

# WOOBURN & BOURNE END PARISH COUNCIL

Council Offices, Town Lane, Wooburn, Buckinghamshire HP10 0PS

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Website: [www.wooburnparish.gov.uk](http://www.wooburnparish.gov.uk) Enquiries to: Clerk to the Council



Wooburn and Bourne End Neighbourhood Plan

Planning Policy Team

Buckinghamshire Council

Queen Victoria Rd

High Wycombe

HP11 1BB

26 October 2022

**By email**

Our Parish Council has received requests for minor adjustments to the details of Green Spaces referenced in our **6<sup>th</sup> Draft Neighbourhood Development Plan**. The requested adjustments, **with which our Parish Council is in agreement**, are detailed below, **in red**.

## 1. From the owner of Green Space A24 in Appendix 1 – Audit of Local Green Spaces.

**Request:** Amendment of the name "Pitcher Farm Track" to "Unnamed Farm Track", as shown in the extract below:

<b>A24</b>	Pathway along Old Railway Line from Cores End Road to the top of the <b>unnamed</b> Farm track in Wooburn Green	Y	Y	Y	Y	Y	A narrow Right of Way from Cores End Road to Spade Oak Construction, with the section from Spade Oak to the <b>unnamed</b> Farm track currently not open to the public or registered as a RoW.	No
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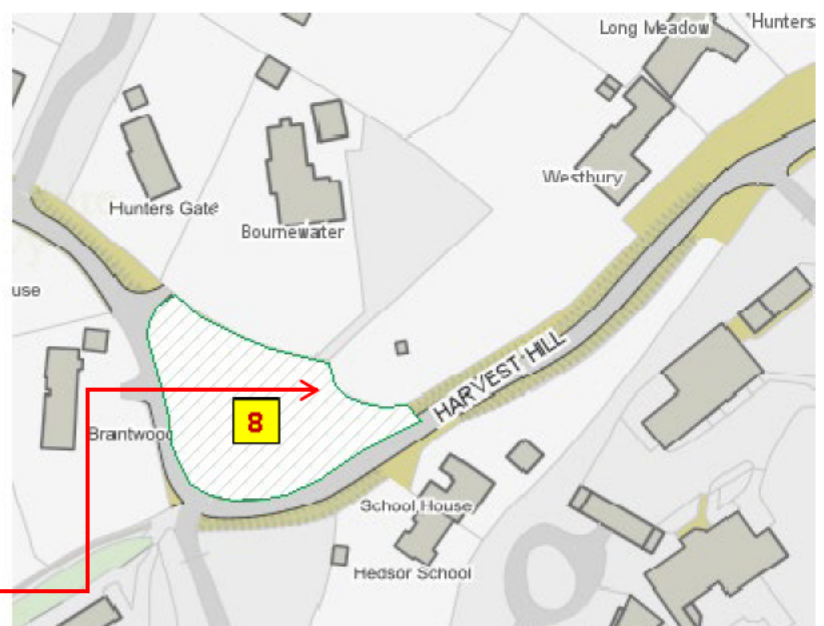
## 2. From the neighbouring owner of Westbury in Harvest Hill, re Green Space 8 in Appendix 2 – Assessment of Local Green Spaces for Designation.

**Request i.:** Adjustment of the map outline on page 34 of the NDP, as in the revised version below:

### 8. Harvest Hill Open Space

A corner verge of grass and bushes on this hill, providing a natural open aspect and visibility around the bend for traffic.

With the agreement of Buckinghamshire Council it is maintained by local residents & WBEP and considered important to their environment.



**Revised Map outline**

**Request ii:** Amendment of wording relating to Green Space 8 in Appendix 2 to synchronise it with the wording in the Site Name heading:

Site Details		Owner: Land Registry - No Registered Estate: "Disinterested" owners known to local residents.
WBE/PD8 No. & Site Name	Grid Reference	Description and purpose
8. Harvest Hill Open Space, Bourne End (A8 in Appendix 1 Audit)	SU 90487 86686 No LR Inspire No.	An important open grass and wild-flower verge/corner, which not only enhances the visual aspects of Harvest Hill lane but also provides a refuge for wildlife and pedestrians. In cooperation with the Parish council, local residents maintain this important large verge under a cultivation license from Bucks County Council to preserve it as a green space

**Checklist**

Statutory Designations	Site Allocations	Planning Permissions
Not applicable	None	<ul style="list-style-type: none"> <li>■ Part of the <b>Open Space</b> (about 35%) is the subject of an application for stopping up order following a planning application to appropriate the land by the owner of the adjacent property. The whole</li> <li>■ <b>Open Space</b> including that covered by the application has been maintained by local residents under a cultivation license granted by Buckinghamshire Council to Hawks Hill Widmoor Residents' Group CIC (Community Interest Company). The license was granted prior to the planning application. This green space was assessed to be designated as a Local Green Space in the third draft of the NDP before the attempted appropriation by the adjacent landowner.</li> </ul>

**3. From the The Hawks Hill Widmoor Residents Group CIC, re Green Space A8 in Appendix 1 – Audit of Local Green Spaces.**

**Request:** Amendment of wording relating to Green Space A8 in Appendix 1 to synchronise it with the wording of Green Space 8 in Appendix 2:

A8	Harvest Hill Open Space, Bourne End.	Y	Y	Y		Y	An important open grass and wild-flower verge/corner, which not only enhances the visual aspects of Harvest Hill lane but also provides a refuge for wildlife and pedestrians.  In cooperation with the Parish Council, local residents maintain this important large verge under a Cultivation Licence from Bucks Council to preserve it as a Green Space.	Yes
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**4. From the The Hawks Hill Widmoor Residents Group CIC, re Green Space 6 in Appendix 1 – Assessment of Local Green Spaces for designation.**

**Request:** Amendment of the Name of Green Space 6 in Appendix 2 from “Hawks Hill” to “Harvest Hill” and additional text under “Description and purpose”, as below:

Site Details	Owner: Land Registry - No Registered Estate: (Bucks. Council.?)	
WBE/PD8 No. & Site Name	Grid Reference	Description and purpose
6. Green Space at the junction of Kiln Lane/Widmoor and Harvest Hill (A6 in Appendix 1 Audit)	SU 91100 87021 No LR Inspire No.	An open corner, with bushes at its rear, forming part of the character of the local area. Used by pedestrians as a safe footway, as well as a wildlife corridor and aiding visibility for traffic. In cooperation with the Parish Council, local residents maintain this important large verge under a Cultivation Licence from Bucks Council to preserve it as a Green Space.

Yours faithfully,



Cllr Tim Bingham  
Chairman  
Wooburn and Bourne End Parish Council



## Rachael Riach

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**From:** David Davis [REDACTED]  
**Sent:** 08 October 2022 10:17  
**To:** Neighbourhood Planning Mailbox  
**Subject:** [EXTERNAL] Re Neighbourhood Plan for Wooburn and Bourne End

You don't often get email from [REDACTED] [Learn why this is important](#)

Sir, Madam, the Bourne End "Future of Our Village forum" (FoOV) submits the following comment on the Neighbourhood Plan for Wooburn and Bourne End.

*It should be noted that the Future of Our Village forum (FoOV) produced one of the two Community Led consultations that raised many of the issues echoed in the subsequent consultations and in community feedback received and considered by the Parish Council during its thorough and painstaking process to produce this Neighbourhood Development Plan. This being so, we as a long established Bourne End organisation have no hesitation in acknowledging our approval of this submission and in stating our thanks to the Parish Council for producing a document that truly recognises current and future local issues and concerns, as raised by local people and organisations. It is a document that has the true spirit of localism at its heart and in the objectives and Policies its sets out.*

*Regards, David Davis (Secretary FoOV forum)*



## Rachael Riach

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**From:** Martin Barber [REDACTED]  
**Sent:** 26 October 2022 10:47  
**To:** Neighbourhood Planning Mailbox  
**Cc:** Peter Barber  
**Subject:** [EXTERNAL] Wooburn and Bourne End Neighbourhood Plan submission consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Sir/Madam,

I have been appalled by the proposals to build more and more houses in Wooburn/Bourne End and am very concerned that the proposed developments should NOT be allowed.

I have been a Wooburn resident for over 50 years. My children went to St Paul's school in Stratford drive. The river Wye flows through my garden. Over the years the amount of housing has increased and by next summer the Pegasus Retirement home, Wooburn Bales will be adding 44 more flats to the already congested area. Here are some of the reasons for my objection:

As an elderly resident I am noticing that there is even now a serious issue with our local GP provision which struggles to cope with the number of patients. The two proposed development sites would increase the number of potential patients way beyond the limits of our Medical Centre.

Each home usually has two or more vehicles so together with the servicing vehicles, bin lorries, delivery vans etc, there would be a huge increase in traffic here.

The river has flooded the grassy area between Holtspur Hill and Windsor Lane several times. Although my own property in Wooburn Manor Park has been safe I am concerned that the open fields of Slate Meadow and Hollands Farm would not be available as a flood area. When there are heavy bursts of rain the water very quickly runs down the roads in High Wycombe and Loudwater so that in the space of about 20 minutes our section of the river rises rapidly. Its not surprising to see here a rise of 6-8 inches in the space of half an hour. Were a flash flood to occur the water would need to be dispersed all the way along the river course. I'm not sure this aspect has been taken into account.

For the above reasons and many more I am huge opposed to any further building in Wooburn or Bourne End.

with best regards,

Martin Barber

## Rachael Riach

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**From:** Margaret Marshall [REDACTED]  
**Sent:** 01 November 2022 22:19  
**To:** Neighbourhood Planning Mailbox  
**Subject:** [EXTERNAL] Wooburn and Bourne End Neighbourhood Plan submission consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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I would like to say I fully support the Neighbourhood Development Plan submitted by Wooburn and Bourne End Parish Council, it has gone through an extensive process and the contents reflect my wishes for our community. I look forward to seeing it put into action, Margaret Marshall 6 Claytons Meadow, Bourne End SL85DQ

Sent from my iPad

## Rachael Riach

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**From:** Marlow Local Group <marlowgroup@livingstreets.org.uk>  
**Sent:** 26 October 2022 12:20  
**To:** Neighbourhood Planning Mailbox; clerk@wooburnparish.gov.uk  
**Subject:** [EXTERNAL] Wooburn and Bourne End Neighbourhood Plan submission consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

You don't often get email from marlowgroup@livingstreets.org.uk. [Learn why this is important](#)

Dear Sirs,

As an organisation that champions good walking environments and this is a neighbouring area, we viewed this proposed plan with interest. Especially as it may influence the envisaged segregated traffic-free cycle route between Marlow and Bourne End centres. ( to help reduce traffic on the A4155).

Apologises, we have only just been made aware of the plan to comment on it.

We would like the following noted:

1. All through the document pavements / cycle tracks seem only to be considered within 'green spaces' in the plan. Rather than the vital pieces of infrastructure they are in their own right.
2. There is mention of protecting existing walkways and PRoW, but no emphasis on improving what is there and how this could improve the congestion and parking problems in the parish or how pedestrian access will link to new developments. Nor how the new road junctions should be made safer for pedestrians and cyclists.
3. The 2033 Vision is very good, apart from point 3.7. There is no mention of investment in infrastructure that encourages healthy and sustainable active transport. And it is contradictory. Over the last 50 years it's been proven that as increasing parking spaces and improving 'traffic-flow' is not sustainable and has induced higher volumes of cars and even more demand for parking spaces. Thereby further decreasing air quality, increasing parking problems and congestion and quality of life for residents.
- 4.
5. It does concern us that the NDP policies table on p.68 mentions parking five times and yet green spaces only twice. What is the parish priority here!?

Rather than arguing over whether a dwelling has 1.5 or 2 off-street parking spaces, Authorities should be designing and developing communities that **don't make residents car-dependant**, therefore reducing demand for parking spaces and stopping the unsustainable rise in car volumes on our roads.

Many thanks for your consideration



Yours faithfully,

Mark

**Mark Skoyles**

Chair



**Marlow Living Streets Local Group**

**Get involved:** <https://www.livingstreets.org.uk/get-involved/local-groups/marlow>

**Follow us:** <https://www.facebook.com/marlowlivingstreets>

[www.livingstreets.org.uk](http://www.livingstreets.org.uk)

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## Rachael Riach

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**From:** Rafaela Christodoulou <Rafaela@arrowplanning.co.uk>  
**Sent:** 28 October 2022 17:25  
**To:** Neighbourhood Planning Mailbox  
**Cc:** Mark Schmull; 'Charles Lunnon'; 'Marion Lunnon'; richard@hollands-farm.co.uk  
**Subject:** [EXTERNAL] APL-217 6th draft Wooburn and Bourne End Neighbourhood Plan reps  
**Attachments:** APL-217 - WBE NDP Representation Oct 2022.pdf; Appendix 1 - Brownfield land in use.pdf; Wooburn and Bourne End Neighbourhood Plan consultation 2022 form.pdf

You don't often get email from rafaela@arrowplanning.co.uk. [Learn why this is important](#)

[Please note this has been sent from an **external source** - treat with caution and **do not open** attachments / use links until you are sure this is a trusted communication see intranet/IT for advice.]

Dear Sir/ Madam,

On behalf of our clients, please find attached the completed form, representations, and appendix in response to the consultation on the 6th draft Wooburn and Bourne End Parish Council Neighbourhood Development Plan.

Kind regards,  
Rafaela

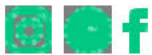


**Rafaela Christodoulou** | Graduate Planner  
Arrow Planning Limited

07960 054633

[rafaela@arrowplanning.co.uk](mailto:rafaela@arrowplanning.co.uk)

[www.arrowplanning.co.uk](http://www.arrowplanning.co.uk)



Wooburn and Bourne End Neighbourhood Plan  
Wooburn & Bourne End Parish Council  
Town Lane,  
Wooburn,  
Buckinghamshire  
HP10 0PS

Our ref: APL- 217 Hedsor Wharf Lodge

28 October 2022

Dear Sirs,

**Re: Wooburn and Bourne End Parish Council Neighbourhood Development Plan – Consultation Response**

These representations have been prepared on behalf of our client, Mr. and Mrs. Lunnon, in response to the consultation on the 6th draft Wooburn and Bourne End Parish Council Neighbourhood Development Plan ('NDP'). These representations are separate from those made by Catesby Estates in respect of the allocated site at Hollands Farm (Local Plan Policy BE2), but we support their observations and objections. Representations were also submitted in response to the consultation on the 5<sup>th</sup> draft of the NDP.

### Planning Policy Requirements for Neighbourhood Plans

A Neighbourhood Plan needs to meet the Basic Conditions, which are:

1. The Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State. (e.g., National Planning Policy Framework and Guidance)
2. The making of the Neighbourhood Plan contributes to the achievement of sustainable development.
3. The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
4. The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations (particularly, the Strategic Environmental Assessment Directive), Environmental Impact Assessment Directive, and the Habitats and Wild Birds Directives).



5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010), either alone or in combination with other plans or projects.

Guidance and advice for the content of Neighbourhood Plans is contained in the National Planning Policy Framework (July 2021) (the 'NPPF') and Planning Practice Guidance (the 'PPG').

Paragraph 13 of the NPPF states that “Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

Paragraph 74 of the NPPG (Reference ID 41-074-20140306) states:

“When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with
- the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy
- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy
- the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach

Having reviewed the NDP, it is evident that several parts of the NDP are not compliant with the policy requirements for the preparation of Neighbourhood Plans. Taking each point in turn:

### Vision and Objectives

The general tone of the NDP still remains as one that is negative; it does not recognise the thrust of national policy which supports and encourages sustainable development. The NPPG is clear that “**Plans should be prepared positively**, in a way that is aspirational but deliverable<sup>1</sup>” (emphasis added).

Despite our previous comments, the NDP is still not prepared positively. The document is focused on preventing development, preventing change, and fails to recognise how settlements and industries evolve over time. This is crucial for places to prosper and continue to be vibrant.

The rural economy is a key component of the local and national economy which has been particularly badly affected in recent years. The NPPF is clear that planning policies should support a prosperous rural economy, with reference (para 84) to policies and decisions enabling:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

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<sup>1</sup> NPPG Neighbourhood Planning Paragraph: 005 Reference ID: 41 005 20190509

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open spaces, cultural buildings, public houses and places of worship.

The NDP fails to include any policies which do this. The Vision and Objectives for the NDP should be expanded to include a new, positively worded, objective to encourage a prosperous rural economy and support rural diversification.

### Policy WBE/PD2

Policy WBE/PD2 – Residential infill and Quality Design proposes that new development should be of similar density to properties in the surrounding area. As noted in our previous representations for the 5<sup>th</sup> NDP draft, the phrasing of the policy contradicts the NPPF requirements which require new developments to make efficient use of the land while maintaining the character of the area it sits within. It is possible to bring forward development of a higher density than the surrounding, whilst still being in keeping with the character and appearance of the area. The requirement for proposals to be of a similar density to properties in the surrounding area should therefore be removed from the Policy.

### Policy WBE/PD4

As per our previous representations, the policy should be amended to encourage greener transport initiatives and low car ownership, reflecting para 152 of the NPPF. The policy should include the wording “*Measures to encourage non-car modes of transport such as cycle parking provision and Green Travel Plans will be supported*”. In the Consultation Statements (p.29), while it is acknowledged that such a suggestion is positive, it is argued that the Local Plan contains such policies to promote alternative transport.

Therefore, given the current climate and energy crisis, it is essential that the NDP makes provisions for and encourage greener transport initiatives.

The Policy should also not seek to amend the BC Parking Guidance by setting additional parking requirements. The requirement under paragraph 1 for developments of up to 10 homes to have higher parking provision than is required under the BC Parking Guidance should be removed as it is not consistent with the Council’s Guidance, nor is it based on a justified evidence base.

### Policy WBE/PD8

Policy WBE/PD8 (mentioned as WBE/A2 in the 5<sup>th</sup> draft), is accompanied by map 7.3 (previously map S4). The map identifies the western edge of the gap, adjacent to the Wessex Road industrial estate, as open space. Map 7.3 is an older version of a map from the Hollands Farm Development Brief. The map is incorrect and should be removed as it does not reflect the adopted SPD or the existing conditions. As was highlighted in our previous representation, the land comprises previously developed land with numerous commercial buildings and several open storage areas currently located as part of Hollands farm (as per Appendix 1). It is mentioned within the map

description that the 'landscape buffers and green spaces will be designated when the development has been built and/or landscaped'. Nevertheless, as brownfield land in use, this land could not be used for open space or landscaping. Therefore, it is necessary for this map to be amended to reflect the brownfield nature of the land.

## Summary

In summary, therefore, we request that the following changes are made to the NDP:

- i. The Vision and Objectives for the NDP should be expanded to include a new, positively worded, objective to encourage a prosperous rural economy and support rural diversification.
- ii. Policy WBE/PD2 should be modified to **remove the wording** "*it should be demonstrated that the number of units in any new development is of a similar density to properties in the surrounding area.*"
- iii. Policy WBE/PD4 should be modified with additional wording "*Measures to encourage non car modes of transport such as cycle parking provision and Green Travel Plans will be supported*" and for the car parking standards for developments of 10 units or less to be made consistent with the BC Parking Guidance.
- iv. Policy WBE/PD8 map 7.3 should be amended to remove the area of open space and landscaping in the southwest corner, and instead, show this as brownfield land (its current condition).

We trust that this response will be given full consideration and that the NDP will be updated accordingly before proceeding to the next stage of consultation.

If you require further information, then please contact me on the details at the head of this letter.

Yours faithfully

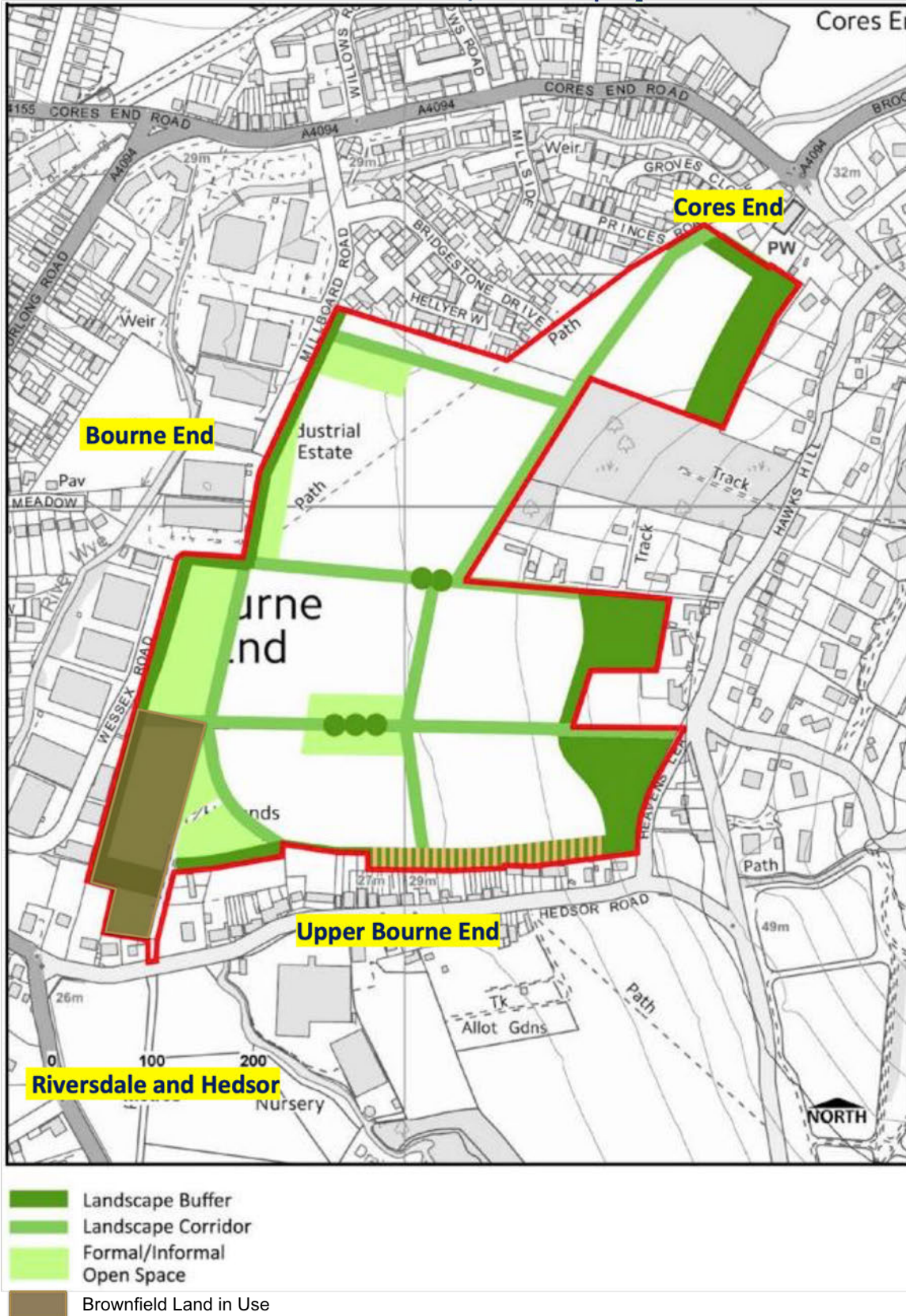


Mark Schmull

Cc: Mr & Mrs Lunnon



**Map 7.3: from the Hollands Farm Development Brief; showing the proposed remaining Settlement separation between Bourne End and Upper Bourne End, and Bourne End and Riversdale and Hedsor Road Landscape Buffers and Green Spaces will be Designated when the development has been built and/or landscaped.**





## **Wooburn and Bourne End Neighbourhood Plan submission consultation 2022**

**Open date:** 22 September 2022

**Close date:** 3 November 2022

**Name:** Planning Policy Team

**Phone:** 01296 383 698

**Email:** [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)

### **Overview**

**We want to hear the views of local residents and organisations on the Neighbourhood Plan for Wooburn and Bourne End.**

In February 2015, the Parish of Wooburn and Bourne End was designated a Neighbourhood Area by the former Wycombe District Council, now Buckinghamshire Council.

This followed an application by Wooburn and Bourne End Parish Council.

Wooburn and Bourne End Parish Council has completed a period of local community engagement on the Neighbourhood Plan and have submitted the final draft version to us.

The next stage of the process is for us, as the local authority, to carry out a public consultation on the submitted plan.

This is a final opportunity for local people to comment on the modified plan before it goes to independent examination.

The Wooburn and Bourne End Neighbourhood Plans policies relate to:

- Conservation areas and heritage assets
- Residential infill and quality design
- Access and layout of new infrastructure developments
- Parking applications for new developments and existing properties
- Conservation area character assessments

- Development impact on watercourses, hedgerows and bats
- Safeguarding community facilities and public houses
- Designation of local green spaces and separation of settlements in Wooburn and Bourne End Neighbourhood Area
- New link road width and bus service
- Slate Meadow site entrance
- Preserving the character of Hawks Hill and Harvest Hill area

## Related documents

The following documents are available on the Wooburn and Bourne End Neighbourhood Plan submission consultation page at

<https://yourvoicebucks.citizenspace.com/>

- Draft Wooburn and Bourne End Neighbourhood Plan
- Wooburn and Bourne End Neighbourhood Plan Basic Conditions Statement
- Wooburn and Bourne End Neighbourhood Plan Consultation Statement
- Wooburn and Bourne End Neighbourhood Plan SEA screening report

## How to submit a comment

You can submit a comment in one of the following ways:

- Complete the online survey at <https://yourvoicebucks.citizenspace.com>
- Complete, and return, the printed version of the survey below
- Email us at [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)
- Write to us at **Wooburn and Bourne End Neighbourhood Plan**, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.

If you have any questions about this consultation, please email us at [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk) or phone us on 01296 383 698.

If you would like to be notified of future progress with the Neighbourhood Plan, please indicate this in your response.

**Please make sure we receive your comments before midnight on 3 November 2022.** We cannot consider any comments received after that deadline.



## What happens next

Following consultation, we will collate the responses and submit them to an independent examiner.

The examiner will consider public comments and ensure the Plan meets conditions laid out in the Localism Act and other relevant regulations.

If the plan passes independent examination, the next stage is a local referendum to see whether the Plan has community support.

If it is supported, we will adopt it as part of local planning policy to assess planning applications in the Neighbourhood Area to which the plan relates.

## Privacy

We will use the information you provide here only for this activity. We will store the information securely in line with data protection laws and will not share or publish any personal details. For more information about data and privacy, please see our [Privacy Policy](#).

If you have questions about data and privacy, please email us on [dataprotection@buckinghamshire.gov.uk](mailto:dataprotection@buckinghamshire.gov.uk). Or write to our Data Protection Officer at Buckinghamshire Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF.

## Consultation survey

\*Indicates a Mandatory question

### Your interest in this consultation

#### 1. What is your interest in this consultation? \*

Please tick (✓) one option

- Resident (**Go to question 4**)
- Organisation (**Go to question 2**)
- Agent (**Go to question 3**)

**2. What is the name of your organisation? (Go to question 4)**

Arrow Planning Ltd

**3. Which organisation do you represent in this consultation?**

Local landowners/residents - Mr. and Mrs. Lunnon of Hollands Farm, Bourne End

**Contact details**

We need to ask for your name and address because planning law states that we cannot accept anonymous comments.

The information you provide here will only be used for the purpose of this consultation and will be stored securely in line with data protection laws. No personal information will be shared or published.

**4. Full name\***

Mark Schmull

**5. Address\***

If you are a resident, this is your home address. If you are an agent or organisation this is your business address.

Clarks Barn, Bassetsbury Lane, High Wycombe, Bucks HP11 1QX

**6. Would you like to be notified of future progress with the Neighbourhood Plan?**

Please tick (✓) one option

Yes

No

## 7. What is your email address?

If you provide your email address and have asked to be notified of progress with the Neighbourhood Plan, we will contact you by email.

mark@arrowplanning.co.uk

## Your views

### 8. Please indicate whether you support or object to the submitted Neighbourhood Plan:

Please tick (✓) one option

- I support the submitted Plan but do not wish to make any comments or suggest changes (**End of survey**)
- I support the Neighbourhood Plan and would like to provide comments or suggest changes (**Go to question 9**)
- I object to the Neighbourhood Plan and will provide comments and evidence to explain my reasons (**Go to question 9**)

## Your comments

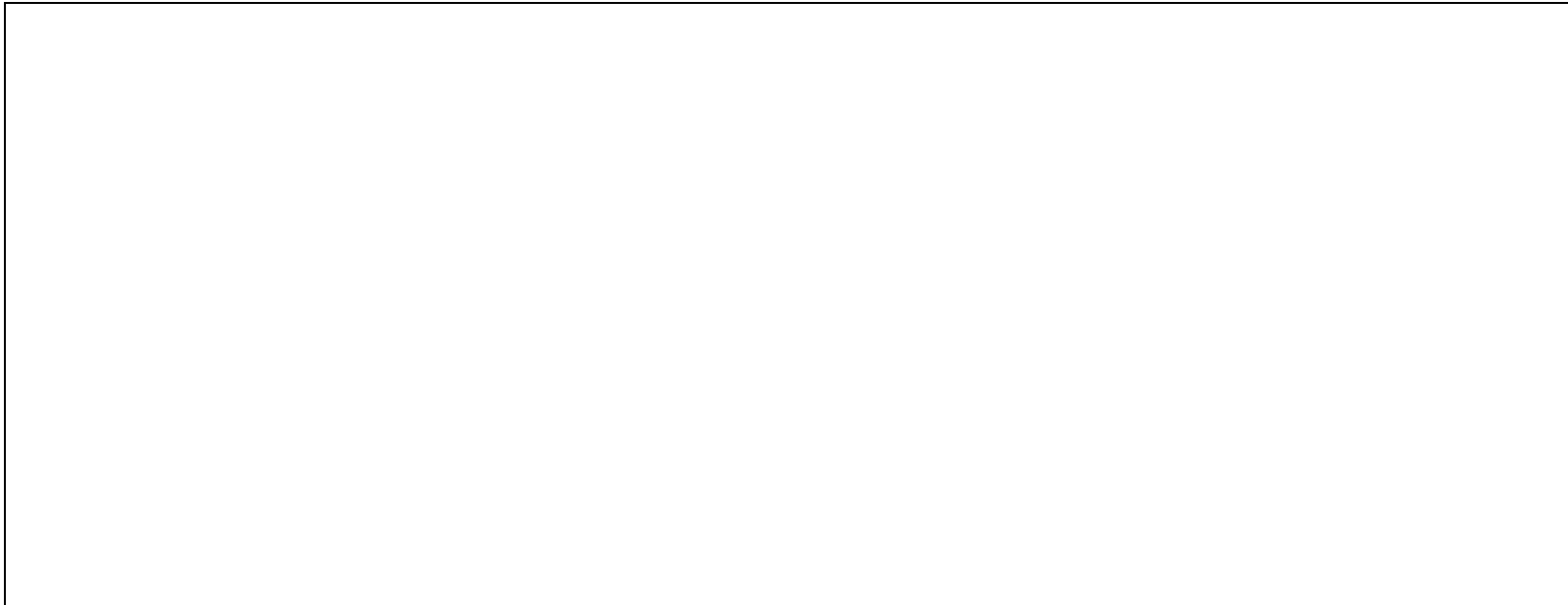
Any comments you make in this section will be made available to the public on our website, as required by law. It is very important you don't include any personal details in your comments.

### 9. Please provide your comments, suggested changes or reasons for objecting:

If you comment on specific sections of the Neighbourhood Plan, please make it clear which sections these are.

If you have evidence to support your comments, please send it to us by email or post.

Please find enclosed covering letter and appendix with our representations.



## **End of the survey**

**Thank you for taking the time to complete this survey.**

Please return your completed survey by midnight on **Thursday 3 November 2022**. You can:

- Email it to [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)
- Post it to Wooburn and Bourne End Neighbourhood Plan, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.
- Take it to one of our three main council access points located at:
  - Walton Street Offices, Aylesbury, HP20 1UA
  - Queen Victoria Road, High Wycombe, HP11 1BB
  - King George V House, King George V Road, Amersham, HP6 5AW

## Rachael Riach

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**From:** Dawn Adams <DawnA@catesbyestates.co.uk>  
**Sent:** 03 November 2022 09:25  
**To:** Neighbourhood Planning Mailbox  
**Subject:** [EXTERNAL] Wooburn and Bourne End Neighbourhood Plan - Reg 16 Consultation Response  
**Attachments:** 02.11.22 Reg 16 Neighbourhood Plan Representations.pdf; Completed Forms.pdf; Appendix 3 - Adopted Highways Extent.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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[Please note this has been sent from an **external source** - treat with caution and **do not open attachments / use links** until you are sure this is a trusted communication see intranet/IT for advice.]

Dear Sir, Madam

Please find attached representations in respect of the Woodburn and Bourne End Neighborhood Plan Reg 16 Consultation.

Catesby wish to object to certain policies within the draft Neighborhood Plan but where possible, have suggested alternative wording.

Should you have any queries, please let me know.

Kind Regards  
Dawn

**Dawn Adams**  
Senior Planning Manager

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Wooburn and Bourne End Neighbourhood Plan,  
Planning Policy Team,  
Buckinghamshire Council,  
Queen Victoria Rd,  
High Wycombe  
HP11 1BB

2<sup>nd</sup> November 2022

Dear Sirs

**WOOBURN AND BOURNE END NEIGHBOURHOOD DEVELOPMENT PLAN  
REG 16 PUBLIC CONSULTATION – 6<sup>th</sup> DRAFT REVISION DATED 26/07/2022**

Thank you for the opportunity to provide representations to the 6<sup>th</sup> edition of the Draft Wooburn and Bourne End Neighbourhood Development Plan. By way of background, Catesby Estates are the appointed land promoter at Hollands Farm which forms the majority of allocation BE2: Hollands Farm. An outline planning application (Ref: 21/06215/OUT) for 400 homes, primary school and 6.5ha of open space was submitted in May 2021 and is currently pending determination by Buckinghamshire Council.

Catesby have submitted representation to every consultation version of the Neighbourhood Plan and can appreciate the hard work which has gone into developing the Neighbourhood Plan to date. Nonetheless, we continue to have a number of concerns regarding the Neighbourhood Plan policies and specifically policies that conflict with either the adopted Hollands Farm Development Brief SPD or national planning policy.

Within this letter is a summary of our concerns and for ease, we have also attached Table 1 to this letter which set out specific concerns to policies and possible alternative wording. Attached to this representations are therefore:

- Representations (This letter)
- Completed Form
- Appendix 1 – Table 1: Specific Policy
- Appendix 2 – Map showing adopted highway land immediately around Hollands Farm, Bourne End

**Overarching Objections**

Wycombe Local Plan was adopted in September 2019 and allocated the site at Hollands Farm, Bourne End for an indicative number of 467 dwellings. Following allocation, a detailed Development Brief was prepared. This was done in liaison with a wide variety of stakeholders, including Bourne End Parish Council (whose members partly make up the Neighbourhood Plan Steering Group) and a considerable amount of time (over 2 years) was spent preparing the document.

The Development Brief for Hollands Farm is a detailed document setting out the vision for the site and was subject to detailed consultation between various stakeholders where balanced judgements have been made to inform the design concepts. We are concerned that the Neighbourhood Plan is seeking to introduce conflicting policies to the Development Brief. In particular, the objections to these policies is set out below:

- Policy WBE/HF1 - New Link Road Width And Bus Service
- WBE/PD6 Development Impact On Watercourses, Hedgerows And Bats
- Policy WBE/PD8: Designation Of Local Green Spaces And Separation Of Settlements In Wooburn & Bourne End Neighbourhood Area
- Policy WBE/HH1 Preserving The Character Of Hawks Hill And Harvest Hill Area

#### Policy WBE/HF1 - New Link Road Width And Bus Service

We have a number of concerns with this policy and wish to object:

Firstly, the policy requires applications to address safety issues “in the transport assessment” – what transport assessment is being referred to? Is this the transport assessment submitted with the planning application package for Hollands Farm? Or is this referring to the NDP Transport Assessment which has no time frame and no stated purpose in which case we would strongly object. This part of the policy requires clarification.

Secondly, part 1 of the policy WBE/HF1 requires sufficient width to allow two buses to pass each other along the link road in its entirety. This is not feasible as the access from Princes Road to Cores End road is constrained by existing adjacent properties. There are a number of possible solutions which could include routing and timetabling of bus routes or shuttle system to allow larger vehicles to wait however, this will need to be set out through a detailed planning application at Jacksons Fields. This was clearly recognised in the Development Brief which states at para 6.5.16:

*Princes Road is suitable for one-way bus working. Where widening opportunities exist beyond Princes Road the Principal Route will be designed to facilitate two-way bus movements (in accordance with design guidance) and will "future proof" the site. Bus stop locations within the development should be considered in relation to land uses within the site and comply with national guidance in terms of walking distances. At least one bus stop should adjoin or be close to the school.*

Therefore the first part of policy WBE/HF1 is not workable and conflicts with the Development Brief.

Part 2 of the policy again seeks to replicate policies in the Development Brief in a more draconian fashion whereas para 6.5.21 of the Development Brief states “*Parking will be discouraged along the Principal Route in order to maintain traffic flows at peak times, and particularly to minimise and avoid congestion near the school.*” The Neighbourhood Plan policy seeks to impose a red route with no parking permitted at any time.

Part 3 requests a lay-by incorporated into the proposals. Again, this is considered in the Development Brief within para 6.5.12.

We recommend deletion of the policy as it is unnecessary and adds a layer of complexity in duplicating existing policy.

#### WBE/PD6 Development Impact On Watercourses, Hedgerows And Bat

Policy WBE/PD6 seeks to protect and enhance hedgerows and the policy states:

*“For the benefit of wildlife, Developers should aspire to retaining a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25 m natural buffer around woodlands) and incorporate a dark corridor with no lighting.”*

This policy takes no account into the health, propensity or value of hedgerows or trees. This is an excessive policy which is not in accordance with the NPPF or PPG, neither of which seek to protect hedgerows or trees except in certain circumstances (e.g. those subject to Tree Preservation Order). National Policy only seeks to protect ancient woodland by imposing a 15m buffer. There are no ancient woodlands within Bourne End and Wooburn and yet Policy WBE/HH1 proposes more excessive protection.

We would suggest an alternative wording would require an Arboricultural Assessment with root protection areas shown on plans when considering development that would affect trees or hedgerows. This would accord with the PPG which finds *“The interaction of trees and tree roots with built infrastructure, transport networks, buildings and utility services is complex and requires detailed inter-disciplinary co-operation, with expert arboricultural or forestry advice.”* (Paragraph: 029 Reference ID: 8-029-20190721).

#### Policy WBE/PD8: Designation Of Local Green Spaces And Separation Of Settlements In Wooburn & Bourne End Neighbourhood Area

Firstly, this policy seeks to designate the buffer areas at Hollands Farm and Slate Meadow, once built, as local green spaces. With respect to Hollands Farm, there is a discrepancy between the “Statement of Intent” and the precise policy wording. The area identified in the Statement of Intent is the buffer between the development and Hawks Hill/Harvest Hill, whereas the policy actually includes two areas identified for Local Green Space:

- The area which separates Bourne End from Hawks Hill and also Upper Bourne End
- The area which separates Bourne End from Hedsor Road

Map 7.3 is also included within the NDP. This does not reflect the adopted SPD and is therefore confusing and misleading as it provides conflicting information. We object to the inclusion of this map from the Development Brief as it does not reflect the adopted SPD but more importantly, it is not being applied appropriately.

As set out in para 1.1.1 of the Development Brief for Hollands Farm, it states *“A Development Brief provides a series of principles setting out the Council’s preferred approach to how a site should be*

*developed, adding detail to a Local Plan policy site allocation.” The main purpose is to “establish a broad design approach/concept for the site” . Para 1.2.3 also states*

*“This is supported by an illustrative masterplan to show the distribution of land uses, taking into account the Local Plan policy requirements. This includes the **approximate** location of housing, a primary school site, the principal road through the site, pedestrian access points into and through the site and open space provision.” (my emphasis)*

The plans in the Development Brief are therefore clearly not intended to be used as a means of refusing planning consent, as is being proposed through the NDP. They show broad design concepts.

We do not however, object to the sentiment behind the proposed policy and recommend that rather than reference the Development Brief, the policy refers to the public open space within the approved planning application, once built. We therefore recommend the wording is changed to the following and Map 7.3 is deleted:

*Designation of the open spaces adjacent to Hawks Hill and Hesdsor Raod that will be established as part of the planning consent for the Hollands Farm development are designated Local Green Spaces once constructed.*

Secondly, the policy indicates the designation of 17 areas for designation as Local Green Space. A considerable number of these are small, incidental roadside verges that form part of the adopted highways network. This is ostensibly done for ecology purposes however, we are extremely doubtful of the ecology benefits of these roadside verges given they are isolated from larger areas of habitat and regularly mowed to maintain highways visibility. Putting this aside though, the designation of the verges will severely limit the ability for any transport recommendations to be implemented by the NDP Transport Assessment or pending planning applications at Hollands Farm and Jacksons Field.

At appendix 3, we have included a map showing the adopted highway land around Hollands Farm, Bourne End and below are the proposed local green spaces which are also designated as adopted highway. We consider the zealous designation of these spaces restricts the ability for both the adopted highway land to function and hamstringing the possible improvement of existing junctions.

Draft Local Green Space designations on adopted highway land:

- 1. Green area - Watery Lane north of M40
- 2. Verges - Watery Lane – Boundary Road to Moorside
- 6. Verge – junction of Kiln Lane/Widmoor and Harvest Hill
- 8. Harvest Hill Open Space
- 9. Green area junction of Hawks Hill and Grassy Lane
- 12. Green Triangle between Cores End Rd and the Old Railway Line
- 13. Verge corner Parade, Wharf Lane at Southbourne Drive

In a similar vein, we note at Policy WBE/PD7 - Safeguarding Community Facilities and Public Houses that the Peace Gardens, Penny’s Corner in Bourne End has also been identified as Community facility.



This land falls entirely within adopted highway land and was identified in the Wycombe Local Plan as a junction for possible improvements as part of the Hollands Farm allocation (Policy BE2).

The NDP also suggest that the 17 Local Green Spaces contribute to public open space (as well as ecology) and reference is made to the Wycombe's Open Spaces Framework Assessment (WOSFA) from which the NDP sets out a conclusion of "A strategic and a local open space deficiency". The conclusion in the NDP from this is that:

*"This underlines the importance of protecting the existing Green Infrastructure and for WBEPC to identify opportunities to increase recreational/amenity green spaces wherever it is practical to do so and to act as necessary."*

The Wycombe Open Spaces Framework was published in December 2010 so is of considerable vintage nonetheless, at page 20, the report sets out the open spaces serving Bourne End and Woodburn. The report states:

*"there is a shortfall in all typologies with the exception of allotments and public amenity space. The lack of larger multi-functional open spaces is of particular concern. Shortfall in informal open spaces, such as semi-natural spaces and commons are not of concern since the settlement is surrounded by high-quality countryside."*

The report then sets out a number of possible improvements. It is noted that none of the improvements appear to have been explored through the NDP.

We are concerned that the report does not justify the plethora of highways verges being identified as Local Green Spaces. The shortfall identified in the Wycombe Open Spaces Framework is for large multi-functional open space. The highways verges do not perform this function.

Therefore, Catesby object to those identified Local Green Spaces which are on adopted Highways land.

#### Policy WBE/HH1 Preserving The Character Of Hawks Hill And Harvest Hill Area

Catesby object to this policy as it not justified nor in accordance with national policy. The policy makes no allowance for instances where public benefits outweigh perceived harm. This is initially recognised in the NDP, at para 5.4, the NDP includes an extract from the Planning White Paper:

*"Planning decisions are discretionary rather than rules-based: nearly all decisions to grant consent are to be undertaken on a case-by-case basis, rather than determined by clear rules for what can and cannot be done."*

Despite this, the phasing of some policies in the NDP is draconian in nature with no ability to allow for circumstances where the benefits of allowing developing outweigh the dis-benefits. A clear example of this is Policy WBE/HH1 which seeks to preserve the character of Hawks Hill/Harvest Hill and any development which does not do this is refused.

The premise for the policy is also unclear. The current NDP specifically states as part of the explanatory text to policy WBE/HH1 that:

*“Following the Independent Examiner’s formal inspection of the WDLP, WDLP Policy DM32 was amended to include clause 6.132 to provide greater protection to areas of the District displaying a semi-rural character, with the Hawks Hill /Harvest Hill Area specifically confirmed as such” (my emphasis)*

Catesby consider this sentence justifying Policy WBE/HH1 to be misleading. The “clause” is in fact explanatory text which supports Policy DM32. The wording is therefore not a policy test and does not have the same weight as adopted policy – it is intended for use to interpret Policy DM32. Therefore, the wording cannot have the same weight as adopted policy. This section is not in accordance with the adopted Local Plan.

The policy goes on to state that “any planning application which requires highway improvements or other changes that would damage or destroy features such as but not limited to trees, hedgerows or banks which contribute to the landscape characteristics of the area” will not be permitted. There is considerable ambiguity in this policy, how does one assess whether a particular hedgerow “contributes to the landscape characteristics”?

We therefore question why there is a need for duplication of Local Plan policy in any event? This adds an unnecessary layer of policy.

#### **Other comments**

#### **NDP Transport Assessment**

The Neighbourhood Plan appears to commit to a future transport assessment. The executive summary states this is: “*intend[ed] to promote a comprehensive Transport Assessment to review road safety, parking and traffic flow in the Neighbourhood Area, to identify what mitigations are possible.*”

It is not clear what the purpose of this document is or how it will be used. There have been a number of transport studies undertaken by the Council as part of the Local Plan and also within recent planning applications. As a wider point but it is unclear how any future identified highways improvement could be made when the NDP appears to designate most roadside verges and the entire of Hawks Hill in Policy WBE/HH1 as protected or designated in some fashion. The ability to improve the network appear compromised by other policies in the NDP.

#### **Conclusion**

The work undertaken by the Neighbourhood Plan Team is admirable however there are some fundamental changes required to improve the Neighbourhood Plan to ensure its consistent with existing policy and does not simply add unnecessary layer of duplication and complication.

The Plan should positively promote sustainable development. The Plan should be written in a concise and considered way. This would provide a clear and practical base on which to determine planning applications. The justification for policies should be clear so there is no misunderstanding on their intention.

It is therefore concluded that the Plan fails to meet the basic conditions. It fails to have regard to local policy guidance and national policies and advice, it fails to make a contribution to sustainable development, and it is not in general conformity with the adopted policies.

Finally, we consider that an **oral hearing is required** in this instance.

Yours sincerely



**Dawn Adams**

Senior Planning Manager

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**Table 1: Comments or objections to wording within the Reg 16 (6<sup>th</sup> edition) of Bourne End Neighbourhood Development Plan and alternative wording suggestions.**

Page and Paragraph no.	Existing Wording	Comments – Support/Object	Proposed Wording
Executive Summary	Amongst its many objectives, Wooburn and Bourne End Parish Council intend to promote a comprehensive Transport Assessment to review road safety, parking and traffic flow in the Neighbourhood Area, to identify what mitigations are possible.	<b>Object</b> – What is this seeking to achieve? How will it be used? What is the scope and timeframe?	Clarification required
Para 5.4.2	<i>“... However, as the Government’s White paper entitled “Planning for the future” observes: “Planning decisions are discretionary rather than rules-based: nearly all decisions to grant consent are to be undertaken on a case-by-case basis, rather than determined by clear rules for what can and cannot be done.”</i>	This is an accurate description of the planning system and yet this philosophy does not appear to be carried through the policies within the NDP. A number of policies do not allow for interpretation by the decision maker on a case by case basis.	
5.6.2.	<i>Green Infrastructure such as verges is important for wildlife. These green spaces are part of the landscape and character of the villages and settlements that</i>	<b>Object:</b> We would refute that small roadside verges are important for wildlife. The vast majority are regularly mowed to allow suitable highways visibility. Furthermore, the verges are isolated among the road network which further limits their ecology potential.	Delete proposed Local Space Designations on adopted highways land.

	<i>comprise Wooburn and Bourne End Parish.</i>		
5.6.5	<p>The NPD suggest that the 17 Local Green Spaces contribute to public open space (as well as ecology) and reference is made to the Wycombe’s Open Spaces Framework Assessment (WOSFA) which concluded with the statement that the Parish has “A strategic and a local open space deficiency”.</p> <p>The conclusion in the NDP from this is that: “This underlines the importance of protecting the existing Green Infrastructure and for WBEPC to identify opportunities to increase recreational/amenity green spaces wherever it is practical to do so and to act as necessary.”</p>	<p>The Wycombe Open Spaces Framework was published in December 2010. At page 20, the report sets out the open spaces serving Bourne End and Woodburn. The report states:</p> <p><i>“there is a shortfall in all typologies with the exception of allotments and public amenity space. The lack of larger multi-functional open spaces is of particular concern. Shortfall in informal open spaces, such as semi-natural spaces and commons are not of concern since the settlement is surrounded by high-quality countryside.”</i></p> <p>There appears to be no justification therefore for the plethora of highways verges being identified as Local Green Spaces. The shortfall identified in the Wycombe Open Spaces Framework is for large multi-functional open space.</p>	Delete proposed Local Space Designations on adopted highways land.
5.8.3.3.	<p>The NPPF and WDLP guidance is comprehensive and WBEPC has not identified any local issues that are not addressed by the NPPF or WDLP Policies. Therefore, this NDP does not establish any additional Environmental Policies</p>	This is not correct, policy WBE/PD6 is an environmental policy.	
5.8.4.1		The link does not work	
WBE/PD6 Development	For the benefit of wildlife, Developers should aspire to	<b>Object:</b> This policy takes no account of the health or value of existing hedges or trees. National policy	Development should include an arboricultural report and root



<p>impact on Watercourses, Hedgerows and Bats</p>	<p>retaining a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25 m natural buffer around woodlands) and incorporate a dark corridor with no lighting.</p>	<p>does not seek to provide a 10m buffer to hedgerows and a buffer of 25m is significantly more than the Natural England guidance on buffers to ancient woodland, trees of the highest protection. This policy is completely excessive.</p>	<p>protection areas should be protected through the planning application and construction period.</p>
<p>Policy WBE/PD8: Designation Of Local Green Spaces And Separation Of Settlements In Wooburn &amp; Bourne End Neighbourhood Area</p>	<p>2.4 Designation of the open spaces, which separate Bourne End from Hawks Hill and also Upper Bourne End described as buffer areas in the Development Brief for Hollands Farm. The buffer areas that will be established as part of the planning consent for the Hollands Farm development as envisaged in the Development Brief are designated Local Green Spaces per paragraph 3.1 and table 3.2 below.</p> <p>2.5. Designation of the open spaces, which separate Bourne End from Hedsor Road described as buffer areas in the Development Brief for Hollands Farm. The buffer areas that will be established as part of the planning consent for the Hollands Farm development as envisaged in the Development Brief are</p>	<p><b>Object:</b> Map 7.3 is from an earlier draft Development Brief and does not reflect the adopted Development Brief, it is therefore misleading. Furthermore, this use of the mapping from the Development Brief is not used appropriately.</p> <p>As set out in para 1.1.1 of the Development Brief for Hollands Farm “A Development Brief provides a series of principles setting out the Council’s preferred approach to how a site should be developed, adding detail to a Local Plan policy site allocation.” The main purpose is to “establish a broad design approach/concept for the site”. Para 1.2.3 also states “This is supported by an illustrative masterplan to show the distribution of land uses, taking into account the Local Plan policy requirements. This includes the approximate location of housing, a primary school site, the principal road through the site, pedestrian access points into and through the site and open space provision.”</p> <p>The plans in the Development Brief are therefore clearly not intended to be used as a means of</p>	<p>Delete Map 7.3 and amend wording to:</p> <p><i>Designation of the open spaces adjacent to Hawks Hill and Hedsor Road that will be established as part of the planning consent for the Hollands Farm development are designated Local Green Spaces once constructed.</i></p>


	designated Local Green Spaces per paragraph 3.1 and table 3.2 below.	refusing planning consent, as is being proposed through the NDP.	
POLICY WBE/HF1 - NEW LINK ROAD WIDTH AND BUS SERVICE	<p>To ensure the free flow of traffic along the length of the Link Road the planning application must address all safety issues identified <b>in the transport assessment</b> and Highways Department to ensure:</p> <p>1. That the road width is sufficient along the length of the Link Road and at both ends at Cores End/Princes Road and at the entrance/exit at Hedsor Road so that two buses, HGVs and wide vehicles are able to pass each other on either side of the road in either direction all the way along the link road and at the access points of Princes Road and Hedsor Road.</p>	<p><b>Clarification required:</b> Firstly, the policy requires applications to address safety issues “in the transport assessment” – what transport assessment is being referred to? Is this the transport assessment submitted with the planning application package for Hollands Farm? This needs clarification.</p> <p><b>Object:</b> Part 1 - There is an identified pinch point at Princes Road/Cores End Road where it is not feasible for two buses or two HGVs to pass each other. This is recognised in the Development Brief and a planning application will need to identify a suitable solution. This policy is therefore not implementable.</p>	<p>Delete or clarify reference to the Transport Assessment.</p> <p>Delete Part 1 of the policy.</p>
POLICY WBE/HH1 PRESERVING THE CHARACTER OF HAWKS HILL AND HARVEST HILL AREA	<p>“...necessitate highway improvements or other changes that would damage or destroy features such as but not limited to trees, hedgerows or banks which contribute to the landscape characteristics of the area”</p>	<p><b>Object;</b> This policy is not compliant with NPPF and is does not allow for a balanced judgement to be made on a case by case basis.</p>	<p><i>“...necessitate highway improvements or other changes that would damage or destroy features such as but not limited to trees, hedgerows or banks which contribute to the landscape characteristics of the area <b>unless the benefits of doing so outweigh the harm</b>”</i></p>









**KEY**

 Boundaries - Bucks County

**KEY**

 Publicly Maintained Highway

 Not Maintained by BCC



**HIGHWAY EXTENTS A3 PLAN**

**1:4,000**





## **Wooburn and Bourne End Neighbourhood Plan submission consultation 2022**

**Open date:** 22 September 2022

**Close date:** 3 November 2022

**Name:** Planning Policy Team

**Phone:** 01296 383 698

**Email:** [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)

### **Overview**

**We want to hear the views of local residents and organisations on the Neighbourhood Plan for Wooburn and Bourne End.**

In February 2015, the Parish of Wooburn and Bourne End was designated a Neighbourhood Area by the former Wycombe District Council, now Buckinghamshire Council.

This followed an application by Wooburn and Bourne End Parish Council.

Wooburn and Bourne End Parish Council has completed a period of local community engagement on the Neighbourhood Plan and have submitted the final draft version to us.

The next stage of the process is for us, as the local authority, to carry out a public consultation on the submitted plan.

This is a final opportunity for local people to comment on the modified plan before it goes to independent examination.

The Wooburn and Bourne End Neighbourhood Plans policies relate to:

- Conservation areas and heritage assets
- Residential infill and quality design
- Access and layout of new infrastructure developments
- Parking applications for new developments and existing properties
- Conservation area character assessments

- Development impact on watercourses, hedgerows and bats
- Safeguarding community facilities and public houses
- Designation of local green spaces and separation of settlements in Wooburn and Bourne End Neighbourhood Area
- New link road width and bus service
- Slate Meadow site entrance
- Preserving the character of Hawks Hill and Harvest Hill area

### **Related documents**

The following documents are available on the Wooburn and Bourne End Neighbourhood Plan submission consultation page at

<https://yourvoicebucks.citizenspace.com/>

- Draft Wooburn and Bourne End Neighbourhood Plan
- Wooburn and Bourne End Neighbourhood Plan Basic Conditions Statement
- Wooburn and Bourne End Neighbourhood Plan Consultation Statement
- Wooburn and Bourne End Neighbourhood Plan SEA screening report

### **How to submit a comment**

You can submit a comment in one of the following ways:

- Complete the online survey at <https://yourvoicebucks.citizenspace.com>
- Complete, and return, the printed version of the survey below
- Email us at [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)
- Write to us at **Wooburn and Bourne End Neighbourhood Plan**, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.

If you have any questions about this consultation, please email us at [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk) or phone us on 01296 383 698.

If you would like to be notified of future progress with the Neighbourhood Plan, please indicate this in your response.

**Please make sure we receive your comments before midnight on 3 November 2022.** We cannot consider any comments received after that deadline.

## What happens next

Following consultation, we will collate the responses and submit them to an independent examiner.

The examiner will consider public comments and ensure the Plan meets conditions laid out in the Localism Act and other relevant regulations.

If the plan passes independent examination, the next stage is a local referendum to see whether the Plan has community support.

If it is supported, we will adopt it as part of local planning policy to assess planning applications in the Neighbourhood Area to which the plan relates.

## Privacy

We will use the information you provide here only for this activity. We will store the information securely in line with data protection laws and will not share or publish any personal details. For more information about data and privacy, please see our [Privacy Policy](#).

If you have questions about data and privacy, please email us on [dataprotection@buckinghamshire.gov.uk](mailto:dataprotection@buckinghamshire.gov.uk). Or write to our Data Protection Officer at Buckinghamshire Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF.

## Consultation survey

\*Indicates a Mandatory question

### Your interest in this consultation

#### 1. What is your interest in this consultation? \*

Please tick (✓) one option

- Resident (**Go to question 4**)
- Organisation (**Go to question 2**)
- Agent (**Go to question 3**)

2. What is the name of your organisation? (Go to question 4)

CATESBY ESTATES

3. Which organisation do you represent in this consultation?

### Contact details

We need to ask for your name and address because planning law states that we cannot accept anonymous comments.

The information you provide here will only be used for the purpose of this consultation and will be stored securely in line with data protection laws. No personal information will be shared or published.

4. Full name\*

DAWN ADAM

5. Address\*

If you are a resident, this is your home address. If you are an agent or organisation this is your business address.

CATESBY ESTATES  
ORCHARD HOUSE  
PAPPLE CLOSE, HOULTON  
RUGBY  
CV23 1EW

6. Would you like to be notified of future progress with the Neighbourhood Plan?

Please tick (✓) one option

Yes

No

**7. What is your email address?**

If you provide your email address and have asked to be notified of progress with the Neighbourhood Plan, we will contact you by email.

dawn a @catesbyestates.co.uk

**Your views**

**8. Please indicate whether you support or object to the submitted Neighbourhood Plan:**

Please tick (✓) one option

- I support the submitted Plan but do not wish to make any comments or suggest changes **(End of survey)**
- I support the Neighbourhood Plan and would like to provide comments or suggest changes **(Go to question 9)**
- I object to the Neighbourhood Plan and will provide comments and evidence to explain my reasons **(Go to question 9)**

**Your comments**

Any comments you make in this section will be made available to the public on our website, as required by law. It is very important you don't include any personal details in your comments.

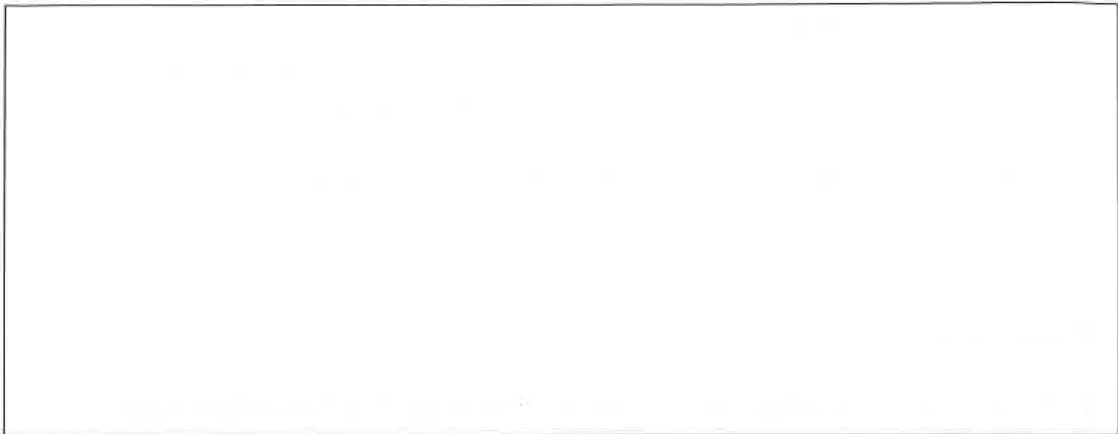
**9. Please provide your comments, suggested changes or reasons for objecting:**

If you comment on specific sections of the Neighbourhood Plan, please make it clear which sections these are.

If you have evidence to support your comments, please send it to us by email or post.

SEE ENCLOSED LETTER.





## **End of the survey**

**Thank you for taking the time to complete this survey.**

Please return your completed survey by midnight on **Thursday 3 November 2022**. You can:

- Email it to [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)
- Post it to Wooburn and Bourne End Neighbourhood Plan, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.
- Take it to one of our three main council access points located at:
  - Walton Street Offices, Aylesbury, HP20 1UA
  - Queen Victoria Road, High Wycombe, HP11 1BB
  - King George V House, King George V Road, Amersham, HP6 5AW

## Rachael Riach

---

**From:** Karen Barnes <karen.barnes@turley.co.uk>  
**Sent:** 03 November 2022 09:58  
**To:** Neighbourhood Planning Mailbox  
**Cc:** Ian Deverell; Sarah Milward; Tom Armfield  
**Subject:** [EXTERNAL] Wooburn and Bourne End Neighbourhood Plan submission consultation - IM Land submission  
**Attachments:** Wooburn and Bourne End Neighbourhood Plan consultation 2022 - Printed survey.pdf; IMLQ3013 - Wooburn Neighbourhood Plan reps - IM Land.pdf

You don't often get email from karen.barnes@turley.co.uk. [Learn why this is important](#)

[Please note this has been sent from an **external source** - treat with caution and **do not open attachments / use links until you are sure this is a trusted communication see intranet/IT for advice.**]

Oure ref: IMLQ3013

Dear Sir/Madam,

### Wooburn and Bourne End Neighbourhood Plan submission consultation - IM Land submission

Please find attached a completed survey form and separate response to question 9 on behalf of IM Land.

Please confirm safe receipt of this submission.

Kind regards,

**Karen Barnes**  
Senior Planner

## Turley

Mobile: +44 7976 704921  
Office: 0118 902 2830

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03 November 2022

**Delivered by email**

Wooburn and Bourne End Neighbourhood Plan Consultation  
Planning Policy Team  
Buckinghamshire Council  
Queen Victoria Road  
High Wycombe  
HP11 1BB

Ref: IMLQ3013

Dear Sir / Madam

**NEIGHBOURHOOD PLAN REPRESENTATIONS – REGULATION 16 CONSULTATION  
LAND OFF HOLTSPUR AVENUE, WOOBURN GREEN**

These representations have been prepared on behalf of our Client, IM Land, in respect of the Neighbourhood Plan for Wooburn Green and Bourne End Submission Consultation 2022 (22<sup>nd</sup> September to 3<sup>rd</sup> November 2022).

IM Land is promoting land off Holtspur Avenue, Wooburn Green through the emerging Buckinghamshire Local Plan for residential development.

**Comments on the draft Neighbourhood Plan**

*Executive Summary*

It is welcomed that the Executive Summary identifies that housing development has already been directed by the adopted Wycombe Local Plan and therefore the draft Neighbourhood Plan only seeks to address new development on infill and back land development, as well as other permitted development routes. This also reflects that Buckinghamshire as the Unitary Authority are preparing a single Local Plan which will replace the current adopted Local Plans across the County with a new Local Plan for Buckinghamshire (LP4B).

The new LP4B has identified a commitment to 'Brown before Green' and accordingly has already held two rounds of brownfield call for sites consultation. An assessment of the sites submitted has identified an insufficient supply of suitable, available and achievable brownfield sites to meet the County's housing requirements with insufficient cap. Accordingly, Buckinghamshire Council sought the submission of greenfield sites in September 2022 as part of a 'Wider Call for Sites' Consultation, acknowledging the need for the allocation of greenfield sites and release of Green Belt land to meet the needs of the emerging new LP4B.

The Parish's proactive commitment to reviewing the NDP within a period of two years from the adoption of the Buckinghamshire Council new Local Plan is therefore welcomed and will ensure that the Neighbourhood Plan remains up to date and in general conformity with the emerging new LP4B.

9 Colmore Row  
Birmingham  
B3 2BJ

T 0121 233 0902 [turley.co.uk](http://turley.co.uk)

It is supported that the Neighbourhood Plan intends to promote a comprehensive Transport Assessment being undertaken to review road safety, parking and traffic flow. We presume that this will be separate to the draft Neighbourhood Plan and subject to community and stakeholder engagement, to which we reserve the right to submit relevant comments at the time.

### *Challenges facing Wooburn and Bourne End Parish – the Neighbourhood Area*

We acknowledge the challenges identified in Section 2. There is an opportunity to resolve these changes, including the delivery of genuine affordable housing, sustaining shops and facilities, and delivering much needed new infrastructure by supporting future greater housing growth in the Neighbourhood Plan. New housing development will deliver a growth in the population who can spend their money in local shops, and ultimately brings in new investment.

The importance of this is set out in the National Planning Policy Framework (2021) (NPPF) at paragraph 79, which states *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”* In this regard it is a basic condition that neighbourhood plans contribute to sustainable development (condition d<sup>1</sup>). NPPF Paragraph 86 f) also states planning policies and decisions should *“recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.”*

### *Vision for Wooburn and Bourne End Parish*

We support the positive statement in the vision that new development in the area has resulted in an improvement in local infrastructure. As referred to above, future development can continue to do this, in response to the specific challenges identified in Section 2 of the Plan.

### *Neighbourhood Development Plan Policies*

We support Policy WBE/PD2 ‘Residential Infill and Quality Design’ that new development must demonstrate high quality design, noting specific reference to density, building materials and height. Whilst the policy refers to residential infill development, the aspects of high quality design remain relevant for any new development in the Neighbourhood Plan area. Any future development on IM Land’s site off Holtspur Avenue would be of the highest quality.

We have no objection to policy WBE/PD4 ‘Parking standards for all planning applications for new developments and existing properties’ ensuring parking standards for developments are in accordance with that set out by Buckinghamshire Council, satisfying basic condition e.<sup>2</sup>) requires neighbourhood plans to be in general conformity with the strategic policies contained in the development plan.

We trust this representation will be duly registered and reviewed by the Council. If you have any queries in relation to the details submitted, or require any additional information, please do not hesitate to contact me.

---

<sup>1</sup> PPG Paragraph: 072 Reference ID: 41-072-20190509

<sup>2</sup> PPG Paragraph: 074 Reference ID: 41-074-20140306



Yours sincerely

Karen Barnes  
**Senior Planner**

[karen.barnes@turley.co.uk](mailto:karen.barnes@turley.co.uk)



## **Wooburn and Bourne End Neighbourhood Plan submission consultation 2022**

**Open date:** 22 September 2022

**Close date:** 3 November 2022

**Name:** Planning Policy Team

**Phone:** 01296 383 698

**Email:** [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)

### **Overview**

**We want to hear the views of local residents and organisations on the Neighbourhood Plan for Wooburn and Bourne End.**

In February 2015, the Parish of Wooburn and Bourne End was designated a Neighbourhood Area by the former Wycombe District Council, now Buckinghamshire Council.

This followed an application by Wooburn and Bourne End Parish Council.

Wooburn and Bourne End Parish Council has completed a period of local community engagement on the Neighbourhood Plan and have submitted the final draft version to us.

The next stage of the process is for us, as the local authority, to carry out a public consultation on the submitted plan.

This is a final opportunity for local people to comment on the modified plan before it goes to independent examination.

The Wooburn and Bourne End Neighbourhood Plans policies relate to:

- Conservation areas and heritage assets
- Residential infill and quality design
- Access and layout of new infrastructure developments
- Parking applications for new developments and existing properties
- Conservation area character assessments

- Development impact on watercourses, hedgerows and bats
- Safeguarding community facilities and public houses
- Designation of local green spaces and separation of settlements in Wooburn and Bourne End Neighbourhood Area
- New link road width and bus service
- Slate Meadow site entrance
- Preserving the character of Hawks Hill and Harvest Hill area

## Related documents

The following documents are available on the Wooburn and Bourne End Neighbourhood Plan submission consultation page at

<https://yourvoicebucks.citizenspace.com/>

- Draft Wooburn and Bourne End Neighbourhood Plan
- Wooburn and Bourne End Neighbourhood Plan Basic Conditions Statement
- Wooburn and Bourne End Neighbourhood Plan Consultation Statement
- Wooburn and Bourne End Neighbourhood Plan SEA screening report

## How to submit a comment

You can submit a comment in one of the following ways:

- Complete the online survey at <https://yourvoicebucks.citizenspace.com>
- Complete, and return, the printed version of the survey below
- Email us at [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)
- Write to us at **Wooburn and Bourne End Neighbourhood Plan**, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.

If you have any questions about this consultation, please email us at [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk) or phone us on 01296 383 698.

If you would like to be notified of future progress with the Neighbourhood Plan, please indicate this in your response.

**Please make sure we receive your comments before midnight on 3 November 2022.** We cannot consider any comments received after that deadline.

## What happens next

Following consultation, we will collate the responses and submit them to an independent examiner.

The examiner will consider public comments and ensure the Plan meets conditions laid out in the Localism Act and other relevant regulations.

If the plan passes independent examination, the next stage is a local referendum to see whether the Plan has community support.

If it is supported, we will adopt it as part of local planning policy to assess planning applications in the Neighbourhood Area to which the plan relates.

## Privacy

We will use the information you provide here only for this activity. We will store the information securely in line with data protection laws and will not share or publish any personal details. For more information about data and privacy, please see our [Privacy Policy](#).

If you have questions about data and privacy, please email us on [dataprotection@buckinghamshire.gov.uk](mailto:dataprotection@buckinghamshire.gov.uk). Or write to our Data Protection Officer at Buckinghamshire Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF.

## Consultation survey

\*Indicates a Mandatory question

### Your interest in this consultation

#### 1. What is your interest in this consultation? \*

Please tick (✓) one option

- Resident (**Go to question 4**)
- Organisation (**Go to question 2**)
- Agent (**Go to question 3**)

**2. What is the name of your organisation? (Go to question 4)**

**3. Which organisation do you represent in this consultation?**

**Contact details**

We need to ask for your name and address because planning law states that we cannot accept anonymous comments.

The information you provide here will only be used for the purpose of this consultation and will be stored securely in line with data protection laws. No personal information will be shared or published.

**4. Full name\***

**5. Address\***

If you are a resident, this is your home address. If you are an agent or organisation this is your business address.

**6. Would you like to be notified of future progress with the Neighbourhood Plan?**

Please tick (✓) one option

- Yes
- No



## 7. What is your email address?

If you provide your email address and have asked to be notified of progress with the Neighbourhood Plan, we will contact you by email.

Karen.barnes@turley.co.uk

## Your views

### 8. Please indicate whether you support or object to the submitted Neighbourhood Plan:

Please tick (✓) one option

- I support the submitted Plan but do not wish to make any comments or suggest changes **(End of survey)**
- I support the Neighbourhood Plan and would like to provide comments or suggest changes **(Go to question 9)**
- I object to the Neighbourhood Plan and will provide comments and evidence to explain my reasons **(Go to question 9)**

## Your comments

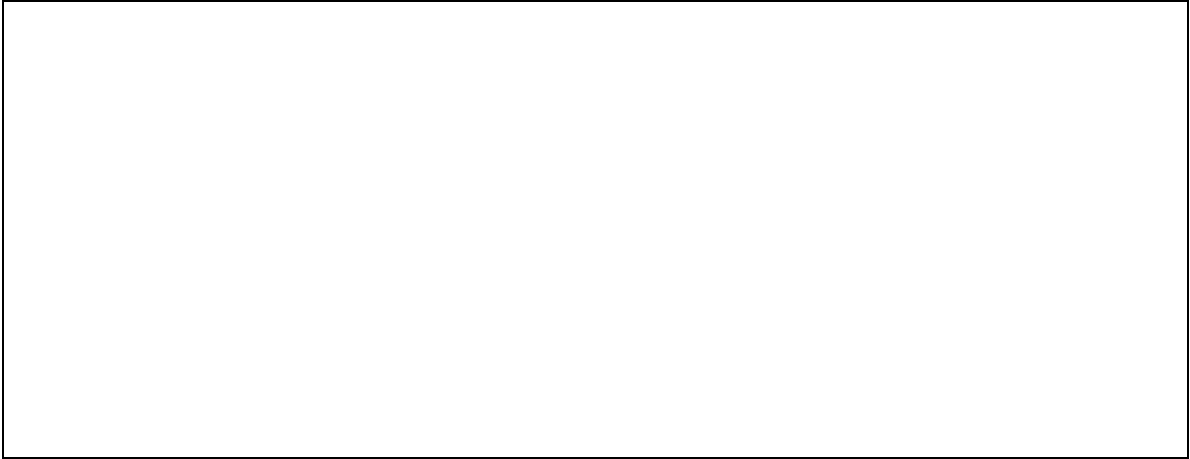
Any comments you make in this section will be made available to the public on our website, as required by law. It is very important you don't include any personal details in your comments.

### 9. Please provide your comments, suggested changes or reasons for objecting:

If you comment on specific sections of the Neighbourhood Plan, please make it clear which sections these are.

If you have evidence to support your comments, please send it to us by email or post.

Please refer to the accompanying letter dated 3rd November 2022



## **End of the survey**

**Thank you for taking the time to complete this survey.**

Please return your completed survey by midnight on **Thursday 3 November 2022**. You can:

- Email it to [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)
- Post it to Wooburn and Bourne End Neighbourhood Plan, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.
- Take it to one of our three main council access points located at:
  - Walton Street Offices, Aylesbury, HP20 1UA
  - Queen Victoria Road, High Wycombe, HP11 1BB
  - King George V House, King George V Road, Amersham, HP6 5AW



David Wilson  
E: david.wilson@thamewater.co.uk  
M: +44 (0) 7747 647031

Buckinghamshire Council

Issued via email:  
neighbourhoodplanning@buckinghamshire.  
gov.uk

1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB

03 October 2022

## Buckinghamshire – Wooburn and Bourne End Neighbourhood Plan – Regulation 16 Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the majority of Buckinghamshire and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

### **General Water and Wastewater Infrastructure Comments**

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*”

Paragraph 26 of the revised NPPF goes on to state: “*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production*

*of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

## **Water Efficiency/Sustainable Design**

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:  
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

### **Comments in Relation to Flood Risk and Sustainable Drainage Systems**

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

### **Site Allocations**

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,



David Wilson  
Thames Water Property Town Planner



Date: 02 November 2022  
Our ref: 408268



Buckinghamshire Council  
[Neighbourhoodplanning@buckinghamshire.gov.uk](mailto:Neighbourhoodplanning@buckinghamshire.gov.uk)

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Sir/Madam,

### **Wooburn and Bourne End Neighbourhood Plan – Regulation 16 Consultation**

Thank you for your consultation on the above dated 27 September 2022 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

### **Burnham Beeches Special Area of Conservation**

The Neighbourhood Plan does not make reference to Burnham Beeches SAC. Since the adoption of the Wycombe District Local Plan (2019), new evidence has come to light as part of the evidence base for the emerging Chiltern and South Bucks Local Plan, of the impact of recreation disturbance on Burnham Beeches SAC. Natural England recognises that new housing within 5.6km of the internationally designated Burnham Beeches Special Area of Conservation (SAC) can be expected to result in an increase in recreation pressure. This evidence base can be found [here](#).

Natural England were happy with the route that Wycombe District took in their Appropriate Assessment for their Local Plan, with regard to the provision of open space as mitigation for the increased recreation associated with new houses in the Wooburn and Bourne End parishes. However, as these mitigation measures are being used as 'SAC mitigation', a Habitats Regulations Assessment and Appropriate Assessment will need to be conducted – due to the People over Wind 2018 Judgement.

Due to the material change in circumstances from the new recreation evidence, we would advise the Neighbourhood Plan to include a Burnham Beeches SAC specific policy, to outline the specific measures that will be needed to be undertaken as mitigation. This could be to the Country Park and to the areas of on-site open space within the developments.

### **Chilterns Area of Outstanding Natural Beauty (AONB) Proposed Extension**

The plan area is within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, paragraph 174 of the

National Planning Policy Framework (NPPF) states that planning policies and decisions should protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside. Natural England advises that this area should be considered as a valued landscape with appropriate Local Plan policies to protect and enhance its intrinsic character and natural beauty. Furthermore, Paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation Order by Natural England but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight in plan-making and as a material consideration in planning decisions.

For more information about the boundary review process, please read these [Frequently Asked Questions](#).

### Further Recommendations

We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and paragraphs 174(d), 179 and 180 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure “all relevant development results in a biodiversity net gain for the parish”.

In addition we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me at [ellen.satchwell@naturalengland.org.uk](mailto:ellen.satchwell@naturalengland.org.uk). For all other consultations, please contact [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully,

Ellen Satchwell  
Sustainable Development Lead Adviser  
Thames Solent Team

# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural environment information sources

The [Magic](#)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)<sup>5</sup> website and also from the [LandIS website](#)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.

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<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>

- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>



Historic England

By email only to:

Our ref:  
Your ref:  
Main: 020 7973 3700  
[e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)

Date: 24/10/2022

Dear Sir or Madam

**RE: Wooburn & Bourne End Neighbourhood Plan, Regulation 16**

Thank you for inviting Historic England to comment on the above neighbourhood plan. On the basis of the information currently available, we do not wish to offer any detailed comments at this stage.

We would refer you to our general advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer.

We may wish to make specific comments on proposals later in the planning process.

Yours faithfully,

**Isaac Smith**

**Business Officer**



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.







Planning Policy Team  
Buckinghamshire Council  
Wycombe Old Library  
Queen Victoria Road  
High Wycombe  
HP11 1BG  
[neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)

3<sup>rd</sup> November 2022

Dear Sir / Madam

**NEIGHBOURHOOD PLAN FOR WOUBURN AND BOURNE END – REPRESENTATIONS TO THE DRAFT PLAN PUBLIC CONSULTATION**

We write to provide representations on the draft Neighbourhood Plan (NHP) for Wooburn and Bourne End, on behalf of the owner of land known as Jackson’s Field, Bourne End. This land is allocated for housing and forms the northern part of Policy BE2 ‘Hollands Farm’ in the adopted Wycombe District Local Plan (2019). This allocation is also subject to a detailed site-specific Development Brief, adopted and published by Buckinghamshire Council in September 2021.

An outline planning application for new homes on the Jackson’s Field site is under preparation and pre-application discussions are ongoing with the Council’s planning team. An outline application for new homes and a new primary school has been submitted on the southern part of the BE2 allocation by Catesby Estates, and we are working closely with Catesby Estates to ensure a comprehensive and consistent approach across the two sites.

We have been monitoring the progress of the draft NHP and have submitted representations to previous public consultations, most recently in January this year.

These comments are submitted within the context set by the Government’s Planning Practice Guidance (PPG) and the National Planning Policy Framework (NPPF), which sets out the Government’s planning policies for England and how these are expected to be applied.

In reviewing the draft NHP, particular regard has been paid to the PPG advice in Paragraphs: 036 Reference ID: 41-036-20190509 and 041 Reference ID: 41-041-20140306. In summary, this requires NHPs to be in general conformity with the development plan and to plan positively to support the strategic policies of the plan, as well as requiring the policies in a NHP to be clear and unambiguous so that the decision maker can apply it consistently and with confidence when determining planning applications.

We set out below our comments on various specific aspects of this NHP in view of this guidance and how the NHP needs to be modified to ensure it is sound.

**NHP Executive Summary**

This states the following –

*“The Neighbourhood Area road infrastructure is fixed and its constraints make major improvements difficult and unlikely. Amongst its many objectives, Wooburn and Bourne End Parish Council intend to promote a comprehensive Transport Assessment to review road safety, parking and traffic flow in the Neighbourhood Area, to identify what mitigations are possible.*

*Therefore, the primary purpose of this NDP is to address the impacts of continued development and local infrastructure constraints and to make progress towards our Vision.”*

It is unclear what is meant by the road infrastructure being “fixed” and why the local Parish Council is intending to prepare a Transport Assessment for the NHP area, particularly given this consultation document is Draft 6 of the NHP, which has now been submitted to Bucks Council for examination. If such work is required, then it should have been prepared as part of the evidence base of the NHP prior to the strategy of the NHP being set. Irrespective of this, the transport implications of the strategic policies and spatial strategy of the Local Plan has already been undertaken as part of the evidence base of the Local Plan and there is no sound reason for undertaking further transport work at this stage, which will be required in any event as part of any future planning applications.

Dealing specifically with the BE2 allocation site, this will be accompanied by detailed transport assessment work, which considers existing and proposed transport infrastructure, include a new Link Road, improved public transport and improved walking and cycling facilities in accordance with adopted policy.

We question the primary purpose of the NHP being to address the impact of development proposals. Development proposals at the BE2 allocation site, the largest development site within the NHP area, will be accompanied by a full set of technical assessments which will consider impact from the development and appropriate mitigation measures, including Section 106 contributions to improve local infrastructure, services, and facilities, where appropriate. In addition, the impacts associated with the BE2 housing allocation were addressed as part of the Local Plan process when the site was allocated for housing-led development in 2019. It is not for the local level NHP to “address the impacts” associated with housing allocations in the higher level strategic Local Plan.

### **WBE/PD6 Development Impact on Watercourses, Hedgerows and Bats**

Policy and guidance related to these matters are set by Bucks Council and relevant statutory authority, such as the Environment Agency and Natural England. These are strategic policy matters that require a consistency approach across the UK and are not for local level NHPs to determine. There is no apparent technical evidence base assessment work to support the proposed draft policy requirements. We strongly object to the suggested requirement to retain a 5-10m buffer around retained and new hedgerows, and a buffer of 25-100m adjacent to woodlands. This is overly onerous and not in accordance with national policy and guidance, which only sets such buffers for development adjacent to ancient woodlands (at 15m compared to the 25-100m proposed in the draft NHP).

In addition, the policy suggests “for the benefit of wildlife” that no lighting should be provided in these “dark corridors”. We are concerned about how this would work in practice and the implications for public safety and secure design. We suggest that Policy WBE/PD6 be deleted and relevant national guidance be relied upon as good practice for protecting wildlife and watercourse.

## **POLICY WBE/PD8: Designation of Local Green Spaces and Separation of Settlements in Wooburn & Bourne End Neighbourhood Area**

Policy WBE/PD8 refers to Strategic Green Spaces at paragraph 2 and Local Green Spaces at paragraph 3. It goes on to then present maps showing various green spaces. At paragraph 2 it states that these spaces are considered to be “strategic infrastructure” and that no development will be allowed in these areas. Paragraphs 2.4 and 2.5 refer to open spaces within the BE2 allocation site (known as Hollands Farm). These are referred to as “buffer areas” between the new development and Hawks Hill / Hedsor Road. The policy seeks at Paragraphs 2.4 and 2.5 to have these areas identified as Local Green Spaces. The policy then goes on to refer to these spaces again under Paragraph 3, which cross refers to various maps. This is unclear as drafted and it appears the green spaces within the BE2 allocation are being identified as both strategic and local green spaces. We suggest some editing is needed to ensure the policy is clear.

As noted above, the BE2 allocation is subject to both a site-specific Local Plan policy and a detailed Development Brief prepared by Buckinghamshire Council. These provide guidance for development and the location of green space within the allocation site will be controlled by the relevant outline planning consents. We have no issues with the principle of new open spaces being protected from future development once the masterplans for the BE2 allocation have been considered and agreed with Buckinghamshire Council, as the local planning authority, and the relevant outline planning consents are in place. As noted above, these are under discussion with the Council at present and a full pack of technical assessment work will be provided to the Council so it can consider important matters, such as the location of open spaces and appropriate landscape buffers. However, we do have an issue with the ‘Statement of Intent’ at page 26-27 of the draft NHP and the inclusion of the Development Brief plan at Map 7.3 (page 29) of the draft NHP. This map is included in the Development Brief at Figure 6.2 ‘Landscape Framework’. It is critical if the NHP is to reproduce illustrations from the Council’s Development Brief that it is consistent with the approach taken in the Development Brief. The Development Brief seeks to guide development proposals (see extracts below) ahead of planning applications being submitted; the NHP appears to be seeking to restrict development without any evidence base assessment work to support it.

The Development Brief provides three illustrations to guide development proposals on the BE2 allocation site – a Development Framework (Figure 6.1), a Landscape Framework (Figure 6.2) and a plan showing height and density (Figure 6.3). The context is critical here. The Development Brief states at para 6.1.2:

*“Figures 6.1, 6.2 and 6.3 illustrate how these responses **could** be expressed through a series of frameworks for the allocation.”*

At para 1.1.3, the Development Brief states its main purpose is to “...establish a **broad design approach/concept** for the site...”

At para 1.2.3, the Development Brief states:

*“This is supported by an illustrative masterplan to show the distribution of land uses, taking into account the Local Plan policy requirements. This includes the **approximate** location of housing, a primary school site, the principal road through the site, pedestrian access points into and through the site and open space provision.”*

Specifically, in relation to the edge treatment with Hawks Hill, which is of relevant to our client’s land, the Development Brief states at 6.3.2:

*“...Placing lower-density housing with restrained building height and generous plots on rising ground towards Hawks Hill, with a substantial and heavily-planted landscape buffer separating the two”*

We have no issue with the provision of an appropriate landscape buffer, and this will be discussed with the Council as part of the planning application process. However, the Council’s Development Brief does not state that proposals at the BE2 allocation site must be in accordance with Landscape Framework at Figure 6.2 and, therefore, it is not appropriate for the NHP to seek to restrict development in the way currently suggested in this draft policy. We strongly object to the wording as drafted and consider this to be in conflict with policy and guidance adopted by Buckinghamshire Council.

**POLICY WBE/HF1 - New Link Road Width and Bus Service**

The highways team at Buckinghamshire Council, as the highways authority, are best placed to consider and decide on technical matters such as the design of and impact from the proposed new Link Road. This will be discussed and agreed as part of the planning application process. These planning applications will be supported by a robust pack of technical evidence so that the highways authority has the technical evidence it needs to make informed decisions on what are complex technical matters. We suggest that Policy WBE/HF1 be deleted from the draft NHP.

In summary, we consider the NHP to be unsound as presently drafted and that it requires modifications in response to the above matters. We therefore wish to reserve our right to make these representations orally at the forthcoming examination of the NHP.

Your sincerely,

Aoife Conacur  
Head of Planning - Capreon

aconacur@capreon.com  
30 Market Place, London W1W 8AP

What is your interest in this consultation? - Interest	What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Resident	Mrs C Ellis	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Michael Seaton	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Shirley Seaton	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Joanne Seaton	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Ms Juliet M Durdle	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Virginia Summerlin	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Lisa Moss	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Stephen Habgood	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Julian Denee	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Liam Spencer	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Andrew Beebee	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Anne Biggs	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	John Walton	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Carolyn Pole	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Sejal Wasani	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Andrea Darley	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Robert Farrington	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Cecilia Coleshaw	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	john kelly	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	John Summerlin	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	John Andrew Taylor	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Andriy Kisel	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Sally Jones	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Mark Ellis	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	James Leonard Russell	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Jennifer Margaret Russell	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Frances Kelly	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Chris Havelock	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Havelock Peter	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Stephen Baguley	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Catherine Pouncett	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Debbie Heyes	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Bob Blagden	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Peter Williams	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	John Mornement	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Jane Gatfield	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Organisation	John Kelly. Chairman	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	See full response below
Resident	Stuart Paul Wilson	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Paul Caplin	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Martina Keyte	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Matt Ived	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Alison Barnett	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	See full response below
Resident	Timothy Bingham	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	John W Fellows	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Paul & Heather Clements	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered

Organisation	Mark Andrew Skoyles	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	See full response below
Organisation	Philip Pitcher	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	See full response below
Resident	Miriam Blazey	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Ian Gavin Blazey	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Angela June Fowke	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Derek Smith	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Sue Wagner	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Resident	Emily Charlotte Louise Fowke	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered



## Response ID ANON-4FUW-W1Y4-U

Submitted to Wooburn and Bourne End Neighbourhood Plan submission consultation  
Submitted on 2022-10-24 17:05:56

### About you

What is your interest in this consultation?

Organisation

### Organisations

What is the name of your organisation?

Organisation:  
Hawks Hill Widmoor Residents Group CIC

### Contact details

What is your full name?

Name:  
John Kelly, Chairman

What is your address?

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

Would you like to be notified of future progress with the Neighbourhood Plan?

Yes

What is your email address?

Email:  
[REDACTED]

### Your views

Please indicate whether you support or object to the submitted Neighbourhood Plan.

I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes

### Your comments

Please provide your comments, suggested changes or reasons for objecting.

Comments:

The Hawks Hill Widmoor Residents Group CIC (the CIC) by signed mandate represents approximately 200 households which fall within the area covered by the new Policy HH1 as detailed in the Wooburn and Bourne End Parish Council Neighbourhood Development Plan document (the NDP). The CIC agrees with the amendments to Policy HH1 proposed by the Wooburn and Bourne End Parish Council regarding the Harvest Hill Open Space (A8) in the proposed green space section of the document. Namely, the map on page 34 to be amended to show the existing boundary at Westbury and the textual changes in the "Planning permission" section on page 59. Regarding the proposed green space at the junction of Kiln Lane/Widmoor and Harvest Hill (A6), the CIC also agrees with the proposed textual changes in the "Site details" section on page 58 and the additional wording to the text in the "Description, purpose and quality" section on page 51. The CIC thanks the Parish Council for the efforts that it has made via the Community led plans and consultations to ascertain the views of the parishioners and of the individual community areas within the Parish and the CIC has no hesitation in confirming its support for this document and

resultant undertakings and policies contained therein. In particular, we commend Policy HH1 which was formally recognised by the Inspector of the Wycombe Local Plan as being a policy that should be included within the appropriate NDP and instructed that the Wycombe Local Plan Policy DM32 be formally amended to provide the introduction for the said NDP policy. By the inclusion of Policy HH1 this NDP truly recognises the need for local issues and concerns to be reflected in its policies.

## Response ID ANON-4FUW-W1YG-E

Submitted to Wooburn and Bourne End Neighbourhood Plan submission consultation  
Submitted on 2022-10-26 07:34:11

### About you

What is your interest in this consultation?

Resident

### Contact details

What is your full name?

Name:  
Alison Barnett

What is your address?

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Would you like to be notified of future progress with the Neighbourhood Plan?

Yes

What is your email address?

Email:  
[REDACTED]

### Your views

Please indicate whether you support or object to the submitted Neighbourhood Plan.

I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes

### Your comments

Please provide your comments, suggested changes or reasons for objecting.

Comments:

It is important to preserve identity of Bourne end and provision for its residents and history.

The railway track, slate meadow etc needs to be kept as Greenland for the wildlife, natural boundaries and generations to come

Bourne end is becoming over developed and losing its identity. The number of "locals" is reducing each year and with that rich history of the village. This needs addressing and consideration to keep areas as is and to consider old traditions.

## Response ID ANON-4FUW-W19B-9

Submitted to Wooburn and Bourne End Neighbourhood Plan submission consultation  
Submitted on 2022-10-30 16:49:27

### About you

What is your interest in this consultation?

Organisation

### Organisations

What is the name of your organisation?

Organisation:  
Marlow Living Streets

### Contact details

What is your full name?

Name:  
Mark Andrew Skoyles

What is your address?

Address line 1:  
2nd floor, 42 High Street

Address line 2:

Village, town or city:  
MARLOW

Full postcode:  
SL7 1AW

Would you like to be notified of future progress with the Neighbourhood Plan?

Yes

What is your email address?

Email:  
marlowgroup@livingstreets.org.uk

### Your views

Please indicate whether you support or object to the submitted Neighbourhood Plan.

I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons

### Your comments

Please provide your comments, suggested changes or reasons for objecting.

Comments:

Further to my email sent last week which alluded to fact that this plan will, in all likelihood, add to parking and congestion problems in the long term. Marlow Living streets would have liked to have seen the following added to plan solutions which encourage developers to build more sustainable solutions:

- \*Roads/junctions which comply to DoT LTN1/20.
- \* Allocations for Car share club parking spaces.
- \* Allocation for bicycle parking at dwellings
- \* Allocation of space for community bike or scooter share schemes
- \* Allocation of space for improved walk ways and cycle paths that provide DIRECT links to school/doctors/shops etc.

Best Regards

Mark Skoyles

Chair

Marlow Living Streets



## Response ID ANON-4FUW-W19S-T

Submitted to Wooburn and Bourne End Neighbourhood Plan submission consultation  
Submitted on 2022-11-01 11:43:22

### About you

What is your interest in this consultation?

Organisation

### Organisations

What is the name of your organisation?

Organisation:  
Manor Farm (Wooburn Green)

### Contact details

What is your full name?

Name:  
Philip Pitcher

What is your address?

Address line 1:  
Manor Farm

Address line 2:  
Town Lane

Village, town or city:  
Wooburn Green

Full postcode:  
HP10 0DQ

Would you like to be notified of future progress with the Neighbourhood Plan?

Yes

What is your email address?

Email:  
pitcherpropertyuk@gmail.com

### Your views

Please indicate whether you support or object to the submitted Neighbourhood Plan.

I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes

### Your comments

Please provide your comments, suggested changes or reasons for objecting.

Comments:

I didn't feel it appropriate to chose the third option available, eg: "that we do not support the NDP", as that is not the case for the majority of the document. However, there are some areas we do not agree with, and thus we did want to raise some points for those considering this at the Buckinghamshire level.

For reference, we have been in contact with the NDP Working Party, through Wooburn Parish Council, about some points relating to our assets, landownership and farming/business operations. Whilst we have found them to be very amenable and open to discussion, we are unlikely to resolve the matters before the 03 Nov, and with my annual leave in early November, I wanted to raise them on here as well - in case needed for future reference.

The general points are:

1. Although the map extracts are not complete in the NDP doc - Mill Wood is labelled as an Ancient Woodland. Its designation is 'Ancient and Semi Natural' Woodland, and this designation does not apply to the entire area of Mill Wood (over 1/4 of it is not designated - as it was a more recent plantation).

2. We have concerns about the references to the land under (POLICY WBE/PD8). We were not consulted on the NDP Working Party's intentions here. This covers the area from Wooburn to Berghers Hill, and under Mill Wood. Unless I have interpreted the document incorrectly, this is described as needing further restriction from development / change (to what already exists) to protect the merging of Berghers Hill with Wooburn? In reality, we feel the area under Mill Wood is distinctly separated from Berghers Hill by Windsor Hill (road). Furthermore, on the otherside of Windsor Hill, Berghers Hill would be unable to merge with Wooburn by the presence of Farm Wood, and the band of Woodland which goes under the development (on the Wooburn side). Thus we feel the existing designations, road network and natural landscape will suffice in protecting the coalescence of these settlements - and that our land should not need any further specific references in the NDP.

3. There are considerable references to Biodiversity gains and Climate Change mitigation, and as the only true remaining fully active farmer in the Parish we did not know whether these references were purely for Council/Parish Council land, or whether they would rely on us to help achieve this objectives? Again, there seems to be a disconnect between these matters and engaging with people who can directly assist with seeing these improvements come to fruition.

Whilst we understand the

## Buckinghamshire Council response to Regulation 16 consultation on the Wooburn and Bourne End Neighbourhood Plan

### Highways DM

Policy or Para	Page	Comment
<p><b>WBE/PD3</b> <b>(section 7.3)</b></p>	<p><b>19</b></p>	<p><i><b>POLICY WBE/PD3</b></i></p> <p><i><b>ACCESS AND LAYOUT OF NEW INFRASTRUCTURE DEVELOPMENTS</b></i></p> <p><i>New non-residential developments such as (but not limited to) Schools, Medical facilities, shops or commercial or industrial premises must as a condition of planning approval ensure sufficient parking and adequate ingress and egress for the site its staff, customers, and deliveries.</i></p> <p><i>Planning applications must provide details of the number of employees and the intended parking provision for employees and the expected customer vehicle movements requiring parking and a layout drawing of how traffic and parking will be managed consistent with the anticipated use; ideally, layouts for large sites should incorporate a one-way ingress/egress system and drop off zones.</i></p> <p>This is a superfluous policy given that the Local Highway Authority are consulted on applications (where applicable) to ensure that proposed developments feature appropriate parking provision, acceptable access configuration/location, adequate serving and delivery arrangements, satisfactory development layouts, etc. that comply with local and national guidance and policies (NPPF, Policy DM33 of the WDLP, Buckinghamshire Countywide Parking Guidance policy document and Highways Development Guidance.</p>

		<p>Furthermore, it would be inappropriate to state a blanket assertion that that developments should feature one-way accesses and drop-off zones.</p>
<p><b>WBE/PD4</b> <b>(Section 7.4)</b></p>	<p><b>20</b></p>	<p><b><i>WBE/PD4 - PARKING STANDARDS FOR ALL PLANNING APPLICATIONS FOR NEW DEVELOPMENTS AND EXISTING PROPERTIES</i></b></p> <p><i>1. Number of car parking spaces</i></p> <p><i>The Buckinghamshire Council (BC) Parking Guidance set out in Table 6 Residential car parking standards establishes Wooburn and Bourne End Parish (the Neighbourhood Area) in Zone B. Table 6 (for up to 10 dwellings) for Zone B properties shall apply regardless of the size of development (that is no matter whether a development has more or less than 10 homes).</i></p> <p>This is contrary to the standards contained within the <i>Buckinghamshire Countywide Parking Guidance (BCPG)</i>. Therefore the Highway Authority will continue to utilise the BCPG standards and not the amendment within Policy WBE/PD4</p> <p><i>3. Planning applications for garages to be converted to living space or knocked down to be replaced with extensions for living space, <b>must not</b> result in increased on-street parking. A review of the impact of such changes to a property must become a test in planning applications such that design and layout of the conversion and/or extension must demonstrate that there will be no increase of on-street parking.</i></p>

		<p>Issues with parking when proposals seek the change of garages into habitable floor space are already reviewed by the Highway Authority during the planning application stage.</p> <p><i>4. Planning applications for dropped kerbs must demonstrate that there is no net loss of off-street and on-street parking, so that each lost on-street car parking space is replaced by at least one in-curtilage parking space on the property applying for permission to drop a kerb.</i></p> <p>This is something already taken into account by the Highway Authority when determining the potential impacts of development on the highway/transport network. However, it would also be prudent to point out that often a dropped kerb is to facilitate a vehicular access to park a car from the highway and into the curtilage of a private dwelling, thus resulting in a nil-detriment situation to on-street parking capacity.</p>
<p><b>POLICY WBE/HF2 NEW LINK ROAD WIDTH AND BUS SERVICE</b></p>	<p><b>39</b></p>	<p><i>1. That the road width is sufficient along the length of the Link Road and at both ends at Cores End/Princes Road and at the entrance/exit at Hedsor Road so that two buses or HGVs are able to pass each other on either side of the road in either direction all the way along the link road and at the access points of Princes Road and Hedsor Road.</i></p> <p>This requirement is <b>undeliverable</b> within the confines of the ownership of both parts of the Policy BE2 site (specifically though this part of the BE2 site is the Jackson’s Field portion and the extant highway land in this area).</p> <p>The Highway Authority have consistently stated that there is insufficient width to permit a two-way bus service on the existing section of Princes Road that does not fall within the Jacksons Field portion of the entire site. Specifically, it has been explained that a 6.5m carriageway width is required by bus operators in order to provide for the safe and convenient passage of buses. As a result, and for several other beneficial reasons, the Highway Authority has stated that an existing bus route would be taken through the site in a one-way direction</p>

	<p>(envisaged to be from the north to the south). Ergo, the Highway Authority will not be seeking nor does it expect a diverted two-way bus service to operate through the Policy BE2 site.</p> <p>Therefore the WBEPC are strongly discouraged from placing Point 1 of Policy WBE HF2 within their NDP as it will not and cannot be secured by the Highway Authority as part of any permission granted at the Policy BE2 site.</p> <p><i>2. That parking along the Link Road is prevented to avoid impeding traffic and that the design of the Link Road should either be of sufficient width to incorporate designated parking in marked out bays on either one side or both sides of the road or that the Developer has agreement from Highways Department that they will designate the Link Road as a red route and implement double red lines along its length</i></p> <p>The Highway Authority will not designate a Red Route but could secure/deploy other waiting restrictions and/or physical measures in order to prevent displaced parking from occurring on key sections of the Link Road.</p> <p><i>3. A bus lay-by is incorporated for each bus stop on each side of the road to ensure traffic flow is unimpeded through the Development.</i></p> <p>The bus operator and the council's Passenger Transport section will be consulted on bus stop locations and their configuration for the most suitable configuration (e.g. on-street bus markings are sometimes preferred as they allow better opportunities for driver's to re-commence their journey after stopping, particularly at peak times).</p>
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**Transport**



Comment from team	Policy or Para	Page	Comment
Transport Strategy Team	WBE/HF2	42	Having read through our highways teams comments regarding this policy we as a team can only see this leading to more congestion on the roads and more unhappy customers for the buses due to delays. This then has a knock on effect of people using public transport less causing more cars on the road meaning more congestion and more carbon emissions released. This also goes against our LTP 4 policy number 7: reliable road travel.
Transport Strategy Team	WBE/SM3	48	We are very pleased that you are looking to improve the pedestrian crossing as this will encourage more people to walk therefore increases the amount of active travel.

## **Ecology**

<b>Summary</b>
<p>Section 5.8.3.3 has stated within the provided Neighbourhood Plan, due to the detailed NPPF and WDLP that the provided neighbourhood Plan does not establish any additional environmental policies. From which this is disappointing that any natural or biodiversity policies have been proposed. The Neighbourhood Plan identifies that there will be increase of development within Woodburn and Bourne End, which will increase pressures on the existing natural environment and biodiversity therefore, the local polices provided needs to be stronger, to provide durability, resilience and enrichments for biodiversity, reflecting the current policies, legislations and guidance's. Policy WBE/PD6 is welcomed with regards to watercourses, hedgerows and sensitive lighting schemes for wildlife.</p> <p>It is highly recommended to be in accordance with the already in place plans, guidance's and legislations that a biodiversity policy is in place specifically for the Parish, to represent and protect the rich diversity natural landscape and wildlife.</p>

Comment for team	Policy/Para	Page	Comment
1	WBE/PD6	22	<p><b>Watercourses</b></p> <p>It is welcomed to see that there is a specific policy in relation to watercourses particularly in relation to development not having adverse effects and retaining a minimum 10m ecological buffer. It is recommended to also require developments to contribute towards helping a waterbody reach 'good' ecological status under the Water Framework Directive and must not cause a deterioration of or prevent a waterbody from achieving this whilst delivering Biodiversity Net Gains.</p> <p>It might be worth making note of developments must take precautions to ensure that no invasive non-native species are introduced, and if already present ensure they are not allowed to spread.</p> <p><b>Hedgerow</b></p> <p>This is also welcoming to see that a hedgerow buffer is required. It is recommended for development to avoid potential damage, destruction or removal of native hedgerows as some hedgerows are important and priority habitats.</p> <p>There are many ancient woodlands with the parish. It is recommended to incorporate the requirement of buffers around ancient woodlands to reduce fragmentation and human interference to this irreplaceable habitat, in accordance with government guidelines.</p> <p>By protecting our buffer zones not only are we protecting the habitat and wildlife from harm, but it is also avoiding the potential for habitat fragmentation.</p> <p><b>Lightening Strategy</b></p> <p>It is welcomed to see that the impacts of lightening will be taken into consideration in relation to bats</p>
2	-	-	<p><b>Green Spaces</b></p> <p>It is welcomed to see that quite a few green spaces are to be maintain with wildlife and the habitat in mind.</p>

3	-	<p data-bbox="728 215 1019 247"><b>Biodiversity Net Gain</b></p> <p data-bbox="728 271 2049 502">It is a requirement that <b>ALL</b> development is to be in accordance with the Environmental Act 2021 and NPPF to which development should provide Biodiversity Net Gain following the appropriate mitigation hierarchy in accordance with CIEEM (Chartered Institute of Ecology and Environmental Management) guidelines (Avoid, minimise, restore, offset/compensate, enhance). Where development is proposed to cause harm to flora and fauna, avoidance should be the first option if this is possible. Currently at the moment biodiversity net gains have not been mentioned within the Neighbourhood Plan.</p> <p data-bbox="728 518 2049 598">To add on in accordance with the NPPF, the new Biodiversity Net Gain SPD and the Environment Act 2021 biodiversity net gains must be measurable.</p> <p data-bbox="728 614 2049 774">Paragraph 174d of NPPF requires that: <i>“Planning policies and decisions should contribute to and enhance the natural and local environment by ... <u>minimising impacts on and providing net gains for biodiversity</u>, including by establishing coherent ecological networks that are more resilient to current and future pressure”</i>.</p> <p data-bbox="728 790 2049 901">The NPPF in section 179b states: <i>“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”</i></p> <p data-bbox="728 917 2049 1109">The NPPF (2021) Paragraph 180a states <i>“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.”</i></p> <p data-bbox="728 1125 2049 1340">The NPPF (2021) Paragraph 180d states <i>“When determining planning applications, local planning authorities should apply the following principles.... development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”</i></p>
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4	-	-	<p><b>Biodiversity Enhancement Features</b></p> <p>In line with recognised good practice and government policy on biodiversity and sustainability, all practical opportunities should be taken to harmonise the built development with the needs of wildlife. Species specific enhancements should be integrated within development such as bat and bird boxes also hedgehog holes.</p> <p>There are many bat and hedgehog records within the area. It is recommended for the Neighbourhood Plan to include some specific biodiversity enhancements. For example Policy G3: 'Biodiversity' of the Wendover Neighbourhood plan 2019-2033 states that: <i>"All suitable new buildings bordering open spaces will be required to incorporate integrated swift and bat boxes."</i></p> <p>The NPPF (2021) Paragraph 180d states <i>"When determining planning applications, local planning authorities should apply the following principles.... development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."</i></p>
5	-	-	<p>The Neighbourhood Plan would benefit from demonstrating how biodiverse Wooburn and Bourne End is. Wooburn and Bourne End contains many protected sites and priority habitats: ancient woodlands, traditional orchards and chalk streams.</p> <p><u>It is recommended that a map of existing biodiversity assets within and adjacent to the Parish is incorporated into the Neighbourhood Plan using records collected from BMERC (Buckinghamshire and Milton Keynes Environmental Records Centre).</u> <b>Development on or adjacent to designated sites and priority habitat sites should be avoided.</b> Particularly as chalk streams and traditional orchards are under substantial pressure.</p>

		<p>The Local Plan Policy 'NE1 Biodiversity and Geodiversity' of the Aylesbury Local Plan 2013-2033 states: <i>"g. <u>"Where development proposals affect a Priority Habitat (As defined in the Buckinghamshire Biodiversity Action Plan or UK Biodiversity Action Plan) then mitigation should not be offsite. Where no Priority Habitat is involved then mitigation can be off-site. When there is a reasonable likelihood of the presence of protected or priority species or their habitats, development will not be permitted until it has been demonstrated that the proposed development will not result in adverse impacts on these species or their habitats.</u> The only exception will be where the advantages of development to the protected site and the local community clearly outweigh the adverse impacts. In such a case, the council will consider the wider implications of any adverse impact to a protected site, such as its role in providing a vital wildlife corridor, mitigating flood risk or ensuring good water quality in a catchment."</i></p> <p>The area is also within the central Chilterns chalk rivers biodiversity opportunity area. This has not been recognised within the Neighbourhood Plan.</p> <p>The NPPF (2021) Paragraph 174a states: <i>"Planning policies and decisions should contribute to and enhance the natural and local environment by..... protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)"</i>.</p>
6	-	<p><b>Protected Species</b></p> <p>There is also no mention of notable or protected species found within Wooburn and Bourne End. There are many records of protected species within the Parish including bats, hedgehogs, red kites and great crested newts.</p> <p>Permission can be refused if adequate information on protected species is not provided by an applicant, as it will be unable to assess the impacts on the species and thus meet the requirements of the National Planning Policy Framework (2021), ODPM Circular 06/2005 or the Conservation of Habitats and Species Regulations 2017. The Council has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications. CLG 2007 'The validation of planning applications'</p>

		<p>states that applications should not be registered if there is a requirement for an assessment of the impacts of a development on biodiversity interests.</p> <p>Section 99 of ODPM Circular 06/2005 states:</p> <p><i>“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a <u>reasonable likelihood</u> of the species being present and affected by development. <u>Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted.</u>”</i></p>
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