on the Policies Map is allocated for residential use.</p> <p>Development of the site is required to:</p> <ol style="list-style-type: none"> 1. Place-making <ol style="list-style-type: none"> a) Maintain a sense of separation between Hazlemere and Holmer Green, through the layout of the site; b) In the event that land to the north east in Chiltern District (off Earl Howe Road) is allocated for development in the Chiltern and South Bucks Local Plan, to be planned comprehensively with that site as a whole; and in any event to not prejudice future integration; c) Provide a comprehensive development of the site within Wycombe District; d) Redevelop the existing coach yard and riding stables; e) Consider the opportunity to redevelop existing residential properties fronting Amersham Road. 2. Transport: <ol style="list-style-type: none"> a) Provide access from the A404 and the Wycombe Road; b) Provide walk / cycle access through Tralee Farm onto Wycombe Road; c) Improve access to existing bus routes; d) Provide or contribute to off-site highway improvements as required by the Highway Authority. 3. Green Infrastructure/Environment <ol style="list-style-type: none"> a) Provide access to and retain the existing orchard within the north east of the site; b) Provide protection and future management for the orchard; c) Retain the woodland in the south west corner of the site at Badger Way; d) Provide a Green Infrastructure link through the valley of the site, connecting the orchard to the woodland at Badger Way; e) Retain the field boundaries within the site; f) Manage local sources of flood risk. 4. Development of this site will be required to meet the needs arising from the development for additional primary school places. 	<ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> a) Repeated verbatim in A(2) b) Brought up to date in A(1), deleting the first clause referencing Chiltern and South Bucks Local Plan, and inserting a clarification that integration needs to be achieved with surrounding neighbourhoods. c) Not included as out of date – purpose included in A(1) d) Repeated verbatim in A(3) e) Omitted from policy as included within the site red line – the land is included as part of the Bellway application. 2. <ol style="list-style-type: none"> a) See response above. b) Clarification included on the purpose of the walk/cycle link – to bus stops and community infrastructure. c) See response above. d) Repeated verbatim in B(6) Two other clauses included – see notes alongside HAZNP6 3. <ol style="list-style-type: none"> a) reworded in C(1) to clarify location as HW8 ambiguously worded b) omitted as repeats DM34(3)(d) c) included in C(4) but bringing up to date as HW8 refers to the woodland being on the site rather than off site. d) Included at C(2) updating wording for clarification e) Reference to 'field boundaries' is replaced by 'hedges' in C(3), for clarification. f) Repeated verbatim at C(8) 4. Included at D, with the first clause reworded to fit the wording of the rest of the HAZNP5 policy

POLICY HAZNP5: Planning for Sustainable Development at Amersham Road/Tralee Farm

The main site as shown on the Policies Map is allocated in the Wycombe District Local Plan for residential use (Policy HW8). The Neighbourhood Plan includes some additional parcels of land to bring the policy up to date.

Development of the site is required:

A. For its place-making proposals -

- 1) to be planned comprehensively with that site as a whole, integrate into surrounding neighbourhoods; and in any event to not prejudice future integration;
- 2) to maintain a sense of separation between Hazlemere and Holmer Green, through the layout of the site; and
- 3) to redevelop the existing coach yard and riding stables.

B. In respect of its transport proposals -

- 1) to provide vehicular access from the A404;
- 2) to provide a strategic walk / cycle access to existing bus routes and community infrastructure through Tralee Farm onto Wycombe Road;
- 3) to facilitate a future pedestrian and possible cycle connection through to Badger Way and the adjacent play area through the provision of a suitable layout and rights for pedestrian and cycle access to the boundary without ransom;
- 4) to provide a pavement from Inkerman Drive to the site access along the A404;
- 5) to effect changes to the A404 along the site frontage to facilitate easier pedestrian and cycle access to the adjacent AONB; and
- 6) to provide or contribute to off-site highway improvements as required by the Highway Authority.

C. In respect of its green infrastructure and environmental proposals -

- 1) To provide a Green Infrastructure corridor within the site along the whole of the rear of Wycombe Road;
- 2) To provide Green Infrastructure connectivity through the valley of the site, connecting the orchard that lies adjacent to the site to the north to the woodland near the play area at Badger Way adjacent to the site to the south;
- 3) to retain the hedges within the site;
- 4) To enhance Green Infrastructure along the south western boundary of the site connecting existing isolated pockets of green infrastructure, including the off-site woodland between Badger Way and the A404, and the off-site woodland near the play area at Badger Way, and the larger back gardens with mature trees to the rear of Lacey's Drive;
- 5) to provide a strategic Green Infrastructure link along the north eastern boundary of the site, connecting the orchard adjacent the site to the north to

- the wider countryside to the south, as part of the provision of a sense of separation;
- 6) to provide a landscape setting to the site on its southern boundary, along the A404, which is the boundary to the Area of Outstanding Natural Beauty;
 - 7) to contribute to off-site green infrastructure network improvements adjacent to the site as appropriate; and
 - 8) to manage local sources of flood risk.

D. In respect of local educational infrastructure to meet the needs arising from the development for additional primary school places.

A

1. Including text from 1(b) but bringing it up to date, deleting the first clause referencing Chiltern and South Bucks Local Plan, and inserting a clarification that integration needs to be achieved with surrounding neighbourhoods
2. Repeats 1(a) verbatim
3. Repeats 1(d) verbatim

B

1. See response above
2. Including wording of 2(b) with clarifications on the purpose of the walk/cycle link – to bus stops and community infrastructure (but see also response above)
3. New clause to clarify one way that integration can be achieved, a requirement of the HW8 policy
4. New clause – the pavement is included in the Bellway planning application, so bringing the policy up to date
5. New clause to clarify on way that integration can be achieved, a requirement of the HW8 policy
6. Repeats 2(d) verbatim

C

1. Taking the aim of 3(a) and rewording for clarification to remove ambiguity
2. Including wording from 3(d) and updating wording for clarification to be consistent within the policy.
3. Replaces 'field boundaries' from 3(e) with 'hedges' for clarification.
4. New clause clarifying the site specific requirements flowing from policy DM34.
5. See response above
6. New clause clarifying the site specific requirements flowing from policies DM34 and DM32
7. New clause clarifying the requirements of DM34 as they relate to this site.
8. Repeats verbatim 3(f)

D.

Apart from a rephrasing at the start to be consistent in wording with clauses A, B and C, wording repeats that of 4 in HW8.