

| What is your interest in this consultation? - Interest | What is the name of your organisation? - Organisation | 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 |
|--|---|--------------------------------|---|--|
| Resident | Not Answered | Stephen Peter Simpson | I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes | Not Answered |
| Resident | Not Answered | Russ Murden | I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes | Not Answered |
| Resident | Not Answered | Janet Collins | I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes | Not Answered |
| Resident | Not Answered | Patrick Ruffles | I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes | Not Answered |
| Resident | Not Answered | Jane Baker | I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes | Not Answered |
| Resident | Not Answered | Nigel Garrard | I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes | Not Answered |

Response ID ANON-4CAQ-T8K4-M

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-10-26 16:56:05

About you

What is your interest in this consultation?

Resident

Contact details

What is your full name?

Name:
Ed Gemmell

What is your address?

Address line 1:
[REDACTED]

Address line 2:

Village, town or city:
Hazlemere

Full postcode:
[REDACTED]

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

Yes

What is your email address?

[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:

HAZNP 2 E should be changed to not allow the cutting down of any trees and if a tree is in the way of housebuilding it should be moved.

HAZNP3 A should require all houses to be zero carbon in the build stage and not zero carbon 'ready'

HAZNP 3 B the requirement for all buildings to be Passivhaus should be extended to include householder applications

Response ID ANON-4CAQ-T8KE-5

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-10-17 12:12:13

About you

What is your interest in this consultation?

Organisation

Organisations

What is the name of your organisation?

Organisation:
Chiltern Society

Contact details

What is your full name?

Name:
Planning Field Officer

What is your address?

Address line 1:
Chiltern Society

Address line 2:
White Hill Centre, White Hill

Village, town or city:
Chesham

Full postcode:
HP5 1AG

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:

Comments by The Chiltern Society

Policy HAZNP1

The Society supports this Policy but would like to see specific areas of land identified which could be used for starter / downsizing homes to ensure no conflict with other policies regarding biodiversity and tree canopy cover. Clarification is also needed on the size of the properties envisaged, quoting Council tax bands A - C is meaningless to most people. It would be better to quote number of bedrooms or square footage.

Policy HAZNP2

This Policy is fully supported however the Society believes that it does not go far enough in protecting green space within the village. There is no mention

in the Plan about the Terriers Farm development which has a significant impact on open space within the Parish and under current proposals would lead to the loss of significant lengths of mature hedgerow providing a key wildlife corridor linking Kingswood to Lady's Mile, which surprisingly is not mentioned on the Green Infrastructure Network Plan given its prominence in the text.

In Clause B there should be no option to provide biodiversity gains outside the Parish or on land bordering the Parish. There are substantial areas of land, including areas such as Hazlemere Road Corridor and Hazlemere Golf course where biodiversity can be provided and improved. In addition, the green spaces identified such as Lady Mile offer substantial opportunities for improvement. It is disappointing that the Council would even consider proposals to offset biodiversity outside the Parish thereby depriving residents of the benefits of the compulsory gains.

In Clause C there should be clarity on what very special circumstances means. In supporting documentation it refers to the rules regarding development in the Green Belt but as it has been seen from the development of HW8 this does not offer real protection.

In Clause D there should be no mitigation measure outside the Parish and the words within Hazlemere Parish should be added to the last sentence. In clause 5.10 clarification is required on what type of off-site biodiversity net gains won't be able to be delivered in or adjacent of the Network and why.

Policy HAZNP3

This is supported but the wording is overblown and unnecessarily prescriptive in detail. Encouraging building that is more energy efficient is laudable but there need to be parameters that this can be measured against.

Reference should be made to the Chilterns Building Design Guide given that most developments will be able to be seen from the AONB. There should also be reference to the Chilterns Conservation Board position statement on Development affecting the Setting of the Chilterns AONB.

Policy HAZNP4

Clauses A and B are supported. However several large developments have included "travel plans" as part of their planning application, most of which are ineffective as they have no tangible measurement of outcomes to show they have a positive impact on travel choices. These clauses are written in a way that will continue to allow developers to provide for the travel mode that their clients ask for.

Clause D is sensible and the Society support this policy. We believe this should be extended to include public EV charging spaces in any redevelopment of non - domestic premises.

Clause E is worded to provide a major get out for Developers by stipulating 'where possible'. Any Developer with experience will always find reasonable ways of avoiding building off site infrastructure before income is generated from sales. If the Council is truly committed to this the words 'where possible' should be removed.

Clause F should be widened to include the whole Parish and any activity in it, including by the Parish Council and Buckinghamshire Council if the Council is truly committed to providing for those that cannot walk or cycle. It would be helpful if in Para 5.31 statistics for the Parish or District could be provided rather than meaningless National statistics

Policy HAZNP5

This Policy is generally supported.

The Society however object to inclusion of section 4 of Clause B. This footpath is already the subject of a planning application and will cause harm to the tree and scrub belt adjacent to the A404 and adjacent to the boundary with the Chilterns AONB. This is contrary to the Policy not to fell trees. This should be deleted and greater emphasis placed on providing a safer and less exposed route through Badger Way to Inkerman Drive.

The Society would also add to Clause C to emphasis the visual intrusion the site would have on views from the AONB. The Parish Council will be aware that one of the principal reasons for rejecting an Appeal against development at Orchard House, part of the HW8 site, was the visual impact of the development on the AONB.

The Society is disappointed that the Plan does not include reference to Site HW7, Terriers Farm which has a substantial effect on land at the Eastern boundary of the Parish. The current proposals for this site reduce the tree canopy, remove hedgerows and would have a detrimental impact on Lady's Mile and the adjacent AONB. The Chiltern Society believe it is essential that the Neighbourhood Plan makes reference to this site given its impact on the Parish.

Response ID ANON-4CAQ-T8KM-D

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-10-18 17:22:32

About you

What is your interest in this consultation?

Resident

Contact details

What is your full name?

Name:
BRIAN ALEXANDER EDEN

What is your address?

Address line 1:

Address line 2:

Village, town or city:
High Wycombe, Bucks

Full postcode:

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

Yes

What is your email address?

Email:

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 have read the Hazlemere Neighbourhood Plan and provide the further comments regarding HAZNP5 Clause B4.
5.53 Knowing this road as I do, it would be totally inappropriate to try and squeeze a footpath and cycleway onto the narrow verge along the side of what is known as Inkerman Hill, the route between Inkerman Drive and a potential site access location.
The steepness alone of the hill would make it unsafe as a cycleway, and impossible for wheelchair use. Also, as this is a very busy road and the proximity of vehicles to pedestrian traffic would make it very frightening and dangerous.
In any case, there is nowhere accessible by this route that would not be better accessed via the northern access onto Wycombe Road, or the proposed new access to the west of the site onto Badger Way.
5.55 Just where is the existing road considered wide enough to site a central refuge for pedestrians to cross the road to access the AONB to the south of the A404. This is yet another good reason for establishing a 4-way roundabout on the A404 at Gravely Way to serve a new development on HW8. The roundabout would provide the safe central refuge for pedestrians wishing to walk to the AONB on the south of the A404, and a footpath could easily be accommodated with the construction of the access road to the HW8 site.

Response ID ANON-4CAQ-T8KN-E

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-10-29 12:20:27

About you

What is your interest in this consultation?

Resident

Contact details

What is your full name?

Name:
Frank Wood

What is your address?

Address line 1:

██████████

Address line 2:

██████████

Village, town or city:
Hazlemere

Full postcode:

██████████

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

Yes

What is your email address?

Email:

████████████████████

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 suggest that it would be great to have a walking and cycling route from Hazlemere into high Wycombe, using the Hazlemere rec and other farmland as an alternative to having to walk down the Amersham Road which has narrow paths and very loud

Response ID ANON-4CAQ-T8KR-J

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-10-14 17:24:22

About you

What is your interest in this consultation?

Resident

Contact details

What is your full name?

Name:
Brian Alexander Eden

What is your address?

Address line 1:

[REDACTED]

Address line 2:
Amersham Road

Village, town or city:

[REDACTED]

Full postcode:

[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:

I do not support parts of Policy HAZNP5 as follows.

1. Section A 5.36 in as far as including the parcel of land that was omitted from HW8. I do not believe this was an oversight. It was excluded because it contains significant tree cover and provides the desired screening of the development from the AONB to the south. It's only inclusion is because it is owned by Bellway and satisfied their greed for additional development.
2. Section B 5.47 sets out need for more than one vehicular access from the A404, and highlights there existing a number of such vehicular accesses which could be used. There are 6 such accesses, 5 of which are private driveways serving single residencies which were provided in 1930s when the A404 was considerably less busy. All are now dangerous requiring considerable patience, care and attention when accessing the A404. The 6th access used to serve the Orchard Stables and is considered by Bellway for emergency access only. There is NO safe access onto the A404, and should not be promoted in any neighbourhood plan. Even the Inspectorate of Appeals have highlighted this in turning down the appeal by Nicolas King to build just 8 houses, not 250+, further away from the blind bend and hill on the A404. Access to the A404 should Not be endorsed. It would appear that the only safe access for the volume of traffic that this development will generate would be at a 4 way full size roundabout at Gravely Way on the A404. Currently another dangerous access onto the A404.

Response ID ANON-4CAQ-T8KW-Q

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-10-03 13:36:03

About you

What is your interest in this consultation?

Resident

Contact details

What is your full name?

Name:
Brian Rodgers

What is your address?

Address line 1:
[REDACTED]

Address line 2:
Hazlemere

Village, town or city:
High Wycombe

Full postcode:
[REDACTED]

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

Yes

What is your email address?

[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:

Policy HAZNP1

I support this Policy but would like to see specific areas of land identified which could be used for starter / downsizing homes. Clarification is also needed on the size of the properties envisaged, quoting Council tax bands A - C is meaningless to most people. It would be better to quote number of bedrooms or square footage. It would also be helpful to define 'affordable'. Currently the average cost of a bungalow in Hazlemere is between £600 and £700 a square foot and a starter home is about £500 per square foot.

Policy HAZNP2

This Policy is full supported however it does not go far enough in protecting green space within the village.

In Clause B there should be no option to provide biodiversity gains outside the Parish or on land bordering the Parish. There are substantial areas of land, including the Hazlemere Golf course where biodiversity can be provided and improved. In addition, the green spaces identified such as Lady Mile offer substantial opportunities for improvement. It is disappointing that the Council would even consider proposals to offset biodiversity outside the Parish.

In Clause C there should be clarity on what very special circumstances means. In supporting documentation it refers to the rules regarding development in the Green Belt but as it has been seen from the development of HW8 this does not offer real protection

In Clause D there should be no mitigation measure outside the Parish and the words within Hazlemere Parish should be added to the last sentence

Policy HAZNP3

This is supported but the wording is overblown and unnecessarily prescriptive in detail. Encouraging building that is more energy efficient is laudable but there need to be parameters that this can be measured against

Policy HAZNP4

Clauses A and B are supported. However a number of large developments have included "travel plans" as part of their planning application, most of which are not worth the paper they are written on with no tangible measurement of outcomes to show they are effective. These clauses are written in a way that will continue to allow developers to provide for the travel mode that their clients ask for.

I don't support Clause C. If this is to be a Council aim I would like to see evidence in the Plan that there is a demand for this from Hazlemere residents.

Clause D is sensible and I support this policy.

Clause E is worded to provide a major get out for Developers by stipulating 'where possible'. Any Developer with experience will always find reasonable ways of avoiding building off site infrastructure before income is generated from sales. IF the Council is truly committed to this the words 'wee possible' should be removed.

Clause F should be widened to include the whole Parish and any activity in it, including by the Parish council and Buckinghamshire Council if the Council is truly committed to providing for those that cannot walk or cycle. It would be helpful if in Para 5.31 statistics for the Parish or District could be provided rather than meaningless National statistics

Policy HAZNP5

This Policy is generally supported the only exception being section 4 of Clause B. This footpath is already the subject of a planning application and will cause harm to the tree and scrub belt adjacent to the A404 which is contrary to the Policy not to fell trees. This should be deleted and greater emphasis placed on providing a safer and less exposed route through Badger Way to Inkerman Drive.

Response ID ANON-4CAQ-T8KX-R

Submitted to Hazlemere Neighbourhood Plan submission consultation
Submitted on 2022-11-07 17:41:02

About you

What is your interest in this consultation?

Resident

Contact details

What is your full name?

Name:
Andrew Bond

What is your address?

Address line 1:

██████████

Address line 2:

Village, town or city:
High Wycombe

Full postcode:

██████████

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

No

What is your email address?

██████████
████████████████████

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:

Whilst I generally support the plan, I wonder about the delivering net zero homes section of the plan (6).

Reference is made to passive house standards PHI but to the governments future homes standards surely this should be the minimum requirement even if implemented early in the plan.

In addition no consideration is made for homes designed to a carbon negative standard.

Rachael Riach

From: Joanne Jones <j.jones@nexusplanning.co.uk>
Sent: 10 November 2022 13:54
To: Neighbourhood Planning Mailbox
Cc: o.bell@nexusplanning.co.uk
Subject: [EXTERNAL] Hazlemere Neighbourhood Plan - Representations on behalf of Inland Homes
Attachments: Hazlemere Reg 16 NP Representation on behalf of Inland Homes.pdf
Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from j.jones@nexusplanning.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,

Please find attached representations to the Hazlemere Neighbourhood Plan Reg 16 Submission consultation on behalf of Inland Homes.

I would be grateful if you could acknowledge receipt of the attached.

Many thanks

Kind Regards

Joanne Jones
Associate Director
(Working days: Tuesday to Thursday)

T +44 (0) 118 2149 340
M +44 (0) 7812 980 197
E j.jones@nexusplanning.co.uk



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nexusplanning.co.uk



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Buckinghamshire Council

neighbourhoodplanning@buckinghamshire.gov.uk

<By email only>

Reading

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Apex Plaza

3 Forbury Road

Reading RG1 1AX

[nexusplanning.co.uk](https://www.nexusplanning.co.uk)

10 November 2022

Our Ref: 32794

Dear Sir/Madam

**Hazlemere Neighbourhood Submission Plan
Regulation 16 Consultation**

On behalf of our client, Inland Homes Ltd, we provide representations in response to the Hazlemere Neighbourhood Submission Plan (HNP) Regulation 16 Consultation.

By way of background context to these representations, an outline planning application (including details of access and layout) was submitted in August 2018 by Nexus Planning, on behalf of Inland Homes Ltd, for the erection of 101 dwellings with all other matters reserved, at Land to the rear of 20 Wycombe Road, Holmer Green – application reference 18/07194/OUT. This application relates to the northern part of the site allocated for residential development in the Wycombe District Local Plan under Policy Site HW8. An appeal against the non-determination of this planning application is currently being considered by the Planning Inspectorate - Appeal Ref. APP/K0425/W/22/3296128.

Representations were also previously also made to the Regulation 14 Consultation of the HNP. Given that these representations were submitted to the Hazlemere Parish Council, for ease of reference, they are appended to this submission..

Approach to the Representations

The seven basic conditions that a Neighbourhood Plan must meet are set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The Hazlemere Neighbourhood Submission Plan has been considered in the light of these conditions, with the following conditions being particularly relevant to our consideration:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development; and
- e. the making of the order (or 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).

The structure of these representations follows the structure of the Submission draft of the Neighbourhood Plan (“NP”) with the specific paragraph or policy referenced.

General Commentary

From what is available on the Parish Council website, it remains the case that there are no evidence documents being published alongside the NP for review and comment. The basis upon which policy proposals have come about therefore remains unclear. Further commentary in this regard, replicated from our Regulation 14 response, is therefore provided alongside specific paragraphs/policies, below:

Section 1

Paragraph 1.8 refers to the parish council’s team and consultants. However, no further detail is provided as to which consultants have been involved in the process to date and therefore the specialisms/credentials of the consultants is not known.

Furthermore, specific reference is made to the gathering of “evidence to support these policy proposals...” As stated above, no documents/evidence has been provided to review as part of this consultation process. There is therefore a distinct lack of clarity in justification of the NP.

The wording of paragraph 1.8 implies that the expectations from the community engagement is the driver for the NP, and that any evidence base seeks to justify the policy proposals driven by the community engagement, rather than the policy proposals being informed by evidence. Community response should be considered holistically with evidence rather than predetermining the evidence.

Section 3

Paragraph 3.3 is not factually correct. The strategic policies which set housing targets do still apply to neighbourhood areas with settlements inset in the Green Belt. There is no reference in the NPPF, at paragraphs 66 and 67, as to the implication or otherwise of strategic housing requirement policies and their applicability in the Green Belt. Strategic housing requirement policies apply for the whole area covered by a strategic policy making authority.

The provisions of the NPPF at paragraphs 140 confirm that:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..... Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

This means that the NP plan cannot, in itself, determine that there is a need for additional Green Belt boundary amendments, but can, if not already set by the strategic policies of a local plan, determine where and how that boundary is amended.

Paragraph 3.3 of the NP refers to paragraphs 149 and 150 of the NPPF. It is considered that these paragraphs do not “prevent Neighbourhood Plans allocating conventional housing or other development land (i.e., ‘inappropriate’ development not exempted by §149 or §150).” For example, the green belt and paragraphs 149 and 150 of the NPPF do not prevent the NP allocating housing or development sites within the settlement boundary of Hazlemere.

Section 4

Paragraph. 4.8 states that “the solutions offered by the community of Hazlemere were developed into policies by the steering group.” This wording implies that the community response was the sole basis of the policies developed, and there is nothing stated which confirms if or how the ‘solutions’ proposed in the policies were evidenced.

Policy HAZNP1

The general premise of this policy in encouraging smaller housing for first time buyers and down-sizers is supported. However, it is questioned as to whether “*full regard*” should be given to the Wycombe District Housing Intensification SPD on the basis that it is now some 11 years old; the Residential Design Guide is also 5 years old. No flexibility or consideration is reflected in the wording of the policy that there may be parts of the of these documents that have been superseded or are no longer applicable due to their age having regard to more recent local or national planning policy and guidance.

Policy HAZNP2

Point B requires that a sequential approach to the delivery off-site biodiversity compensation with priority to be given to the Green Infrastructure Network identified in the NP. The wording of the policy now enables a level of flexibility as to where and how off-site compensation is to be delivered which was lacking in the Regulation 14 Draft Plan. This flexibility is essential given that there is no absolute requirement for biodiversity gains to be local, and particularly so when it is unclear from the NP what investigations have been undertaken to determine the suitability and availability of the identified areas for providing the appropriate compensation. This change is therefore welcomed.

Point E has been amended from the previous version (Point D):

- With regards to the loss of one or more trees, it has been recognised that there may be circumstances whereby the loss of a tree “is unavoidable”. However, it is considered that whilst this stance provides more flexibility than the absolute stance of the Regulation 14 policy, it is now ambiguous as to how unavoidability is to be determined. It has not been defined in the supporting text to the policy and fails to acknowledge that planning applications will need to balance a whole range of material considerations. Therefore, there is arguably still no recognition of the following key considerations:
 - The status of the tree(s) impacted by the proposed development i.e. categorised as ancient or veteran, protected by a TPO, or within a conservation area.
 - The quality or health of the tree(s) when assessed by a qualified expert.
 - The potential benefits that the proposed development bring which would outweigh the loss of the trees(s).
- Regarding the requirement to provide an increase in tree canopy cover, the reduction in requirement now sought for sites of 0.5ha or more from that of the previous version of the policy is welcomed. However, it is still the case that no evidence has been presented to demonstrate how the same canopy cover requirement but in a shorter period is justified and can be delivered, above and beyond the provision at Local Plan level for 25% over 25 years. This potentially impacts on the ability to deliver, both physically and viably, the development needs allocated at local plan level, and no evidence has been provided to demonstrate that the potential impacts of the policy requirements have been considered.

Policy HAZNP3

The aims of Policy HAZNP3 in delivering zero net carbon buildings are not questioned, and the changes that have been made to the policy from the Regulation 14 version are welcomed.

However, there is no evidence to demonstrate the viability implications, in particular, have been considered. The supporting text to this policy, specifically at paragraph 5.24, simply states that “*land values in Hazlemere are high relative to build costs and ought to be sufficient to ensure requirements to tackle improving energy and carbon performance are viable*”, does not reflect a considered and evidenced approach in this regard.

Policy HAZNP5

Large parts of this policy remain unchanged from that of the Regulation 14 version. However, as the criteria within the policy have been relabelled and, in some cases, reordered, for clarity applicable text from the Regulation 14 version of our representations is restated below.

As a general comment, much of this policy and its supporting text repeats that in the WDLP which is entirely unnecessary. Instead, the policy should identify any specific additional requirements, including the justification for those changes and how they don't undermine the deliverability of Policy HW8 of the WDLP.

The need for a comprehensive development is referenced at **Criterion A.1** of Policy HAZNP5. However, no detail or explanation is provided as to what ‘comprehensively’ means in this instance – it is open to interpretation. The allocation is formed of land parcels, largely defined by field boundary hedges, to which additional land parcels are proposed to be added by the NP.

It is also unclear as to what is meant by ‘future integration’ at Criterion A.1. This wording appears to have been taken from criterion 1b of Policy HW8 of the WDLP which is no longer applicable given the withdrawal of the Chiltern and South Bucks Local Plan.

Criterion B.1 does not list the provision of a vehicular access from Wycombe Road to the north instead stating that access is required from the A404. This is a clear diversion from Policy HW8 Wycombe District Local Plan which shows vehicular access at both Wycombe Road and the A404. It also conflicts with the Council's development brief for the site. No evidence has been provided to demonstrate that this single access approach is feasible and deliverable. Accordingly, it could jeopardise the delivery of the HW8 allocation and could result in the HNP not being in conformity with strategic policies contained within the development plan.

Furthermore, an access from the north is clearly needed if the field boundaries are to be retained, the need for which is outlined at **Criterion C.3** and paragraph 5.62, and the Council's adopted development brief.

Criterion B.3 is again inconsistent with Policy HW8. Whilst paragraph 5.52 provides some explanation that this link would be aspirational for the future, there is no detail as to why the pedestrian access point from Badger Way is actually necessary. Irrespective of this, the policy lists the access as one of the requirements for the site, but it is currently not deliverable nor justifiable.

Reference to the retention of existing orchards to the rear of Wycombe Road has now been omitted and instead **Criterion C.1** now requires the provision of a Green Infrastructure corridor within the site along the whole of the rear of Wycombe Road. This is still a clear diversion from Policy HW8 of the Wycombe District Local Plan which does not expressly seek such a provision.

Criterion C.5 also diverts from Policy HW8 in stating that a strategic Green Infrastructure link along the north eastern boundary of the site, connecting the orchard adjacent the site to the north to the wider countryside to the south, should be provided as part of the provision of a sense of separation. Policy HW8 does not seek to determine how a sense of separation should be provided through the development of the site, other than as stated as Paragraph 5.1.72

of the supporting text to the policy i.e. linking the orchard to the woodland area off Badger Way along the shallow valley through the site.

In this regard, the **Basic Conditions Statement** published alongside the NP states that, with regard to the conformity of the NP to Development Plan policy, HAZNP5 is *“intended to update HW8 in the light of further evidence to shape the proper planning of the site and of minor changes to the site boundary to reflect land ownership. It refines the design principles of HW8 without undermining any of the core spatial principles of that policy (e.g. quantum, mix, supporting infrastructure).”* However, it is not clear what evidence this is referring to; no evidence is provided with the publication of the NP.

Furthermore, as outlined above, an NP is required to be in general conformity with strategic policies of a Development Plan as a whole and not just the quantum, mix and supporting infrastructure. The design and green infrastructure requirements of Policy HW8 should also be conformed with, particularly so when the justification/evidence for the *“refinement”* referred to in the Basic Conditions Statement is not clear.

Criterion C.7 requires that contributions to off-site green infrastructure network improvements are made *“as appropriate”*. However, no explanation/evidence has been provided as to what the purpose of such contributions would be or under what circumstances contributions would be appropriate – **Paragraph 5.67** adds little in the way of explanation or justification for this.

It is therefore considered this is inconsistent with paragraphs 56 and 57 of the NPPF which state that conditions should *“only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects...”* and that *“Planning obligations must only be sought where they meet all of the following tests:*

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development.”*

In addition, **Paragraphs 5.51(iv)** states that suitable access cannot be provided via 20 Wycombe Road and that additional land would also be required. However, this is demonstrably not the case as an access layout was provided as part of the outline planning application referenced above and was deemed to be acceptable by the Local Highways Authority through the application process.

Summary and Conclusion

In order for a Neighbourhood Plan to be put to a referendum, prescribed basic conditions set in the Town and Country Planning Act 1990 are required to be met. It is considered that the Pre-submission Hazlemere Neighbourhood Plan fails to meet three of these basic conditions, as follows:

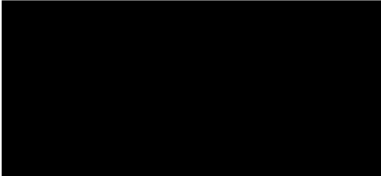
- **Condition a.** – it is acknowledged that the NP has improved in its regard for the NPPF from that of the Regulation 14 version. However, there are still instances of misinterpretations, for example, in green belt policy in the NPPF in Paragraph 3.3 of the NP and the requirement for Green Infrastructure requirements contrary to Paragraphs 56 and 57 of the NPPF.
- **Condition d.** – a fundamental part of achieving sustainable development is demonstrating that sufficient and proportionate evidence has informed the solutions set. It remains the case that no evidence which has informed

the NP has been provided as part of the consultation process of the NP, nor referenced within the NP itself. It is therefore not clear what the basis is for the NP and whether the policies and approach outlined are appropriate or deliverable.

- **Condition e.** – a Neighbourhood Plan has to be in general conformity with the strategic policies contained in the development plan for the area and, with specific regard to the Policy HAZNP5, it is still considered that the NP is inconsistent with Policy HW8 of the WDLP.

Please accept this submission as representations duly made to the HNP submission consultation. We would be grateful for your acknowledgement of this in due course and to be kept informed of the next stages of the Neighbourhood Plan process. Should you have any queries or require anything further at this stage, please do not hesitate to contact me.

Yours faithfully



Joanne Jones

Associate Director

M: +44 (0) 7812 980197

E: j.jones@nexusplanning.co.uk

Rachael Riach

From: Hywel James <h.james@nexusplanning.co.uk>
Sent: 10 November 2022 15:22
To: Neighbourhood Planning Mailbox
Subject: [EXTERNAL] Hazlemere Neighbourhood Plan Regulation 16 Consultation - Submission of representations on behalf of The Ernest Cook Trust
Attachments: Representations on behalf of the Ernest Cook Trust - Hazlemere Neighbourhood Plan Regulation 16.pdf
Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from h.james@nexusplanning.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 The Ernest Cook Trust, please find attached representations to the Hazlemere Neighbourhood Plan Regulation 16 consultation. This attached submission comprises a completed copy of the consultation survey with an enclosed letter.

I would be most grateful if you could confirm receipt of this submission.

Kind Regards

Hywel

Hywel James
Associate

M +44 (0) 7976 980 535
E h.james@nexusplanning.co.uk



LONDON | BIRMINGHAM | BRISTOL | MANCHESTER | READING

nexusplanning.co.uk



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Hazlemere Neighbourhood Plan submission consultation 2022

Open date: 29 September 2022

Close date: 10 November 2022

Name: Planning Policy Team

Phone: 01296 383 698

Email: neighbourhoodplanning@buckinghamshire.gov.uk

Overview

We want to hear the views of local residents and organisations on the Neighbourhood Plan for Hazlemere.

In September 2021, the Parish of Hazlemere was designated a Neighbourhood Area by Buckinghamshire Council. This followed an application by Hazlemere Parish Council.

Hazlemere Parish Council has now completed a period of local community engagement on the Hazlemere Neighbourhood Plan and have submitted the final 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 Hazlemere Neighbourhood Plans policies relate to:

- Delivering homes for first time buyers and downsizers
- Protecting and improving green Infrastructure
- Delivering zero carbon buildings
- Promoting sustainable transport
- Planning for sustainable development at Amersham Road / Tralee Farm

Related documents

The following documents are available on the Hazlemere Neighbourhood Plan submission consultation page at <https://yourvoicebucks.citizenspace.com/>

- Draft Hazlemere Neighbourhood Plan
- Hazlemere Neighbourhood Plan Basic Conditions Statement
- Hazlemere Neighbourhood Plan Consultation Statement
- Hazlemere Neighbourhood Plan Screening Statement

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
- Write to us at **Hazlemere 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 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 Thursday 10 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. 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)

N/A

3. Which organisation do you represent in this consultation?

THE ERNEST COOK TRUST

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*

HYWEL JAMES

5. Address*

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

NEXUS PLANNING
ROOM 704, THE PROGRAMME BUILDING
BRISTOL
BS1 2LZ

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.

H.JAMES@NEXUSPLANNING.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 SEE OUR ENCLOSED REPRESENTATIONS

End of the survey

Thank you for taking the time to complete this survey.

Please return your completed survey by midnight on **Thursday 10 November 2022**. You can:

- Email it to neighbourhoodplanning@buckinghamshire.gov.uk
- Post it to Hazlemere 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

Hazlemere Neighbourhood Plan
Planning Policy Team
Buckinghamshire Council
Queen Victoria Road
High Wycombe
HP11 1BB

Bristol
704 The Programme Building
7th and 8th Floor
1 All Saints Street
Bristol BS1 2LZ
nexusplanning.co.uk

Sent electronically to: neighbourhoodplanning@buckinghamshire.gov.uk

10 November 2022

Our Ref: 36172

Your Ref: Hazlemere Neighbourhood Plan Regulation 16 Consultation

Dear Sir / Madam

Representations on behalf of The Ernest Cook Trust

On behalf of The Ernest Cook Trust (“the Trust”), please find enclosed representation to the Hazlemere Neighbourhood Plan (“HNP”) Regulation 16 consultation. Following the Trust’s response to the Regulation 14 consultation, dated July 2022, we are instructed to respond to the Regulation 16 consultation that is considering the version of the HNP that will be submitted to the Neighbourhood Plan Examiner.

These representations have been prepared in the context of the Trust’s ownership of the Queensway Allotments, which is identified as a Local Amenity Space within draft Policy HAZNP2. Particular attention is given to the provisions of, and the justification supporting draft Policy HAZNP2, but commentary is also provided in relation to the HNP as a whole.

Given that the HNP is at the final stage of consultation prior to it being submitted for examination, particular regard is had to the Basic Conditions and the compliance of the HNP with the requirements set out in the relevant paragraphs of the National Planning Practice Guidance (“the PPG”) note titled ‘Neighbourhood Planning’ (ref. ID: 41). The HNP is considered against the relevant requirements under the following headings.

Evidence underpinning the Neighbourhood Plan

The PPG¹ states the following with respect to the evidence that is needed to support a neighbourhood plan:

“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the

¹ Paragraph ref. ID: 41-040-20160211

intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order." (Emphasis added)

The PPG² also states:

"In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions. There is no legal requirement for a neighbourhood plan to have a sustainability appraisal. However, qualifying bodies may find this a useful approach for demonstrating how their draft plan or order meets the basic condition. Material produced as part of the Sustainability Appraisal of the local plan may be relevant to a neighbourhood plan." (Emphasis added)

During the Regulation 14 consultation on the HNP undertaken by Hazlemere Parish Council between 30th May 2022 and 11th July 2022, no supporting documents were made available alongside the pre-submission draft of the HNP for consideration by members of the public or stakeholders. The documentation made available for the Regulation 16 consultation is as follows:

- Draft Neighbourhood Plan;
- Basic Conditions Statement;
- Consultation Statement;
- Screening Statement.

Accordingly, no evidence has been presented in support of the Neighbourhood Plan.

Having regard to the relevant paragraphs of the PPG, it is not possible for an Examiner to make an informed judgement on whether the HNP "guides development to sustainable solutions" or whether the intention or rationale of the policies is justified.

In light of this, the HNP cannot be properly tested and therefore cannot be concluded to meet the Basic Conditions.

Scoring of Potential Local Green Spaces and Local Amenity Spaces

As part of Appendix A of the HNP, a range of sites are assessed against Local Green Space Criteria to determine whether they should be designated as Local Green Spaces or Local Amenity Spaces.

As outlined earlier in these representations, it does not appear as though any evidence has been prepared to justify the HNP. Consequently, there is no evidence or methodology underpinning the identification of sites for assessment or the subsequent scoring of the sites against the Local Green Space Criteria at Appendix A of the HNP. Indeed, with respect to the Queensway Allotments there is no analysis provided to explain the scoring given for this site (as well as a number of the other sites assessed). Moreover, none of the other sites identified to be within the Green Belt have been designated as a Local Green Space or a Local Amenity Space (this is discussed later in these representations).

² Paragraph ref. ID: 41-072-20190509

Notwithstanding the above, the Trust does not agree with the scoring provided for the Queensway Allotments site, particularly against the following criteria:

- Tranquillity – the Queensway Allotments is located immediately adjacent to the Amersham Road, a busy main road that connects High Wycombe and Amersham. There is no methodology or evidence available to provide a rationale for the site having been considered to contribute towards this requirement, but it is not considered that the site can contribute towards this requirement in light of its location adjacent to a busy main road.
- Biodiversity – DEFRA does not identify that the Queensway Allotments includes any priority habitats and the Wycombe District Council proposals map does not outline any ecological designations at the site. Accordingly, there is no evidence that the Queensway Allotment scores well against the Biodiversity criteria and the identification of it as such is not justified.

In light of the above, the designation of the Queensway Allotments as a Local Amenity Space is not justified.

Need to Designate the Queensway Allotments as a Local Amenity Space

Notwithstanding the above, the Queensway Allotments is situated within the Green Belt and accordingly benefits from the protection against inappropriate development afforded to it by the National Planning Policy Framework (“the Framework”)³. Therefore, the further designation of the Queensway Allotments with less stringent requirements is not necessary.

Indeed, the PPG⁴ states the following in relation to the designation of Local Green Spaces:

“If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”

“One potential benefit in areas where protection from development is the norm (eg villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community.”

The built-up area of Hazlemere is not included within the Green Belt and it is only land beyond the settlement boundary that is constrained by the designation. Accordingly, in-line with the PPG, there is no benefit from designating land within the areas of the Parish that are covered by the Green Belt as Local Green Space. Indeed, none of the other sites identified to be within the Green Belt as part of the table at Appendix A of the HNP are given a Local Green Space or Local Amenity Space designation.

This is even more relevant in the context of Local Amenity Space which is subject to a less stringent policy requirement than land within the Green Belt (or a Local Green Space).

³ Paragraph 147

⁴ Paragraph ref. ID 37-011-20140306

Basic Conditions

As outlined earlier in these representations, it is not possible to test the compliance of the HNP with the Basic Conditions due to the absence of any evidence to justify the policies contained within. Nevertheless, the commentary in the Basic Conditions Statement with respect to the compliance of Policy HAZNP2 with the Framework makes no reference to any of the Framework's policies relating to Local Green Spaces or general amenity spaces – it is only concerned with climate change and green infrastructure matters (which are only relevant to criteria A and B of Policy HAZNP2). As such, there is no indication that criteria C and D of the policy are consistent with the Framework.

Having regard to the proposed designation's compliance with Policy DM12 of the Wycombe District Delivery and Site Allocations Plan (adopted 2013) ("the DSA"), which the Council claims, it is important to note the content of paragraph 6.73 of the DSA (which supports Policy DM12), which states:

"Designated green spaces are a key element of the District's green infrastructure, the retention of which is important. They are areas of open space within built-up areas which are not in the Green Belt but which are considered important for their recreational or amenity value. The purpose of this designation is to protect these spaces from fragmentation and development. Green spaces are included in the Open Space Audit." (Emphasis added)

Therefore, the designation of the Queensway Allotments, which is outside the built-up area and within the Green Belt (as reaffirmed by the adoption of the Wycombe District Local Plan in 2019), is inconsistent with Policy DM12 of the DSA.

Summary

Due to the absence of any evidence justifying the policies contained within, it is considered that the HNP has not been prepared in accordance with the guidance set out within the PPG and it is not possible to test the compliance of the HNP with the Basic Conditions.

Notwithstanding this, the Trust does not consider that the HNPs scoring of the Queensway Allotments against the criteria for Local Green Spaces / Local Amenity Spaces is justified. Moreover, the designation of the Queensway Allotments as a Local Amenity Space is inconsistent with Policy DM12 of the DSA so would fail the Basic Conditions.

Yours faithfully



Hywel James
Associate



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

Buckinghamshire Council

Issued via email:
neighbourhoodplanning@buckinghamshire.
gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

05 October 2022

Buckinghamshire – Hazlemere Neighbourhood Plan submission 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: 20 October 2022
Our ref: 408208
Your ref: Hazlemere Neighbourhood Plan – REG 16



Planning Policy Team
Buckinghamshire County Council

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

BY EMAIL ONLY - Neighbourhoodplanning@buckinghamshire.gov.uk

T 0300 060 3900

Dear Sir or Madam

Hazlemere Neighbourhood Plan – Regulation 16

Thank you for your consultation request on the above dated and received by Natural England on 29th September 2022.

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..

Natural England does not have any specific comments on this draft neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England



Historic England

By email only to:

Our ref:
Your ref:
Main: 020 7973 3700
e-seast@historicengland.org.uk

Date: 24/10/2022

Dear Sir or Madam

**RE: Hazlemere Neighbourhood Plan 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



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

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





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30th November 2022

Ref: Hazlemere NDP Reg 16

Dear Sir/Madam,

**Hazlemere Neighbourhood Plan – Regulation 16 Submission Consultation
Town and County Planning (England) Neighbourhood Planning (General) Regulations 2012 (as amended)**

Buckinghamshire Council have reviewed the submission version of the Hazlemere Neighbourhood Development Plan; the Basic Conditions Statement and the Consultation Statement. To assist the examiner, the council's comments are divided into two; comments that relate to the basic conditions and comments that help to improve and update the plan.

Should any of the comments be unclear or, if you would like further information in relation to points raised please contact us using the contact details at the top of the letter.

Yours sincerely,

Nina Merritt
Senior Planning Policy Officer
Buckinghamshire Council

Comments relating to Basic Conditions

| <u>Policy or paragraph</u> | <u>Page</u> | <u>Comments</u> | <u>Modifications</u> |
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| Policy HAZNP1: Delivering Homes for First Time Buyers and Downsizers | 21 | The policy reads more as a statement of aspiration than a tool against which to assess whether a planning application is acceptable. For larger sites, Policy DM22 already requires a mix of dwelling sizes and tenure. If the intention is that for sites below 10 dwellings larger houses will be resisted or a mix which includes smaller dwelling is to be required the policy needs to be explicit. Otherwise it is difficult to understand how this policy will help deliver smaller dwellings for first time buyers or downsizers. | Consider moving this policy into supporting text. |
| Policy HAZNP2: Protecting and Improving Green Infrastructure | 22 | <p>As currently written the policy does not meet the basic conditions. Firstly it does not comply with paragraph 131 of the NPPF which seeks to retain trees where possible. In addition, proposals which lead to the felling of any trees will be refused unless it can be demonstrated it is unavoidable and satisfactory mitigation measures are put in place. It is not possible for the felling of a single tree, without a TPO or outside a Conservation Area to require permission. It would also be inappropriate to have a blanket ban on felling. This part of the policy cannot be implemented.</p> <p>It is also not in conformity with Policy DM34: Delivering Green Infrastructure and Biodiversity in Development of the Wycombe Local Plan which allows for other green infrastructure to be considered if trees are not</p> | <p>Consider placing part C of the policy into a separate Local Green Space Policy, alongside reviewing the designations at Amersham Road Space Designation and Orchard adjacent to the Land off Amersham Road.</p> <p>Review the designation of Local Amenity Spaces against the Local Green Space criteria.</p> <p>Reword part E of the policy to align with National Policy, Local Plan Policy and the Biodiversity Net Gain and Tree Canopy SPD's.</p> |

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| | | <p>deliverable. In particular, it does not comply with point 2.b of policy DM34 on mitigation hierarchy or the supporting text (paragraph 6.155).</p> <p>The policy or supporting text should also refer to the adopted Biodiversity Net Gain SPD which sets out the mitigation hierarchy. There is also question over the deliverability of the compensation without the evidence around owning/securing the land.</p> <p>With regards to Part C of the policy, we suggest adding this as a separate policy titled 'Local Green Spaces'. With regards to the Amersham Road Space designation, this does not conform to basic conditions as it will add uncertainty/lack of clarity in the development plan, by trying to give an extra level of protection to the woodland. It may prevent the delivery of policy HW7: Land at Terriers Farm clause 4a)ii and as such is contrary to the intent of this strategic policy.</p> <p>With regards to the <i>“Orchard adjacent to land off Amersham Road”</i>, the land is already designated as a Green Space under policy DM12 of the Delivery and Site Allocations Plan. The designation was an addition to the DM12 spaces in the 2019 WDLP. In addition, where it says <i>“Proposals for development on a Local Green Space will only be supported in very special circumstances”</i>, it is recommended to change this to, <i>“proposals for inappropriate development on a Local Green Space will only be allowed in the very special circumstances as set out in NPPF paragraphs 149 and 150, as per para 103”</i>.</p> | |
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| | | <p>We recommend deleting part D of the policy and reassessing the sites under the Local Green Spaces criteria. This part of the policy seeks to designate sites under a designation which doesn't exist in the planning system – the supporting text sets out what the LAS are trying to achieve, but if it is a protection akin to the LGS one, then the sites should be assessed as per the NPPF criteria and either meet these criteria or not. Other sites can be left as is, protected by DM12 Green Spaces policy of the Delivery and Site Allocations Plan for most of them. The policies map shows that land covered by WDLP strategic policy HW20 (which allocates land at Queensway to provide a new cemetery to High Wycombe urban area) as land falling under HAZNP2- on the key: “protecting and improving GI”. The site remains in the Green Belt and AONB -The land to the north and east of Queensway looks to be an extensive track of land thus not meeting the LGS criteria and is already Green Belt - Land at Grange farm is already in the green belt.</p> <p>The proposal to achieve a minimum of 25% canopy cover on sites is in line with LP policy. However there is no evidence that this is achievable within the 10 year requirement. The Canopy Cover SPD was underpinned by a significant amount of work looking to see if this was achievable, taking into account different growth rates of different species, with a calculator developed accordingly. It could lead to inappropriate fast growing species. This therefore needs further consideration or</p> | |
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| | | evidence to underpin the requirement to demonstrate it is achievable. | |
| Policy HAZNP3: Delivering Zero Carbon Buildings | 27 | <p>This policy seeks to go beyond what is required by the NPPF and moves into the areas covered by building regulations. There is no evidence which underpins this policy.</p> <p>Part a) It is also unclear within the policy if this applies to all development including house builder applications and applications for stables, agricultural buildings, telecoms masts etc. which all come under the definition of development. It is also not clear on how this will be assessed.</p> <p>Part b) This part suggests that development which would otherwise be unacceptable in terms of design/layout/plot size etc., will be permitted if it can achieve Passivhaus Standards. This would be contrary to the NPPF which requires good design everywhere, and the adopted Local Plan policies including DM32 and DM35.</p> <p>Part c) It is unclear if this refers to all buildings or just habitable ones. More precise wording is required. It is also not clear what the situation would be if, post construction, it transpires that a development has a performance gap which cannot be rectified. It is unclear how this would be enforced.</p> <p>d) Again it is unclear if this should apply to all development or be refined to refer to particular types of</p> | Suggest deleting this policy and provide additional text in the supporting text to support the delivery of Zero Carbon Buildings. Consider referencing the Minerals and Waste Local Plan within the supporting text. |

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| | | <p>development. It is also not clear on what would be deemed acceptable or not.</p> <p>It may be useful to reference policy 10: Waste Prevention and Minimisation in New Developments from the Buckinghamshire Minerals and Waste Local Plan as it looks at “construction methods that minimise the use of primary minerals and encourages the use of building materials made from recycled and alternative materials.” This would support their approach to sustainable developments.</p> | |
| Paragraph 5.24 | 29 | <p>There is no evidence provided to support this statement. Evidence should be provided in terms of the impact these requirements would have on development viability.</p> | Suggest this paragraph is removed. |
| Policy HAZNP4: Promoting Sustainable Transport | 30 | <p>Part b) It is unclear how this point is achievable and calculated. We also suggest changing the word ‘may’ as this provides a level of uncertainty</p> <p>Part e) reads more as a statement rather than a policy and does not comply with policies in the Local Plan in relation to transport infrastructure linked to new developments.</p> <p>Point f) It is not clear what the “best standards of accessibility” might be and therefore it will be difficult to judge if a proposal complies.</p> | <p>Suggest additional information is provided on how point b is achievable and calculate. Also provide more certain wording.</p> <p>Remove part e from the policy and place into supporting text.</p> <p>Further explanation is required to define ‘best standards of accessibility’</p> |
| Policy HAZNP5: Planning for Sustainable Development at Amersham Road/Tralee Farm | 32 | <p>As currently written, this policy does not comply with the basic conditions. The policy currently duplicates and in some places is not in conformity with the policy HW8, a strategic allocation within the Wycombe Local Plan.</p> | <p>Remove duplication to policy HW8 within the Wycombe Local Plan.</p> <p>To ensure consistency, add ‘and the Wycombe Road’ at the end of the first bullet point under Part B of the policy.</p> |

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| | <p>It's worth noting that a HW8 development brief has recently been published which already adds detail to policy HW8 and sets out the Council's preferred approach in developing the site.</p> <p>It is unclear as to how and why the additional parcels of land bring the policy up to date as set out in the first paragraph.</p> <p>Point two and three from part a in the policy duplicates policy HW8. It also does not conform to the policy HW8 as it removes clause 1e.</p> <p>Part b.1 does not conform to policy HW8. Policy HAZNP5 states that vehicular access will be provided from the A404. Policy HW8 within the Wycombe Local Plan requires vehicular access to be provided from the A404 and the Wycombe Road.</p> <p>Part b.2 does not conform with HW8 as it omits clause 2.c) which refers specifically to improvements rather than simply provision of access to existing bus routes. With regards to part b.3 of the policy, it is not in conformity with NPPF. There is no evidence that this could be delivered. Part b.4 and .5 are additions and have not been tested regarding the viability. Point b.6 is duplicated.</p> <p>Part C does not conform to policy HW8. It deletes clause 3b of policy HW8. Part C.1 is a new addition. Part c.2</p> | <p>Further explanation is required to explain how and why the additional parcels of land bring the policy up to date.</p> |
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| | | <p>provides additional detail to clause 3d of policy HW8. The illustrative figure poses the question of whether these links would be meaningful enough to accomplish their multi-faceted functions, including dealing with the surface water flow path. Part c.3 is more specific to hedges whereas policy HW8 clause 3e refers to field boundaries. Part c.4 and 5 are also addition points to policy HW8. There is potential for c.5 to non-confirm if it sterilises too much land for development and risks reducing the overall quantum. Part c.6 is also a new addition and part c.7 also may not conform as it does not follow the mitigation hierarchy. Point c.8 duplicates clause 3.f of policy HW8.</p> <p>Part D is a duplication of clause 4 from policy HW8.</p> <p>The supporting text refers to the fact that HAZNP5 brings HW8 up to date because the Chiltern area site has not come forward. Given that the plan was adopted recently in August 2021, that HW8 does not rely on the Chiltern area site to come forward and is now supported by a Development Brief (published in September 2022), we object to this argument.</p> | |
| Plan E Planning for sustainable development at Amersham Road including Tralee Farm | 33 | The plan within the neighbourhood plan does not match the plan set within the Wycombe Local Plan. The plan within the neighbourhood plan also fails to take account of the landform and ecology. The plan has left white space rather than dark green for the woodland area fronting Amersham Road which is adjacent to HW8. This | Ensure the map aligns with the plan within the Local Plan. |

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| | | is considered to be an error as this area should be dark green. | |
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Comments to improve and update the plan

| <u>Policy or paragraph</u> | <u>Page</u> | <u>Comments</u> | <u>Modifications</u> |
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| Point 3: Planning Policy Context | 2 | The last sentence in this paragraph refers to policies and says they are from the local plan. Policy DM12: Green Spaces is from the DSA. The sentence needs to be reworded for clarity/accuracy | Amend the sentence to provide clarity |
| Paragraph 1.8 | 8 | The consultation concluded on the 11 th July and not the 13 th as stated in this paragraph | Amend the date to state 11 th rather than 13 th |
| Paragraph 2.4 | 10 | Description of wards is slightly confusing – it either has two or one ward. In addition Buckinghamshire Council established since April 2020 is no longer “new”. | Amend this to be factually correct. |
| Paragraph 3.6 and 3.7 | 14 | The NDP refers to strategic policies as only those contained in policies CP1 to CP12 –this is incorrect. Strategic policy is defined in the NPPF glossary. The CP policies are all strategic. Strategic policies also encompass Strategic Housing sites policies HW7 and HW8 and strategic policy HW20 which relate to a new cemetery provision for the urban area; DM34 is a strategic policy as it is an umbrella policy for DM10 to 14 in the Delivery and Site Allocations policy ; so is DM31 on the historic environment. All CP policies in the Wycombe Plan relate to the NDP + HW7 and HW8 +DM34 etc. So, the core policies will have implications for all the policies – there is a strategic thread running through the whole plan where any policy relates to these core policies. Reference has | Factually correct these two paragraphs |

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| | | been made to HW20 which allocates land at Queensway, Hazlemere, for a new cemetery, but erroneously classifying it as non-strategic. The Local Amenity Space designation conflicts with strategic policy HW20. In relation to HW8, where it says “also releasing land from the Green Belt” the word “also” should be deleted – as it is the only case of release from the Green Belt. | |
| Paragraph 3.7 | 14 | The list of policies from the Wycombe District Local Plan is missing policy CP4: Delivering Homes. This policy directly affects Hazlemere NP area as it sets out where housing developments will take place in the overall plan – including reference to NP areas and site allocations. | Include policy CP4: Delivering Homes from the Wycombe District Local Plan into the list of policies. |
| Paragraph 3.7 | 14 | The list of policies from the Wycombe District Local Plan is missing policy CP11: Historic Environment. This policy directly affects Hazlemere NP area as it sets out how the authority will consider development that affects the historic environment within the NP area such as the Terriers Conservation Area along with Listed Buildings and non-designated Heritage Assets. | Include policy CP11: Historic Environment from the Wycombe District Local Plan into the list of policies. |
| Paragraph 3.8 | 15 | There is a factual inaccuracy in relation to the first bullet point. Only a small part of the Terriers Farm allocation (Policy HW7) falls within the Hazlemere Parish. As it reads, it currently stipulates that 500-541 homes will be built within the parish at Terriers Farm. | Make clear that this allocation is only partially within the parish area. |
| Paragraph 3.9 | 16 | Consider adding heritage assets such as the Terriers Conservation Area and listed buildings in the list as these apply to the parish of Hazlemere. | Consider adding heritage assets such as the Terriers Conservation Area and listed buildings in the list. |

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| Paragraph 3.10 | 16 | It would be useful to include policy DM31: Development affecting the Historic Environment as it would apply to Hazlemere Parish. | Consider including policy DM31: Development affecting the Historic Environment. |
| Policy HAZNP1: Delivering Homes for First Time Buyers and Downsizers | 21 | The policy refers to 'the village' but we don't have any 'village' boundary. It is not clear where the village starts and finish | Change the word 'village' to either 'settlement' or 'built up area'. |
| Policy HAZNP2: Protecting and Improving Green Infrastructure | 22 | <p>Part a) It is unclear how the nature and location of development in relation to the network will be judged and applied. Further clarification is required to help implement this when determining a planning application.</p> <p>Part b) It is unclear what is meant by 'Proposals' and when the requirement to deliver 10% biodiversity is triggered. Clarification is needed to determine if this is for all development including, householder applications, advert applications, change of use applications and listed building applications or for major development schemes. It is also unclear how this sits alongside the adopted Biodiversity New Gain SPD.</p> <p>In addition, the word 'should' allows for interpretation. This should be changed to 'will' to add certainty. Clarification is also required on what is meant by 'not practical' and how this is demonstrated. The High Wycombe area that adjoins the NP area is unparished and so it is unclear as to whether this means that these area cannot be considered until after an adjoining Parish has been ruled out.</p> | <p>Provide some further explanation on how the nature and location of development in relation to the network will be judged and applied.</p> <p>Provide further clarification on what is meant by the term 'Proposals'</p> <p>Change the word 'should' to 'will' to add certainty.</p> <p>Explanation is required on what is meant by 'not practical'</p> <p>Provide clearer maps of the Local Amenity Spaces</p> |

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| | | <p>Part d) The NP policy map is not detailed enough for the Development Management officers to be able to determine what these areas of local amenity space actually cover. Each one needs a clear boundary on a map at a more suitable resolution so there is no debate as to whether land is local amenity space or not.</p> <p>Part e) Not all proposals have landscaping schemes. It is unclear if where no landscaping schemes are proposed, if this part of the policy is not applied or if all proposals will now require a landscaping scheme.</p> | |
| Paragraph 5.8 | 23 | This paragraph should also refer to the designation under DM12 of a new Green Space at HW8 as part of the WDLP process, as set out in appendix L schedule of the WDLP and on the WDLP policies map. | Add reference to the designation under policy DM12 of the new green space at site HW8 of the local plan. |
| Paragraph 5.15 | 25 | It currently suggests that the Canopy Cover SPD sets the requirement for 25% canopy cover. It is not the SPD that sets the requirement, the SPD just explains how to achieve it. The requirement is in policy DM34 | Amend the sentence to ensure it highlights that policy DM34 sets the requirements and not the SPD |
| Paragraph 5.37 | 34 | <p>The paragraph refers erroneously to the land in the former Chiltern area as “land to the north” when it lies in fact in the east of the site.</p> <p>The need for connections to facilities and bus routes to the north, which lie in Holmer Green, remains.</p> <p>There is no evidence of deliverability of the future active travel connection mentioned here and it will not have</p> | Amend the factual error. |

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| | | been tested in the viability for HW8 as part of the Local Plan. | |
| Paragraph 5.38 | 35 | The site allocated on with Wycombe Local Plan policies map does not include 20 Wycombe Road as described. It was in the then Chiltern District area. The land is in the control of Inland home who own the Tralee Farm Site. | Amend this factually incorrect sentence. |
| Appendix A: Hazlemere Green Infrastructure Network (Policy HAZNP2) | 46 | Part of the area coloured dark Green is a Designated Heritage Assets including Terriers Conservation Area and Listed buildings | May be beneficial to include these on the map and to provide a key |
| Archaeology | N/A | It is disappointing that archaeology is not considered within this Neighbourhood Plan. We would suggest that as a minimum, a policy is included which focuses on buried archaeology and recommends that development proposals should, as a minimum, consult with the Historic Environment Record (HER). This would be in accordance with paragraph 194 of the NPPF which states that in determining applications “As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. | Consider adding a policy on Archaeology within the plan. |
| Heritage/Archaeology | N/A | The Council are currently compiling a local list of heritage assets of local architectural or historic interest. Any sites confirmed on the list will be taken into consideration in the planning process. | |