The Planning Inspectorate

Report to Wycombe District Council

by Nicola Gulley MA MRTPI

an Inspector appointed by the Secretary of State

Date: 10 July 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the

Wycombe District Local Plan

The Plan was submitted for examination on 28 March 2018

The examination hearings were held between 16 July and 26 September 2018

File Ref: PINS/K0425/429/12

Abbreviations used in this report

AA	Appropriate Assessment
AMR	Authority Monitoring Report
AP	Action Point
AONB	Area of Outstanding Natural Beauty
ADSAP	Adopted Delivery and Site Allocations Plan
CCB	Clinical Commissioning Board
ChCB	Chilterns Conservation Board
DASAP	Adopted Delivery and Site Allocations Plan
DtC	Duty to Co-operate
DPH	Dwellings Per Hectare
FOAN	Full Objectively assessed need
FEMA	Functional Economic Market Area
GB	Green Belt
GIA	Gross Internal Area
GTAA	Gypsy and Traveller Accommodation Assessment
HEDNA	Housing and Economic Needs Assessment
HELAA	Housing and Economic Land Availability Assessment
HMA	Housing Market Area
HLS	Housing Land Supply
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
MEA	Main Expansion Area
MHCLG	Ministry of Housing, Communities and Local Government
MM	Main Modification
NHS	National Health Services
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PREA	Princes Risborough Expansion Area
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Wycombe District Local Plan provides an appropriate basis for the planning of the District, provided that a number of main modifications [MMs] are made to it. Wycombe District Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out a sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In three cases, MM7, 17 and 59, I have added consequential modifications that I consider are necessary for the soundness of the Plan. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- An overall increase in housing land supply from 10,927 to between 11,659 and 11,899 dwellings;
- An amendment to Policy CP5 to allow for the delivery of a range of Class B uses and sui generis employment related uses on all employment allocations;
- The inclusion in Policy CP6 of the requirements for new retail floorspace;
- An increase in the indicative number of dwellings at: Policy HW5 - Abbey Barn South and Wycombe Summit from 505 to 580 dwellings; Policy HW6 – Gomm Valley and Ashwells from 530 to between 520 and 720 dwellings; and at Policy HW7 - Terriers Farm and Terriers House from 500 to between 500 and 540 dwellings;
- Deletion of Policy HW15 - Land to the rear of Hughenden Road, High Wycombe
- The amendment of Policy DM24 to require the provision of affordable housing on the basis of units; and
- Modifications to the wording of development management policies for consistency with national guidance, positive preparation and to reflect updated evidence.

Introduction

1. This report contains my assessment of the Wycombe District Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (the Framework) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised Framework was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Unless stated otherwise, references in this report are to the 2012 Framework.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Wycombe District Local Plan, submitted in March 2018, is the basis for my examination. It is the same document as was published for consultation in October 2017.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any Main Modifications [MMs] necessary to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out a sustainability appraisal (SA) of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and have recommended some consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA that has been undertaken. Where necessary I have highlighted these amendments in my report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises a set of 16 no. A3 plans identified as Appendix L: Maps as set out in the submitted Wycombe District Local Plan.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.

7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed to the Policies Map in Appendix L – Maps of the Wycombe District Local Plan (Regulation 19) and the further changes published as Annex 2 of the proposed MMs.

Consultation

8. Section 20(5)(a) of the Act requires that I consider whether the requirements of sections 19 and 24(1), the regulations under section 17(7), and any regulations under section 36 have been met. My findings in relation to these matters are set out in the following paragraphs.

9. The content and timing of the Plan and the approach to public consultation / engagement is set out in the Local Development Scheme (LDS)[1] and the Statement of Community Involvement (SCI)[2]. A number of local residents and interest groups have expressed concerns about the effectiveness of the public consultation. These include claims that the Council failed to engage with local communities in a constructive and meaningful way, informed rather than included local communities in decision making, did not disseminate information effectively and had insufficient regard for the comments and representations made to proposals throughout the plan making process. I am however, satisfied that the Council has made genuine attempts to effectively consult and engage with stakeholders at every stage of the plan making process and has complied with the requirements set out in the SCI for the LP. Moreover, there is no substantive evidence to lead me to conclude that the Council has failed to comply with the relevant legislation, national policy and guidance, or SCI.

Sustainability Appraisal

10. A SA report, including a Strategic Environmental Assessment, (SA) was published in September 2017[3]. As part of the Examination, the SA was updated through the compilation of a composite SA document which brought together evidence base documents[4] to provide a single document, the provision of a clear explanation of the site selection process and how it relates to the SA, the addition of a new chapter in the SA which provides a detailed overview of findings in respect of the draft Plan and its cumulative effects, and an appraisal of the MMs.

11. During the hearing sessions several representors expressed concern that the plan making process had failed to give appropriate consideration to alternatives. These concerns related primarily to the formulation of the strategy, settlement hierarchy and the site assessment process. I am however, satisfied that the SA of the Plan's strategy, policies and allocations has considered reasonable alternatives and that the reasons for selecting particular policy approaches and site allocations, and rejecting others, are clear. Specific aspects of the SA work conducted during the examination are dealt with in the relevant sections of this report.

[1] WDLDP12
[2] WDLDP11
[3] WDLP2 & WDLP2.1
[4] SA1, SA2, SA3, SA4, SA5, WDLP2, WDLP2.1, WDLP10.19 (where relevant to the SA) and WDLP10.22.

12. Overall, I am satisfied that the sustainability appraisal, including the consideration of reasonable alternatives, has been carried out throughout the process of preparing the Plan, as required by section 19(5) of the Act, and complies with the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance.

Habitats Regulations Assessment

13. In accordance with the Habitats Directive[5], an HRA[6]of the Plan has been undertaken and reviewed as necessary in the light of changes put forward during the examination. The HRA, which was revised to take account of the *'People over Wind, Peter Sweetman v Coillte Teoranta'* and the *'Holohan v. An Bord Pleanál'* **judgements**, concluded that significant effects were likely or uncertain in relation to: Air pollution at Windsor Hill SSSI, Bradenham Woods, Park Wood and the Coppice SSSI, and Bisham Woods SSSI (components of the Chiltern Beechwoods SAC), Aston Rowant SAC and Burnham Beeches SAC; and Recreational pressure at Windsor Hill, (components of the Chiltern Beechwoods SAC) and Burnham Beeches SAC. Appropriate Assessments of these effects were undertaken, and it was concluded that the Plan would not adversely affect, either alone or in combination, the integrity of the SACs assessed. Based on the submitted evidence, I am satisfied that the Plan is compliant with the requirements of the Habitats Directive.

Climate Change

14. The Plan includes policies designed to ensure that the development and use of land in the district contribute to the mitigation of, and adaptation to, climate change as required by section 19(1A) of the Act. These include the development strategy and other policies which focus development in locations within the Tiers 1 to 6 of the settlement hierarchy thereby reducing the need to travel; CP12 (Climate Change), DM33 (Managing Carbon Emissions: Transport and Energy Generation), DM38 (Water Quality and Supply) and DM39 (Managing Flood Risk and Sustainable Drainage Systems); Policies CP10 (Green Infrastructure and the Natural Environment), DM34 (Delivering Green Infrastructure and Biodiversity in Development) and DM35 (Placemaking and Design Quality) which provide a framework for green infrastructure, design and place making, the natural environment and biodiversity. The policies are based on the findings and recommendations of studies contained in the Council's evidence base.

Assessment of the Duty to Cooperate

The Duty to Cooperate

15. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33(A) in respect of the plan's preparation. The Council's Duty to Co-operate Report[7] (REF WDLP8) details the strategic, cross-boundary issues of relevance to the plan's preparation such as housing, employment (including retail) infrastructure, Travellers and Travelling Showpeople, heritage and the historic environment, Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) green infrastructure and biodiversity, flood

[5] European Union Habitats Directive (92/43/EEC)
[6] WDLP 3, 3A, 3B and 3C
[7] WDLP8

risk, water quality and supply, and identifies the bodies with whom the Council sought to co-operate in the plan making process.

16. Of particular note is the positive and constructive approach to co-operation and joint working taken by the Buckinghamshire Authorities. This approach has led to a number of important outcomes including:

- A Memorandum of Understanding (MoU) between the Council and Aylesbury Vale District Council (AVDC) to allocate land within its emerging LP to meet the unmet housing need of 2,275 dwellings in Wycombe District[8];
- A MoU between AVDC and the other Buckinghamshire Councils in respect of the allocation and distribution of land for Class B employment uses within the defined Functional Economic Market Area[9]; and
- Joint working between the Councils on the production of a number of strategic evidence base documents including those relating to the definition of Housing Market Area / Functional Economic Market Area in Buckinghamshire, the Buckinghamshire Housing and Economic Development Needs Assessment and the Buckinghamshire Green Belt Assessment.

17. Whilst concerns have been raised under the auspices of the duty to co-operate, these fundamentally relate to other aspects of the Plan's legal compliance or to its soundness and are, consequently, addressed elsewhere in this report. Importantly, no organisation with whom the Council is required to co-operate contends that the Council has not fully met the duty.

Conclusion on the Duty to Cooperate

18. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 10 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness and legal compliance rather than responding to every point raised by representors.

Issue 1 – Is the objectively-assessed need for housing soundly based, supported by robust and credible evidence, consistent with national policy? And are there any unmet needs and if so, how will they be addressed during the Plan period?

[8] MoU3 and WDLP8.1
[9] MoU5 and WDLP8.1

Housing Market Area

20. The Council, together with its partner authorities, commissioned a study to determine the housing market area (HMA) and Functional Economic Market Area (FEMA) for each local authority within Buckinghamshire. The study[10], which was updated in 2016 to allow for consideration of additional 2011 Census data[11], looked at a range of factors including commuting patterns, house price data, migration flows within the County and wider region. The findings of the updated Study indicate that Wycombe District exhibited high levels of self – containment and, as a consequence, falls wholly within the Central Buckinghamshire HMA. On the basis of the evidence presented the HMA is justified and represents an appropriate basis on which to assess housing need in the District.

Objectively-Assessed Need for Housing in Wycombe

21. The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) has sought to establish the Full Objectively Assessed Need for Housing (FOAHN) and Full Objectively Assessed Economic Needs (FOAEN) across Buckinghamshire. The assessment was: initially produced in 2015[12]; updated in 2016[13] to reflect the decision of South Buckinghamshire and Chiltern District Councils to produce a joint local plan, as well as include newly released population and household projection data and consultation feedback received by all four authorities; and supplemented by an Addendum in 2017[14] which provided additional analysis and clarification in relation to the economic development needs assessment and the need for affordable housing. The evidential base line for the Plan is provided by the HEDNA Update (2016) and HEDNA Addendum (2017).

22. The HEDNA Update identifies an OAHN for Wycombe District of 13,200 dwellings for the plan period. This figure has been derived using the 2014-based household projections which identified a baseline figure of 10,991 households that was adjusted to reflect the individual circumstances of the District. In accordance with the advice in the PPG[15], adjustments have been made to the baseline figures, including the use of a 10-year migration variant, an allowance for transactional vacancies, second homes and suppressed households and other demographic factors such as changes in the birth and death rates and the reduction in household size. The use of a 10-year migration trend, which takes account of short-term fluctuations in migration rates and household formation rates is a robust and appropriate approach. The result of these adjustments was an increase in the base line figure to 11,207 dwellings. The approach to, and nature of, the adjustments made to the baseline have been clearly explained in the HEDNA Update, are based on robust evidence and have resulted in the definition of a figure on which the OAHN can be based.

23. In addition to the adjustments to the 2014 baseline, the HEDNA Update also assessed the need for a further uplift to be made to the figure arising from other factors including:

[10] HMA3
[11] HMA1
[12] HEDNA5
[13] HEDNA3
[14] HEDNA2
[15] Planning Practice Guidance – Housing and Economic Needs Assessment (2014)

- Market Signals – Consideration was given to a range of different market signals in the HMA, including matters such as house prices, affordability and development rates. These findings indicated that house prices in the HMA had increased consistently over the period 2011-16, that the affordability ratio for housing had deteriorated over the same period and the rate that new housing was being developed in the HMA was below that of the national average. The study concluded that in addition to making provision for concealed families and homeless households, a 10% uplift should be applied to the baseline housing requirement figure for Wycombe to address market signals. Based on the evidence presented I consider this is realistic and robust approach.

- Jobs Growth – In order to determine the potential impact of jobs growth on the OAHN for the Buckinghamshire HMA, the HEDNA considered a range of factors including: changes in the number of economically active people; forecast growth in the number of employees in the HMA/FEMA; and the impact of commuting patterns throughout the county. The findings suggest that overall it was likely there would be an increase of 40,700 jobs in the FEMA over the period 2013-33 and that in order to meet this increase there will be a need for 28,800 extra workers. Demographic projections predict that natural growth would result in the provision of an extra 22,500 workers. Therefore, in order to address the projected shortfall in workers, the HEDNA recommends an increase in the provision of new housing in the HMA/FEMA of 4,329 dwellings. The requirement was apportioned across the FEMA authorities and resulted in an additional need for 1,254 dwellings in Wycombe. However, when account was taken of the uplift for market signals it was clear that the projected growth in workers exceeded forecast and planned jobs growth in the District and that, as a result no further adjustment was needed. Although some concern was expressed about the use of census data, the approach taken is justified and based on robust and credible evidence.

24. I have had regard to the arguments that the OAHN should be either higher or lower than 13,200 dwellings. However, I consider that the figure is based on robust evidence which included a reasonable set of assumptions and is justified having regard to the circumstances of the District.

Affordable Housing

25. In accordance with the Planning Practice Guidance[16], the HEDNA Update defines the quantum of new affordable homes needed in Wycombe over the plan period and considered whether an increase in the OAN for housing would assist in delivering the number of homes required. In doing so the assessment looked at a range of different data sources including those in relation to homelessness, concealed households and overcrowding and considers the ability of households to buy or rent accommodation within the District. The Assessment concludes that there is a need for an additional 3,100 new affordable homes to be provided in Wycombe over the plan period. Topic Paper 2: Housing[17], explains that based on the housing supply contained in Policy CP4, the Plan would make provision for some 3,065 new affordable homes over the Plan period. The estimated need would therefore be within 1% of the estimated supply. As a consequence, the HEDNA Update makes no provision for an uplift in the baseline figure.

[16] Planning Practice Guidance – Housing and Economic Development Needs Assessment
[17] TP2

26. Whilst the potential exists for the delivery of affordable housing to fall below the level required, I am content that the mechanisms outlined in the monitoring framework would be sufficient to ameliorate such an occurrence.

Student Accommodation

27. The Wycombe District Council Strategic Housing Market Assessment (2013) Report of Findings[18] indicates the presence of the Buckinghamshire New University is a potential driver for change in the High Wycombe housing market area. To ensure that appropriate consideration has been given to the potential impact of student accommodation on the OAHN, the Council reviewed the issue and presented evidence[19] that: indicates that there has been a decline of approximately 598 or 7% in student numbers over the period 2005-16; that this trend data had been factored into the calculation of OAHN for the District; and that should a need arise for additional accommodation, it could be met through the implementation of an extant permission for a 258 bed halls of residence. Based on the evidence presented, I am satisfied that the approach taken to considering the need for student accommodation and its impact on the OAHN accords with the requirements of national planning policy.

Latest Household Projections

28. The 2016 – Based Household Principal Projections for England were issued shortly after the completion of the LP hearing sessions in September 2018. The projections indicate that household growth in Wycombe has slowed significantly and that the number of households shown in the 2016-based household projections is approximately 40% lower than that shown in the 2014-based household projections. Additional evidence presented in respect of this matter indicates that should the OAHN be revisited in light of the latest projections it is likely to result in a reduced housing requirement for the District[20].

29. However, there are some doubts about the reliability of the 2016-projections and their reliability for plan making. Notwithstanding this, the PPG on HEDNA makes clear that the household projections are only the starting point for establishing a housing requirement figure. For these reasons and having regard to the importance of boosting the supply of housing, it would be unjustified to revisit the Plan's evidence base and delay adoption of the Plan in the light of the 2016-based projections. In order to ensure certainty about the approach, it is recommended that the revisions outlined in **MM6** in respect of this matter are included in the plan.

Housing Land Availability

30. In order to meet the FOAHN for Wycombe the Council undertook an assessment of the capacity of the District to accommodate additional housing development. The Housing and Economic Land Availability Assessment[21] (HELAA), through a number of iterations and in conjunction with other studies such as the housing capacity

[18] HM4
[19] Council's Response to the Inspectors Follow Up Question 4
[20] Council's Response to the Inspectors Follow Up Question 3
[21] HELS1

review, Green Belt and AONB assessments and the SA process [22], assessed in detail the potential for new housing to be delivered from a range of sources. This included: the potential for development on unallocated sites capable of accommodating 5 dwellings or more; the release of land within the Green Belt; development in the AONB; a new settlement; the expansion of the existing settlements of Longwick-cum-Ilmer, Great and Little Kimble-cum-Marsh, Saunderton and Stokenchurch; an increase in the development capacity at the Princes Risborough Expansion site; a windfall allowance; and increased site densities. Matters in relation to the Green Belt, AONB and site specific issues are considered under issues 4, 7 and 8.

31. The HELAA used a 5-stage assessment process which identified the site/broad locations for development, considered the suitability, availability and achievability of sites/broad locations, assessed the potential for windfall development, reviewed the results of the assessment in order to determine if further opportunities for housing development existed, and identified the Plan's potential 5 year housing land supply and trajectory.

32. The findings of the Draft HELAA[23] indicated that the combination of all of the sites identified as suitable for development, including those within the Green Belt and AONB, would result in the provision of land for the development of 9,083 new dwellings. Following comments from Aylesbury Vale District Council[24] the Council reviewed the assumptions in the HELAA. The review concluded that Wycombe had the capacity to deliver 10,927 dwellings, some 2,275 dwellings short of the defined OAHN for the District.

33. The approach taken to defining the development capacity of the District in the HELAA process was well-considered, methodical and comprehensive and has resulted in the identification of a realistic and achievable housing target.

Unmet Need

34. To ensure the OAHN is delivered, the Council has, under the DtC, entered into a MoU with the AVDC for land to accommodate the remaining 2,275 dwellings to be allocated in their emerging local plan. Evidence presented at the hearing sessions confirmed that an appropriate uplift in housing supply had been included in the Regulation 19 Vale of Aylesbury Local Plan (VALP) and that the plan was, at that time, subject to examination. Whilst some apprehension has been expressed about the appropriateness of the unmet need for Wycombe being provided in the emerging VALP, it is consistent with NPPF and represents a positive approach to the delivery of new housing that would, largely, be within the same HMA and timeframe as that of the LP. As such, I consider that the approach to the delivery of unmet need is sound.

Housing Requirement

35. To meet the OAHN, Policy CP4 outlines a requirement for 10,925 new dwellings to be constructed in the District over the Plan period. Figure 6, as updated by **MM6**, indicates that in order to meet the housing target over the plan period, there is a

[22] HELS6, GB1, AONB1 and SA1
[23] HELS2
[24] HELS5

housing land supply (HLS) of between 11,659 and 11,899 dwellings. The HLS is made up of:

- Between 5,359 – 5,599 dwellings on allocated sites;
- 255 dwellings on sites allocated in the Adopted Delivery and Site Allocations Plan (2013);
- 100 dwellings on sites allocated in the 'made' Longwick-cum-Ilmer and Bledlow-cum-Saunderton Neighbourhood Plans (NP);
- 137 dwellings on sites to be allocated in the emerging Great and Little Kimble-cum-Marsh NP;
- 2,404 dwellings on sites that had been constructed between 1st April 2013 and 1st April 2018;
- 2,865 dwellings on sites which had an extant planning permission or were under construction on 1st April 2018; and
- 539 dwellings on windfall sites.

36. The Updated Monitoring Data to April 2018[25] indicates that when data from 2017-18 is taken into account the number of completions increases from 1,065 to 2,404 dwellings and the number of sites with planning permission or under construction has increased by 409 to 2,865 dwellings. These figures have also been adjusted to take account of expired permissions on unallocated sites and demolitions and in my view provide a robust basis on which to calculate this element of the Plan's housing supply.

37. The HLS makes an allowance for the provision of 80 dwellings within the NP of Longwick-cum-Ilmer (Policy RUR5), 20 dwellings in the Bledlow-cum-Saunderton NP and 137 dwellings in the emerging Great and Little Kimble-cum-Marsh NP (Policy RUR6). Sites which already have planning permission in Longwick-cum-Ilmer are included in the commitments.

38. The windfall element of the supply provides for 539 dwellings to be constructed on unallocated sites during the period 2020-33. The allowance has been calculated having regard to the historic trend data in respect of completions on sites of 5 dwellings or less over the period 2006-2016. No allowance is made in the calculation for the development of residential gardens or prior approvals for office to residential conversions. This is because the use of data relating to development of residential gardens to predict future windfall allowances is contrary to the requirements of the NPPF and insufficient trend data currently exists to accurately predict the contribution office conversions may make to the supply of housing. In my view the approach taken to defining the allowance is justified and supports the windfall figure contained in the Plan.

39. The housing supply calculations do not include a provision for undetermined planning applications. Although this source has the potential to yield housing, sites which did not have planning permission on the base date were, correctly, omitted from supply calculation. The sites will, following the grant of planning permission, be included in subsequent iterations of the Plan. Equally, the Plan does not identify reserve or safeguarded sites.

40. Whilst the HLS contained in Policy CP4 exceeds the requirement by between 734 and 974 dwellings, the level of exceedance is not significant, but would be

[25] AP3.3

sufficient to provide a buffer for flexibility and allow the Council to manage the fluctuations in the supply and delivery of new housing over the Plan period.

Other Housing Policies

41. Policy DM22 provides the mechanism for managing the provision of new development to meet a range of housing needs and tenures in Wycombe over the Plan period. This includes the requirement for all sites to include a mix of dwelling size, type and tenure and, on sites of 100 dwellings or more, for at least, 5% of the plots to be self-build. Concerns were expressed about the appropriateness of requiring a mixture of dwellings on all sites, that the policy failed to adequately address the needs of older people and that the scale of the requirement for self-build plots was overly restrictive and would have an adverse impact on site viability. Although concerns have been expressed about Policy DM22, subject to **MM57** which is necessary to clarify requirements in respect of mixed housing developments, self-build plots and to explain the need for older persons accommodation, the policy is sound.

42. In conjunction with Policy DM22, Policy DM23 provides a framework for the development of other residential uses in Wycombe. Subject to the revisions contained in **MM58** which is necessary to clarify when Class C2 development is acceptable in the countryside, the policy is supported.

43. Modifications, through **MM68**, are also necessary to Policy DM36 to ensure that the requirements in respect of managing future extensions and alterations to dwellings are clear and robust.

44. Policy DM40 seeks to ensure that new dwellings meet up-to-date national technical standards for accessible and adaptable housing as set out in the Planning Practice Guidance on Housing- Optional Technical Standards. In support of the policy, additional evidence was submitted which demonstrates that the need for the implementation of the standards in Wycombe and that the requirement would not place an undue burden on new development in the District[26]. In light of this, and subject to **MM71** which requires the inclusion of the current technical standards in the Plan, the requirements of Policy DM40 are justified and comply with the requirements of the NPPF.

Conclusions on Issue 1

45. Having considered all the matters raised and subject to the MMs, I am satisfied that the Plan's overall requirement for housing is based on a rigorous and objective assessment of need which takes account of local circumstances. Although the OAHN for housing cannot be met fully within the District, the approach to identifying the Plan's housing land supply has been rigorous, based on robust and credible evidence and has sought to maximise the provision in accordance with the key objectives of national planning policy. The approach to providing for unmet need is sound.

[26] Action Point 3.20

46. **Issue 2 - Is the objectively-assessed need for employment provision soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?**

Functional Economic Area

47. With the adjoining authorities of Aylesbury Vale, Chiltern and South Buckinghamshire, Wycombe District lies within the Central Buckingham FEMA and in the sub-FEMA of Wycombe, Chiltern and Beaconsfield. Travel to work patterns show strong levels of containment within the four Districts, with approximately 68% of residents employed in the Central Buckingham FEMA[27]. Having regard to the nature of the District and its strategic location, the FEMA represents the most appropriate basis to assess employment needs.

Employment OAN and Employment Land Requirements

48. The Vision and objectives of the Plan seek to ensure that Wycombe is a District that is economically strong and fosters the economic strength of the M40/A404 location and that of the rural economy. The Plan through Policy CP5 seeks to provide a framework to deliver and manage these strategic requirements.

49. The evidence base for the economic components of the Plan is provided by a combination of the HEDNA Update[28] and HEDNA Addendum[29]. These test a number of forecasts and projections, including labour demand forecasts[30] which are based on the anticipated growth in the employment sector; labour supply forecasts which are founded on the dwelling led population projections; past employment take up projections which are based on floorspace completions over a 10 year period; and 'bottom up' forecasts which take account of local demand information. In addition, the studies provide an updated analysis of the property market, assess the supply and demand balance and, using an established national methodology[31], identify future floorspace and land requirements for the FEMA and constituent authorities.

50. Critics contend that the approach taken to defining the OAN for employment is too cautious, it fails to take account of commercial insights and would result in the under provision of employment land in the FEMA. However, determining the OAN for employment is not an exact science. In this case the approach taken to determining employment needs in the combined HEDNA was based on a detailed assessment which looked at a range of clearly defined and distinctly different growth scenarios and was informed by a property market analysis that considered a range of contextual indicators. It includes a review of the current and future trends in the sector and the views of property agents, business representatives and organisations operating in the FEMA. The approach accords with the requirements of the PPG on HEDNA, is comprehensive, well considered and provides a positive basis on which to plan for the employment needs of Wycombe.

51. The findings of the Addendum indicate that jobs growth in the District is projected to rise from a total FTE workforce of 36,100 in 2013 to 40,200 by 2033, an increase of 4,100 jobs or 11%. When considered on a sectorial level the findings

[27] HMA1
[28] HEDN3
[29] HEDN2
[30] Provided by Oxford Economics and Experian
[31] Homes and Communities Agency Employment Density Guidance (2015)

indicate that there will be a combined growth for Class B1a and B8 uses of some 5,400 FTE employees and a decrease of 1,300 FTE employees in Class B1c/B2 uses. When the level of projected job growth is converted into floorspace requirements, the assessment concludes that there would be a total need for an additional 54,000 sqm of floorspace to accommodate the total projected employment growth up to 2033. The Addendum indicates that this would result in a need for 14 hectares of land for Class B1a, 8 hectares for Class B1c/B2 and 10 hectares for Class B8 use. This equates to a total need for 32 hectares of new employment land in Wycombe over the Plan period once existing commitments are taken into account.

52. The conversion ratios were based on those contained in the Housing and Communities Agency Employment Density Guidance (2015) and have been reviewed against the methodologies used by other local plans in the region. Some concern has been expressed about the level of the ratio applied to Class B8 use, principally because it is suggested that it does not reflect the floorspace requirements associated with national and regional warehousing and distribution development. However, I am content that the ratio falls within the parameters identified in the Guidance for Class B8 use and would ensure that appropriate provision is made for warehouse development. **MM7** is required to allow for a more flexible approach to the delivery of Class B uses on allocated sites and to ensure that Class B8 development could, where necessary, be accommodated in the District.

Employment Land Supply

53. The process of identifying land for the development of new employment related uses, was, broadly, similar to that undertaken in respect of housing. The HELAA process identified 23 possible sites for employment related development. Each site was then subject to a detailed assessment process which considered its development potential, suitability, availability, achievability including viability and the potential to overcome constraints to development. This was informed, in part, by the findings of the Wycombe Commercial Assessment[32] which provided commercial property advice on the provision of employment allocations. Sites within the Green Belt and AONB were subject to additional assessments which looked specifically at the impact the removal or development of the site would have on the specific designation.

54. The findings of the HELAA process identifies 6 sites, of which 1 site is within the Green Belt, as suitable for allocation in the Plan for strategic and local Class B use. Each of the sites identified for allocation was found to be deliverable within the second quarter of the plan period and would serve, to differing levels, the needs of the regional and local employment market. The combination of these sites would deliver 21 hectares of land for new employment related development. This leaves a shortfall of some 10 hectares in employment provision which, subject to the MoU[33],would be provided within in Aylesbury Vale.

55. The quantum of land identified in the HELAA falls below the level of the OAN for employment in the District. Therefore, in order to ensure that sufficient land is made available to meet the defined need within the FEMA land has been identified

[32] HELS12
[33] MoU5

for new employment related development within the emerging Aylesbury Vale Local Plan. This includes land for Class B1a and B8 uses. Critics of the approach suggest that the provision of land for Class B8 use in Aylesbury Vale would not address market demand in the sector nor would it assist in meeting the suppressed need for warehousing in Wycombe. However, the Plan makes provision for 6 hectares or 60% of the OAN for Class B8 use; that the remaining 4 hectares would be provided within the same FEMA as the need arises; and, as I outline later in my report, the revisions proposed to Policy CP5 would allow for greater flexibility in the delivery of land for Class B8 use in Wycombe. In light of this, I am satisfied that the approach taken to the allocation of land to meet the identified OAN for employment is sound.

Employment Requirement

56. To address the need of the local economy, Policy CP5 outlines a requirement for the provision of 21 hectares of new strategic and local employment land. To meet this requirement land is allocated at the following sites:

- Wycombe Air Park, High Wycombe Policy HW16);
- Abbey Barn South, High Wycombe (Policy HW5);
- Gomm valley, High Wycombe (Policy HW6)
- Land adjacent to Regents Park, Princes Risborough (Policy PR9);
- Lower Icknield Way, Princes Risborough (Policy PR10); and
- Stokenchurch Business Park, Stokenchurch (Policy RUR10)

57. In addition, the policy seeks to: safeguard strategic and local employment areas; support High Wycombe as a centre for office development; and facilitate rural enterprise and diversification.

58. In order that Policy CP5 is flexible and therefore responsive to changes in the sector**, MM7** is necessary to include a new criterion which seeks to ensure that a range of Class B Uses or similar sui generis uses can be developed on new or existing employment sites and to amend criterion 2 to support the development of new offices within High Wycombe town centre. Similar revisions are necessary Policy PR9 (**MM34)** and Policy RUR10 (**MM53)**. Whilst I note the representations made to MM7, I am content that the modified Plan would improve the clarity and application of the policy and accord with the Framework. I have made a consequential change to Policy CP5 (3) to read 'town centre'.

59. Policy DM28 seeks to restrict development within strategic employment areas to B class uses. Whilst the approach is similar on local employment areas the policy provides some flexibility and allows Class D1 uses and sui generis /other uses which complement the primary use of the site. In order to improve the clarity and application of the policy, **MM61** is required to provide a new criterion and reasoned justification which seeks to clarify the nature and scale of the sui generis /other uses acceptable on local employment sites and the approach to be taken to the redevelopment of existing sites. A further revision, through **MM78** to Appendix G – List of Strategic and Local Employment Areas, is necessary to ensure the accuracy of the information contained in the Plan.

Conclusions on Issue 2

60. Overall, having regard to all the matters raised and subject to the MMs the Plan's strategy for employment is soundly based, supported by robust and credible evidence and consistent with national planning policy.

Issue 3 – Is the Plan's overall strategy justified, effective and consistent with national planning policy?

Vision and Objectives

61. Wycombe District is in southern Buckinghamshire and is characterised by attractive and historic settlements many of which are set within or close to the spectacular landscape of the Chilterns AONB and / or the Metropolitan Green Belt. The location of Wycombe in relation to the strategic road and rail network and its proximity to London has meant the District has experienced a significant increase in the demand for new housing and commercial development over recent years.

62. The key issues which need to be addressed by the LP have been identified in Wycombe District – Big Challenges. These include the need to provide new market and affordable homes, jobs and infrastructure in a manner that promotes sustainable development meets the need of the growing and aging population and respects the unique character of the District.

63. The Plan's Vision, which is taken from the Sustainable Community Strategy for Wycombe, encapsulates these key issues and provides a clear, locally distinct and aspirational picture of the place Wycombe is intended to be at the end of the Plan period. Whilst it has been suggested that the Vision should be expanded to include reference to the rich natural and historic environment of the District and to provide a commitment to planning for future development needs, these amendments are not necessary to improve either its clarity or application.

64. In order to achieve the vision, the LP sets out a series of objectives under the following eight themes: Cherish the Chilterns; Strengthen the Sense of Place; Foster Economic Growth; Improve Strategic Connectivity; Facilitate Local Infrastructure; Deliver Housing; Champion Town Centres; and Mitigate Climate Change. Subject to **MM3**, which correctly amends the Plan to clarify that there is no prioritisation between objectives, and its approach to flood risk, I am satisfied that the objectives address the key issues and considerations that have been identified, expand on the Plan's vision and provide a clear context for the LP Strategy.

Overall Strategy

65. The strategy contained in the submitted Plan comprises four distinct elements: an overarching core policy which seeks to deliver sustainable development throughout the District; a spatial strategy which seeks to distribute development in a proportionate and sustainable manner throughout the defined settlement hierarchy: a growth strategy which seeks to meet the defined need for infrastructure, future housing, employment and retail development; and a policy framework for the management of future development in Wycombe, which needs to be updated by **MM55** to reflect the requirements of the NPPF. The strategy is

accompanied by a diagram which clearly illustrates the distribution of development throughout the District, the AONB and Green Belt and the transportation linkages between individual settlements and the wider region.

66. A number of alternative strategy options were considered as part of the Local Plan: Options Consultation (2014)[34]. This included the consideration of a range of different housing and employment growth and spatial development options. These options were assessed and refined in light of the findings of the SA process, public consultation, the Duty to Cooperate and the evidence contained in a range of studies including those in relation to the settlement hierarchy, housing and functional economic market areas, retail, viability, land supply, the Green Belt, the AONB, transport, green infrastructure and flood risk and water. I am content that the process of assessing options and all reasonable alternative strategies was comprehensive and undertaken in a positive and robust manner.

Sustainable Development

67. Policy CP1 provides an overarching framework for the delivery of sustainable development at local level and requires that all new development contributes towards achieving the objectives of the Plan and the principles for development in High Wycombe, Marlow, Princes Risborough, Bourne End and Wooburn and the Rural Areas. The approach advocated by Policy CP1 is appropriate, consistent with the requirements of the NPPF and will provide a positive basis on which to deliver new, sustainable development throughout the District.

Spatial Strategy

68. The spatial components of the strategy are expressed under Policies CP2 and CP3 which, in combination, distribute growth and define the settlement hierarchy for the District.

69. It has been suggested that the approach to the distribution of housing and employment development outlined in Policy CP2 is constraints led. I am however, mindful that the combination of the AONB and Green Belt designation means that 77% of the District is subject to significant constraint and that it is incumbent on the Council, as part of the plan making process, to have appropriate regard for these constraints. In my view, the approach taken to the formulation of the overall strategy has, carefully, sought to balance the socio-economic and the environmental needs of the District. As a consequence, I consider that the Plan's strategy provides a positive framework which seeks to meet the District's need for new housing and commercial development, whilst continuing to safeguard those aspects of the built, natural and historic environment that are of local and national importance. These matters are considered in more detail in Issues 1, 2 and 7 of this report.

70. In light of this, I consider that Policy CP2 provides a logical and realistic approach to the delivery of development, is based on a clear understanding of the relevant socio-economic and environmental factors and provides a positive and flexible framework to meet the need for new development.

[34] CONS4

Settlement Hierarchy

71. Policy CP3, subject to **MM5** which is necessary to provide clarification about the approach to the development of previously developed land and the nature of the constraints to development, identifies those settlements which are considered to be sustainable and therefore capable of accommodating growth over the Plan period. These include: Tier 1 - Large Urban Areas; Tier 2 - Market Towns and Other Major Settlements; Tier 3 - Higher Order; Tier 4 - Other Service Villages; Tier 5 - Small Villages; and Tier 6 - Hamlets.

72. The Settlement Hierarchy[35] was defined following an assessment of the main socio-economic characteristics of each settlement and refined through the SA and public consultation process. The assessment process considered a range of factors including the existing population of each settlement, the availability of key services[36], travel distance between settlements and higher tier settlements and accessibility to public transport. The settlements were then ranked with those with the largest population and greatest number of key services at the top of the hierarchy. Some adjustments were made to the definition of higher tier settlements to allow for geographical factors and the proximity of smaller settlements. In my view the approach to defining the settlement hierarchy was based on comprehensive and robust evidence and has resulted in the logical and realistic categorisation of settlements across the District.

73. High Wycombe has the largest population and the highest number of services and has correctly been identified as the only Tier 1 Settlement in the District. Having regard to its role in the District and beyond, and taking account of its potential, it is justified that around 50% of the Plan's allocated housing and 75% of the allocated employment growth will be constructed in this settlement over the Plan period.

74. Tier 2 of the hierarchy includes the 'Market Towns and Other Major settlements' of Princes Risborough, Marlow and Bourne End/Wooburn. In combination these settlements are intended to accommodate 3,045 new houses on allocated sites and will provide for new/relocated employment development on the Regents Park (Policy PR9) and Lower Icknield Way (Policy PR10) sites over the plan period. These settlements have populations of between 6,890 and 14,325 residents and have between them 24 key services, 14 high-order services and have good access to public transport. Although more limited in terms of size and facilities than the 'Large Urban Areas', the 'Market Towns and Other Major Settlements' offer a good range of facilities and act as service centres for their own and surrounding communities. It is therefore appropriate that these settlements have been identified as capable of accommodating further growth.

75. Eleven settlements are identified as being 'Higher Order Service Villages' and 'Other Service Villages' and are in the third and fourth Tier of the hierarchy. These settlements have populations of between 5,965 and 682 residents and provide between them 73 key services, 11 high-order services and have good to limited access to public transport. Proposed new housing and employment related development in these settlements is of a smaller scale with the Plan allocating land

[35] SHS1 and SHS1.1

[36] Defined as post offices, primary schools, GP surgeries, food stores, community/village halls, high-order services such as secondary schools, dentists, pharmacies, indoor sports / leisure centres and permanent libraries.

for 326 new houses and 2.9 hectares of new employment land. In addition to these allocations, Policy RUR 5 and RUR 6 indicate that the Neighbourhood Plans for Longwick-cum-Ilmer Parish and Great and Little Kimble-cum-Marsh Parish will identify opportunities for a further 460 new houses to be built over the Plan period. Although more limited in terms of size and facilities than the 'Market Towns and Other Major Settlements', the 'Higher Order Service Villages and Other Service Villages' offer a good range of facilities and act as important service centres for their own, and surrounding communities. It is therefore appropriate that these settlements have been identified as capable of accommodating further growth.

76. The lowest two tiers of the hierarchy are 'Small Villages' and 'Hamlets' and include 38 settlements which have populations of less than 700 and offer limited key services. In view of the small scale of these settlements the Plan does not specifically allocate sites but, correctly, provides a policy framework which seeks to ensure that proposals for new housing and employment related development in these settlements comply with the Framework.

77. It was suggested that the approach to the categorisation of Bourne End/Wooburn as a Tier 2 settlement and Flackwell Heath as a Tier 3 settlement were incorrect. However, the evidence indicates that Bourne End and Wooburn combined have the fourth largest population in the district, benefit from a full range of key services and all but one of the high-order services, and have a 'good' accessibility by public transport to the district and wider region. Based on the evidence presented I am content that combining the settlements Bourne End and Wooburn to form a single Tier 2 settlement is justified, and that the combined settlement would be capable of absorbing future growth. With regard to Flackwell Heath, the evidence makes clear that, although the settlement has the fifth largest population in the district, it does not provide all the key services or high-order services expected of a Tier 2 settlement and only has 'fair' access to public transport serving Wycombe. In light of the evidence presented, I am content that Bourne End / Wooburn and Flackwell Heath have been correctly categorised.

78. Overall, I conclude that the approach to Policy CP3 and the definition of the settlement hierarchy is justified.

Growth Strategy and Management of Future Development

79. The growth component of the strategy outlines a realistic but nevertheless positive approach to meeting the defined needs and delivering the vision and objectives of the Plan. The growth strategy is expressed through Policies CP4 Delivering Homes), CP5 (Delivering Land for Business), CP6 (Securing Vibrant and High-Quality Towns) and CP7 (Delivering the Infrastructure to Support Growth) which, collectively, provide a framework for the delivery of: between 5,359 and 5599 new dwellings; 3100 new affordable homes; 21 hectares of land for employment purposes; and 22,300 square metres of new retail floorspace. The level of growth identified is based on the findings of evidence produced specifically to inform the development of the Plan and is consistent with the approach advocated in the Framework. More detailed matters relating to the growth strategy are considered elsewhere in the report and in the light of all the evidence, I am satisfied that it is sound.

Strategic Context

80. The location of Wycombe, between London and Oxford and its close links with the national motorway network and Heathrow Airport, means that the District is, in the later stages of the Plan period, likely to be affected by the implementation of a number of key strategic projects. These projects include the Cambridge –Milton Keynes – Oxford Arc, the East-West Expressway and the construction of a third runway at Heathrow. The Plan, as submitted, makes little reference to these projects or their potential socio-economic significance for the District. **MM1**,**2** and **4**, are necessary to include an explanation of the proposals, timescales and possible governance arrangements for the delivery of these projects so that the Plan has been positively prepared [37].

Conclusions on Issue 3

81. The Plan's overall strategy has been informed by evidence in relation to key strategic issues, objectives and the vision for the District. Based on clear and robust evidence, a sensible and logical settlement hierarchy has been defined which provides an effective framework for the distribution of growth and management of resources throughout Wycombe. Subject to the MMs described above, the strategy set out in the Plan is justified and likely to be effective in ensuring that the development needs of the District can be met in a way that contributes to the achievement of sustainable development, and it is consistent with national planning policy.

Issue 4 - Can the identified need for housing and employment provision be accommodated without releasing any land from the Green Belt? If not, do exceptional circumstances exist that would justify the release of land from the Green Belt?

Overview

82. The HEDNA[38] and HEDNA Addendum[39] suggest that the OAN for Wycombe over the Plan period is 13,200 new dwellings and 32 hectares of employment land. The Plan has been prepared in the context of the 2012 NPPF which requires that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities for growth.

83. In order to maximise the potential for delivering the objectively assessed need for housing and employment within the District, a Green Belt Review has been undertaken. The decision to undertake a Green Belt review was informed by early work on the SA, HEDNA and HELAA[40], which looked at a range of factors to determine the overall capacity for development across the District, including: appropriate scope for development at settlements in different tiers of the settlement hierarchy; capacity for development within the AONB; the release of employment land for housing; as well as considering different strategies for distributing growth across the District. In the Council's Response to the Aylesbury

[37] Council's response to Inspectors Follow Up Question 2
[38] HEDN3 and 5
[39] HEDN2
[40] HELS1

Vale Review of Housing Capacity[41], the Council further refined work on capacity including reviewing:

- The scope for development within the Parishes of Great and Little Kimble and Longwick-Cum-Ilmer (outside the Green Belt);
- The possible enlargement of the Princes Risborough Expansion Area;
- A re-assessment of developable areas within the former 'reserve' sites;
- An examination of the potential for releasing further employment and publicly owned land for the construction of housing;
- An appraisal of the potential for empty homes and housing estates for regeneration to yield additional housing supply.
- A review of windfall assumptions; and
- A re-assessment of development densities for all sites

84. The GB Review found that, outside the Green Belt, the District had the capacity to accommodate 9,788 new dwellings (74% of the OAHN) and approximately 5 hectares of new employment land (15% of the OAEN). This left a shortfall of some 5,689 dwellings and 27 hectares of employment land.

85. The findings of the Green Belt review concluded that there were 10 sites within the designation that were suitable for release and that the development of these sites would result in the provision of an additional 1,139 new dwellings and 17 hectares of new employment land. To accommodate this level of development, changes are proposed to the Green Belt boundary which would result in the removal of approximately 77 hectares of land from the designation. This equates to approximately 0.5% of the District's Green Belt.

86. The combination of all of the sites identified as suitable for development within, and outside the Green Belt, would result in the provision of land for the development of 10,927 new dwellings (83% of the OAHN) and 21 hectares of new employment land within the District (66% of the OAEN). The unmet need for 2,275 new dwellings will be met, through the DtC, in Aylesbury Vale. The remaining 10 hectares of new employment land will be delivered in the FEMA outside the District.

87. It is clear from the evidence presented that although every effort has been made to identify suitable land for development outside the designation, there would still be a considerable shortfall in the provision of land for new housing and employment development. The release of land from the Green Belt to provide for 1,139 new dwellings and 17 hectares of new employment land would make a significant contribution towards reducing this shortfall.

88. As such, I conclude that there is a compelling case for the release of land from the Green Belt to meet the OAN housing and employment development. This is, however, subject to exceptional circumstances being demonstrated for the alteration of the Green Belt boundaries to justify the removal of specific sites for development, a matter that I deal with in Issue 8.

Green Belt Review

[41] HELS3

89. The Buckinghamshire Green Belt Assessment[42] was commissioned in partnership with the other authorities in the County[43]. The study reviewed: Green Belt and non-Green Belt land within the county; defined 'large built-up areas' within each constituent authority; identified logical and justified parcels of Green Belt land for assessment; assessed the parcels at a strategic level against the Green Belt purposes contained in the NPPF; and presented conclusions on the performance of each parcel. The findings of the review indicate that, within Wycombe, only the settlement of High Wycombe was considered to be a large built-up area and that that, although every area of the Green Belt met the NPPF purposes to some degree, there were some weakly performing areas that required further consideration. The study identified 7 weakly performing areas, either wholly or partially, within Wycombe.

90. The Green Belt Part Two Assessment (GB2)[44] reviewed the designation within Wycombe at a detailed level. The study built on the earlier review and considered adjustments to the Green Belt boundary in respect of, weakly performing areas identified in the Part One study, sites promoted by land owners and developers at earlier stages in the LP process and sites identified by the Council. In total 104 sites were identified. The sites were subject to a 4-stage assessment process in order to determine if exceptional circumstances existed and justified their removal from the Green Belt. These stages considered whether a site: was capable of delivering sustainable development; was, when considered against the Green Belt purposes, capable of being removed from the designation; otherwise developable; and whether there were exceptional circumstances to justify the amendment to the Green Belt Boundary.

91. The review identified 10 sites which it considered appropriate for removal from the Green Belt. These were:

- Wycombe Air Park, High Wycombe (Policy HW16);
- Land Adjoining High Heavens Household Recycling Centre, Off Clay Lane, High Wycombe (Policy HW 17);
- Hollands Farm, Bourne End (Policy BE2);
- Land at Green Farm, Glynswood, High Wycombe (Policy HW9);
- Land off Amersham Road including Tralee Farm, Hazlemere (Policy HW8);
- Land East of Sidney House, Lane End (Policy RUR 3)
- Land adjacent to Seymour Court Road, Marlow (Policy MR6);
- Clappins Lane, Naphill, (Policy RUR7);
- Poppy Road, Princes Risborough (Policy PR11); and
- Heavens Above, 16 High Heavens, Marlow Bottom (Policy RUR 11)

92. The Council has considered the need to deliver sustainable development which is central to the assessment, and appropriate consideration was given to the matters identified by representors. Equally clear is that the approach to identifying sites suitable for removal from the Green Belt has been rigorous and demonstrates the Council's wish to maximise the opportunities to meet as much of the housing need within the District as possible. With regard to consistency with the NPPF, there is no nationally prescribed methodology for reviewing Green Belts. The NPPF does

[42] GB2
[43] Aylesbury Vale DC, Chiltern DC, South Bucks DC and Buckinghamshire CC
[44] GB1

however, clearly set out the 5 purposes of designation and it has become common practice amongst LPAs to conduct reviews which seek to test whether the designated area, as a whole, still meets these purposes and if any subsequent removal of sites would be deliverable and promote sustainable development. The methodology in both the Green Belt Studies reflects this approach, and in my view adequately addresses the requirements of the NPPF.

93. As such, I am satisfied that both the Green Belt Assessments, as they relate to Wycombe District, provide a sound and robust evidence base which are consistent with the requirements of the NPPF and afford a basis for the enduring Green Belt boundaries shown on the policies map.

Green Belt Policy

94. *The framework for the management of development in the Green Belt is provided by Policies* CP2 and CP8. In addition, Policies DM42, DM43 and DM45 provide a mechanism for managing the development, replacement or extension of dwellings and conversion of existing buildings in the Green Belt. Subject to **MM72**, **73**, **74**, **75** and **76**, which are necessary to reflect the requirements of the NPPF and provide greater clarity about the application of the policies, I am satisfied that the framework provided is justified and consistent with the requirements of national policy.
Conclusions on Issue 4

95. Subject to the MMs outlined, I conclude that there is a compelling case in principle for the release of land from the Green Belt to meet objectively assessed need for housing and employment. This is however, subject to the exceptional circumstances being demonstrated for the alteration of the Green Belt boundary to justify the removal of specific sites from the designation for development, matters dealt with in Issue 8.

Issue 5 – Are the requirements for affordable housing and Gypsy and Traveller accommodation supported by robust and credible evidence, consistent with national policy and will they be met during the Plan period?

Affordable Housing

96. As indicated in Issue 1, the findings of the HEDNA indicate that there is a need for an additional 3,100 new affordable homes to be provided in Wycombe over the plan period.

97. The Wycombe District Council Viability Assessment (2017)[45] provides the evidence base for the Plan's approach to securing affordable housing. The study employs a residual land valuation model, which: includes locally specific factors such as construction cost, sales values, developer profit, density and housing mixes, CIL and S106 contributions and benchmark land values for agricultural, residential and commercial/employment land; and tests a number of target options against a range of different sized and located notional sites in order to determine the contribution new residential schemes can make to the supply of affordable housing in the District.

[45] VIA1

98. I am content that the viability assessment has been prepared in accordance with the requirements of national planning policy and provides a robust and comprehensive basis on which to determine the Plan's affordable housing target.

99. Policy DM24 of the submitted LP sets out the requirement for the provision of affordable housing on sites of 11 dwellings or more outside the AONB. Sites outside the AONB are required to provide on-site affordable housing of at least 40% of the total Gross Internal Area (GIA) on sites that are greenfield, were last used for Class B Business uses or similar sui generis employment generating uses, and 30% of the total GIA on all other sites. Whilst inside the AONB, sites of between 6 and 10 dwellings or more or greater than 1000 sqm of residential floorspace, are required to make commensurate financial contributions.

100. Policy DM24 as drafted does not comply with the requirements of national planning policy in the NPPF, which seeks the provision of affordable homes on sites of 10 or more dwellings. In addition, although the use of GIA as a means of securing affordable housing is innovative, it is also likely to lead to uncertainty amongst land owners, developers and lending institutions about the cost of a development over the life of a scheme and could, potentially, delay new housing delivery.

101. **MM59** is necessary to amend Policy DM24 to require the provision of affordable housing on sites of 10 or more dwellings outside the AONB, replace the use of GIA with a requirement for provision to be based on the total number of units on sites and to provide further clarification about the mix and tenure of provision. Additional evidence contained in the Wycombe District Council Viability Assessment Briefing Note[46] supports the proposed modifications and indicates that these changes would result in a requirement outside the AONB for 48% of the total number of units on greenfield sites or land last used for Class B business or a similar sui generis use and 35% of the total number of units on all other sites.

102. Whilst I note the representations made to MM59, I am content that the revision proposed would improve the clarity and application of the policy and accord with the Framework. However, in order to ensure numerical consistency, I have made a consequential change to Policy DM24(3) to delete 'between 6 and 10 dwellings' and replace it with 'between 6 and 9 dwellings'.

Gypsy and Travellers Accommodation

103. In accordance with the requirements of the Planning Policy for Traveller Sites (PPTS) (2015), the Aylesbury Vale, Chiltern, South Bucks and Wycombe District Gypsy, Travellers and Travelling Showpeople Accommodation Assessment (GTAA)[47], provides an assessment of the current and future accommodation needs in Wycombe District for the period 2016-2033.

104. The findings of the GTAA indicate that: there is no need for additional Gypsy and Traveller pitches to meet the needs of households that fall within the PPTS, Annex 1 definition but a need exists for 7 pitches to meet the needs of unknown households; and a need exists for 1 plot to meet the needs of Travelling

[46] AP3.10
[47] GT1

Showpeople households that fall within the PPTS, Annex 1 definition and for 2 additional plots to meet the needs of unknown households. The GTAA therefore shows a total need for 1 plot to meet the needs of a household and 7 pitches and 2 plots for unknown households over the Plan period. Of these, 3 pitches and 1 plot are required to be provided between 2016-23, with the remainder required towards the latter end of the Plan period.

105. The approach taken to determining the need for new accommodation is based on clear and robust evidence which, I am satisfied, has been prepared in a manner that is consistent with the requirements of the NPPF and PPTS.

106. Evidence contained within Topic Paper 10: Meeting the needs of Travellers[48], indicates that planning permission for 5 qualifying pitches has been granted since the base date of the GTAA. The remaining need, for 2 pitches and 3 plots, will be accommodated through the intensification of existing sites in the District during the last quarter of the Plan period

107. The submitted Plan makes no specific provision to address the remaining need. Rather, through Policy DM26, as amended by **MM60** which is necessary to make clear that the policy applies to the settlement area of Marsh, it provides a framework for delivering additional pitches/plots through a combination of new sites and/or the expansion and intensification of existing sites. In light of the modest scale of the remaining need and the evidence of delivery I am content that the proposed approach to providing additional pitches and plots is realistic and justified.

Conclusions on Issue 5

108. Overall, subject to the MMs, I am satisfied that the requirements for affordable housing and Gypsy and Traveller accommodation are supported by robust and credible evidence, consistent with national policy and that they will be met during the Plan period. In addition, I am satisfied that, subject to the MMs, the Plan takes fair and reasonable account of the needs of Gypsies and Travellers as a group with protected characteristics in accordance with the Equality Act.

Issue 6 - Are the requirements for town centres and community facilities supported by robust and credible evidence and consistent with national policy?

Town Centres

109. The submitted Plan through Policy CP6 augments the ADSAP and defines the hierarchy for town centres, directs development to the appropriate centre and seeks to improve the quality of the public realm through the implementation of regeneration proposals and a reduction in vacant units.

110. To provide certainty, **MM8** is necessary to amend Policy CP6 to identify a need for new convenience and comparison goods floorspace in High Wycombe and Princes Risborough and explain how it will be delivered. The requirement of the policy is supported by the findings of the Wycombe Town Centres and Retail Study,

[48] TP10

Addendum[49] which identifies a need for: 4,500 sqm of new convenience and 30,600 sqm of new comparison floorspace in High Wycombe; and 1,200 sqm of new convenience and 800 sqm of new comparison floorspace in Princes Risborough for the Plan period.

Community Facilities

111. Policy DM29, supported by the Community Facilities Strategy[50], provides the framework for the management of existing and provision of new community facilities in the District. To ensure the currency of the policy and to allow for the consideration of issues in relation to the viability of existing and future uses, **MM62** is necessary to update the reasoned justification to accord with national policy.

Conclusions on Issue 6

112. Subject to the MMs, I am satisfied that the requirements for town centres and community facilities are supported by robust and credible evidence and consistent with national policy.

Issue 7 – Does the Plan provide a framework for the management of the Natural, Built and Historic Environment that is soundly based, justified and consistent with the requirements of national policy?

The Chilterns Area of Outstanding Natural Beauty

113. The strategic framework for development in that part of the Chilterns AONB that falls within the District is outlined by Policy CP2 of the submitted Plan. The policy, which is supported by the findings of the AONB Site Assessment Report, provides a strategy which seeks to ensure that all new development within the AONB, when considered as a whole, contributes towards the conservation and enhancement of the natural beauty of the area. In my view the policy provides a clear, justified and positive strategy which appropriately balances the requirement to conserve and enhance the AONB with the need for future development.

114. At local level, Policy DM30 provides the mechanism for managing all new development within the AONB.

115. The inclusion of '*where possible enhance*' within the policy, does not in my view diminish the requirement to enhance the AONB contained in national policy, rather it recognises that not all new development could or should seek to improve the designation. This is particularly the case with development such as small-scale domestic extensions and proposals for the change of use of existing buildings. Equally, I consider that the inclusion of '*significant*' in criterion 3 of the policy, in relation to the assessment of the impact of development on the setting of the AONB, does not weaken the approach but represents a sensible way of allowing the nature, scale and location of new development to be balanced against its potential impact on the designated area. With regard to major development, I am satisfied an appropriate definition has been provided within the reasoned justification of the policy and that it complies with the NPPF. To provide greater clarity about the requirements of the policy, **MM63** revises the reasoned justification of Policy DM30

[49] RET1

[50] INF9 and 10

to make reference to Policy CP10 and explain how proposals in the setting of the AONB will be assessed. This is necessary for the effectiveness of Policy DM30.

Development in the Area of Outstanding National Beauty

116. The Area of Outstanding Natural Beauty Site Assessment Report[51] provides the evidential basis for the identification and allocation of sites for housing and employment related development within the AONB. The study reviewed sites using a four stage methodology which: identified the broad locations suitable for development, having regard to the settlement hierarchy and the findings of the Green Belt Assessment; considered the suitability of the sites in light of a variety of possible constraints; provided a detailed landscape assessment of the site; and assessed whether the allocations of each of the remaining sites would be major development in the AONB. Of the sites reviewed the assessment identified 12 sites for allocation, on which it was considered development would not be 'major' and would therefore not have a serious adverse effect on the AONB. These sites are:

- Land to the rear of Stokenchurch Business Park (Policy RUR10)
- Land to the rear of Mill Road, Stokenchurch (Policy RUR8)
- Land at Wood Farm, Stokenchurch (Policy RUR9)
- Land south of Finings Road (Policy RUR1)
- Land at Sidney House (Policy RUR3)
- Land between Chalky Road and Marlow Road, Lane End (Policy RUR2)
- Part of Greens Farm, Glynswood, High Wycombe (Policy HW9)
- Seymour Court Road, Marlow (Policy MR6)
- Heavens Above, 16 High Heavens Wood, Marlow Bottom (Policy RUR11)
- Land off Clappins Lane, Naphill (Policy RUR7)
- Land to rear of Poppy Road, Princes Risborough (Policy PR11)

117. Although differing approaches have been taken in the Green Belt and the AONB Assessments, it is clear that the legislative and policy basis for these designations are fundamentally different and that these differences, are, at least in part, the reason why the assessments have not been conducted in the same way. A key difference is the way the boundaries of the designations can be altered. In the case of Green Belts these changes can be made by local authorities through the plan making process, whilst AONB boundaries can only be altered by Central Government.

118. In terms of the development within the AONB, the Assessment explains that the NPPF does not provide a strict numerical definition of 'major development' but rather requires that a judgement is made about the individual circumstances of a site, the nature and scale of the proposal and the potential impact of these factors on the AONB. To provide clarity the Assessment methodology outlines the factors which need to be considered in determining the significance of the development. These include an assessment of the local context of the site in terms of its scale and form in relation to the existing settlement, the potential for the allocation to have a serious impact on the landscape, quiet enjoyment, wildlife/habitats and heritage of the AONB and whether or not the development could be considered 'major' in the normal meaning of the word. The approach taken in the Assessment and subsequent site allocations complies with the requirements of the NPPF and

[51] AONB1

provides a clear, logical and justified basis on which to make a judgement about what constitutes 'major development' in the AONB.

Green Infrastructure and Biodiversity

119. The Natural Environment Topic Paper indicates that in addition to the AONB, Wycombe has a number of sites of European, National and Local ecological and/or geomorphological importance. This includes Ancient Woodland, Special Areas of Conservation, Sites of Special Scientific Interest and Priority Habitats[52].

120. Policy CP10 in conjunction with Policy DM34 and Policies in the ADSAP provides a mechanism for protecting, conserving and enhancing natural environmental assets of local, national and international importance, protecting and enhancing green infrastructure networks and making provision for the long-term management and maintenance of green infrastructure.

121. Policies CP10 and DM34, as submitted, do not reflect the requirements of the NPPF in respect of green infrastructure and biodiversity gain. **MM9** and **MM66**, are necessary to ameliorate this and ensure consistency with national policy.

122. A number of representors have expressed concern that Policy DM34 (3) would have an adverse impact on the delivery of new housing, employment and retail sites. In many cases these concerns are based on the belief that to achieve the objectives of the policy, it would be necessary for trees to be planted on 25% or more of the developable area of a site. This is not the case, and the additional evidence presented during the Examination[53] demonstrates that the provision of trees with the capacity to create 25% canopy cover could be achieved without requiring tree planting on a quarter of the developable area of a site or adversely affect its development capacity. That said, no substantive evidence has been presented to demonstrate that significantly more than 25% canopy cover could be achieved on a range of sites or that the requirements of the policy are flexible enough to respond to the individual characteristics of a development or site. Therefore, **MM66** is required to amend the criterion by the deletion of 'at least', and to expand the definition of tree canopy to include green roofs and walls.

Landscape Character and Settlement Patterns

123. Policy DM32 provides a framework for assessing and managing the impact of development on the landscape character and settlement patterns of the District. Subject to **MM65,** which is necessary to clarify requirements in relation to the design, density and layout of development in semi-rural areas, the policy is sound.

Historic Environment

124. Wycombe is an area rich in heritage and has 61 designated Conservation Areas, over 1,200 Listed Buildings, 54 Scheduled Ancient Monuments and 11 registered historic parks and gardens and a significant number of non-designated heritage assets[54]. The framework for the management of the historic environment is provided by Policies CP11 and DM31.

[52] TP7
[53] Action Point 5.9
[54] TP9

125. It has been suggested that the Plan does not provide a positive and comprehensive strategy for the conservation and enjoyment of the historic environment, and that Policy DM31 fails to differentiate between designated and non-designated heritage assets.

126. To ameliorate the situation, **MM10** provides for revisions to Policy CP11 that clarify the approach to be taken to the management of designated, non-designated and historic landscapes in the District. Modifications are also necessary to Policy DM31, through **MM64**, to ensure that the policy clearly differentiates between designated and non-designated heritage assets. On this basis I am satisfied that Policies CP11 and DM31 comply with the requirements of national policy. However, I note that not all of the text proposed for deletion in PolicyDM31 was shown in the MMs table that was subject to consultation. I have therefore made an amendment to the text of MM64 to clarify the text to be deleted from Policy DM31.

Sense of Place

127. The framework for the management of the design of new residential and non-residential development within the built environment and the countryside is provided by Policies CP9, DM32, DM35, DM36, DM37 and DM44. In the interests of a clear and effective policy **MM67** is necessary to amend Policy DM35 by including a criterion which seeks to ensure the efficient use of land and a reference to the Chiltern Design Guide; **MM75** is required to modify Policy D44 by the deletion of the reference to 'employment' in the criterion 1.c; and revisions through **MM69** are necessary to ensure that Policy DM37 makes clear the approach to the provision of security shutters in buildings fronting a public highway.

Other Policies

128. Policy DM20 outlines those matters to be determined in accordance with the NPPF. In order to ensure the longevity of the policy, **MM56** correctly proposes to delete the specific reference to paragraphs of the NPPF in the policy. In order to ensure the factual accuracy of the Plan I have amended MM56 to clarify that it applies to the third version of the NPPF.

Conclusions on Issue 7

129. Subject to the MMs outlined, the Plan will provide a positive framework for the management of the natural, built and historic environment that is soundly based, justified and consistent with the requirements of national policy.

Issue 8 – Are the housing, employment, mixed-use and transportation and other allocations positively prepared, justified and effective? where necessary have exceptional circumstances been demonstrated to justify releasing land from the Green Belt? And do the allocations in the AONB accord with the requirements of national planning policy?

Site Selection Process

130. The individual site allocations contained within the submitted Plan were identified through the HELAA and refined as part of the SA process. In total 356 possible development sites were identified which, following and initial review, were

reduced 160 sites. Each of the site was then subject to a detailed assessment process which considered its development potential, suitability, availability, achievability including viability and the potential to overcome the constraints to development.

131. Sites within the Green Belt and AONB were subject to additional assessments which looked specifically at the impact the removal or development of the site would have on the specific designation.

132. There have been some challenges to the approach taken to the identification and assessment of sites, this is inevitable given that an element of planning judgement is required as part of the process. I am however, content that the reasons for selecting allocated sites and rejecting others are clear and that the conclusions are reasonable and logical.

133. In addition to identifying developable sites, the detailed findings of the HELAA and related studies were used to inform and define the scale of development and the detailed requirements contained in the Plan's site allocation policies. This approach will assist in ensuring the timely delivery of the allocated sites and that future development proposals respond appropriately to site specific issues.

Housing Densities

134. The HELAA explains that the Plan does not take a standard approach to the application of site densities. Rather, to determine the indicative development capacity for individual sites, consideration was given to a range of factors including the local development context, landscape and ecological constraints. Evidence in relation to the approach taken to the definition of density levels for every allocated site is contained in Appendix 4 of the HELAA[55]. To provide greater clarity about the average density for each of the allocations, **MM77** is necessary to include specific information in relation to the net developable area and dwellings per hectare (dph) of the allocated and committed housing sites within Appendix 7. The revised appendix indicates that the density levels on allocated sites range from 16 to 300dph. Although I note the variation in density levels, I am mindful that two thirds of the sites exceed 30dph and nearly half 35dph and that where they fall below these levels there are clear and logical reasons for doing so. In my view the approach to defining density levels is realistic, based on robust evidence and will assist in maximising the potential for the delivery of new housing development in the District.

135. **MM13**, **14**, **15** and **16** are necessary to amend the indicative development capacity at: Policy HW5 - Abbey Barn South and Wycombe Summit from 505 to 580 dwellings; Policy HW6 – Gomm Valley and Ashwells from 530 to between 520 and 720 dwellings; Policy HW7 - Terriers Farm and Terriers House from 500 to between 500 and 540 dwellings; and Policy HW11 - Clay Lane, Booker, High Wycombe from 30 to 40 dwellings. These modifications are necessary to reflect changes in the development context of the sites and will assist in ensuring an appropriate level of flexibility in the housing land supply.

[55] HELS1.4

Flood and Landscape Management

136. The framework for the consideration of matters in relation to flood risk and sustainable drainage systems is provided by Policy DM39, as revised by **MM70,** which is necessary to provide clarity about the requirements of national policy. The policy is based on the findings and recommendations contained in the Wycombe Strategic Flood Risk Assessment (SFRA) Level 1[56] and SFRA Level 2[57] and is, in my view, consistent with the requirements of national policy. To ensure that the requirements of the Policy are addressed in site specific proposals, revisions through **MM12**, **14**, **15**, **22, 38, 39, 40, 46** and **48** are necessary to the Policies HW4, HW6, HW7, HW19, PR13, PR14, PR15, RUR2 and RUR 4 to explain the requirement for proposals to manage local sources of flood risk. Similarly, in order to ensure that the development of allocated sites does not have an adverse impact on the landscape or AONB, **MM51** and **52** are necessary to amend Policies RUR8 and RUR9 to ensure that development takes a landscape-led approach. Other policies subject to similar modifications in relation to flood risk and landscape are addressed in the following site-specific assessments.

Housing Allocations

Policy HW8 - Land off Amersham Road including Tralee Farm, Hazlemere

137. The site could accommodate 350 dwellings and associated public open space. It is anticipated that the allocated site will be brought forward in conjunction with the adjoining site known as '*Land Off Earl Road*' which is in Chiltern District. The site is situated within the Green Belt and adjacent to the AONB. The allocated site, which comprises approximately 12 hectares of land currently occupied by agricultural buildings, warehousing, a former equestrian centre and some residential dwellings, is enclosed largely by residential development and is located adjoining the Tier 1 settlement of High Wycombe. The conclusions of the GB2 Assessment indicate that the Green Belt parcel, which contains the allocation: only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location for growth; capable of being removed from the Green Belt; and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

138. Although I note the issues in relation to the impact of the proposal on the existing orchard, flood risk and the provision of a primary school, I am content that, subject to **MM16** which is required to explain the requirements for flood management and educational provision, these issues are addressed in the policy and can be appropriately managed through the course of the development. Therefore, based on the submitted evidence, I am content that the allocated site is sound.

Policy HW9 Land at Green Farm, Glynswood, High Wycombe

139. The site at Green Farm, Glynswood is allocated for the construction of 50 dwellings. It is situated within the Green Belt and in the AONB. The allocated site,

[56] FRW12
[57] FRW2

which comprises a roughly square area of grassland enclosed by a combination of residential development and mature trees, is located on the urban fringe of the Tier 1 settlement of High Wycombe. The findings of the GB2 Assessment indicate that the allocated site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location, is capable of being removed from the Green Belt without adversely impacting on the wider designation and is suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

140. Several representors have suggested that because of its potential impact on a heritage asset, the Disraeli Monument, which is located across Hughenden Valley, the proposal constitutes 'major development' in the AONB. Whilst I recognise that the allocated site is visible from the Monument, I consider that the long range nature of these views together with the location of the site, adjacent to existing residential development, and the presence of boundary trees would ensure that the development of the site would appear to be part of the existing urban area and as such would not have a significant impact on the heritage asset or the enjoyment or landscape qualities of the wider AONB. Therefore, subject to the revision proposed in **MM17** which requires the addition of new criteria that seek to manage flood risk and clarify the nature of the view from the site, I am content that the allocated site is sound. Whilst, I note the representations made to MM17, I am content that the revision proposed would improve the clarity and application of the policy and accord with the Framework. I have made a consequential change to paragraph 5.1.71 of the LP.

Policies HW10 - Horns Lane, Booker, High Wycombe and HW11 - Clay Lane, Booker, High Wycombe;

141. Land at Horns Lane and Clay Lane are allocated for the construction of 64 dwellings and, subject to **MM18** which is necessary to increase the scale of development, 40 dwellings respectively. The sites, along with that allocated under Policy HW16 for employment, are located within close proximity to each other and are situated within the Green Belt to the south-west of High Wycombe. As a result, the submitted Plan identifies the sites allocated under Policies HW10, HW11 and HW16, and the intervening land, which accommodates small-scale commercial and residential development along Clay Lane, as being a single site proposed for removal from the Green Belt.

142. The Horns Lane allocation is located on the urban fringe of High Wycombe and comprises a roughly triangular area of land enclosed by a combination of residential development, the M40 and allotments. The Clay Lane allocation, which comprises an area of undeveloped land enclosed by Clay Lane and Clay Hill, is also located close to High Wycombe. The Wycombe Air Park allocation comprises two parcels of land which include the existing operational air park and a substantial area of undeveloped land. The allocation is enclosed by a combination of the M40, Clay Lane, Marlow Road and to the west by the legal and regulatory limits to development associated with the licensing and operation of the air park. The findings of the GB2 Assessment indicate that the combined site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, and is capable of being removed from the Green Belt without

having an adverse impact on the integrity of the wider designation and suitable for the proposed use.

143. Whilst the combined site is situated largely outside the urban area of High Wycombe, because of its proximity, connectivity and predominantly semi-urban character, the area for removal is, functionally, part of the larger area of the Tier 1 settlement, and as such in a sustainable location. The removal of a relatively small area of land, which is largely semi-urban in character, would not materially increase the potential for High Wycombe, Lane End or Marlow Bottom to coalesce, promote urban sprawl or result in the further encroachment of development into the countryside. Moreover, the requirements outlined in Policy HW11 and HW16 would, for the most part, ensure the establishment of appropriate and enduring boundaries. Therefore, having regard to my conclusions on Issue 1, 2, 4 and HW16 and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for employment and housing development.

144. The conclusions of the HELAA indicate that both the proposed allocated sites are largely free from constraint and based on the evidence presented I am content that the allocations in respect of Policies HW10 and HW11 are sound. I have made a consequential change to MM11 which amends Table 11 - Sites identified for housing or housing-led mixed use development in the High Wycombe area to reflect the change in indicative capacity at the Clay Lane site contained in MM18.

HW15 - Land to the rear of Hughenden Road, High Wycombe

145. The site, which is located close to the Hughenden Stream, is allocated in the Plan for the construction of an unspecified number of dwellings. Evidence presented by the Environment Agency[58] indicates that the site should be considered a Functional Flood Zone (Flood Zone 3b)[59] and that proposals other than 'water compatible' development and 'essential infrastructure' would be inappropriate and undeliverable at this site. The site allocation is not soundly based and **MM19 and MM80** are necessary to delete the allocation.

Policy MR6 - Land adjacent to Seymour Court Road, Marlow

146. Land adjacent to Seymour Court Road comprises an area of some 0.3 hectares of undeveloped agricultural land, which is allocated for the construction of 9 dwellings. The allocated site, which is situated within the Green Belt and the AONB, adjoins the Tier 2 settlement of Marlow and is enclosed by a combination of residential development and mature trees. The findings of the GB2 Assessment indicate that overall the site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

[58] SCG2A

[59] As defined by Table 1 'Flood risk' the Planning Practice Guidance

147. Whilst I note the issues in relation to the impact on the countryside and ribbon development, none of the matters identified demonstrates that the development of the allocation would be of an inappropriate scale or be harmful within the wider landscape. I am therefore, satisfied that the allocation, subject to **MM25** which is necessary to ensure a landscape-led approach to development, is sound.

Policy PR11 – Land to the rear of Poppy Road, Princes Risborough

148. The Poppy Road site is allocated for the construction of 58 dwellings. The site is situated within the Green Belt and, partially, the AONB. The allocated site, which comprises part of the existing garden of 108 Wycombe Road, is enclosed by a combination of residential development and mature trees and located adjacent to the Tier 2 settlement of Princes Risborough. The indicative layout plan[60] for the site indicates that the development would be sited in the north-eastern section of the site close to the existing urban area, whilst the remainder of the site would be undeveloped. Access to the allocation would be via a new link road leading from the Princes Risborough relief Road (Policy PR8) and the existing access from Wycombe Road.

149. The findings of the GB2 Assessment demonstrate clearly that the allocated site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location, is capable of being removed from the Green Belt without adversely impacting on the wider designation and is suitable for the proposed use. The Assessment recommended that, to ensure an enduring boundary for the Green Belt, landscape mitigation would be needed along the southern boundary of the site with Culverton Farm. This requirement has, correctly, been addressed in Policy PR11. Therefore, having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

150. The location of the proposed allocation, adjoining the urban area of Princes Risborough and the presence of mature boundary trees which, largely, screen the site from Pyrtle Spring and the countryside beyond, would, in my view, ensure that the development of the site would not be visually prominent or have a serious adverse impact on the character or visual qualities of the AONB. Matters in relation to the impact of a new highway access on the AONB are addressed in my findings in relation to the Princes Risborough Expansion Area.

151. With regard to constraints, it is clear that the allocation is, in part, a priority habitat, would be within Flood Zone 3 and that highway improvements would be required to ensure safe vehicular access arrangements. The written and oral evidence presented during the examination make clear that these issues can be positively addressed and managed through the development of the site. To ensure that this is accurately reflected in the policy framework, **MM36** proposes revisions to Policy PR11 necessary to require future development proposals to include a detailed ecological, hydrological and visual impact assessment of the site, a water management strategy, implement an ecological buffer, provide additional landscaping and a landscape-led approach to the design and layout of the site, and clarify access arrangements.

[60] Figure 32 of the Submitted LP

152. Based on the evidence presented, and, subject to the proposed modifications, the allocation is sound.

Policy BE2 - Hollands Farm, Bourne End

153. Land at Hollands Farm is allocated for the construction of 467 dwellings, a primary school and associated public open space. The site is situated in the Green Belt and comprises some 23 hectares of agricultural land which is enclosed on all sides by built development and located within the Tier 2 settlement of Bourne End/Wooburn. The findings of the GB2 Assessment indicate that the allocated site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location, is capable of being removed from the Green Belt without adversely impacting on the wider designation and is suitable for the proposed use.

154. The NPPF indicates that the first purpose of Green Belts is to check the unrestricted sprawl of large built up areas. The Buckinghamshire Green Belt Assessment[61], defines 'large built up areas' as being the Tier 1 settlements within constituent authority areas. In this case, the land proposed for removal is located adjacent to the Tier 2 settlement of Bourne End/Wooburn, and so therefore has correctly been adjudged not to fulfil the requirements of the first purpose.

155. The Settlement Hierarchy Study[62] does not identify either Hawks Hill/Harvest Hill as a separate settlement and considers that it is, functionally, part of the Tier 2 settlement. As such, I do not consider that the proposed allocation would materially alter this situation or promote the coalescence of separate settlements. As for encroachment, the proximity of the surrounding built development, gives the site the appearance of being semi-urban, and as such, I do not consider that its removal from the Green Belt would result in the loss of, or promote development in, the countryside. Based on the foregoing, the evidence presented and having regard to my conclusions on Issue 1 and 4, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

156. The Hollands Farm site provides an area of open pasture and woodland on the edge of the settlement of Bourne End/Wooburn and is not currently subject to either a local or national landscape designation. Moreover, whilst I note the allocation is part of a significantly larger area of land being considered for inclusion in the AONB, no decision has been made by Natural England on the suggested revision to the designation's boundary.

157. In terms of the quality of the land, it is accepted that the proposed allocation would result in the loss of fields currently in agricultural use. However, I am content that the approach taken by the Council in assessing and allocating the Hollands Farm site, and other sites in the plan, complies with the requirements of NPPF which seeks to protect the best and most versatile agricultural land.

[61] GB2
[62] SHS1

158. With regard to the impact of the proposal on the local highway network, the Wycombe Local Plan Sites Traffic Modelling Study[63] and the Countywide Local Plan Modelling Study[64] have both assessed the impact of additional traffic generated by the Hollands Farm site on the local area and concluded that, subject to the provision of a spine road which would link Princes Road with Hedsor Road and distribute traffic within the allocation, the additional traffic generated by the site could be accommodated on the highway network. The indicative access point at Hedsor Road is within Flood Zone 3 but, the findings of the Sequential Test Report[65] makes clear that the site passes the exceptions test and that in the event of a flood event affecting the southern access, alternative access and egress would be available at two other locations to the north of the site. In my view this approach is robust and sufficient to demonstrates that, in principle, a safe and suitable access can be achieved.

159. In terms of the impact the proposed access road would have on the Hedsor Road and Riverdale Conservation Area, the exact siting and design of the road has yet to be determined. As such these are matters that can be effectively addressed by Policies DM31, DM35 and BE2, which has correctly been amended by **MM43** to emphasise the need to have special regard to conserving heritage assets and their settings, and through the masterplanning of the site.

160. Overall, I am content that the proposed Hollands Farm allocation is sound.

Policy RUR3 - Land East of Sidney House, Lane End

161. Land East of Sidney House site is situated within the Green Belt and the AONB. The allocation, which comprises a redundant and vacant sheltered housing development and an area of undeveloped land, is located on the northern edge of the Tier 3 settlement of Lane End and enclosed by the M40 motorway. The findings of the GB2 Assessment indicate that the site: does not fulfil any of the Green Belt only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, is capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation; suitable for the proposed use and that its removal from the Green Belt would assist in the redevelopment of an underused PDL site for residential purposes. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development. Therefore, subject to the revision proposed in **MM47** which requires the addition of a new criteria that seeks a landscape-led approach to development, I endorse the allocation.

Policy RUR1 - Land South of Finings Road, Lane End; Policy RUR2 – Land Between Chalky Field and Marlow Road, Lane End; Policy RUR8 - Land South of Mill Road, Stokenchurch; and Policy RUR9 - Land at Wood Farm, Stokenchurch

162. Policies RUR1, RUR2, RUR8 and RUR9 allocate land within the AONB for the development of 10 (MM45), 27, 100 and 28 dwellings respectively. Evidence contained in the AONB Study and HELAA indicate that the proposed allocations are in sustainable locations, would not have an adverse impact on the enjoyment or

[63] TR6
[64] TR1
[65] FRW1

visual qualities of the AONB and are largely free from constraint. Whilst I note that some concerns have been raised about the development of these sites, none of the matters identified demonstrate that the development of the allocated sites would be of an inappropriate scale or be harmful to the visual qualities of the wider landscape. Therefore, subject to the revisions required in **MM45**, **46**, **51** and **52**, which correctly reduce the indicative number of dwellings on the site allocated under Policy RUR1 and require the addition of a new criteria Policy RUR2 to manage flood risk, and in Policies RUR1, 2, 8 and 9 seeking a landscape-led approach to the design and layout of the sites, I am satisfied that the allocations are sound.

Policy RUR6 – Great and Little Kimble-Cum-Marsh Parish

163. Policy RUR6 provides the framework for the development of 160 new dwellings within the emerging Great and Little Kimble-Cum-Marsh Neighbourhood Plan (NP). In order to improve the clarity and application of the policy, **MM49** makes revisions necessary to explain the type of development permissible, the need for it to be phased over the lifetime of the LP and explain the requirement for the site selection process to have regard to local sustainability issues, such as landscape capacity and the availability of public transport. It also includes an additional criterion explaining how development will be delivered in the absence of a made NP. Based on the evidence presented, I am satisfied that the level of growth outlined in the Policy is reasonable and proportionate and that the approach to the delivery of new development is realistic and achievable.

Policy RUR7 - Clappins Lane, Naphill

164. The Clappins Lane site is allocated for the construction of 64 dwellings. The site is situated within the Green Belt and the AONB. The allocated site, which comprises an area of some 2.2 hectares of undeveloped pasture, is enclosed largely by residential development and is located adjoining the Tier 3 settlement of Naphill. The findings of the GB2 Assessment indicate that the site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

165. Whilst some concerns have been raised about the development of the site, none of the matters identified demonstrate that the proposals would have an adverse impact on the enjoyment or visual qualities of the AONB or are significant enough to warrant the removal of the sites from the Plan. Therefore, subject to the revision proposed in **MM50** which require the addition of a new criteria to manage flood risk, I endorse the allocation.

Policy RUR 11 - Heavens Above, 16 High Heavens, Marlow Bottom

166. The Heavens Above site is allocated for the construction of 20 dwellings. The site is situated within the Green Belt and the AONB. The allocated site, which is currently in residential use, is located on the edge of the Tier 3 settlement of Marlow Bottom and enclosed on three sides by dense woodland. The findings of the

GB2 Assessment indicate that the site only fulfils the Green Belt purposes defined in the NPPF relatively weakly, is in a sustainable location for growth, capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation, and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and in light of the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development.

167. Based on the additional evidence presented[66], I am content that the site is deliverable and can be brought forward in the manner envisaged in the Plan. Subject to the revision proposed in **MM54** which seeks a landscape-led approach to development and to manage local sources of flood risk, I am satisfied that the allocation is sound

Employment Allocations

Policies HW16 Wycombe Air Park, High Wycombe

168. Land at Wycombe Air Park, subject to **MM20** which is required to explain the increase in the quantum of development, is allocated for the creation of between 22,000 and 26,600 square metres of new employment floorspace. The site is located close to those allocated for housing development under Policies HW10 and 11 and is situated within the Green Belt to the south-west of High Wycombe. As a result, the submitted Plan identifies the allocated sites and intervening land as being a single site proposed for removal from the Green Belt. The Air Park site is not within the AONB but is within the setting of the designation.

169. The Wycombe Air Park allocation, which is owned by the Council, comprises two parcels of land. The northern parcel includes much of the existing operational Air Park such as air craft hangers, commercial buildings and car parking,whilst the southern parcel is undeveloped land. The site is enclosed by a combination of the M40, Clay Lane, Marlow Road and to the west by the legal and regulatory limits to development associated with the licensing and operation of the air park. The findings of the GB2 Assessment indicate that the combined site: only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location for growth; capable of being removed from the Green Belt; and suitable for the proposed use.

170. For the reasons outlined earlier in this report, the removal of the Wycombe Air Park Site in conjunction with those allocated for development by Policies HW10 and 11 is supported. Therefore, having regard to my conclusions on Issues 1, 2 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for employment and housing development.

171. The Wycombe Air Park allocation proposes the intensification of the existing commercial use of the site and its expansion to allow for the creation of additional, non-aviation, employment related floorspace. The findings of the Wycombe Commercial Assessment[67] indicate that although the location of the Air Park site may not make it attractive to companies wishing to serve the regional and national

[66] Action Point 9.9
[67] HELS12

warehousing and distribution market, it would be well placed to meet more localised needs.

172. To support this, the land owner[68] has provided additional evidence which outlines the key actions necessary for the development of the northern and southern sections of the site. The evidence indicates that proposals for the upgrading of the existing access to serve the northern parcel have been agreed with the Highway Authority, that the work on the new access road will commence in 2019 and that discussions in relation to the acquisition of land/and proposals to relocate the Gliding Club are at an advanced stage. It is anticipated that development on the northern site to accommodate the glider club and alterations to air traffic movements will be completed by summer 2020 and a planning application for the development of the southern parcel will be submitted in summer 2019 with construction work on the site estimated to start a year later. Whilst this is a complex proposal, based on the evidence presented it is clear that the allocation can be delivered in the manner and timescales envisaged in the LP.

173. The development on the Air Park site would be within the setting of the AONB and as such, must have regard to the need to preserve and, where appropriate, enhance the landscape. The detailed design, scale and siting of future buildings on the site can be effectively addressed through the master planning of the site and, I am content that the framework provided by Policies HW16, DM32, DM33 and DM35 will provide an appropriate mechanism for assessing and managing future development.

174. In light of the foregoing, I am content that the allocation is sound.

Policy HW 17 - Land Adjoining High Heavens Household Recycling Centre, High Wycombe

175. Land Adjoining High Heavens Household Recycling Centre is allocated for low density yard-based activity[69]. The site is situated within the Green Belt and the AONB. The allocated site comprises an area of some 3.7 hectares of rough grassland, largely enclosed by a combination of mature trees and hedgerows and is located adjacent to the established High Heavens Household Recycling Centre. The submitted Plan proposes the removal of the allocated site, and the existing Household Recycling Centre from the Green Belt. The findings of the GB2 Assessment, indicate that: the combined site only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location; and capable of being removed from the Green Belt without adversely affecting the integrity of the wider designation and suitable for the proposed use.

176. As with the site proposed for removal in relation to Policies HW10, HW11 and HW16, although the combined site is located outside the urban area of High Wycombe, I nevertheless consider that because of its proximity, connectivity and the nature of the existing use, the area proposed for removal is, functionally, part of the larger High Wycombe area, and as such is in a sustainable location. With regard to the potential impact of removing the combined site from the Green Belt, I am mindful that the existing and future use of the land will make an important contribution towards meeting the social and economic needs of the District and

[68] AP7.13
[69] AP7.17 and 7.20

that the removal of a comparatively small area of land would not undermine the integrity of the designation or its ability to meet the purposes set out in the NPPF. Moreover, having regard to my conclusions on Issue 2 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for economic development.

177. The evidence contained in the HELAA and submitted in respect of Action Point 7.16 indicates that the proposed allocation does not constitute major development in the AONB and is largely free from constraint. However, these findings have been disputed and it has been suggested that because of its potential impact on the landscape the proposal constitutes 'major development' in the AONB. Whilst I agree that the allocated site can be viewed from public vantage points, these are limited in scope and, largely, restricted to the area immediately surrounding the site. Moreover, I consider that the nature of the allocation, its proximity to the existing recycling centre and the presence of mature boundary trees would ensure that the site would not be visually prominent or have a serious adverse impact on the enjoyment or visual qualities of the AONB. As such I do not consider that the proposed allocation would result in major development in the AONB. Therefore, subject to the revision proposed in **MM21** which requires the addition of new criteria that seek a landscape-led approach to development, the allocation is soundly based.

Policy RUR10 - Land rear of Stokenchurch Business Park, Stokenchurch

178. Land to the rear of Stokenchurch Business Park is allocated for Class B1, B2 and B8 uses. The allocated site is located in the AONB and comprises a roughly triangular area of agricultural land enclosed by a combination of the existing business park, the M40 and mature hedgerows. The evidence contained in the AONB Study and HELAA indicate that the development of the allocation would not be of an inappropriate scale or be harmful to the visual qualities of the wider landscape and is largely free from constraint. I am satisfied that the development framework provided by the policy is sufficient to address detailed issues in relation to the future use, access arrangements and that the impact of the allocation on the SAC has been fully and rigorously considered as part of the HRA. Therefore, based on the evidence presented, I am content that the allocation is sound.

Mixed Use and Transportation Allocations

Princes Risborough Expansion Area

179. The combination of Policies PR3, PR4, PR5, PR6, PR7, PR8, PR10, PR11, PR16 and PR17 provide the framework for the Expansion of Princes Risborough *(*PREA). Matters in relation to Policies PR11 and PR16 are discussed separately. Policies PR3 and PR4, as revised by **MM27**, **28** and **29** which are necessary to clarify the requirements for housing and infrastructure delivery, allocate land within the PREA for the construction of up to 2300 dwellings on the MEA allocation, 58 dwellings at the Poppy Road allocation (Policy PR11) and 45 dwellings at the Princes Risborough Station allocation (Policy PR16), two primary schools, a local centre, public open space/green infrastructure and a relief road. The MEA comprises 177 hectares of, largely, agricultural land with some employment uses located between the north-west boundary of the Tier 2 settlement of Princess Risborough and the southern boundary of the smaller settlement of Longwick. The

site is bordered to the north by Lower Icknield Way and to the south by the Chiltern railway line.

180. The allocation is supported by Policies PR6, PR7, PR8 and PR10, as revised by **MM26, 31**, **32** and **33** which are necessary to clarify the requirements of the policies and make consequential amendments to the boundary of the strategic buffer. The combination of the policies outlines the design principles; development requirements for the expansion; seeks the provision and safeguarding of transport infrastructure, including the relief road and a number of local highway improvements; and reserves land at Lower Icknield Way for the relocation of businesses affected by the expansion area. In order to ensure the timely and effective delivery of the development, Policy PR17, subject to **MM42** which is necessary to clarify the application of the policy, outlines the requirement for the provision, funding and management of new educational, recreational and highway infrastructure. Policy PR5 provides the mechanism for managing the defined settlement boundary and strategic buffer between Longwick and Princes Risborough.

181. The MEA is within the setting of the AONB and would be visible from several vantage points in the Chilterns including Whiteleaf cross, Brush Hill Local Nature Reserve and along the Ridgeway National Trail. Critics of the proposed allocation contend that the development of the site would result in increased noise and vibration levels, a reduction in air quality and would ultimately erode the tranquillity of the AONB. The Princes Risborough Expansion Landscape Sensitivity and Capacity Study[70] analyses in detail the ability of the land immediately to the south, west and north of the settlement to accommodate a major expansion area. The study found that those parts of the site closest to the built-up area and railway line have the greatest capacity to absorb new development, whilst those along Icknield Way have less capacity. The findings recognised that the development of the MEA would have an impact on the setting of the AONB, but concluded that with appropriate mitigation, any impact could be effectively ameliorated. The recommendations of the study in respect of masterplanning and landscape mitigation have been carried forward into the principles for development in Princes Risborough and the requirements of Policies PR6 and PR7.

182. A key element of the PREA is the provision of a relief road to serve the development and relieve traffic in the centre of Princes Risborough. The indicative route of the proposed relief road runs from Lower Icknield Way, south through the MEA and skirts the existing urban area to connect with Wycombe Road. The opponents of the proposed scheme question both the need for, and the route of the proposed road. However, the evidence presented in respect of the need for the scheme supports the provision and makes clear that the forecast volume of traffic from the PREA could only be accommodated if extra road capacity in the form of a new relief road was provided[71]. The options for the indicative alignment of the relief road were defined in discussion with statutory consultees and through engagement with local residents. The options, and a number of variants, were reviewed through a number of technical studies[72] [73] and assessed as part of the SA process. The reviews /assessments process concluded that, overall, the indicative

[70] LAN1
[71] TR19
[72] TR22
[73] TR15

alignment of the proposed relief road identified in the submitted Plan was the best performing option. Based on the evidence presented, and subject to detailed considerations, the need for, and indicative route of the proposed relief road is justified and based on robust and credible evidence.

183. The southern section of the indicative relief road, between Picts Lane and Wycombe Road, is located within the AONB and the Green Belt. In addition to its primary function, the road will also provide access to the Poppy Road allocation (Policy PR11). The southern section of the highway would be some 700 metres in length and would have a land take of less than 1.5 hectares and would because of its siting, in the countryside to the west of Wycombe Road and close to Pyrtle Brook, be visible in the landscape of the AONB. This in itself does not demonstrate harm, and it is clear from the evidence presented that any impact could, with careful siting and a detailed design that incorporates the mitigation measures in relation to matters such as lighting, ecology, hydrology and visual impact, be effectively mitigated[74].

184. On balance, and in light of the submitted evidence, I am satisfied that the MEA and the indicative route of the relief road would not have a serious adverse impact on the AONB.

185. With regard to the impact on the Green Belt, the NPPF makes clear that local transport infrastructure schemes are not inappropriate development in Green Belts, provided it can be demonstrated that the location is necessary. In light of my earlier conclusions in respect of the need for, and indicative siting of the relief road, I consider that its location within the Green Belt is justified in principle.

186. Situated in the centre of the Expansion area is the small historic hamlet of Alscot. Whilst concerns have been expressed about the impact of development on the character and appearance of the Conservation Area, these are matters of judgement which should be made on the basis of detailed evidence. In the absence of such detailed evidence, matters in relation to the impact of the development on the setting or character and appearance of the heritage asset can, having regard to the statutory requirements[75], be effectively addressed through the masterplanning of the site and the framework provided by Policies PR6, DM31 and DM35 which provide an appropriate mechanism for assessing and managing future development on the site.

187. A strategic buffer, approximately 50 metres wide and extending the length of the northern boundary of the MEA area, provides a barrier/open space between: the MEA and Longwick; and the MEA and the countryside beyond Lower Icknield Way. A number of concerns have been expressed about the width of the buffer because, it is suggested that it would not be visible when viewed in the wider landscape and because the open land would, in part, be used for strategic open space.

188. Policy PR5, as amended by **MM30** which correctly takes account of the granting of planning permission at Ivy Farm, Longwick, and the Princes Risborough Expansion: Issues and Options Report[**76**] make clear that the purpose of the strategic buffer is, for the most part, to protect the undeveloped character of the

[74] TP6, AONB1 and WDLP2
[75] Planning (listed Buildings and Conservation Areas) Act 1991 and NPPF
[76] PR9

countryside within the designation and to maintain separation between smaller settlements and the MEA. The scale and location of the strategic buffer would, when viewed from the area immediately surrounding the MEA, be sufficient to ensure the visual and physical separation of the settlements and protect the identity of Longwick as a separate village. With regard to the issue of development in the strategic buffer, Policy PR5 explains that the designation is not intended to be an absolute restriction on all development but that any such development would need to be small scale in order to respect the rural character of the area.

189. The scale of growth at the MEA was defined through public consultation[77] and the SA[78] process. The revised trajectory[79] for the allocation, indicates that construction work will commence in 2024, with 792 dwellings delivered by 2029, a further 840 dwellings by 2033, and the remainder of the site, some 599 dwellings, constructed beyond the Plan period. The anticipated rate of delivery allows for the construction of 180 dwellings per annum. As the site is likely to be constructed by at least 3 national housebuilders this rate of delivery would equate to 60 dwellings per annum, for each developer. In my view, a reduction in the scale of the growth proposed would undermine the objective of delivering the OAHN, whilst an increase in the scale of the allocation is likely to be undeliverable given the anticipated rate of delivery on the site. In light of the evidence presented and the need to meet the OAHN the scale and rate of delivery of housing at the MEA is considered reasonable and realistic.

190. To facilitate the development of the MEA for housing, it will be necessary for the employment related uses within the site to be relocated. Policy PR10, in conjunction with Policy PR4, reserves an area of some 12 hectares of land at the junction of Chestnut Way and Lower Icknield Way immediately west of the Birmingham railway line, for the relocation of existing B1, B2 or B8 business uses affected by the expansion of Princes Risborough. The approach outlined in Policy PR10 is logical and, subject to **MM35** which is desirable to allow for the flexible delivery of employment related uses, is sound.

191. The delivery of social, educational and transport infrastructure is an integral part of the proposal. The framework for managing infrastructure provision is provided by Policy PR17, which seeks to deliver on-site provision and off-site contributions in an equitable way and phase delivery to ensure that infrastructure and housing development align. The required infrastructure will be funded, largely, from S106 contributions secured from the Land Owners/Developers of the site, with, subject to final approval, additional funding for the southern section of the relief road provided by a grant from the Housing Infrastructure Fund (HIF).

192. Seeking a coordinated approach to the delivery of infrastructure and housing across the site is an important element of the scheme and necessary to ensure that the PREA functions and integrates effectively into the settlement. **MM28** is necessary to amend Policy PR3 to allow the submission of planning applications for individual parcels. In my view this revision is necessary to introduce flexibility into the policy framework and ensure that development can commence on site in a timely manner. The use of a framework for equalisation is necessary to ensure an equitable distribution of costs and the timely delivery of infrastructure.

[77] PR6, PR8 and PR9
[78] WDLP2
[79] Council's Statement for Matter 8 – Development Framework for Princes Risborough

193. Critics have suggested that not all the infrastructure identified in the Plan is necessary for the delivery of the development and that the scale of provision would impact adversely on the viability of the site. These are matters that will change over the lifetime of the scheme and will need to be revisited as the delivery of the site progresses. The evidence presented in respect of the site does however, demonstrate that there is a need for the provision of affordable housing, school places, medical facilities, open space and transportation improvements[80] and that, based on the submitted evidence[81] and allowing for development costs and S106 contributions, there would still be significant headroom in the scheme. With regard to HIF funding, the Council accepts that the provision of the grant may not be guaranteed and, sensibly, outlines in its statement for Matter 8 an alternative funding mechanism for the scheme.

194. Overall, and based on the submitted evidence, I am content that the PREA allocation is sound.

Other allocations in Princes Risborough

195. Policies PR12, PR13, PR14 and PR16 collectively provide the framework for the management of Town Centre Traffic and Public Realm Enhancements in Princes Risborough and the redevelopment of the: Land Fronting New Road (Back Lane); Land South of Horns Lane; and Land at Princes Risborough Station. Subject to the revisions proposed by **MM37**, **38**, **39**, **40** and **41** which, correctly, seek to clarify the requirements of the policies and are necessary for soundness, I am content that Policies PR12, PR13, PR14 and PR16 are sound.

Other Allocations

Policy HW21 – Land at Queensway, Hazelmere

196. Land at Queensway is allocated for the development of a new cemetery, which is intended to meet the future burial ground needs of the High Wycombe area over the Plan period. The site is located within the Green Belt and AONB. The NPPF makes clear that cemetery uses are not inappropriate development in Green Belts, as long as they preserve the openness of the Green Belt and do not conflict with the purpose of including land within it. Based on the submitted evidence, I am content that the framework provided by the policy would ensure that the openness of the Green Belt in this location would not be reduced. Similarly based on the evidence contained in the HELAA I am content that the proposal would not have a serious adverse impact on the AONB or constitute major development. Therefore, subject to the revision proposed in **MM23** which requires a landscape-led approach to development, I am satisfied that this allocation is sound.

Policy RUR4 – Little Marlow Country Park

197. The Little Marlow Country Park allocation occupies approximately 329 hectares of land formerly used for minerals extraction and is situated in the Green Belt and AONB to the west of Bourne End. The Country Park allocation is intended

[80] HEDN2, INF4 and TR19
[81] VIA2

to provide environmental improvements, including ecological and biodiversity enhancements, open space and informal recreational opportunities for the residents of the District. Evidence presented by the Council demonstrates its commitment to delivering and securing funding for the project[82]. Although not directly related to either its scale or primary purpose, the allocation will also contribute towards attenuating the recreational impacts of new development within the vicinity of Burnham Beeches SAC, specifically the allocation at Hollands Farm (Policy BE2) by providing alternative recreational opportunities[83]. Subject to the necessary revisions outlined in **MM48**, I am satisfied the proposed allocation is sound.

Conclusions on Issue 8

198. The Plan's site selections are based on a logical and appropriate set of criteria and assessment methodologies, SA and HRA. Subject to the MMs, I consider that all of the Plan's employment, housing, mixed use and transportation and other allocations have been positively prepared, are justified and will be effective. Where necessary, exceptional circumstances have been demonstrated to justify alterations to the Green Belt boundary and the removal of land to meet the objectively assessed need for employment and housing. In addition, I have found that none of the site allocations within the AONB would constitute 'Major Development' and as such comply with the requirements of the NPPF.

Issue 9 - Will a 5-year supply of deliverable sites be available on adoption of the Plan and are there reasonable prospects that this can be maintained over the Plan period?

199. The housing requirement figure as proposed is 10,925 or 546 dwellings per annum (PA). This represents a modest but nevertheless significant increase in the level of delivery rates from those previously experienced in Wycombe. Delivery has varied considerably over the period 2006 - 17 with completions ranging from 625 dwellings in 2008 – 09, to 223 dwellings in 2012 - 13. This resulted in an average of 482 dwellings pa over that period. Completions for the early part of the LP period (2013 -18) were expected to be 2,730 dwellings, but have fallen below the level required with only 2,404 or 480 dwellings pa delivered.

200. The revised housing supply data (MM6) indicates that completions, current commitments, windfalls and site allocations would provide between 11,648 and 11,888 dwellings during the plan period. The increase in the overall supply figure of between 721 and 961 dwellings has, principally, occurred as a result in changes to the indicative capacity at 4 allocated sites and an increase in sites with planning permission. Whilst the 'headroom' between the requirement and total supply remains limited, this addition provides sufficient 'contingencies' to ensure that delivery will not be put at risk.

201. The Council has robust monitoring arrangements in place and has positive working relationships with the majority of the developers of the allocated sites. This will ensure that any barriers to delivery can be identified and addressed in a timely manner. Delivery rates will be carefully monitored through the Council's Annual Monitoring Report and, if necessary, the plan may need to be reviewed to

[82] Council's Statement for Matter 9 – Development in Rural Areas
[83] WDLP3B

ensure that housing need to 2033 is achieved. Whilst some representors consider that additional sites should be allocated to bolster supply, that would be likely to require the deletion of further land from the Green Belt and result in a delay in Plan adoption.

202. Turning to the five-year requirement, from 2006 to 2015 against a Wycombe Core Strategy (2006 – 20) proportionate requirement of 3,618, 4,334 dwellings were delivered. This is some 20% above the anticipated rate of delivery and, in accordance with paragraph 47 of the NPPF, a 5% buffer has been applied to the five year housing requirement figure.

203. As I indicated earlier, there has been a shortfall in delivery in the first quarter of the Plan period of 326 dwellings. The Council's preferred approach has been to deal with the shortfall within the first five years from adoption - the Sedgefield method. Applying the necessary 5% buffer and allowing for the delivery of the shortfall, the five year requirement from 2018/19 to 2022/23 would be 3,082 dwellings or 616 pa. Based on past rates of delivery, and in light of the new site allocations this requirement is realistic and achievable.

204. Assessing the precise level of five-year supply and anticipated rates of delivery is not an exact science. It involves making assumptions about a large number of sites and various factors including likely start rates and annual rates of building which could be subject to change. In broad terms I am satisfied that most of the sites that the Council has identified within the five-year supply from 2018 - 19 to 2022 - 23 have a realistic prospect of being delivered over the next 5 years and that the level of contingency within the supply is sufficient to address any slippage in delivery at major sites.

Conclusions on Issue 9

205. In light of the evidence presented I consider that there is a reasonable prospect that at the adoption of the Plan there will be a 5-year supply of deliverable housing land and that this situation will be maintained throughout the Plan period.

Issue 10 – Are the arrangements for monitoring and delivery robust and will the Plan be flexible enough to respond to changing circumstances?

206. The Plan includes a monitoring framework that will provide an effective means of measuring the implementation and delivery of the policies and allocations. The findings of the Council's monitoring process will be reported in the Authority Monitoring Report (AMR). Details in respect of housing delivery, including the housing trajectory indicating housing delivery rates, are set out in the HELAA and will be subject to regular review/update through the monitoring process. Amendments necessary to provide an update on the delivery of the identified housing or housing mixed-use developments in High Wycombe, Marlow, Princes Risborough and the Rural Areas are set out in **MM11**, **24**, **27** and **44**. In addition, in recognition of the changing strategic context for the Plan (MM1, 2 and 4), **MM79** correctly propose to extend the monitoring framework for Policy CP2 to include consideration of wider sub-regional growth dynamics.

207. The Plan does not contain a specific commitment to an early review but recognises that the delivery of employment land, in light of the levels of forecast

need and challenging market conditions, has to be closely monitored. Having regard to the requirement in the PPG that plans should be reviewed every five years, I do not consider that a specific review policy is necessary. The monitoring process set out in the Plan will, in my view, provide an effective mechanism to assess whether the Plan is meeting its objectives and intended outcomes.

Conclusions on Issue 10

208. The provisions made for monitoring and review in the submitted LP, as amended by the MMs, are consistent with national planning policy and will provide a robust and sound basis on which to assess the performance of the Plan.

Public Sector Equality Duty

209. In conducting the examination, I have had due regard to the aims expressed in Section 149(1) of the Equality Act 2010 and the evidence presented in the Council's Equality Impact Assessment[84]. This includes the consideration of matters including the accommodation of Gypsies and Travellers and the need for accessible design.

Assessment of Legal Compliance

210. Overall, I am satisfied that the Plan complies with Section 19(1A) of the 2004 Act which requires that development plan documents (taken as a whole) must include policies to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change.

211. My examination of the legal compliance of the Plan is summarised below:

- The Local Plan has been prepared in accordance with the Council's Local Development Scheme;
- Consultation on the Local Plan and the Main Modifications (MM) was carried out in compliance with the Council's Statement of Community Involvement.
- A Sustainability Appraisal has been carried out and is adequate.
- The Habitats Regulations Appropriate Assessment Report[85], most recently updated in January 2019 sets out why an Appropriate Assessment was undertaken and explains why it concluded that the Plan would not adversely affect, either alone or in combination, the integrity of the SACs assessed; and
- The Local Plan complies with all relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

[84] WDLP4
[85] WDLP3 and WDLP3B

212. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

213. The Council has requested that the appointed Inspector recommend MMs to make the Plan sound and capable of adoption. I conclude that, subject to the recommended MMs set out in Appendix 1, the Wycombe District Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the Framework.

Nicola Gulley
Inspector

This report is accompanied by an Appendix containing the MMs.

Appendix 1 – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and <u>underlining</u> for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM1		CHAPTER 1.0 INTRODUCTION AND CONTEXT
	Paragraph 1.15 Page 7	*Add new paragraph after paragraph 1.15* **<u>There are a number of sub-regional strategic initiatives whose development is still at an early stage. This includes the Oxford-Cambridge Growth Arc and associated East-West Expressway, and the third runway at Heathrow. It is too early to say what these projects might imply for growth in the District; the Council expects to actively engage in the formation of appropriate governance structures to steer the preparation of formal strategic plans as part of the process of Plan review.</u>**
	Paragraph 1.18 Page 10	1.18 In addition to preparing evidence on key strategic issues, there are a range of other strategic plans and projects that may affect the District. These include: • The Strategic Economic Plan – prepared by the Buckinghamshire Thames Valley Local Enterprise Partnership which puts forward proposals to deliver increased prosperity and jobs for Buckinghamshire; • The Buckinghamshire Infrastructure Investment Plan – aiming to support growth in the county through new infrastructure provision;

No.	Reference and page no. in the Plan	Proposed Main Modification
		• **<u>The Oxford-Cambridge Growth Arc and East-West Expressway – aiming to deliver up to 1 million new homes by 2050 in a broad area between Oxford and Cambridge, supported by major new road infrastructure;</u>** • **<u>The third runway at Heathrow, associated infrastructure improvements and economic growth;</u>** • HS2 – which cuts through the very northern tip of the District; • East West rail project – which will improve rail links from Princes Risborough to Aylesbury and provide a new direct connection on to Milton Keynes; • Crossrail – improving connections to central London from Maidenhead; • Buckinghamshire Local Transport Plan 4 – which identifies a number of strategic transport issues affecting the District, including the poor north/south road links across the county; • Highways England work feeding into the next Route Investment Strategy (RIS2), including looking at improving access to High Wycombe and improvements at junctions on the A404 south of High Wycombe; • The Bucks Health and Wellbeing Strategy. Authorities surrounding Buckinghamshire are at various stages of preparing their local plans, although local plans in Buckinghamshire are running on similar timescales. Figure 3 illustrates the District in its strategic context. As can be seen, there are a number of matters at a strategic level that remain uncertain. These could lead to the need for an early review of the Plan.
MM2		CHAPTER 2.0 WYCOMBE DISTRICT – THE BIG CHALLENGE

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 2.1 Page 15	2.1 The big challenge is to achieve sustainable development – meeting the needs of today without compromising our ability to meet the needs of tomorrow. We need to provide more homes and jobs, and these need more supporting infrastructure – such as schools, roads and green spaces. We need to make sure the patterns of new development reduce our reliance on the private car; reinforce our town centres to ensure they remain vibrant places; and ensure the District retains **and enhances both its historic environment and** its strong green infrastructure, particularly the Chilterns Area of Outstanding Natural Beauty, for future generations. **In doing so, the wider social, cultural, economic and environmental benefits that conservation of the natural, built, and historic environment can bring in conjunction with new development should be recognised.**
	Paragraphs 2.8 – 2.9 Page 17	2.8 ~~There is also uncertainty around~~ **In September 2018,** the route of the proposed 'expressway' between Oxford and Cambridge being developed by the National Infrastructure Commission**, was announced as focusing on the central corridor 'B'**. ~~Whilst it is not expected to be~~ **This corridor does not fall** within the District **though** it ~~will~~ **is expected to** have an impact on the District as part of the strategic road network. 2.9 The expansion of Heathrow will also have impacts on the District **in terms of associated infrastructure such as the Western Rail Access and increased demand for surface access**.
MM3		CHAPTER 3.0 OUR VISION AND STRATEGIC OBJECTIVES
	Paragraph 3.6 Page 20	3.6 Under each of these objectives are a number of themes and an outline of what we want to achieve under each objective. Collectively these objectives and themes, together with the core planning principles sets out in the

No.	Reference and page no. in the Plan	Proposed Main Modification
		National Planning Policy Framework , add up to delivering the environmental, social and economic aspects of sustainable development for the District. **There is no significance in the ordering of the list in terms of their priorities.**
	Chapter 3 section 8 Page 24	8. Mitigate Climate Change Reduce CO2 emissions by reducing the need for travel by private car, and aid public transport viability, through intensifying existing urban areas by re-use of brownfield sites, locating development in settlements with the widest range of services and facilities, and by clustering development to achieve high quality walking, cycling and public transport provision. **Adapt to flood risk and water scarcity through flood avoidance and mitigation, and through water resources management.**
	Paragraph 3.18 Page 25	*Add new paragraph after paragraph 3.18:* **We plan to locate most development outside areas at risk of flooding. Appropriate development in areas at risk is managed through taking a sequential approach, and by implementing SuDS. The Plan protects water resources - both in terms of supply and quality - for future needs.**
MM4		POLICY CP2 – OVERALL SPATIAL STRATEGY
	Paragraph 4.21 Page 35	4.21 ~~In addition~~ **In September 2018,** the National Infrastructure Commission ~~is considering the most appropriate~~ **announced** corridor **B as the preferred option** for the Oxford to Cambridge Expressway and the Government is proposing a new run~~a~~way on the western side of Heathrow Airport. Both of these will be a significant

No.	Reference and page no. in the Plan	Proposed Main Modification
		influence on the strategic geography of Buckinghamshire as a whole, and therefore for Wycombe District. **At this stage it is too early to say what the implications may be for the District in terms of homes and jobs; however, the Council expects to engage actively in overarching governance structures to steer the preparation of formal strategic plans and a wider spatial strategy which responds to these.**
MM5	Policy CP3 Page 35	POLICY CP3 – SETTLEMENT STRATEGY The Council will direct development within the District in the following way: 1. Tier 1: High Wycombe area. The prime focus for development, including housing and new economic development, will be the urban area of High Wycombe through: a) Regeneration and change in the existing built-up area including the redevelopment of suitable previously developed sites for both housing and employment purposes; b) Maintaining and respecting the physical and community identity of adjoining settlements; c) Development of the former reserve sites; d) Land removed from the Green Belt that is identified in this Plan to deliver new employment floorspace and homes.

No.	Reference and page no. in the Plan	Proposed Main Modification
		2. Tier 2 a) Princes Risborough: ~~on~~ **through developing** suitable previously developed land within the built up area, and through major residential led expansion on the west side of Princes Risborough including improvements to the town centre, the station area and additional land for business. b) Marlow: ~~on~~ **through developing** suitable previously developed land within the built up area, and provision for business through the regeneration of the Globe Park Strategic Employment Area. c) Bourne End and Wooburn: ~~on~~ **through developing** suitable previously developed land within the built up area, on the former reserve site at Slate Meadow, and on land removed from the Green Belt that is identified in this Plan. 3. Tier 3 and 4: Higher Order and Other Service Villages, through: a) Development within the settlement boundary as identified on the policies map; b) Limited land removed from the Green Belt that is identified in this plan; c) Limited development at specified villages beyond the Green Belt; d) Rural exceptions affordable housing schemes; 4. Tier 5 and 6: Small villages and hamlets through: a) Rural exceptions affordable housing schemes where the settlement has some local services. 5. Support for rural businesses: other allocations as identified in this Plan or in neighbourhood plans; 6. Outside of these areas and settlements, development will be restricted to that which is appropriate in a rural area.

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 4.22 Page 35	4.22 The settlement strategy ~~identifies the level of facilities and services available in different places in the District, and~~ ensures that development is not proposed in **areas where development should be restricted such as AONB, Green Belt and areas at risk of flooding, or in** places without the facilities and services to support it.
MM6		POLICY CP4 – DELIVERING HOMES
	Policy CP4 footnote 32 Page 42	[32] The expansion of Princes Risborough is expected to continue beyond the end of the plan period in 2033 adding approximately a further ~~600~~ **540** homes to this total.
	Paragraph 4.36 Page 44	*Add new paragraph and associated footnote after paragraph 4.36* **In September 2018 updated household projections were published which showed lower projected household growth in the District and across the Buckinghamshire Housing Market Area compared with the projections that underpinned the calculation of the housing need in the Housing and Economic Development Needs Assessment. However the household projections are just the starting point for calculating the housing need. Furthermore the Government has expressed concerns about the projections and has since consulted on a revised approach. This indicates that using the new standard methodology for calculating local housing need in the future (see footnote <*n*>), should be based on the 2014-based household projections in the short term and then updating the methodology to maintain higher levels of housing delivery long term. As such the Council is satisfied that the current Housing and Economic Development Needs Assessment continues to provide a sound basis for the Plan.**

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td><u>^{<n>} As a result of the transition arrangements set out in the new National Planning Policy Framework (2018) this Plan uses the “old” methodology for calculating housing need (the objectively assessed housing need) rather than the new simplified standard methodology (local housing need).</u></td></tr>
<tr><td></td><td>Paragraph 4.40
Page 45</td><td>4.40 Having considered and tested all the reasonable options a housing capacity of 10,925 was identified for within the plan period to 2033. Development above this level would cause significant and demonstrable harm or be contrary to specific national policies that restrict development. <u>Up to date monitoring of commitments to March 2018 has identified a greater supply of housing than the plan target.</u> Table 4 shows the main sources of the housing supply identified.</td></tr>
<tr><td></td><td>Table 4
Page 45</td><td>
<table>
<tr><th>2013-2033</th><th>Total net dwellings</th></tr>
<tr><td>Previously developed sites in urban and rural areas</td><td><s>5,611</s> <u>6,200</u></td></tr>
<tr><td>Development of the Former Reserve Sites (Greenfield)</td><td><s>1,755</s> <u>1,850 - 2090</u></td></tr>
<tr><td>Princes Risborough main expansion (Greenfield)</td><td>1662</td></tr>
<tr><td>Green Belt Review (Greenfield)</td><td><s>1,139</s> <u>1,122</u></td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Other Greenfield (including around villages)</td><td>~~760~~ <u>825</u></td></tr>
<tr><td>Total</td><td>~~10,927~~ <u>11,659 – 11,899</u></td></tr>
</table>
</td></tr>
<tr><td></td><td>Table 5
Page 46</td><td>
<table>
<tr><th>Timing</th><th>Net number of dwelling (approx. and rounded)</th></tr>
<tr><td>2013-~~16~~ <u>18</u> (Completions)</td><td>~~1,065~~ <u>2,404</u></td></tr>
<tr><td>~~2016-18~~</td><td>~~1,316~~</td></tr>
<tr><td>2018-23</td><td>~~4,387~~ <u>4651</u></td></tr>
<tr><td>2023-28</td><td>~~2,658~~ <u>3,073 - 3,313</u></td></tr>
<tr><td>2028-33</td><td>~~1,501~~ <u>1,531</u></td></tr>
<tr><td>Total</td><td>~~10,927~~ <u>11,659 – 11,899</u></td></tr>
</table>
</td></tr>
<tr><td></td><td>Paragraph 4.45
Page 47</td><td>4.45 Table 6 indicates that some of this supply has already been built and some is already committed for housing, through existing planning permissions and sites identified in the Delivery and Site Allocations Plan. However this Plan is allocating land for around an additional ~~5,800~~ <u>5360-5600</u> homes up to 2033 of which nearly a third</td></tr>
</table>

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>is on the former reserve sites included in the previous plan, the Wycombe Core Strategy. Some limited additional provision will be made through allocations in emerging neighbourhood plans.</td></tr>
<tr><td></td><td>Table 6
Page 47</td><td>
<table>
<tr><th>Type of site</th><th><s>Net Dwellings</s></th><th><u>Net Dwellings</u></th></tr>
<tr><td>Completions (2013-<s>16</s><u>18</u>)</td><td><s>1,065</s></td><td><u>2,404</u></td></tr>
<tr><td>Sites with permission or under construction @ 1/4/<s>16</s><u>18</u></td><td><s>2,456</s></td><td><u>2,865</u></td></tr>
<tr><td>Allocations in the Delivery and Site Allocations Plan</td><td><s>579</s></td><td><u>255</u></td></tr>
<tr><td>Allocations in ‘made‘ Neighbourhood Plans<u>*</u></td><td><s>20</s></td><td><u>100</u></td></tr>
<tr><td>Allocations in this Local Plan (up to 2033)</td><td><s>5,823</s></td><td><u>5,359 – 5,599</u></td></tr>
<tr><td>Allocations to be made in Neighbourhood Plans</td><td><s>425</s></td><td><u>137</u></td></tr>
<tr><td>Windfall</td><td><s>559</s></td><td><u>539</u></td></tr>
<tr><td>Total</td><td><s>10,927</s></td><td><u>11,659 – 11,899</u></td></tr>
</table>
<u>*neighbourhood Plans 'made' since the base date - Longwick-cum-Ilmer Neighbourhood Plan 'made' 27th March 2018.</u>
</td></tr>
<tr><td></td><td>Figure 6
Page 48</td><td>Amend caption of figure 6:
Figure 6 The housing distribution 2013-33 <u>as set out in Policy CP4</u></td></tr>
</table>

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td>Paragraph 4.47
Page 49</td><td>4.47 The housing provided through this plan will not just be provided in a range of locations but also on a range of sizes of sites. This includes a site that in total will deliver around ~~2,400~~ <u>2,300</u> homes[1] at Princes Risborough and a number of sites accommodating several hundred homes, to many sites accommodating less than 10 homes. Table 7 shows that ~~around~~ <u>over</u> 40% of the housing supply will come forward on sites of less than 100 homes and ~~60%~~ <u>the remainder</u> on sites of more than 100 homes. This range and choice of sites enables different types of housing providers to deliver housing in the District, including major national house builders and smaller scale local builders. It also provides significant opportunities for self and custom build housing. This range of opportunities for different types of providers helps to maximise the ability to maintain strong housing delivery during the plan period.</td></tr>
<tr><td></td><td>Table 7
Page 50</td><td>
<table>
<tr><th colspan="2">Supply by Net Site Size - 2013-33</th><th></th></tr>
<tr><td>Overall Net Site Size</td><td>Number of Homes</td><td>Percentage of supply</td></tr>
<tr><td>Under 10 units</td><td>~~1,750~~ <u>2,088</u></td><td>~~16%~~ <u>18%</u></td></tr>
<tr><td>10 - 99 units</td><td>~~2,635~~ <u>3,048</u></td><td>~~24%~~ <u>25%</u></td></tr>
<tr><td>100 - 499 units</td><td>~~3,651~~ <u>3,065</u></td><td>~~33%~~ <u>26%</u></td></tr>
</table>
</td></tr>
</table>

[1] Around 1,750 homes within the plan period to 2033, the remainder after the end of the plan period.

No.	Reference and page no. in the Plan	Proposed Main Modification
		<table><tr><td>500 units & above</td><td>~~2,891~~ **3428 - 3,668**</td><td>~~26%~~ **30% - 31%**</td></tr><tr><td></td><td>~~10,927~~ **11,659 – 11,899**</td><td>100%</td></tr></table>
MM7	Policy CP5 Page 51 - 52	POLICY CP5 – DELIVERING LAND FOR BUSINESS The Council will address the needs of the local economy by: 1. Safeguarding strategic and local employment areas (as set out in Appendix G) from non-business development as well as encouraging and facilitating their ongoing regeneration and redevelopment for economic purposes. **2. Encouraging a range of development proposals for employment on new and existing employment areas that deliver B use class or similar sui generis uses.** **3**~~2~~. Supporting High Wycombe as a location for high quality offices by **encouraging the development of new premises in the town centre and also** ensuring the delivery of existing key employment commitments, including Handy Cross Hub and High Wycombe Town Centre sites, to provide new B1a office accommodation. **4**~~3~~. Allocating 21 ha of new strategic and local employment areas including: a) Additional new employment sites on the edge of High Wycombe (Wycombe Airpark), and limited employment development on some of the former reserve sites (Abbey Barn South and Gomm Valley) to improve the range and choice of sites; b) New employment sites at Princes Risborough (land adjacent to Regents Park and at Lower Icknield Way) and;

No.	Reference and page no. in the Plan	Proposed Main Modification
		c) A new employment site at Stokenchurch (on land adjoining Stokenchurch Business Park). **5**~~4~~. Facilitating rural enterprise and diversification.
	Paragraph 4.63 Page 58	4.63 This is the approach that has been adopted and consequently, while table 9 sets out the Council's 'best estimate' at matching supply against demand it needs to build in an element of flexibility in that the assumptions for one sector could be met on sites assumed to be taken up by an alternative sector. As such, **most of the** allocations in this Plan are flexible, **not restricting development proposals to any particular type of B use class and in some cases also allowing for sui generis employment generating uses to ensure that the plan can be** responsive to ~~possible~~ changes in market conditions. In addition the assumptions made about permitted development losses (i.e. office to residential) over the Plan period which are a key factor leading to the shortfall of office floorspace against forecasts need to be regarded as flexible in that there is only limited historical data on which to base them – they are best estimates at this point in time.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM8	Policy CP6 Page 60	POLICY CP6 – SECURING VIBRANT AND HIGH QUALITY TOWN CENTRES The Council will: 1. Direct proposals for town centre uses to town and district centres (as defined on the Policies Map) at the appropriate level in the town centre hierarchy (as set out in table 10) according to the scale and function of the use. 2. Enhance our town and district centres and improve the quality of the public realm in: a) High Wycombe – i. Through the implementation of the High Wycombe Town Centre Masterplan and delivery of site specific proposals **for approximately 15,000 sq ms of comparison and 5,000 sq ms of convenience floorspace (gross);** ii. Initially through a focus on the take up of vacant units and making best use of existing town centre retail and leisure space. b) Princes Risborough – through the delivery of town centre public realm improvements and transport changes, and implementation of town centre development sites **for approximately 1,400 sq ms of comparison and 900 sq ms of convenience (gross)**; c) Marlow – through the implementation of key development sites, and through provision of improved links to Globe Park; d) Bourne End – through proposals in the Wooburn and Bourne End Neighbourhood Plan.

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td>Paragraph 4.71 and following paragraphs Page 61 - 62</td><td>
4.71 ~~Overall the sites identified together with take up of a proportion of the vacant units are capable of meeting forecast needs up to 2028, but the lack of other suitable sites in or on the edge of High Wycombe town centre, and indeed beyond limit the overall capacity of the town for retail capacity without impacting on other key constraints[2].~~ **Table XX below compares the supply of sites[3] identified in the Plan for comparison and convenience retail floor space, together with the take up of a proportion of the vacant units, with the projected need for retail floor space over the same period; broken down into five year periods.**

Table XX Comparison of the need for retail with supply in High Wycombe Town Centre
<table>
<tr><th>High Wycombe sq. ms</th><th>2016-23</th><th>2023-28</th><th>2028-33</th><th>Total</th></tr>
<tr><td>Comparison</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Need</td><td>2,100</td><td>13,800</td><td>14,700</td><td>30,600</td></tr>
<tr><td>Supply</td><td>1,850</td><td>9,500[4]</td><td>3,550</td><td>14,900</td></tr>
<tr><td>Difference[5]</td><td>-250</td><td>-4,550</td><td>-15,700</td><td>-15,700</td></tr>
<tr><td>Convenience</td><td></td><td></td><td></td><td></td></tr>
</table>
</td></tr>
</table>

~~[2] Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan (September 2017, AECOM & Wycombe District Council)~~

[3] Excluding sites in the Delivery and Site Allocations Plan and existing commitments and completions up to 2016.

[4] Includes 7,000 sq m for vacant shops being bought back into use.

[5] Difference between the cumulative total for supply and need for retail floorspace.

No.	Reference and page no. in the Plan	Proposed Main Modification

Need	**2,500**	**1,000**	**1,000**	**4,500**
Supply	**5,150**	**0**	**50**	**5,200**
Difference	**+2,650**	**+1,650**	**+700**	**+700**

4.72 **It is clear from Table XX that in the period up to 2028 there is more than sufficient convenience retail floor space (surplus of 1,650 sq m) but a shortfall of 4,550 sq m of comparison floor space.** ~~together with take up of a proportion of the vacant units are capable of meeting forecast needs up to 2028, but~~ **A comprehensive site search was undertaken but** the lack of other suitable sites in or on the edge of High Wycombe town centre and indeed beyond, limit the overall capacity of the town **to meet** ~~for~~ retail **needs** ~~capacity~~ without impacting on other key constraints[6].

4.73 ~~4.72~~ Town centres are an excellent location for offices and High Wycombe town centre has not seen significant office growth in the past. Some of the mixed use sites in the town centre allocated in the Delivery and Site Allocations Plan provide the opportunity to rectify this to some extent over the lifetime of the plan, raising the profile of the town centre and the town as an office location. Similarly additional residential development is being secured in the town centre that will increase the vibrancy of the centre.

4.74 **Table XX below compares the new supply of comparison and convenience floorspace with the need, over the same time periods, for Princes Risborough. This table shows that in the period up to 2028 the**

[6] Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan (September 2017, AECOM & Wycombe District Council)

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<u>planned development will meet all the needs for comparison floor space of 900 sq m. and result in a small deficit of convenience.</u>
<u>Table XX Comparison of the need for retail with supply in Princes Risborough Town Centre</u>
<table>
<tr><th>Princes Risborough (sq. ms)</th><th>2016-23</th><th>2023-28</th><th>2028-33</th><th>Total</th></tr>
<tr><td>Comparison</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Need</td><td>200</td><td>300</td><td>300</td><td>800</td></tr>
<tr><td>Supply</td><td>0</td><td>1,400</td><td>0</td><td>1,400</td></tr>
<tr><td>Difference[7]</td><td>-200</td><td>900</td><td>600</td><td>600</td></tr>
<tr><td>Convenience</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Need</td><td>1,000</td><td>100</td><td>100</td><td>1,200</td></tr>
<tr><td>Supply</td><td>0</td><td>900</td><td>0</td><td>900</td></tr>
<tr><td>Difference</td><td>-1,000</td><td>-200</td><td>-300</td><td>-300</td></tr>
</table>
</td></tr>
</table>

[7] Differences between the cumulative totals for supply and need.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM9	Policy CP10 Page 75 - 76	POLICY CP10 – GREEN INFRASTRUCTURE AND THE NATURAL ENVIRONMENT The Council will promote the conservation and enhancement of the natural environment and green infrastructure of the District through: 1. Conserving, protecting and enhancing the Chilterns Area of Outstanding Natural Beauty and other natural environmental assets of local, national and international importance by: a) Protecting them from harmful development through development management policies in this Plan and the Delivery and Site Allocations Plan including the protection of biodiversity and landscape designations and landscape character based approach to considering proposals; b) Working with the Chilterns AONB Board and other agencies to improve the management of the AONB and other natural assets, and help people's enjoyment of them; c) Taking a landscape character based approach to considering proposals. 2. Ensuring there is a net gain in biodiversity **within individual development proposals and** across the District as a whole over the plan period. 3. **Working with local natural environment partnerships to protect and enhance** ~~Protecting and enhancing~~ the green infrastructure network of the District by: a) Protecting designated sites and through management plans ensuring their biodiversity value will be enhanced; **b) Proactive, early and strategic planning of green infrastructure to maximise its benefits, including a baseline assessment of what exists (function, location, size, connectivity);**

No.	Reference and page no. in the Plan	Proposed Main Modification
		c)~~b)~~ Keeping under review and updating the extent of the Green Infrastructure network and working to identify opportunities for GI in the District in coordination with the Bucks and Milton Keynes Natural Environment Partnership and other agencies; **d) Ensuring through development management policies that all development is required to maximise the opportunities to protect, enhance, expand, connect, improve and use the existing green infrastructure, including across the border of the development site.** ~~c) Protecting the network through development management policies;~~ ~~d) Ensuring green infrastructure is planned into new developments; and~~ ~~e) Taking opportunities to enhance the network, providing new or enhanced links in the network, including where appropriate through new development.~~ 4. Working in partnership with the Environment Agency, Natural England and the water companies to protect, manage and improve water quality in the District, particularly the quality of water bodies which are currently failing to meet the Water Framework Directive (WFD) requirements as set out in the Thames River Basin Management Plan (RBMP).
	Paragraph 4.105 Page 75	4.105 The landscape character and green infrastructure within the District are vital to its sense of place. ~~Planning for and~~ Protecting **and enhancing** existing assets **through planning** is of strategic importance.
	Paragraph 4.111	4.111 These designated sites are **the anchor to an important part of** the green infrastructure network. **By requiring net gain in biodiversity for all development, and long-term management and monitoring plans**

No.	Reference and page no. in the Plan	Proposed Main Modification
	Page 78	**to secure it, including where designated sites are adjacent to development, an enhancement of the biodiversity value of these sites can be ensured.** ~~, where these designated sites are adjacent to development, it can be ensured their biodiversity value can be enhanced.~~
MM10	Policy CP11 Page 79 - 80	POLICY CP11 – HISTORIC ENVIRONMENT 1. Conserving, and where possible enhancing, **the significance, special interest**, character and appearance of designated and non-designated heritage assets and historic landscapes; **and taking opportunities to reinforce the positive contribution to local character and distinctiveness by sustaining the historic environment**. 2. Ensuring the setting of designated and non-designated heritage assets and historic landscapes conserves or where possible enhances the ~~character and appearance~~ **special interest** of the asset or landscape. … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
	Paragraph 4.118 Page 80	4.118 Any development proposal that affects the **significance or special interest of** heritage assets, **including by being within their setting**, needs to consider the protection, conservation, and enhancement of ~~the asset~~ **that significance or special interest**. ~~Heritage assets are not limited to the specific building or site, and may include the setting of the asset or form a part of a wider local grouping.~~ **The more important the asset, the greater the weight will be. The effect of an application on the significance of a non-designated heritage asset will be taken into account in determining the application. In this policy, a non-designated asset of archaeological interest of demonstrably equivalent significance to a scheduled monument shall be**

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td><u>treated as a designated heritage asset.</u> Development proposals should be mindful of not only the heritage asset itself, but also its setting and how it fits into the wider historic environment. Wherever possible, new development should reflect and integrate with the existing character of the local area, and seek to avoid the loss of any features of architectural or historical significance.</td></tr>
<tr><td>MM11</td><td>Table 11
Page 91 - 92</td><td>Table 11 Sites identified for housing or housing-led mixed use development in the High Wycombe area
<table>
<tr><th>Policy reference</th><th>Site</th><th>Area (hectares)</th><th>Indicative dwelling numbers</th></tr>
<tr><td>HW4</td><td>Abbey Barn North</td><td>11.32</td><td>100</td></tr>
<tr><td>HW5</td><td>Abbey Barn South and Wycombe Summit</td><td>34.3</td><td><s>505</s><u>580</u></td></tr>
<tr><td>HW6</td><td>Gomm Valley and Ashwells</td><td>74</td><td><s>530</s><u>520 - 720</u></td></tr>
<tr><td>HW7</td><td>Terriers Farm and Terriers House</td><td>24.6</td><td><s>500</s><u>500 - 540</u></td></tr>
<tr><td>HW8</td><td>Land Off Amersham Road Including Tralee Farm, Hazlemere</td><td>12.87</td><td>350</td></tr>
<tr><td>HW9</td><td>Land at Green Farm, Glynswood, Green Hill, High Wycombe</td><td>1.62</td><td>50</td></tr>
<tr><td>HW10</td><td>Horns Lane, Booker, High Wycombe</td><td>2.04</td><td>64</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>HW11</td><td>Clay Lane, Booker, High Wycombe</td><td>1.97</td><td><s>30</s> <u>40</u></td></tr>
<tr><td>HW12</td><td>Leigh Street, Desborough Area, High Wycombe</td><td>1.21</td><td>275</td></tr>
<tr><td>HW13</td><td>Former Bassetsbury Allotments, Bassetsbury Lane</td><td>2.08</td><td>30</td></tr>
<tr><td>HW14</td><td>Highbury Works/Hazlemere Coachworks, Chestnut Lane, Hazlemere</td><td>0.62</td><td>14</td></tr>
<tr><td><s>HW15</s></td><td><s>Land to the rear of Hughenden Road, High Wycombe</s></td><td><s>2.55</s></td><td><s>no number allocated</s></td></tr>
</table>
</td></tr>
<tr><td></td><td>Table 12
Page 92 - 93</td><td>Table 12 Additional sites identified for housing in the High Wycombe area
<table>
<tr><th>Site</th><th>Area (hectares)</th><th>Indicative dwelling numbers</th></tr>
<tr><td><s>JC and MP Smith, Princes Gate (also known as Ricketts road, Ryedale), High Wycombe, HP13 7AB</s></td><td><s>0.16</s></td><td><s>32</s></td></tr>
<tr><td><s>46 West Wycombe Road High Wycombe Buckinghamshire HP11 2LW</s></td><td><s>0.08</s></td><td><s>12</s></td></tr>
</table>
</td></tr>
</table>

No.	Reference and page no. in the Plan	Proposed Main Modification

~~193-197 West Wycombe Road High Wycombe Buckinghamshire HP12 3AW~~	~~0.19~~	~~9~~
Edie Pusey House 9A Amersham Road High Wycombe Buckinghamshire HP13 6PN	0.18	8
Delafield Heights South, Longland Way / Pettifer Way, previously known as Flats off Chairborough Road	0.7	40
Frank Hudson Furniture Factory, Rosebery Avenue, High Wycombe	0.11	11
~~Kitchener Works, Kitchener Road, adjacent to Smewin Court, High Wycombe~~	~~0.24~~	~~14~~
Notcutts Garden Centre, Clay Lane, High Wycombe	0.91	15
Delafield Heights North, (Longland Way / Pettifer Way, also known as Castlefield Estate, High Wycombe)	1.74	32
~~Casa Mia, Gillets Lane, High Wycombe, HP12 4BB~~	~~0.23~~	~~12~~
~~7-8 High Street, High Wycombe~~	~~0.06~~	~~12~~
~~17-19 Frogmoor, High Wycombe~~	~~0.04~~	~~11~~
27 High Street, High Wycombe	0.01	5

No.	Reference and page no. in the Plan	Proposed Main Modification

~~Rear of 154-156 West Wycombe Road, High Wycombe~~	~~0.1~~	~~10~~
~~Burleighfield House (Mayflower House), London Road, Loudwater~~	~~1.55~~	~~11~~
Dashwood Avenue, High Wycombe	0.89	70
34 Dashwood Avenue High Wycombe Buckinghamshire HP12 3DX	0.02	5
Ogilvie Road, High Wycombe	0.21	9
Land to the rear of Quebec Road, High Wycombe	0.18	5
Netley Works, 89 Queens Road, High Wycombe	0.08	11
Garages between Chiltern Avenue and Rutland Avenue, High Wycombe	0.38	10
Garages at Tyzack Road, High Wycombe	0.25	6
Garages at Havenfield Road, High Wycombe, HP12 4ST	0.03	5
1-9 Shaftesbury Street, High Wycombe, HP11 2NA	0.03	9
~~The Gordon Arms, Gordon Road, High Wycombe~~	~~0.11~~	~~11~~
Sunnyside and St Johns House, High Wycombe	0.09	5

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Westside Fruit/The Apple Orchard, Clay Lane</td><td>0.62</td><td>11</td></tr>
<tr><td><s>Beaumont, 3-13 Holmer Green Road, Hazlemere</s></td><td><s>0.31</s></td><td><s>28</s></td></tr>
<tr><td><s>Thame House, Castle Street, High Wycombe</s></td><td><s>0.25</s></td><td><s>120</s></td></tr>
</table>
</td></tr>
<tr><td>MM12</td><td>Policy HW4
Page 95 - 97</td><td>POLICY HW4 – ABBEY BARN NORTH
The site as shown on the Policies Map is allocated for residential development and is required to:
1. Place making
a) Be sensitively designed to reflect and take into account the “bowl” shaped topography and sloping nature of the site.
2. Transport
a) Provide for footpath, cycle and bridleways through the site to link Abbey Barn Lane, Deangarden Wood, the former railway line, the former ski-slope, Kingsmead Road/Bassetsbury Lane and Deangarden Rise;
b) Provide a site access and layout that:
i. Where feasible provides in part the realignment of Abbey Barn Lane through the site;
ii. Does not prejudice the realignment of Abbey Barn Lane through the <u>eastern part of the</u> site and the reconfiguration of the Abbey Barn Lane/ Abbey Barn Road/ Kingsmead Road junction.
c) Provide off-site highway, pedestrian and cycle works including:
i. A contribution to improvements to London Road;
ii. A contribution towards improvements to Abbey Barn Lane;</td></tr>
</table>

No.	Reference and page no. in the Plan	Proposed Main Modification
		iii. A widened footbridge of 3 metres width over the Back Stream that connects Kingsmead Road with Bassetsbury Lane (or provide an additional cycle bridge of at least 2 metres width) to provide shared use for cyclists / pedestrians; iv. Improvements to walking, cycling and horse riding along the old railway line east from the site to the bottom of Spring Lane. 3. Green Infrastructure/Environment a) Ensure that there is no loss or deterioration of the woodland margin of Deangarden Wood and maintain at least a 15 metre buffer between the development and the woodland; b) Enhance the ecological value of Deangarden Wood to ensure the increased recreational use of the wood does not lead to a negative ecological impact; c) Enhance the ecological value of the former Bourne End to High Wycombe Railway Line corridor as part of the green infrastructure network; d) Retain and secure long term management of a substantial area of the chalk grassland habitat~~.~~**;** **e) Manage local sources of flood risk.** 4. Landscape a) Minimise impact upon the wider views over and through the valley from the surrounding landscape; b) Retain the characteristic wooded backdrop to the settled valley floor; c) Retain the mature woodland in the eastern corner to ensure its landscape contribution to Deangarden Rise, Abbey Barn Road and Kingsmead Road is maintained;

No.	Reference and page no. in the Plan	Proposed Main Modification
		d) Minimise the removal of young woodland along Abbey Barn Lane to maintain the sylvan character of the lane, and mitigate for any loss through replanting. 5. Other a) Provide a commensurate financial contribution secured by planning obligation for primary education provision.
	Paragraph 5.1.18 Page 97	5.1.18 Access to this site is problematic given the change in levels and the current alignment of Abbey Barn and single lane working over the railway bridge. As a result Abbey Barn Lane will need to be re-aligned **through the eastern part of the site which is less constrained**.
	Paragraph 5.1.22 Page 97	*Add new paragraph after paragraph 5.1.22* **This site contains critical drainage areas; as a result any flood risks presented by ground or surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM13		POLICY HW5 – ABBEY BARN SOUTH AND WYCOMBE SUMMIT
	Paragraph 5.1.28 Page 102	5.1.28 The indicative number of dwellings for the site is ~~505~~ **580** dwellings. The ~~Ski Slope~~ **Wycombe Summit** site has planning permission for 30, leaving ~~475~~ **550** as the indicative number for Abbey Barn South.
MM14	Policy HW6 Page 104 – 106	POLICY HW6 – GOMM VALLEY AND ASHWELLS The site as shown on the Policies Map is allocated for a residential led mixed use development comprising Residential, Business and associated Community Uses. Development of the site is required to:

		1. Placemaking a) Adopt a landscape - led design approach to the development of the site. This should recognise the intrinsic character and beauty of the hillside landform, whilst accommodating opportunities for development; b) Establish an appropriate urban edge to High Wycombe and Tylers Green and avoid the coalescence of the two settlements, leaving an undeveloped gap of approximately 200 metres or more at their closest point, informed by landscape impact, ecological requirements and character issues; c) Establish a strong sense of place with a distinctive attractive and functional living environment through a sensitive design response to the local context including topography, landscape, habitats and ecology; d) Provide 1.2 ha of land for B1 employment uses to the west of the Peregrine Business Park, subject to a suitable access being provided; e) Provide a ~~1 form entry~~ primary school on the southern end of the site. 2. Landscape a) Pay particular regard to the landscape character and views of the area from the south, including mitigating unavoidable impacts in a way that respects the existing landscape character; b) Retain undeveloped areas to deliver both ecological and recreational benefits alongside each other whilst at the time respecting the valley's landscape character. 3. Green Infrastructure/Environment a) Conserve and enhance existing nature conservation interests and green infrastructure, and facilitate the provision of new habitats by: i. Minimising the effects of severance and disturbance on existing and proposed habitats caused by access and development; ii. Retaining and providing appropriate buffers to designated sites and valuable habitats within the site and beyond the site boundary to limit adverse effects from development;

No.	Reference and page no. in the Plan	Proposed Main Modification
		iii. Maximising opportunities for habitat creation and connectivity as outlined in the Gomm Valley Biological Opportunity Area (BOA) description with an emphasis on the creation, restoration and management of lowland chalk grassland, woodland, lowland meadows and hedgerows to create a resilient habitat network within the site that connects well with networks beyond the site boundary; iv. Providing a sustainable management framework, to be secured via legal agreement, for the delivery and ongoing maintenance of the undeveloped area including new and retained chalk grassland habitat; v. Delivering a significant net gain in biodiversity that reflect the site's existing nature conservation interest and its designation as a Biodiversity Opportunity Area (BOA). **b) Manage local sources of flood risk.** 4. Transport a) Provide directly or make appropriate contributions to off-site transport works, including, but is not limited to: i. Capacity improvements at the Gomm Road junction; ii. Contribution towards a wider A40 package; iii. Provision of an attractive shared use pedestrian/ cyclist/ equestrian route through King's Wood, using existing private tracks and public bridleways to connect Cock Lane with the A404 Amersham Road (at the Beech Tree Pub); iv. Off-site footpath and cycleway provision; v. Improved pedestrian crossing facilities.

No.	Reference and page no. in the Plan	Proposed Main Modification
		b) Provide vehicular access into and through the site, to include a link/ spine road designed to minimise and distribute the impact of additional traffic on the existing local road network; c) Provide for bus access through the site.
	Paragraph 5.1.37 Page 108	**5.1.37 Based on a conventional design approach (as set out in the adopted Development Brief for the site)** ~~T~~**t**he indicative capacity of the site is 520. This is likely to be about 400 for Gomm Valley, and about 120 for Ashwells. **It is acknowledged that higher housing numbers may be achievable on the site where a high quality innovative and bespoke architectural response is adopted and/or a higher proportion of smaller dwellings form part of the mix. This might result in an indicative capacity of 600 dwellings for Gomm Valley and a capacity for the site as a whole of 720 dwellings. The Council will view positively any proposals for the Gomm Valley site which seek to deliver more than 600 dwellings, where it can be demonstrated that the development would comply with the requirements of national and local policy.**
	Paragraph 5.1.37 Page 108	*Add new paragraph after paragraph 5.1.37* **If outline permission is sought for more than 520 dwellings (400 for Gomm Valley) a bespoke architectural response would need to be robustly proven at application stage with detailed parameter plans and detailed illustrative supporting documents and plans. All of these indicative capacities remain subject to the proviso in paragraph 5.0.4 that they are to be treated as neither maxima nor minima in the planning application process**
	Paragraph 5.1.38	5.1.38 ~~The Council has worked closely with local stakeholders and landowners to produce a development brief for the site. This was adopted in July 2017 and should be used to inform any planning application submitted for the~~

No.	Reference and page no. in the Plan	Proposed Main Modification
	Page 108	~~future development of the site.~~ **The Council has worked closely with local stakeholders and landowners to produce a development brief for the site. This was adopted in July 2017 and should be used to inform any planning application submitted for the future development of the site. When more technical work is undertaken, it may be demonstrated that there are better ways of delivering the objectives than those set out in the brief. Should these improvements differ significantly from the brief, amendments will be required to those parts of the brief so affected.**
	Paragraph 5.1.43 Page 109	*Add newMM64 paragraph after paragraph 5.1.43* **This site contains critical drainage areas; as a result any flood risks presented by ground or surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM15	Policy HW7 Page 111 - 113	POLICY HW7 – TERRIERS FARM AND TERRIERS HOUSE The site as shown on the Policies Map is allocated for residential development and strategic open space. Development of the site will be required to: 1. Placemaking: a) Maintain the physical separation between Terriers and Hazlemere to preserve the individual character of these locations by locating strategic open space as an extension to the existing recreation ground; b) Integrate the historic Terriers Farm barns 2. Green Infrastructure/Environment/Landscape: a) Retain and enhance the pond and its environs;

No.	Reference and page no. in the Plan	Proposed Main Modification
		b) Manage local sources of flood risk; **c)**~~b)~~ Provide a buffer of an average 15m within the site to protect the trees and hedgerows at the margin of Lady's Mile, and the setting of the AONB; **d)**~~c)~~ Retain the main North-South hedgerow, which has an adjacent public footpath, as the major green link through the site; **e)**~~d)~~ Retain a green link between King's Wood in the south and the Area of Outstanding Natural Beauty countryside to the north to retain its function as a wildlife corridor; **f)**~~e)~~ Retain the field boundaries within the site. … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
	Paragraph 5.1.53 Page 115	5.1.53 The indicative capacity of the site is 500 **– 540**.
	Paragraph 5.1.56 Page 115	*Add new paragraph after paragraph 5.1.56* **This site contains critical drainage areas; as a result any flood risks presented by surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM16	Policy HW8	POLICY HW8 – LAND OFF AMERSHAM ROAD INCLUDING TRALEE FARM, HAZLEMERE The site as shown on the Policies Map is allocated for residential use. Development of the site is required to:

No.	Reference and page no. in the Plan	Proposed Main Modification
	Page 116 - 117	1. Place-making a) Maintain a sense of separation between Hazelmere and Holmer Green, through the layout of the site; b) In the event that land to the north east in Chiltern District (off Earl Howe Road) is allocated for development in the Chiltern and South Bucks Local Plan, to be planned comprehensively with that site as a whole; and in any event to not prejudice future integration; c) Provide a comprehensive development of the site within Wycombe District; ¶ **d)** Redevelop the existing coach yard and riding stables; **e)** ~~d)~~ Consider the opportunity to redevelop existing residential properties fronting Amersham Road. 2. Transport a) Provide access from the A404 and the Wycombe Road; b) Provide walk / cycle access through Tralee Farm onto Wycombe Road; c) Improve access to existing bus routes; d) Provide or contribute to off-site highway improvements as required by the Highway Authority. 3. Green Infrastructure/Environment a) Provide access to and retain the existing orchard within the north east of the site; b) Provide protection and future management for the orchard; c) Retain the woodland in the south west corner of the site at Badger Way; d) Provide a Green Infrastructure link through the valley of the site, connecting the orchard to the woodland at Badger Way;

No.	Reference and page no. in the Plan	Proposed Main Modification
		e) Retain the field boundaries within the site~~.~~**;** **f) Manage local sources of flood risk.** **4. Development of this site will be required to meet the needs arising from the development for additional primary school places.**
	Paragraph 5.1.63 Page 119	*Add new paragraphs following paragraph 5.1.63* **In the event that land to the north east in Chiltern District (off Earl Howe Road) is allocated for development in the Chiltern and South Bucks Local Plan, a new primary school will be required. (This may be located on either site, with the location and delivery strategy to be determined as part of the development brief process.)** **Alternatively, a commensurate financial contribution (via a S106 planning obligation) will be required for the provision of additional school places if the adjoining Chiltern site is not allocated OR if it can be demonstrated to the satisfaction of the Local Education Authority that these needs will be better met through the expansion of existing schools.**
	Paragraph 5.1.66 Page 120	*Add new paragraph after paragraph 5.1.66* **This site contains critical drainage areas; as a result any flood risks presented by surface water flooding should be assessed and mitigated for in accordance with policy DM39.**

No.	Reference and page no. in the Plan	Proposed Main Modification
MM17	Policy HW9 Page 121	POLICY HW9 – PART OF GREENS FARM, GLYNSWOOD, GREEN HILL, HIGH WYCOMBE The site as shown on the Policies Map is allocated for residential development. Development of the site is required to: 1. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty, and not have an adverse impact on long distance views from Hughenden Park and Manor; 2. Provide access off Glynswood Road; 3. Retain the footpath through the site; 4. ~~Avoid any adverse impact on surface water~~ **Manage local sources of** flood risk.
	Paragraph 5.1.71 Page 123	1. 5.1.71 The site is also within the Chilterns Area of Outstanding Natural Beauty. The Council's initial analysis suggests that there is scope for some residential development on the part of the site without significant visual harm. The topography steeply rises giving long distance views towards the Chilterns Area of Outstanding Natural Beauty and Hughenden Park and Manor. A more detailed assessment is required by the developer in the form of a landscape and visual impact assessment to determine the impact, particularly in relation to longer distance views, including those from Hughenden Park and Manor. **This includes views both from the Register of Historic Parks and Gardens and other views associated with the wider historic landscape, and in particular, views from the Disraeli monument.**
	Paragraph 5.1.72 Page 123	5.1.72 There is a surface water flow path across the northern part of the site and there is a risk of groundwater emergence. Applicants should refer to the SFRA level 2 findings when undertaking a site-specific FRA. **Risk should be assessed and mitigated for in accordance with DM39**.

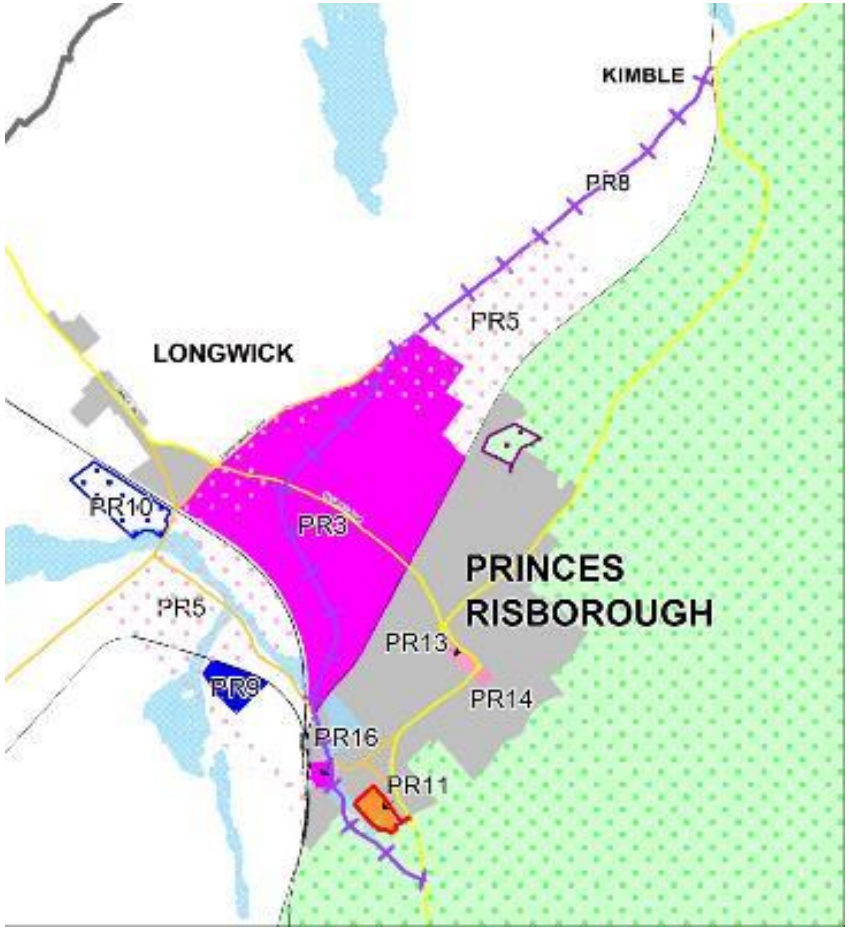
No.	Reference and page no. in the Plan	Proposed Main Modification
MM18		POLICY HW11 – CLAY LANE, BOOKER, HIGH WYCOMBE
	Paragraph 5.1.80 Page 127	5.1.80 The indicative capacity for the site is ~~30~~ **40** dwellings
MM19	Policy HW15 Page 135 – 136	POLICY HW15 – LAND TO THE REAR OF HUGHENDEN ROAD, HIGH WYCOMBE *Policy to be deleted. Other references to policy / proposed allocation elsewhere in the plan to be deleted as a consequence.*
	Paragraphs 5.1.104 – 5.1.115 Page 135 – 138	*Paragraphs to be deleted as a consequence of the deletion of policy HW15 (land to rear of Hughenden Road, High Wycombe)*
MM20		POLICY HW16 – WYCOMBE AIR PARK, HIGH WYCOMBE
	Paragraph 5.1.117 Page 140	5.1.117 **Based on** ~~An~~ **an** assessment of the commercial market the **indicative capacity of the airpark is between 22,000 sqm to 26,600 sqm** ~~has identified that the airpark by virtue of its location has potential to provide up to an additional 14 ha / 26,000 sqm of additional employment floorspace on the airpark~~

No.	Reference and page no. in the Plan	Proposed Main Modification
MM21	Policy HW17 Page 143	POLICY HW17 – LAND ADJOINING HIGH HEAVENS HOUSEHOLD RECYCLING CENTRE, OFF CLAY LANE The site, as shown on the Policies Map, is allocated for low density yard based business uses. Development of the site is required to: 1. Provide single storey restricted height buildings; **2. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty.** **3.**~~2.~~ Retain and manage existing wooded boundaries for screening purposes, to take account of the site's location within the Chilterns Area of Outstanding Natural Beauty; **4.**~~3.~~ Provide off site planting to the east so as to reinforce the western boundary; and **5.**~~4.~~ Provide a full landscape assessment.
MM22	Policy HW19 Page 147	POLICY HW19 – OFFICE OUTLET SITE, QUEEN ALEXANDRA ROAD, HIGH WYCOMBE 1. Land at the Office Outlet site, High Wycombe as shown on the Policies Map is allocated as a mixed office and retail development, comprising A1 retail uses at ground floor level and B1 office uses on the upper storeys. 2. Development is required to: a) Result in no net loss of parking; b) Not prejudice any future redevelopment of Wycombe General Hospital; c) Safeguard land for the provision of a bus lane/route for left turning traffic from Marlow Hill; d) Not rely on on-street servicing~~.~~**;** **e) Manage local sources of flood risk.**

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.1.139 Page 148	5.1.139 ~~The NHS are considering the long-term vision for the future of Wycombe General Hospital, and dependent on that vision, this allocation may come forward as part of a larger redevelopment scheme.~~ **As stated in adopted policy HWTC11 of the Delivery and Site Allocation Plan, Wycombe hospital should be maintained on the site for the long term. Any** ~~D~~**d**evelopment proposals for the **Office Outlet site** should be sensitively designed **so as not to compromise any future development of Wycombe hospital.** ~~to accommodate future proposals for the hospital site.~~
	Paragraph 5.1.140 Page 149	*Add new paragraph after paragraph 5.1.140* **This site contains critical drainage areas; as a result any flood risks presented by ground or surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM23	Policy HW21 Page 150	POLICY HW21 – LAND AT QUEENSWAY, HAZLEMERE Land is allocated at Queensway for cemetery use, as shown on the Policies Map. Development of the site is required to: 1. Provide access from Queensway; 2. Minimise any conflict between the proposed and neighbouring uses or associated impact on the amenities of local residents or visitors to the cemetery;

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>3. Demonstrate that the use of the land for cemetery purposes has no adverse impact on water quality, water courses, groundwater, surface water or drainage systems unless sufficient mitigation measures such as SuDS can be secured through conditions attached to the planning permission, or a legal agreement;
4 ~~Contribute to the enhancement of features within the site and surrounding area by retaining the~~ <u>Minimise harm to the</u> openness of the Green Belt;
<u>5 Conserve, and where possible enhance, the natural beauty of the AONB;</u>
<u>6.</u>5. Provide appropriate planting and boundary treatment; and
<u>7.</u>~~6.~~ Maximise biodiversity by conserving and enhancing the parts of the site with existing ecological value and/or by creating new areas or features within the site.</td></tr>
<tr><td>MM24</td><td>Table 13
Page 157</td><td>Table 13 Sites identified for housing or housing-led mixed use development in the Marlow area
<table>
<tr><th>Policy reference</th><th>Site</th><th>Area (hectares)</th><th>Indicative dwelling numbers</th></tr>
</table>
</td></tr>
</table>

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<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>MR6</td><td>Land at Seymour Court Road, Marlow</td><td>0.3</td><td>9</td></tr>
<tr><td><s>n/a</s></td><td><s>Police Station, Dean Street, Marlow</s></td><td><s>0.24</s></td><td><s>29</s></td></tr>
<tr><td>n/a</td><td>Foxes Piece, Marlow</td><td>1.52</td><td>10</td></tr>
</table>
</td></tr>
<tr><td>MM25</td><td>Policy MR6
Page 158</td><td>POLICY MR6 – SEYMOUR COURT ROAD, MARLOW
Land is allocated at Seymour Court Road for residential use, as shown on the Policies Map.
Development of the site is required to:
1. <s>Adopt</s> <u>Provide</u> a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty;
2. Provide access off Seymour Court Road;
3. Retain the existing footpath through the site; and
4. Retain and strengthen existing boundary vegetation and have regard to Medmenham Biodiversity Opportunity Area Statement.</td></tr>
</table>

No.	Reference and page no. in the Plan	Proposed Main Modification
MM26	Figure 24 Page 169	*Existing figure to be amended in relation to the strategic buffer* 

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td>MM27</td><td>Table 15
Page 170</td><td>Table 15 Sites identified for housing or housing-led mixed use development in the Princes Risborough area
<table>
<tr><th>Policy reference</th><th>Site</th><th>Area (hectares)</th><th>Indicative dwelling numbers to be delivered in the plan period (~~1,797~~ <u>1765</u>)</th></tr>
<tr><td colspan="4">Allocated sites in expansion area</td></tr>
<tr><td>PR3</td><td>Princes Risborough Main Expansion Area</td><td>177.23</td><td>1,662</td></tr>
<tr><td>PR11</td><td>Land to the Rear of Poppy Road, Princes Risborough</td><td>3.74</td><td>58</td></tr>
<tr><td>PR16</td><td>Land at Princes Risborough station</td><td>2</td><td>45</td></tr>
<tr><td colspan="4">~~Other allocated sites elsewhere in the town~~</td></tr>
<tr><td>~~n/a~~</td><td>~~Greensleeves, Maryland, Longwick Road and Aylesbury~~</td><td>~~0.33~~</td><td>~~32~~</td></tr>
</table></td></tr>
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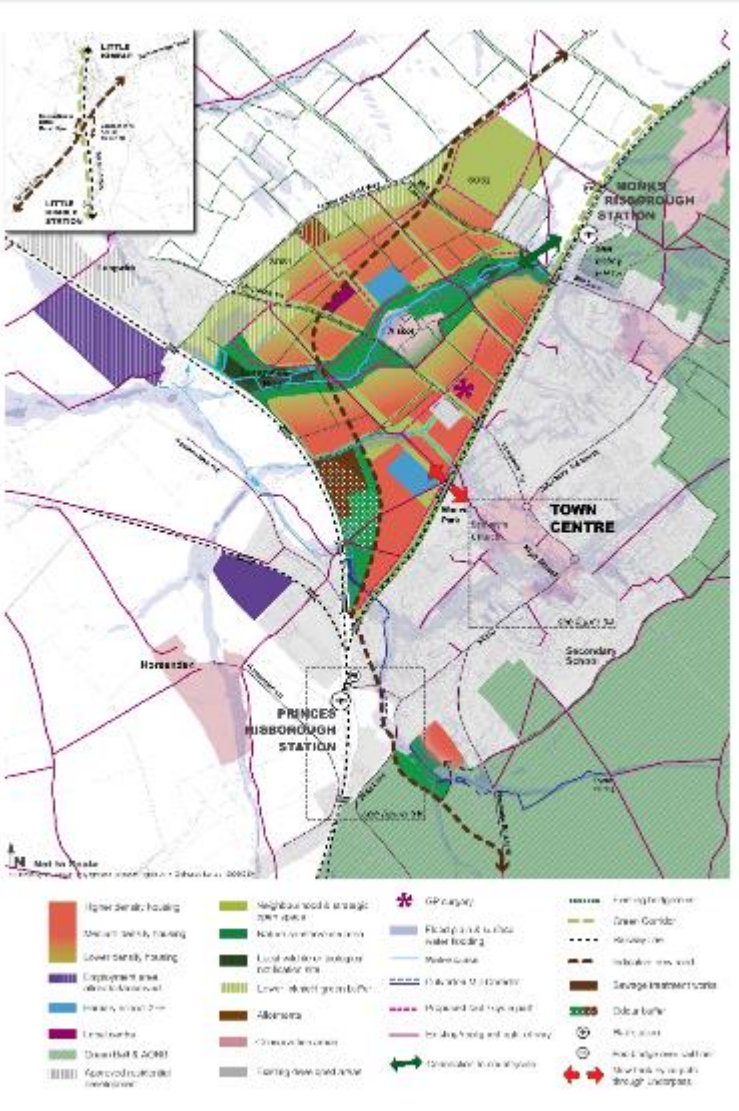
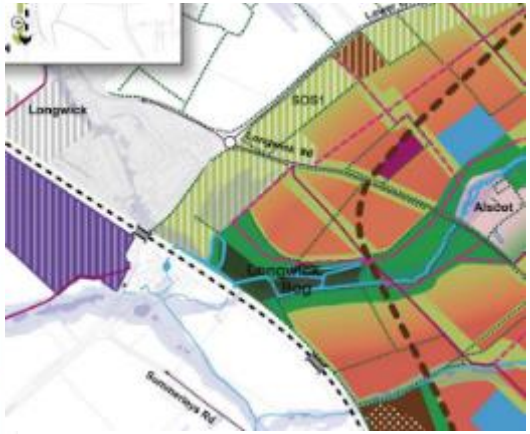
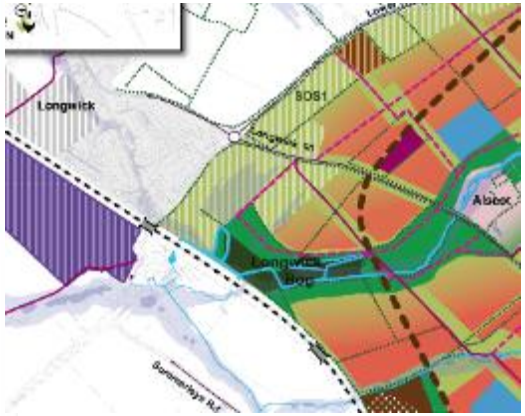
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<tr><td></td><td></td><td>
<table>
<tr><td></td><td><s>Road, Princes Risborough</s></td><td></td><td></td></tr>
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</td></tr>
<tr><td></td><td>Table 16
Page 171</td><td>
Table 16 Housing supply in Princes Risborough
<table>
<tr><th></th><th colspan="2">Within the plan period (to 2033)</th><th>Beyond the plan period (after 2033)</th><th>Total</th></tr>
<tr><td>Within the main expansion area</td><td>1758</td><td>Made up of
• 96 Leo Labs with planning permission;
• 1662 allocated in this Plan</td><td><s>599</s> <u>540</u></td><td><s>2357</s> <u>2298</u></td></tr>
<tr><td>Other allocations within the expansion area</td><td>103</td><td>Made up of
• 58 Land to the rear of Poppy Road (PR11)
• 45 Land at Princes Risborough Station (PR16)</td><td>n/a</td><td>103</td></tr>
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<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Elsewhere in the town</td><td>~~186~~ <u>222</u></td><td>Made up of
• ~~32 from other allocated sites in table 15~~
• ~~139~~ <u>195</u> built, under construction or with planning permission
• ~~16~~ <u>27</u> from windfall</td><td>n/a</td><td>~~186~~ <u>222</u></td></tr>
<tr><td>Total</td><td>~~2047~~ <u>2083</u></td><td></td><td>~~599~~ <u>540</u></td><td>~~2646~~ <u>2623</u></td></tr>
</table>
</td></tr>
<tr><td>MM28</td><td>Policy PR3
Page 173</td><td>POLICY PR3 – PRINCES RISBOROUGH AREA OF COMPREHENSIVE DEVELOPMENT INCLUDING RELIEF ROAD
~~The Council will require t~~<u>T</u>he development of the Princes Risborough Expansion Area as defined on the policies map ~~as~~ <u>is required to be</u> an area of comprehensive development, to be taken forward on a comprehensive basis.~~, and~~ <u>The following are</u> allocate<u>d</u>~~s~~:
…
Remainder of policy is as presented in publication version of the Wycombe District Local Plan</td></tr>
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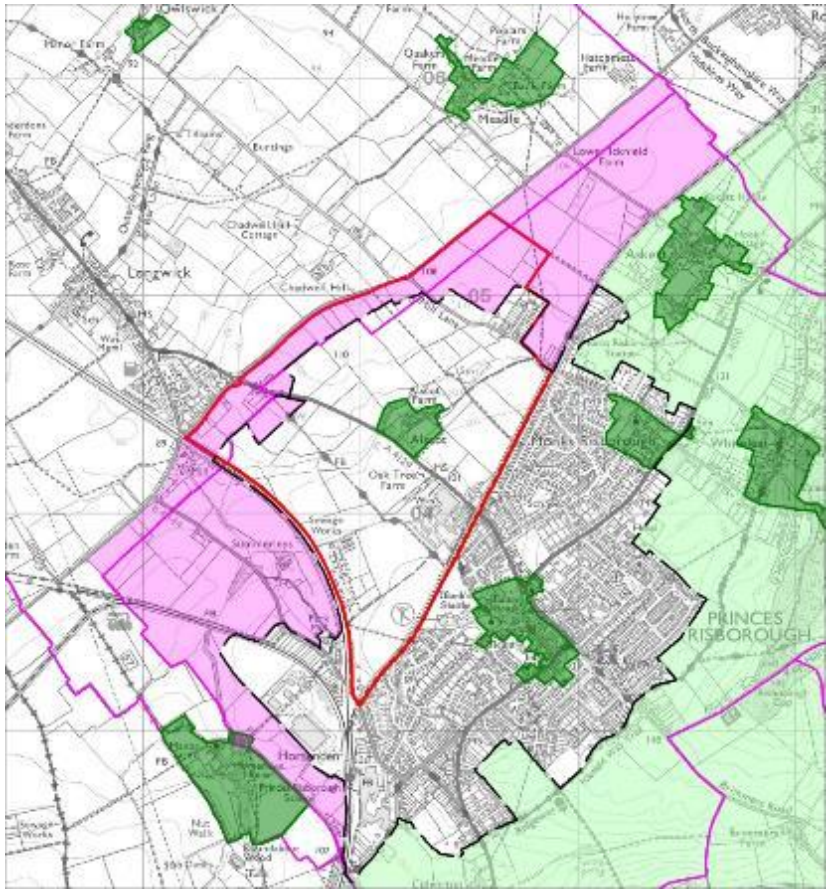
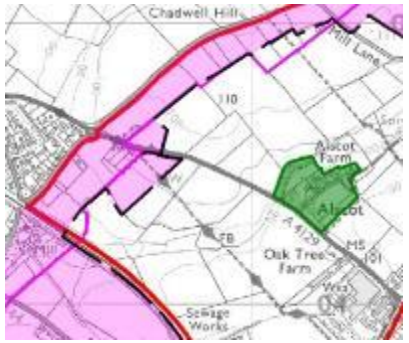
No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.3.16 Pages 174	5.3.16 A structured and coordinated planning approach is needed to ensure that policy will deliver the planned growth in a sustainable and desirable manner. **It is not necessary that a single application is required for the whole expansion area. Realistically, the Council expects that applications for individual parcels will come forward and these will need to demonstrate how they work together to contribute to the whole, and not prejudice the realisation of the total expansion area.** Policies PR4, PR5, PR6, PR7, PR8, PR11, PR16 and PR17 provide further detail in relation to the expansion area, and set out important development principles and requirements which are guiding the production of detailed Capacity and Delivery plans for the town expansion. This work is being taken forward by the Council, enabled by capacity funding from the Homes and Communities Agency (HCA), to achieve the following objectives, to: i. Provide a framework for equalisation of infrastructure costs and delivery; ii. Support the assessment of planning applications, and negotiation of S106 contributions; iii. Further guide the pattern of development, including density, and location of facilities and infrastructure.
MM29	Policy PR4 Page 179	POLICY PR4 –THE MAIN EXPANSION AREA DEVELOPMENT FRAMEWORK ~~The Council will require d~~**D**evelopment of the Main Expansion Area **is required** to deliver the broad disposition and scale of land uses, green infrastructure and major highway infrastructure, shown on the Concept Plan (figure 26). The Concept Plan is illustrative but the following elements are ~~fixed~~ **required within the layout**: 1. Formation of residential neighbourhoods; 2. ~~Two primary schools, located one each side of the A4129 to minimise the need to cross a main road;~~ **Two primary schools;**

No.	Reference and page no. in the Plan	Proposed Main Modification
		a) **<u>One located in the southern part of the Expansion Area, west of the Longwick Road,</u>** **b)** **<u>And one located near the local centre;</u>** 3. A local centre to the north of the Crowbrook; 4. Creation of an internal primary route through the expansion area linking from the B4009 to a point on Summerleys Road between the under bridges of the ~~Banbury~~ **<u>Birmingham</u>** and Aylesbury railway lines, as part of an overall relief road which achieves and sustains satisfactory operation of the local road network; 5. ~~Location of the~~ **<u>A</u>** green gap between development and Longwick; 6. An east-west green corridor focussed on the Crowbrook Stream; 7. North-south green 'lanes' focused on existing rights of way; 8. Land ~~to the~~ **<u>immediately</u>** north of the railway line to safeguard future railway expansion and associated green space; 9. Pedestrian and cycle crossings of the railway; 10. ~~Location of s~~**<u>S</u>**trategic open spaces SOS1 and SOS2 **<u>on the periphery of the Expansion Area.</u>**
	Paragraph 5.3.30 Page 180	5.3.30 The role of the illustrative Concept Plan is to guide the development of Princes Risborough and provide a robust basis for detailed consideration of the components. It is an illustrative plan and does not seek to fix the exact location or configuration of all the various spatial elements of development, for example the exact location of the local centres or play areas. However, in order to secure a comprehensive and robust approach to the delivery of key structuring infrastructure within the main expansion area, this policy sets out ~~the~~ location**<u>al principles</u>** and **<u>the</u>** general configuration of a number of ~~fixed~~ **<u>required</u>** elements of the illustrative Concept Plan.

No.	Reference and page no. in the Plan	Proposed Main Modification	
	Paragraph 5.3.31 Page 180	5.3.31	Capacity work based on the Concept illustrated here indicates the expansion area can deliver up to ~~2460~~ **2300** homes, with ~~600~~ **540** of these homes being provided beyond the plan period. A breakdown of the housing figures showing the sources of supply is given at tables 15 and 16.

	Figure 26 Page 181	*Concept plan to be amended (with feathering) to increase the buffer.*  *Extract of figure 26 as presented in publication version of the Local Plan*  *Extract of revised figure 26 showing increased buffer* 

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.3.46 Page 185	5.3.46 ~~The main expansion area falls naturally into two main development areas (north and south of the Crowbrook green corridor), so a p~~ **The p**rimary school**s need to be distributed through the main expansion area in a way that allows families to walk to school easily** ~~is located in each, taking~~ **and take** into account the location of the existing primary schools in the town~~, and minimising the need for children to cross the main road to Thame in getting to school.~~ **One school will therefore need to be in the south of the expansion area (as the existing schools are north of Longwick Road / New Road). Siting the other primary school close to the local centre will support the vitality and viability of the local centre.** This will enable primary education demand to be met locally and encourage safe and sustainable travel to school.
MM30		POLICY PR5 – SETTLEMENT BOUNDARY AND STRATEGIC BUFFER
	Paragraph 5.3.55 Page 188	5.3.55 The outer edge of the town expansion area warrants its own policy, to reflect the fact that, once the town has been expanded, future gaps will become critical to the protection of the countryside and surrounding settlements. With this in mind a buffer zone has been drawn (see figure 28) which picks up the PR5 settlement boundary, and identifies the key gaps to Longwick, Meadle, Great and Little Kimble, Askett, and Horsenden. In general the buffer adheres to the Town Council (Parish) boundary, with the exception of the Longwick side where the PR5 area extends to the ~~boundary: the land between here and the~~ B4009 Lower Icknield Way ~~is also retained as a buffer~~.

No.	Reference and page no. in the Plan	Proposed Main Modification
	Figure 28 Page 190	*Amendment to existing figure in relation to the "buffer zone" and consequential amendment to settlement boundary to follow the amended buffer*  *Extract of figure 28 as presented in publication version of the Local Plan.*  *Extract of figure 28 showing proposed revision of buffer zone and settlement boundary.* 

No.	Reference and page no. in the Plan	Proposed Main Modification
MM31	Policy PR6 Page 191	POLICY PR6 – MAIN EXPANSION AREA DEVELOPMENT PRINCIPLES ~~The Council will ensure that t~~**T**he main expansion area shown on the Policies Map will be planned as a high quality, vibrant and locally distinctive expansion of the town that will complement and enhance the existing town and respond sensitively to the environmental qualities of the surrounding area. To deliver this, ~~the Council will require~~ development proposals **are required** to demonstrate clearly how they have addressed and incorporated the following principles: … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
MM32	Policy PR7 Page 194	POLICY PR7 – DEVELOPMENT REQUIREMENTS ~~The council will require d~~**D**evelopment within the main expansion area **is required** to provide: … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
	Paragraph 5.3.96 Page 206	5.3.96 The new development will generate the need for more than three new forms of entry (3.6 FE) for primary schools. Opportunities to create capacity in other local primary schools are limited and it is expected that this will be consumed by existing permissions. Therefore nearly all the pupils generated by the expansion will need to be provided for by the new primary schools. Splitting the requirement across two new schools, each of two forms of entry, allows for some flexibility in **delivery**. These schools will also need to incorporate nursery and early years' provision. ~~The location of the new schools needs to take into account the location of existing~~

No.	Reference and page no. in the Plan	Proposed Main Modification
		~~primary schools in the town, and, in the main expansion area, the need to avoid children crossing the main Longwick Road in getting to school.~~
MM33	Policy PR8 Page 214	POLICY PR8 – PROVISION AND SAFEGUARDING OF TRANSPORT INFRASTRUCTURE 1. Land safeguarded for new or improved transport infrastructure is shown on the Policies Map and details set out in 2 and 3 below. Development that prejudices the provision of new or improved transport infrastructure will not be permitted. 2. ~~The Council requires d~~**D**evelopment within the expansion area **is required** to provide and secure new road infrastructure in the form of a complete relief road round the town, to be established and classified as the main A4010, and which achieves and sustains satisfactory operation of the local road network. Within the main residential area this includes: … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.3.140 Page 222 - 223	5.3.140 The alternative route for the town will require the following works and improvements: • Junction of Grove Lane with the A4010: presently over capacity. This junction will need to be replaced and brought up to standard, together with the awkwardly placed and below-standard railway under-bridge over Grove Lane. • Junction of new road with the A4010: will need to be designed to accommodate increased traffic volumes and lead through-traffic away from the town centre. Both junctions will need to be constructed and designed to lead through-traffic away from the town centre, by changing the directional priority and the traffic direction signs to direct the A4010 traffic from Aylesbury and High Wycombe along the relief road. • The railway under-bridges over Grove Lane and Summerleys Road are below-standard both in terms of width and height (3.89m and 4.1m headroom respectively). Grove Lane is barely passable by two-way traffic and Summerleys Road has a signal-controlled shuttle operation. However, they are situated on what is presented as the most appropriate and reasonable alternative route. The under-bridges will need to be • Improved to increase the highway capacity (horizontally), and headroom capacity for large vehicles (vertically). • A new road link passing through the development from the B4009 Lower Icknield Way to Summerleys Road. • A new road link through the former Hypnos and Whiteleaf development sites, to Picts Lane. • A new road link between Picts Lane and the A4010 between Culverton Farm and Woodway.

No.	Reference and page no. in the Plan	Proposed Main Modification
		• **A safe crossing of the relief road for non-motorised users between the east and west parts of Picts Lane.** • New junctions will need to be created where the new road links join in to the existing highway network. • Some lengths of existing roads (Grove Lane, B4009 Lower Icknield Way, Summerleys Road, Picts Lane and Shootacre Lane) along this route will need improvement to carry the forecast volume of traffic: o Some lengths will need widening to a standard capacity width; o Lengths will need to be soundly constructed, if not already; o Positive sustainable drainage will need to be introduced on most lengths.
MM34	Policy PR9 Page 224	POLICY PR9 – PRINCES ESTATE EXPANSION 1. ~~The Council allocates l~~**L**and shown on the Policies Map **is allocated** for a new Strategic Employment Area as a northern expansion of the Princes Estate. 2. ~~The Council will require n~~**N**ew development in the expanded business park as identified on the Policies Map~~,~~ **is required** to: a) Be for employment generating uses in use classes B1, B2 ~~and~~ B8 **and sui generis employment generating uses**; b) Develop the whole site, or if for a part of the site demonstrate a proposal would not compromise delivery of the remaining area;

No.	Reference and page no. in the Plan	Proposed Main Modification
		c) Create a layout and design that has particular regard to its visual impact from the Area of Outstanding Natural Beauty escarpment and the Ridgeway National Trail, open character of the area and the setting of Horsenden Conservation Area; d) Provide access and parking arrangements in accordance with current parking standards. 3. Residential applications will not be permitted.
	Paragraph 5.3.146 Page 225	5.3.146 The Plan aims to retain and grow existing businesses and provide start-up opportunities for local enterprise. **Although this is a strategic site, there is the opportunity for plots to be subdivided for locally generated businesses.** Businesses that need to relocate from the expansion area may be accommodated here, similarly any business that needs to relocate to facilitate the delivery of the alternative route.
MM35	Policy PR10 Page 226	POLICY PR10 – LAND NORTH OF LOWER ICKNIELD WAY ~~The Council reserves e~~**E**mployment land as identified on the Policies Map **is reserved** for the relocation of existing B1, B2, ~~or~~ B8 ~~businesses~~ **and sui generis employment generating uses** affected by the expansion of Princes Risborough. ~~The Council will require n~~**N**ew development here **is required** to: … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM36	Policy PR11 Page 229	POLICY PR11 – LAND TO THE REAR OF POPPY ROAD Development of the site is required to: 1. ~~Protect land within Flood Zone 2 or 3 to create a buffer between development and the chalk head waters of the Pyrtle Spring, preserving existing vegetation, subject to detailed hydrological and ecological assessment;~~ **Respond sensitively to the environmental context of the site by:** **a) Undertaking detailed ecological, hydrological and visual impact assessments;** **b) Conserving and enhancing important or species-rich habitats identified, including the chalk headwaters of the Pyrtle Spring, through:** **i. The provision of a 50m ecological buffer between development and the chalk headwaters of the Pyrtle Spring;** **ii. Ensuring an alternative means of disposal of surface water runoff from existing nearby roads into the Pyrtle Spring.** **c) Any other necessary measures identified as a result of the assessments in (a) above;** **d) Providing any further planting or landscaping required to mitigate any effects on important views;** **e) Establishing a management and maintenance plan for environmental enhancements.** **2. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty.** **3.**~~2. Preserve and enhance the water quality of the Pyrtle Spring by providing alternative means of disposal of surface water runoff from nearby roads;~~ **Manage flood risk from all sources by:**

No.	Reference and page no. in the Plan	Proposed Main Modification
		a) Taking a sequential approach to locating development within the site to avoid areas at higher risk of flooding where possible; **b) Implementing appropriate SuDS which support the ecological management regime.** ~~3. Provide appropriate planting and landscaping to mitigate the effect on views from the Chiltern escarpment and the Ridgway National Trail, and enhance the stream corridor;~~ ~~4. Respond sensitively to any other important habitats or species present on the site;~~ **4.**~~5.~~ Provide ~~main~~ **suitable** vehicular access**. The preferred access is** from the new Princes Risborough relief road**. However, access is also possible from Wycombe Road**; ~~6. Provide a secondary access from Wycombe Road;~~ **5.**~~7.~~ Make a contribution to off-site infrastructure proportionate to the scale of the development, taking into account on-site provision.
	Figure 32 Page 230	Amend the key on Figure 32 in respect of the description of the two points of access. ~~Primary~~ **Preferred** vehicular access ~~Secondary~~ **Alternative** vehicular access

		Land off Poppy Road, Princess Risborough Oct 2018  Please note this plan is indicative only drawn for the purposes of assessing development capacity Proposed residential Proposed tree belts Existing trees/ woodland Flood Zone 2 & 3 Preferred vehicular access Alternative vehicular access Indicative alignment of relief road Site boundary

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.3.160 – 5.3.169 Page 230 - 232	5.3.160 The indicative capacity for the site is 58 homes. 5.3.161 This site includes land to the rear of Poppy Road and land at 108 Wycombe Road. ~~The site is proposed to be taken out of the Green Belt and allocated for residential purposes. The Green Belt Part 2 report has reviewed this site and indicates that exceptional circumstances exist in this case for removing the site from the Green Belt.~~ **The site was formerly in the Green Belt. The south of the site is also designated as being within the Chilterns AONB. Due to its limited size and location within the urban setting of Princes Risborough, it is not considered that development here would amount to major development within the AONB, in the terms of National Policy for the AONB.** 5.3.162 ~~Access to this land from Wycombe Road is problematic. However, t~~**T**he implementation of the relief road section between Picts Lane and Culverton Farm creates the opportunity for ~~an alternative~~ **the preferred** point of access. **Vehicular access to this land from Wycombe Road is also possible, though the access would require redesign and reconstruction to create safe visibility splays. Access from the latter should in any case be retained for people on foot and cycle to increase accessibility to town services and the 300 bus route along the A4010.** 5.3.163 ~~The south of the site is also designated as being within the Chilterns AONB. Due to its limited size and location within the urban setting of Princes Risborough, it is not considered that development here would amount to major development,~~ **Whilst it is a suitable location for development overall, the site is environmentally sensitive, both in terms of flood risk and ecology. It is critical therefore that an integrated approach to**

No.	Reference and page no. in the Plan	Proposed Main Modification
		environmental management is taken in the development of this site, including ensuring the protection and future management of the buffer areas identified. 5.3.164 The Pyrtle Spring is a chalk headwater and as such is a BAP priority habitat. The section of the stream here forms part of the wider Culverton Mill corridor (see figure 26, Concept Plan) Development here should maximise opportunities to preserve and enhance this habitat. Currently surface water runoff from Poppy Road drains into this stream, degrading the water quality and depositing silt. 5.3.165 Parts of the site are within Flood Zones 2 and 3 and within designated Wycombe Critical Drainage Areas. There is also an extensive but low risk of groundwater flooding. Developers will need to undertake a site specific Flood Risk Assessment including detailed hydraulic modelling of climate change allowances. The main access road will need to avoid areas of flood risk or where this cannot be avoided, appropriately manage and mitigate flood risk, **in accordance with DM39**. 5.3.166 ~~The site is exposed to views from the Chiltern escarpment and the Ridgeway National Trail. Therefore d~~ **D**evelopment should take measures to minimise any **potential** visual impact **from the Chiltern escarpment or relevant rights of way**. 5.3.167 The site has been undisturbed for many years and may consequently **contain previously unidentified assets** ~~be~~ of ecological value. The results of an ecological assessment should **therefore** inform the extent and nature of development here. ~~5.3.168 The main vehicle access should be from the new relief road as Poppy Road is constrained and narrow. A layout that facilitated vehicular access to the rear of the existing properties in Poppy Road would be supported,~~

No.	Reference and page no. in the Plan	Proposed Main Modification
		~~subject to it dealing satisfactorily with detailed design matters such as designing out crime. Subject to further assessment, some vehicle access may be possible from Wycombe Road. Access to Wycombe Road should be retained for people on foot and cycle to increase accessibility to town services and the 300 bus route along the A4010.~~ 5.3.169 The Council will assess PR11(7) against its capacity and delivery plans for the area. Until such time as this has been produced and approved by the Council, the Council will require an application for this site to demonstrate how the application is making a fair and equitable contribution towards the provision of off-site infrastructure. **Thereafter, development should contribute in accordance with the capacity and delivery plans.**
MM37	Policy PR12 Page 235	POLICY PR12 – TOWN CENTRE TRAFFIC AND PUBLIC REALM ENHANCEMENTS ~~The Council will ensure that t~~**T**he expansion of the town will not adversely affect the vitality and viability of the town centre but rather enhance and support it, by requiring development in the expansion area at Princes Risborough to contribute to: … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
MM38	Policy PR13 Page 240	POLICY PR13 – TOWN CENTRE SITE: LAND FRONTING NEW ROAD (BACK LANE) 1. This site as shown on the Policies Map is allocated for a small-scale mixed use development suitable for predominantly main town centre uses, including parking. 2. ~~The Council will require n~~**N**ew development **is required** to:

No.	Reference and page no. in the Plan	Proposed Main Modification
		a) Take into consideration the likely incremental approach to redevelopment of this site, demonstrating how development schemes will not prejudice potential further incremental development of the site; b) ~~Front New Road or front any new formalised pedestrian links with~~ **Provide** active frontages on the ground floor **facing New Road or any new formalised pedestrian links**; c) Achieve an overall increase in parking spaces; d) Provide additional tree planting along New Road to improve the streetscape; e) Provide improved boundary treatments in accordance with guidance outlined in the Princes Risborough Conservation Area Character Survey; f) Provide environmental improvements to retained parking areas (if any); g) Enable improved and/or more frequent pedestrian crossing points along New Road; h) Provide new and/or improved pedestrian links from New Road to High Street and Duke Street; i) Rationalise the number of vehicular access points into the site; j) Contribute to the overall public realm improvement plan for the town centre.
	Paragraph 5.3.194 Page 241	5.3.194 **This site contains critical drainage areas; as a result any** ~~Any~~ flood risks presented by ground or surface water flooding should be assessed and mitigated for in accordance with policy DM39.
MM39	Policy PR14 Page 242	POLICY PR14 – TOWN CENTRE SITE: LAND SOUTH OF HORNS LANE

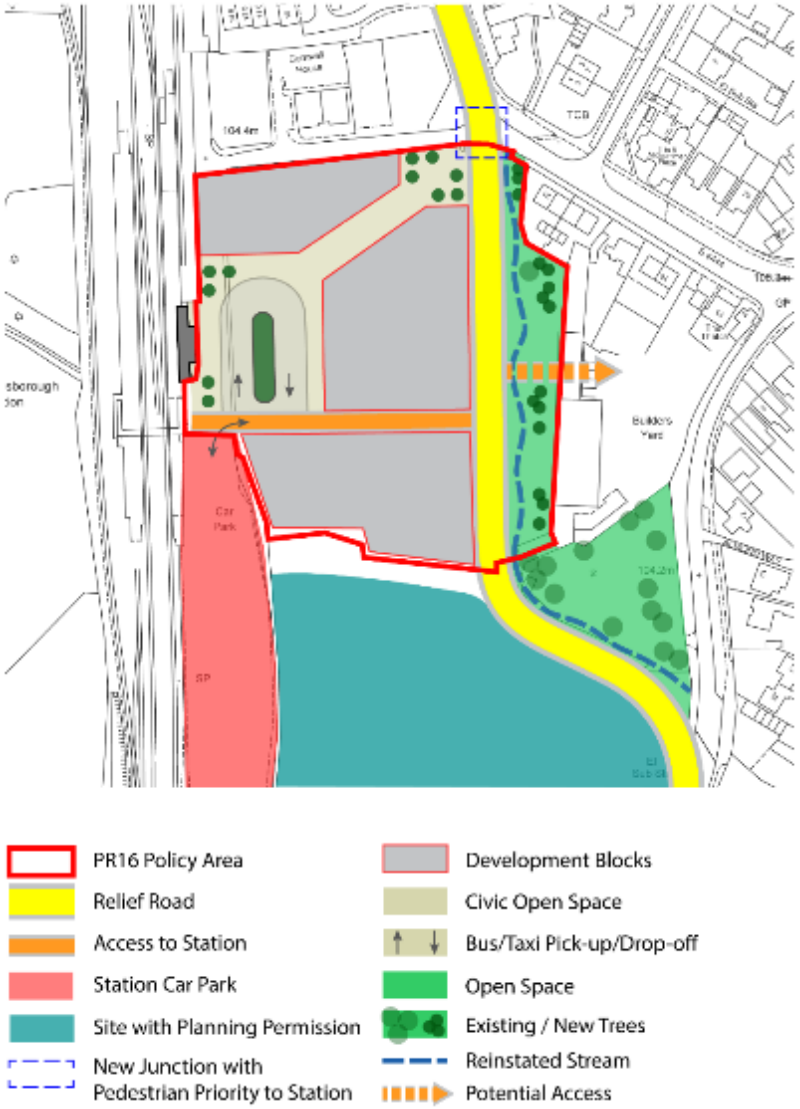
No.	Reference and page no. in the Plan	Proposed Main Modification
		1. This site as shown on the Policies Map is allocated for a small-scale mixed use development, focusing on delivering additional retail development and parking to support the growth of the town. 2. ~~The Council will require r~~**R**e~~-~~development **proposals are required** to: a) Contribute to meeting town-wide needs for parking ~~by the provision of a multi-deck car park~~; b) Take a comprehensive approach to redevelopment; c) Enable the satisfactory relocation of the public toilets; ~~d) Ensure there is no net loss of Class A1 shop use floorspace;~~ **d)**~~e)~~ ~~Front Horns Lane – this must be~~ **Provide** active frontages on the ground floor **facing Horns Lane**; **e)**~~f)~~ Reflect the prominent position of the site; **f)**~~g)~~ ~~Address~~ **Follow the pattern of development / building line on** New Road located north-east of the site; **g)**~~h)~~ Follow the established building line of New Road to the south-east; **h)**~~i)~~ Provide a pedestrian crossing point over New Road south of the roundabout with Bell Street; **i)**~~j)~~ Provide the vehicular access point from New Road. 3. If development proposals for all or part of the site require the relocation of the fire station, scheme promoters will be required to identify and enable provision of an alternative site before redevelopment commences. The fire station will only be relocated from the site if a suitable alternative site is identified which fulfils the requirements of Buckinghamshire Fire and Rescue Service, as assessed by Buckinghamshire and Milton Keynes Fire Authority. Any alternative site and station facility must be provided before the existing fire station is relocated. 4. Development here should contribute to the overall public realm improvement plan for the town centre.

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.3.199 Page 243	*Add new paragraphs after paragraph 5.3.199* **Redevelopment should explore the feasibility of decked parking provision here.** **This site contains critical drainage areas; as a result any flood risks presented by ground or surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM40	Policy PR15 Page 244	POLICY PR15 – MOLINS SPORTS GROUND 1. The area known as Molins Sports Ground, as shown in the Policies Map, is designated for outdoor sports uses. 2. Any need for increased parking space will be provided in the strategic open space north of Mill Lane within the expansion area (see Policy PR7). 3. The existing access to the site from Mill Lane should be retained~~.~~**;** **4. Local sources of flood risk should be managed.**
	Paragraph 5.3.204 Page 245	*Add new paragraph after paragraph 5.3.204* **This site contains critical drainage areas; as a result any flood risks presented by ground or surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM41	Policy PR16 Page 248	POLICY PR16 – LAND AT PRINCES RISBOROUGH STATION 1. **The redevelopment of the land at Princes Risborough Station will provide an important gateway to the town and to the Chilterns AONB. Development proposals are** ~~The Council~~ require~~s~~**d** ~~development of the site~~ to **be of a high standard of design and** provide ~~the following~~:

No.	Reference and page no. in the Plan	Proposed Main Modification
		a) Around 300-400 sqm of convenience retail space ~~and limited A3 development~~ linked to the station; **b) <u>A public square and associated public spaces which:</u>** **<u>i) facilitate bus access;</u>** **<u>ii) incorporate a</u>**~~A~~n improved, cycle- and pedestrian friendly approach to the railway station ~~incorporating a public square which facilitates bus access~~; c) Residential development; d) A route through the site to accommodate the new road infrastructure and associated signal-controlled junction with Station Rd / Station Approach; e) ~~Provide a~~**<u>A</u>**ccess to the main station car park; f) Flood risk management measures, including the de-culverting of the stream in accordance with policy DM15, subject to feasibility / amenity, in the context of the Culverton Mill corridor; g) A contribution to off-site infrastructure proportionate to the scale of the development, taking into account on-site provision. 2. **<u>Tourism-related d</u>**~~D~~evelopment proposals, **<u>such as a</u>** hotel **<u>and/or a combined information centre/cafe</u>**, **<u>are encouraged and</u>** ~~in this location~~ will also be acceptable in principle.
	Figure 36 Page 249	*Amendments to the title and key of figure 36* Figure title to be amended "Figure 36 Railway station site **<u>indicative</u>** concept" In the key

No.	Reference and page no. in the Plan	Proposed Main Modification
		Relief Road ~~– indicative route~~ Open Space ~~– Indicative Area~~ Reinstated Stream~~– Indicative Route~~ […] **Potential access to Blanchfords**

*Figure 36 Railway station site **indicative** concept*



No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.3.212 Page 250	5.3.212 The creation of a **public** station square will be the focus of connections with the rest of the town: Station Road / Bell Street provide the traffic route; Stratton Road / Manor Park Avenue provide a route for pedestrians and cyclists. It should be of the highest quality and green in character, so as to set the scene when arriving, and support the integration of the Chinnor steam railway with Princes Risborough station, to improve the visitor experience and promote tourism. The addition of a hotel would fulfil a long-held aspiration of the local community.
MM42	Policy PR17 Page 252	POLICY PR17 – PRINCES RISBOROUGH DELIVERY OF INFRASTRUCTURE 1. ~~The Council will require n~~**N**ew development within the expansion area **is required to**: a) ~~To d~~**D**eliver on-site infrastructure and equitable contributions for off-site infrastructure across the total requirements for the expansion area, including where that infrastructure has been provided in advance through forward funding, taking into account the value of individual on-site obligations; b) ~~To p~~**P**hase the delivery of infrastructure in step with the provision of residential development. 2. ~~The Council will assess~~ **This development** (1. above) **will be assessed** against ~~its~~ **the Council's** capacity and delivery plans for the area. Until such time as this has been produced and approved by the Council, ~~the Council will require~~ planning applications for development within the main expansion area **are required** to be accompanied by a detailed phasing and infrastructure delivery plan for the whole expansion area. This, and any planning applications, will need to demonstrate that the full package of on and off site infrastructure set out in the Plan, and illustrated on the Concept Plan, can be delivered, and how issues of phasing can be overcome including (but not limited to):

No.	Reference and page no. in the Plan	Proposed Main Modification
		a) Early delivery of necessary elements of the relief road to avoid severe impacts on the transport network in the Princes Risborough area; b) Delivery of the first primary school within first within the first five years of development; c) The provision of strategic open space, including possible interim locations for earlier phases; d) How individual developments physically integrate with adjacent developments, both permitted and emerging. 3. The Council will assist in the delivery of infrastructure through a combination of the following as necessary: a) Seeking S106 contributions on an equitable basis across the different development parcels; b) Preparing grant bids to forward-fund early delivery of essential infrastructure required to unlock the development; c) Purchase**ing** land essential for infrastructure, using powers of compulsory purchase where agreement cannot be reached; d) The use of the Community Infrastructure Levy, including working with the Town Council to co-ordinate spend.
MM43	Policy BE2 Page 268 - 269	POLICY BE2 – HOLLANDS FARM , BOURNE END AND WOOBURN The site as shown on the Policies Map is allocated for residential-led mixed use. Development of the site is required to: 1. Placemaking a) Adopt a landscape-led positive approach to design and layout to limit its impact on the landscape;

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>b) ~~Not have an adverse impact on~~ <u>Have special regard to the conservation of nearby Heritage Assets and their settings, including</u> the ~~setting of~~ Hedsor Road and Riversdale ~~Bourne End and Wooburn~~ Conservation Area.
c) Maintain a sense of separation between Harvest Hill and the new development site;
d) Ensure satisfactory relationship to the industrial buildings at Millboard Road Employment Area on the western boundary.
…
Remainder of policy is as presented in publication version of the Wycombe District Local Plan</td></tr>
<tr><td>MM44</td><td>Table 20
Page 277</td><td>Table 20 Sites identified for housing or housing-led mixed use development in rural areas
<table>
<tr><th>Policy reference</th><th>Site</th><th>Area (hectares)</th><th>Indicative dwelling numbers</th></tr>
<tr><td>RUR1</td><td>Land south of Finings Road , Lane End</td><td>0.86</td><td>~~19~~ <u>10</u></td></tr>
<tr><td>RUR2</td><td>Land between Chalky Field and Marlow Road, Lane End</td><td>1.27</td><td>27</td></tr>
</table></td></tr>
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<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>RUR3</td><td>Land at Sidney House, Lane End</td><td>1.14</td><td>Further work required</td></tr>
<tr><td>RUR7</td><td>Land at Clappins Lane, Naphill</td><td>2.24</td><td>64</td></tr>
<tr><td>RUR8</td><td>Land south of Mill Road, Stokenchurch</td><td>7</td><td>100</td></tr>
<tr><td>RUR9</td><td>Land at Wood Farm, Stokenchurch</td><td>0.9</td><td>28</td></tr>
<tr><td>RUR11</td><td>Land at Heavens above, Marlow Bottom</td><td>1.14</td><td>20</td></tr>
<tr><td>RUR12</td><td>Uplands Conference Centre</td><td>7.6</td><td>59</td></tr>
</table>
</td></tr>
<tr><td></td><td>Table 21
Page 278</td><td>
Table 21 Additional sites identified for housing in rural areas
<table>
<tr><th>Site</th><th>Area (hectares)</th><th>Indicative dwelling numbers</th></tr>
<tr><td><s>Land off Simmons Way, Lane End</s></td><td><s>0.26</s></td><td><s>17</s></td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>~~Land adjacent to Longburrow Hall, Stokenchurch~~</td><td>~~0.6~~</td><td>~~14~~</td></tr>
<tr><td>Westhorpe House, Westhorpe Park, Little Marlow</td><td>1.86</td><td>12</td></tr>
<tr><td>Coal Yard, Smalldean Lane, Saunderton</td><td>0.67</td><td>6</td></tr>
</table>
</td></tr>
<tr><td>MM45</td><td>Policy RUR1
Page 280</td><td>POLICY RUR1 – LAND SOUTH OF FININGS ROAD, LANE END
The site as shown on the Policies Map is allocated for residential development.
Development of the site is required to:
1. Preserve the setting of the Lane End conservation area and the setting of the listed building (White Gable Cottage);
2. Provide satisfactory access from Finings Road at the north of the site;
3. Maintain access to water tower;
<u>4. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty.</u>
<u>5.</u>~~4.~~ Provide 15m buffer for the Ancient Woodland;
<u>6.</u>~~5.~~ Create a robust landscape edge on the southern edge of the site providing connectivity to the ancient woodland and existing hedgerows.</td></tr>
</table>

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraph 5.5.10 Page 281	5.5.10 The indicative capacity for the site is ~~19~~ **10** dwellings
MM46	Policy RUR2 Page 282	POLICY RUR2 – LAND BETWEEN CHALKY FIELD AND MARLOW ROAD, LANE END The site as shown on the Policies Map is allocated for residential uses. Development of the site is required to: 1. Provide access from Chalky Field; **2. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty;** **3.**~~2.~~ **Limit the** ~~Built~~ extent **of built form to within** ~~not to extend beyond~~ the boundary of Cutlers House, Marlow Road opposite**; ¶** **4.** ~~e~~**C**reate a new landscape structure for the southern boundary; **5.**~~3.~~ Maintain and enhance screening from Marlow Road into Lane End; **6.**~~4.~~ Retain and enhance the existing pond~~.~~**;** **7. Manage local sources of flood risk.**
	Paragraph 5.5.14 Page 284	*Add new paragraph after paragraph 5.5.14* **This site contains critical drainage areas; as a result any flood risks presented by surface water flooding should be assessed and mitigated for in accordance with policy DM39.**

No.	Reference and page no. in the Plan	Proposed Main Modification
MM47	Policy RUR3 Page 284	POLICY RUR3 – LAND AT SIDNEY HOUSE, LANE END The site as shown on the Policies Map is allocated for residential uses. Development of the site is required to: **1. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty.** **2.** ~~1.~~ Provide satisfactory access from either Park Close, Ivy Place or Denham Road; **3.** ~~2.~~ Protect new development from noise and light pollution from the motorway.
MM48	Policy RUR4 Page 287	POLICY RUR4 – LITTLE MARLOW LAKES COUNTRY PARK 1. The Little Marlow Lakes country park, as defined on the Policies Map, is allocated for outdoor recreation. 2. ~~As part of the ongoing improvements to the country park a~~**A**ny development within the **country** park should provide for environmental improvements, including the provision of publicly accessible open space, ecological and biodiversity enhancements, and contribute to the continued development and long term management of the country park. 3. ~~As part of the ongoing improvements to the country park and to positively promote it as a destination for visitors, e~~**C**ar parking facilities should be provided in the east side of the country park. 4. Planning permission will not be granted for development within the country park that that has an adverse effect upon the amenities or setting the River Thames, watercourses, lakes, wet woodlands, adjoining conservation areas, or Listed Buildings, or which prejudices the function of the area for the purposes of a country park.

No.	Reference and page no. in the Plan	Proposed Main Modification
		5. Any development will be required to provide safe, convenient and direct access to Marlow and Bourne End for pedestrians, cyclists, and disabled users. 6. Any development close to an existing waterbody or other wetland feature should protect and enhance that feature's ecological value, biodiversity, and its natural setting within the Country Park.
	Paragraph 5.5.24 Page 289	*Add new paragraph after paragraph 5.5.24* **This site contains critical drainage areas; as a result any flood risks presented by surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM49	Policy RUR6 Page 293 - 294	POLICY RUR6 - GREAT AND LITTLE KIMBLE-CUM-MARSH PARISH 1. The Council requires 160 homes to be developed in the Parish of Great and Little Kimble-cum-Marsh over the Plan period. 2. A Neighbourhood Plan will determine the distribution of development across the Parish, and allocate specific sites **for housing and other uses as appropriate. The** ~~In the absence of a~~ Neighbourhood Plan **should have regard to the following principles:** ~~development will be required to:~~ a) **Development should be phased to be** ~~Be~~ delivered over the lifetime of the Local Plan; b) **The required housing should be p**~~P~~rovide**d**: i. ~~up to a maximum of 160 homes~~ **On** a range of small sites within or adjacent to the **existing** villages of **Great Kimble (including** Smokey Row), Little Kimble **and**

No.	Reference and page no. in the Plan	Proposed Main Modification
		ii. **Through** including a small allowance for windfall sites in **the hamlets of** ~~villages such as~~ Marsh and Kimblewick; c) **Development sites should be selected** ~~Selected sites~~ based on an appraisal of local **sustainability** issues, including an assessment of: ~~the capacity of the landscape to:~~ i. **The capacity of the landscape to accommodate** ~~Accommodate~~ development without having a major impact on the setting of the Chilterns Area of Outstanding Natural Beauty; ii. **The location of the proposed development sites in relation to public transport services, and/ or their capacity to support improvements.** ~~Contribute to the provision of sustainable transport schemes.~~ ~~3. Proposals for large scale developments will not be permitted~~ **3. In the absence of a Neighbourhood Plan, development will be required to meet the principles set out in 2 above.** ~~4~~. Development proposals or allocations will not be permitted which would~~; a)~~ prejudice the delivery of infrastructure improvements required for the expansion of Princes Risborough.
	Paragraph 5.5.40 Page 293	5.5.40 The Parish of Great and Little Kimble-cum-Marsh is located in the northern part of the District and contains the villages of ~~Smokey Row,~~ **Great Kimble (including that part known as** Smokey Row**)**, ~~Great Kimble,~~ Little Kimble, **and the hamlets of** Marsh and Kimblewick. Great **Kimble** and Little Kimble **are together** ~~is~~ identified as being a Tier 4 settlement in the settlement hierarchy**.** ~~This part of~~ t**T**he Parish is served by public transport services on the A4010 and has a station on the Aylesbury to Princes Risborough railway line which passes through the Parish.

No.	Reference and page no. in the Plan	Proposed Main Modification
	Paragraphs 5.5.41 – 5.5.44 Page 294 – 295	5.5.41 The figure of 160 homes is based upon an initial assessment of the capacity of the landscape to accommodate development. This assessment[8] appraised parcels of land around the villages of **Great Kimble (**Smokey Row**)** and Little Kimble, where a small number of homes (14) have already been **completed and a further 9 units** permitted[9]. The Sustainability Appraisal further informs this figure: the area having limited local facilities other than good public transport links. 5.5.42 In allocating specific sites, a Neighbourhood Plan will take this policy as the starting point, but review the exact proportion of homes to be provided by windfall and to be allocated through specific sites, and the phasing of development. It is expected that the Neighbourhood Plan will wish to define the northern edge of the strategic buffer to Princes Risborough (PR5). In the Local Plan the northern edge is defined as the Parish Boundary. 5.5.43 The Council accepts that a proportion of the new homes could be provided on windfall sites**, as per 2 b ii. of the Policy,** to offer a degree of flexibility in terms of where new homes are built. 5.5.44 In order to minimise the impact of the new homes on any one particular settlement, it is proposed that the new homes be provided on a number of small sites linked to the existing villages **of Great Kimble (Smokey Row) and Little Kimble** ~~within the Parish~~. Whether sites are 'small' or not will be assessed against how much they expand the village to which they are adjacent, and the extent to which they are compatible with the existing structure of the landscape.
MM50	Policy RUR7	POLICY RUR7 – LAND OFF CLAPPINS LANE, NAPHILL

[8] Landscape Sensitivity & Capacity Study - Kimble area (September 2017, Wycombe District Council)
[9] As at 1st April 2016

No.	Reference and page no. in the Plan	Proposed Main Modification
	Page 296 - 297	The site as shown on the Policies Map is allocated for residential uses. Development of the site will be required to: 1. ~~Adopt~~ **Provide** a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty; 2. Provide road access off Clappins Lane and provide additional suitable footways; 3. Retain and supplement the existing planting on all boundaries of the site; 4. Provide a footpath link to the existing public right of way to the east of the site; 5. Provide on site and facilitate off site a green infrastructure link from Naphill Common and the Allotments to the west of the village and Courns and other woods to the east; 6. Not have an adverse impact on the Chilterns Beechwoods Special Area of Conservation (SAC)~~.~~**;** **7. Manage local sources of flood risk.**
	Paragraph 5.5.57 Page 300	*Add new paragraph after paragraph 5.5.57* **This site contains critical drainage areas; as a result any flood risks presented by surface water flooding should be assessed and mitigated for in accordance with policy DM39.**
MM51	Policy RUR8 Page 302	POLICY RUR8 – LAND SOUTH OF MILL ROAD, STOKENCHURCH The site as shown on the Policies Map is allocated for residential development. Development of the site is required to:

No.	Reference and page no. in the Plan	Proposed Main Modification
		1. ~~Adopt~~ **Provide** a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty; … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
MM52	Policy RUR9 Page 304	POLICY RUR9 – LAND AT WOOD FARM, STOKENCHURCH The site as shown on the Policies Map is allocated for residential development. Development of the site will be required to: 1. ~~Adopt~~ **Provide** a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty; … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
MM53	Policy RUR10 Page 306	POLICY RUR10 – LAND TO THE REAR OF STOKENCHURCH BUSINESS PARK, IBSTONE ROAD, STOKENCHURCH 1. Land to the rear of the Stokenchurch Business Park, as shown on the Policies Map, is allocated for a mix of B1, B2 ~~and~~ B8 **and sui generis employment generating uses**. … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
MM54	Policy RUR11	POLICY RUR11 – Heavens Above, 16 High Heavens, Marlow Bottom

No.	Reference and page no. in the Plan	Proposed Main Modification
	Page 308	The site as shown on the Policies Map is allocated for residential uses. Development of the site is required to: 1. Provide access off High Heavens Wood; **2. Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty.** **3.**~~2.~~ Provide a buffer to the ancient woodland to the north of the site; **4.**~~3.~~ Minimise the disturbance effect of adjacent development of the other surrounding woodland; **5.**~~4.~~ Provide measures to enhance the biodiversity value of the ancient woodland, and other woodland surrounding the site; **6.**~~5. Avoid any adverse impact on surface water~~ **Manage local sources of** flood risk.
	Paragraph 5.5.76 Page 310	5.5.76 ~~Surface water flow path runs through the site, development must consider this to ensure there is no adverse impact on surface water flood risk.~~ **This site contains critical drainage areas; as a result any flood risks presented by surface water flooding should be assessed and mitigated for in accordance with policy DM39.**

No.	Reference and page no. in the Plan	Proposed Main Modification
MM55	Paragraph 6.4	*Add new paragraphs after paragraph 6.4* **The National Planning Policy Framework was updated in 2018. However, this plan and its policies have been examined and approved for adoption against the 2012 National Planning Policy Framework, as per paragraph 214 of the 2018 NPPF. The policies in this chapter were therefore drafted to respond to the 2012 NPPF. They are also considered to be consistent with the 2018 edition of the NPPF. Where reference is made to the NPPF in this Chapter of the Plan this is in effect a reference to both editions, as the substantive guidance has been carried forward.** **The NPPF will continue to be a material consideration in future development management decisions but the starting point for any development management decision is still the adopted development plan. (Section 38(6) of the Planning and Compulsory Purchase Act 2004). This is confirmed in paragraph 47 of the 2018 NPPF which says: "Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise." (Note: as this plan has been adopted after the 2018 NPPF, its policies are also not expressly subject to the advice on 'weight' in paragraph 213 of the 2018 NPPF.)**

No.	Reference and page no. in the Plan	Proposed Main Modification
MM56	Policy DM20 Page 318	POLICY DM20 – MATTERS TO BE DETERMINED IN ACCORDANCE WITH THE NATIONAL PLANNING POLICY FRAMEWORK **The following matters will be determined in accordance with the NPPF:** 1. Development which is affected by contaminated land ~~will be considered against paragraphs 120 to 122 of the NPPF~~. 2. Development which raises pollution issues (including air quality, noise issues, and light pollution) ~~will be considered against paragraphs 123 to 125 of the NPPF~~. 3. Applications for the display of advertisements ~~will be considered against paragraph 67 of the NPPF~~. 4. Applications for Listed Building Consent will be considered against the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 ~~with reference to Section 12 of~~ **and** the NPPF. 5. Applications for telecoms development ~~will considered against paragraphs 42 to 46 of the NPPF~~.
	Paragraph 6.5 Page 318	6.5 Policy DM20 sets out those areas of policy on which the Council will rely on the detailed policies of the ~~2012~~ National Planning Policy Framework (NPPF) for determining planning applications. **The current NPPF is the third edition published in June 2018.** In the event that the NPPF is **further** revised the Council will take a view on whether the approach to those matters listed under DM20 is still applicable, setting out its position, and if necessary producing new policy if it is identified that a locally relevant policy is more appropriate.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM57	Policy DM22 Page 320	POLICY DM22 – HOUSING MIX 1. All residential development **<u>of 10 or more dwellings</u>** is required to include a mix of dwelling size, type and tenure taking account of current evidence in relation to priority housing need in the District, and in order to support a sense of place and mixed communities. 2. Any development which includes 100 houses or more is required to include ~~at least~~ 5% of the proposed dwelling numbers as self-build plots.
	Paragraph 6.14 Page 321	*Add new paragraphs before paragraph 6.14* **<u>Where it can be demonstrated that there is no demand for the provision of self-build plots over a continual 12 month period, consideration will be given to reducing the requirement. Proposals which include the provision of more than 5% self-build plots or their inclusion on smaller sites will be supported.</u>** **<u>A S106 planning obligation will be required to secure the delivery of self-build plots in accordance with this policy and must include details of a marketing strategy for the self-build plots on the application site and other measures intended to ensure effective engagement with the community and parties on the self-build register. The planning obligation will also set out the circumstances under which the requirement to deliver self-build plots will be relaxed or released.</u>**
	Paragraph 6.16	6.16 **<u>The housing needs of older people cross over the C2 and C3 Use Classes and it takes a variety of forms.</u>** The Housing and Economic Development Needs Assessment (HEDNA)**<u>, uses the Housing LIN</u>**

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	Page 321	**toolkit, to identify** ~~identifies~~ that the increase in the over 75 age group results in a need for an additional 1,790 dwelling units of specialist accommodation for older people. The majority of this need is for private accommodation which could be met in a number of ways ~~either through people remaining in their own homes, moving to adaptable independent accommodation or~~**, including through mainstream adaptable accommodation,** as part of a mixed extra care development **or sheltered housing. Specialist accommodation offers elderly people the opportunity to move from unsuitable or under-occupied accommodation.** The HEDNA also identifies a need for institutional or C2 accommodation of 590 bed spaces, the Housing and Economic Land Availability Assessment (HELAA) identifies that ~~we currently have~~ **at that time we already had** committed schemes which will deliver 565 bed spaces (of which 263 bed spaces are already completed or under construction).
MM58	Policy DM23 Page 322 - 323	POLICY DM23 – OTHER RESIDENTIAL USES 1. Developments for other residential uses will be acceptable **in accordance with policy CP3**. 2. Developments for other residential uses will not be acceptable where there is already an overconcentration of such uses existing in the neighbourhood. 3. Developments for other residential uses will be required to: a) Secure high quality design in accordance with other policies in the plan; b) Reflect and respect the scale and intensity of use of surrounding dwellings; c) Secure sufficient parking to meet the needs of the residents; d) Secure sufficient bin storage and cycle storage;

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		e) Preserve the amenities of neighbouring properties. 4. Developments for Class C1 Hotels will also be required to comply with national policies for the location of main town centre uses. **5. Development for C2 residential institutions (and staff accommodation) on existing sites in the countryside will be acceptable where these are required to support an existing enterprise or business.** **6.** ~~5.~~ Developments for Houses in Multiple Occupation will be required to secure an acceptable number and arrangement of communal facilities within the building.
MM59	Policy DM24 Page 325	POLICY DM24 – AFFORDABLE HOUSING 1. The Council will require all developments for ~~more than~~ 10 **or more** dwellings or more than 1000 sqm of residential floorspace to provide on-site affordable housing of at least: a) ~~40% of the total gross internal area~~ **48% of the total number of units** on sites that are greenfield land or were last used for Class B business use or a similar sui generis employment-generating use, or; b) ~~30% of the total gross internal area~~ **35% of the total number of units** on all other sites, 2. Within the Chilterns AONB, the Council will require a commensurate financial contribution towards the provision of affordable housing from all developments of between 6 and **9** dwellings and/ or over 1,000 square metres residential floorspace (inclusive). 3. Where a development falls below the size thresholds in 1 or 2 but is demonstrably part of a potentially larger developable area above those thresholds, the Council will require affordable housing on a pro rata basis. **4. The required affordable housing mix and tenure shall be provided in accordance with current evidence.**

<table>
<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td></td><td>Paragraph 6.39
Page 328 - 329</td><td>6.39 ~~The affordable housing requirement is expressed as floorspace requirement as it is a more proportionate measure in terms of the overall level of development provided on a site. Residential schemes vary in terms of the types and mix of units as well as the size of the same types of dwellings. Using floorspace as a measure is also a simpler method of calculation and is the same basis used for both Community Infrastructure Levy and viability assessments.~~ <u>The viability assessment behind these percentages assumes a mix of house types and sizes across the affordable segment. In the absence of any specific requirement in relevant planning policies, experience suggests a tendency for normal development economics to skew units towards small flats (maximising the number of units at least cost). This would result in far less affordable housing need being met overall than should be expected, and the needs of families for larger units not being met at all. Therefore the required affordable housing mix set out in Table XX below is based on the current evidence of need in Table 123 of the HEDNA addendum. Delivering this mix is therefore integral to meeting identified affordable housing needs. At least 80% of the affordable housing must be affordable rented, with up to 20% as intermediate products, in line with the current evidence in the HEDNA. We will update the evidence through a supplementary planning document if necessary based on new evidence and to provide flexibility in its application.</u>

<u>Table XX</u>
<table><tr><th><u>Tenure</u></th><th><u>Type</u></th><th><u>Dwelling Size</u></th><th><u>Required proportion of each tenure</u></th></tr><tr><td><u>Affordable Rented</u></td><td><u>Flats or Houses</u></td><td><u>1 bedroom / 2 person</u></td><td><u>At least 12%</u></td></tr></table></td></tr>
</table>

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	Flats or Houses	**2 bedroom / 4 person**	**At least 35%**
	Houses only	**3 bedroom / 5 or 6 person**	**At least 35%**
	Houses only	**4 bedroom or larger / 7 or 8 person**	**No more than 15%**
Intermediate	**Flats or Houses**	**1 bedroom / 2 person**	**At least 12%**
	Flats or Houses	**2 bedroom / 4 person**	**At least 45%**
	Houses only	**3 bedroom / 5 or 6 person**	**No more than 35%**
	Houses only	**4 bedroom or larger / 6 or 7 person**	**No more than 5%**

Smaller affordable units are best delivered in a mix of flats and houses, and the most appropriate mix will vary site by site. Larger affordable units are only appropriate as family houses, not as large flats.

The size of units is expressed as a combination of bedroom numbers and person numbers. This is to ensure that bedrooms are adequately sized for optimum occupation of the affordable housing.

The required proportions include a combination of maxima and minima. This allows for a degree of flexibility in design and delivery whilst ensuring the most critical housing needs are prioritised.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM60	Policy DM26 Page 331 - 332	POLICY DM26 – CRITERIA FOR TRAVELLER SITES 1. The development of new sites, or the extension or intensification of existing sites will only be allowed where: a) The site is not in the Green Belt; b) The site is not in the **settlement area of Marsh, as** ~~area~~ shown in the plan in Appendix E. … *Remainder of policy is as presented in publication version of the Wycombe District Local Plan*
MM61	Policy DM28 Page 340	POLICY DM28 – EMPLOYMENT AREAS 1. In areas designated as Strategic Employment Areas on the Policies Map development will be restricted to B Class uses as specified in the Use Classes Order. 2. In areas designated as Local Employment Areas on the Policies Map development will be mainly restricted to: **a) Class** B ~~Class~~ uses; **b)** ~~Similar~~ **S**ui generis uses **that are compatible with the surrounding commercial activity and will not undermine the viability or operations of the employment area;** **c)** ~~Certain other uses falling within~~ Class D1 **uses which** ~~will also be allowed where these~~ comprise clinics, health centres, GP or dental surgeries. 3. Other uses **such as ATMs/ banking facilities, catering outlets, crèches etc.** that support **or complement** the business uses ~~of either type of area~~ will ~~also~~ be allowed where they are ~~small~~ **appropriate in** scale, and directly support the character and function of the designated Employment Area.

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		4. The redevelopment of existing employment sites and premises for employment use to make more efficient use of sites and provide modern premises attractive to the market will be encouraged, provided that the development does not have an adverse impact on amenity, car parking or highway safety in the surrounding area. **5.** ~~4.~~ Other uses will not be permitted in the designated Employment Area.
	Paragraph 6.78 Page 340	6.78 The areas designated as Strategic Employment Areas and Local Employment Areas are shown on the Policies Map and listed in Appendix G. **In addition to the designated Strategic and Local Employment Areas, as shown of the Policies Map, the Adopted Delivery and Site Allocations Plan (DSA), seeks through Policy DM5 to provide a framework for the management of Scattered Business Sites in the District.**
	Paragraph 6.80 Page 341	6.80 Local Employment Areas are important concentrations of businesses, but are generally lower quality accommodation and types of activity taking place. On the whole these areas often have a higher concentration of B2 and B8 uses. It is important to safeguard the employment generation role these areas have by ensuring that any new development continues to generate employment. The sites designated under this policy were assessed as being sites that should be retained by the Economy Study and the Council has subsequently undertaken a further review of employment sites. **The types of sui generis uses considered suitable on employment land include builder's merchants and commercial garages.**
	Paragraph 6.83	*Delete footnote 158*: ~~158 National Planning Policy Framework (2012) paragraph 24~~

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	Page 342	
MM62		POLICY DM29 – COMMUNITY FACILITIES
	Paragraph 6.85 Pages 342 - 343	6.85 The NPPF ~~says that~~ **describes how** ~~'~~the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities~~'~~ and that ~~'~~planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.'~~159~~ . Planning policies should also ~~"~~promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship~~"~~~~160~~ . *Footnotes*: ~~159 National Planning Policy Framework (2012) paragraphs 69 and 70~~ ~~160 National Planning Policy Framework (2012) paragraph 28~~

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	Paragraph 6.88 Page 344	6.88 The focus of this policy is the array of land and buildings across the District currently or last used for a community use, not the current business or occupier per se. This is important as all such uses are generally lower value uses of land that would be highly vulnerable to development pressures without this protection, and affordable land for such uses is a highly scarce commodity. Protecting land and buildings in this way allows for new and different community uses to replace past uses within communities. This is necessary to prevent the longer term incremental loss of land and buildings for such uses. ~~For that reason, the viability of the current enterprise is not of great relevance, and it will not justify the release of a site to uses other than community uses.~~
MM63	Policy DM30 Page 346	POLICY DM30 – THE CHILTERNS AREA OF OUTSTANDING NATURAL BEAUTY 1. The Council will require development within the Chilterns Area of Outstanding Natural Beauty to: a) Conserve, and where possible enhance, the natural beauty of the Chilterns AONB; b) Be appropriate to the economic and social wellbeing of the local communities within the AONB, or to promote the understanding or enjoyment of the AONB; c) Deliver the highest quality design which respects the natural beauty and built heritage of the Chilterns and enhances the sense of place and local character. 2. Planning permission for proposals which constitute major development within the Chilterns Area of Outstanding Natural Beauty will only be permitted in ~~exceptional circumstances~~ **accordance with national policy, and will otherwise be refused**.

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		3. Development in the setting of the Area of Outstanding Natural Beauty must not have a significant adverse impact on the natural beauty of the Chilterns Area of Outstanding Natural Beauty.
	Paragraphs 6.100 – 6.103 Pages 348 - 349	6.100 The National Planning Policy Framework advises that ~~"G~~**g**reat weight should be given to conserving **and enhancing** landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty~~"~~ but also that due regard is had to the economic and social well-being of all rural communities ~~(NPPF 115 and section 3)~~. 6.101 This policy is drafted to reflect **the strategic objectives of Policy CP10 and** this legal framework, giving priority to the natural beauty of the Area of Outstanding Natural Beauty. **Policy CP10 embeds the enhancement of natural beauty as a strategic objective of the plan.** Part 1 of ~~the~~ **this** Policy draws together the NPPF guidance on Areas of Outstanding Natural Beauty with other issues arising from the CROW duties ~~noted below~~. **All development should, as a minimum, conserve the natural beauty of the Chilterns AONB. Development should also, wherever possible, provide for positive enhancement to the natural beauty of the Chilterns AONB. The Council recognises that not all development can enhance natural beauty, but where there are opportunities to do so, then permission may be refused if these opportunities are not taken.** 6.102 Section 2 of the Policy replicates ~~paragraph 116 of~~ the NPPF, but is included here for clarity. The NPPF sets up a public interest exceptions test for major development. Major development cannot be simply defined in terms of numbers, but is a matter of the impact, or extent of harm, on the Area of Outstanding Natural Beauty, as well as the scale of development proposed. The term major development in this context therefore does not

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		refer to the familiar planning application thresholds (10 dwellings) or any other numerical threshold but instead requires the Council to judge the significance of a proposal in its specific context. Section 3 of the Policy relates to development in the setting of the Area of Outstanding Natural Beauty. Section 85 CROW requires the Council to have regard to Area of Outstanding Natural Beauty purposes in the exercise of their functions not only in relation to land within the but also as they might affect land in an Area of Outstanding Natural Beauty. 6.103 Development proposals which lie outside the Area of Outstanding Natural Beauty but within its setting can also have impacts on it. The Council's duty of regard applies to development outside but which would affect land in an Area of Outstanding Natural Beauty. For example, views out of the Area of Outstanding Natural Beauty from key visitor viewpoints into surrounding areas can be very significant. Although it does not have a defined geographical boundary, the setting of the Chilterns Area of Outstanding Natural Beauty is the area within which developments, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns Area of Outstanding Natural Beauty. **Where development in the setting of the AONB would demonstrably harm the AONB, and having regard to the scale of harm and the significance of the landscape, consent will be refused unless this harm is outweighed by other land use planning benefits.**
MM64	Policy DM31 Page 349 – 350	POLICY DM31 – DEVELOPMENT AFFECTING THE HISTORIC ENVIRONMENT 1. All development is required to conserve and, where possible, enhance the Historic Environment. Great weight will be given to ~~avoiding adverse impacts on~~ **the conservation a** designated ~~and non-designated~~

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		~~assets~~ **asset's significance**, their settings, and other character features or positive elements of special interest. Designated heritage assets include: a) Listed Buildings ~~(including locally listed buildings)~~ ~~b)~~ Scheduled Monuments ~~(including non-scheduled archaeological remains of equivalent significance)~~ c) **Registered** Historic **P**~~p~~arks and **G**~~g~~ardens d) Conservation areas ~~e) Scheduled monuments, designated historic parks and gardens, and conservation areas are shown on the Policies Map.~~ 2. Developments likely to affect the significance of designated or non-designated heritage assets, or their setting, are required to evidence a thorough understanding of context ~~through the preparation of a proportionate assessment of the significance of the historic environment, both on and off site, and demonstrate how:~~ **the significance of the asset and any potential impacts on that significance through the preparation of a proportionate heritage impact assessment.** ~~a) Through physical alterations and, where relevant, a management plan:~~

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		~~i. The historic environment will be conserved or enhanced;~~ ~~ii. Opportunities to enhance the historic environment have been maximised.~~ ~~b) A sequential approach has been taken to avoid, minimise and mitigate harm.~~ 3. Developments which secure the preservation of buildings and other heritage assets that are deemed to be at risk by national and local heritage at risk registers will be supported. ~~**4.** Developments resulting in the loss of the whole or part of a heritage asset will only be permitted exceptionally, and where it can be demonstrated that the new development will proceed after the loss has occurred. In these circumstances recording and analysis of that asset must be undertaken to an appropriate standard with deposit in a public archive.~~ **Where development would lead to substantial harm to or total loss of significance of a designated heritage asset, consent will be refused unless it can be demonstrated that this is necessary to achieve substantial public benefits that cannot be achieved otherwise and which outweigh that harm or loss, or all of the following apply:** **a) The nature of the heritage asset prevents all reasonable uses of the site;** **b) No viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation;**

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		c) Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; **d) The harm or loss is outweighed by the benefit of bringing the site back into use.** **5. Where development would lead to less than substantial harm to the significance of a designated heritage asset, consent will be refused unless this harm is outweighed by the public benefits of the proposal, including securing its optimum viable use.** **6. Where development would demonstrably harm the significance of a non-designated heritage asset, and having regard to the scale of harm and the significance of the asset, consent will be refused unless this harm is outweighed by other land use planning benefits.** **Non-designated heritage assets include:** **a) Locally listed buildings** **b) Areas of archaeological importance** **c) Non-scheduled archaeological remains** **d) Historic parks and gardens on the Buckinghamshire County Register** **e) Other historic landscapes and features**

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	Paragraph 6.112 Page 352	*Add new paragraph after paragraph 6.112* **The Council maintains a list of locally important assets of historical or architectural character. While these are considered to be non-designated heritage assets in national policy, inclusion on the local list is a material consideration in the consideration of a scheme. The Wycombe Local List of buildings and monuments of archaeological significance is available on our website.**
MM65		POLICY DM32 – LANDSCAPE CHARACTER AND SETTLEMENT PATTERNS
	Paragraph 6.123 Page 355 – 356	*Add new paragraph after paragraph 6.123* **Some areas of the District, such as the Hawks Hill/Harvest Hill area, display a semi-rural character and this should be protected from development that would introduce an urban character through its design, density or layout. Features such as sunken lanes and low density development are more characteristic of a rural area and development proposals that introduce features that have urban characteristics would not be appropriate as they are likely to have an adverse impact on these semi-rural areas.**
	Paragraph 6.128 Pages 357	6.128 ~~Paragraph 29 of the~~ **The** NPPF ~~says~~ **advises** that ~~'~~opportunities to maximise sustainable transport solutions will vary from urban to rural areas~~'~~. Like much of the South East, Wycombe District is a mainly rural district with a number of towns and villages in relatively close proximity. Nationally, the greatest opportunities for

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		sustainable transport solutions will naturally be in the large metropolitan cities. The least opportunity will be in the more remote rural areas elsewhere in the country. The geography and transport infrastructure of Wycombe District and its main towns (and their proximity and connectivity beyond the District, e.g. to Aylesbury, Beaconsfield, Oxford or London) provides the conditions for all new development to be accessible by sustainable transport modes provided it is in the right locations. Locations outside of Tiers 1 to 4 in the Settlement Hierarchy and Strategy (see Policy CP3) are unlikely to satisfy the requirement in 1a of this policy without significant improvements to existing sustainable transport options.
MM66	Policy DM34 Page 360	POLICY DM34 – DELIVERING GREEN INFRASTRUCTURE AND BIODIVERSITY IN DEVELOPMENT 1. All development is required to protect and enhance **both biodiversity and** green infrastructure features and networks both on and off site **for the lifetime of the development.** 2. Developments **proposals** ~~likely to affect the significance of designated or non-designated green infrastructure assets~~ are required to evidence a thorough understanding of context through the preparation of a proportionate assessment of existing and planned green infrastructure **biodiversity** and ecological features and networks both on the site and in the locality, and demonstrate how: a) Through physical alterations and a management plan **for the lifetime of the development:** i. Existing green infrastructure **and biodiversity assets** will be ~~protected or maintained~~ **maximised;** ii. Opportunities to enhance existing and provide new green infrastructure **and biodiversity assets will be** ~~have been~~ maximised~~, including delivering long lasting measurable net gains.~~¶ **iii. Development will deliver long lasting measurable net gains in biodiversity.**

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		iv. Where appropriate, a monitoring plan will be put in place to review delivery of i-iii. b) **The mitigation hierarchy has been applied by following a** ~~A~~ sequential approach ~~has been taken~~ to avoid, minimise, mitigate, and finally compensate for (on then off site) any harm **to biodiversity. If significant harm cannot be avoided in this way, development will not be permitted**. 3. ~~In all cases,~~ ~~d~~**D**evelopment **(excluding householder applications)** is required as a minimum to: a) Secure adequate buffers to valuable habitats; b) Achieve a future canopy cover of ~~at least~~ 25% of the site area on sites outside of the town centres and 0.5HA or more. **This will principally be achieved through retention and planting of trees, but where it can be demonstrated that this is impractical the use of other green infrastructure (e.g. green roofs and walls) can be used to deliver equivalent benefit**; c) Within town centres and on sites below 0.5HA development is required to maximise the opportunities available for canopy cover (including not only tree planting but also the use of green roofs and green walls); d) Make provision for the long term management and maintenance of green infrastructure **and biodiversity assets**; e) Protect trees to be retained through site layout and during construction.
	Paragraph 6.137 Page 359	6.137 Policy DM34 sets out our approach to achieving and maximising Green Infrastructure and enhancements to local biodiversity. Part 1 of the policy sets the overall purpose, with Part 2 setting out the approach to follow. Part 3 includes specific minimum requirements to be included as part of the overall package of GI required by Part 2. **This policy is designed to help achieve the aims of CP7, CP9 and CP10 and it should be applied**

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			in conjunction with DM11 to DM14 as necessary. Whilst the Policy applies to all development, the application of the Policy requirements will be tailored in proportion to the scale and sensitivity of the individual development proposal. Further guidance may be provided in SPD.
	Paragraph 6.138 Page 361	6.138	**This Policy refers to both Biodiversity and** ~~In this Policy~~ Green Infrastructure**. These are distinct concepts and policy objectives, but they relate to many of the same features of the environment. Green Infrastructure** refers to all of the natural or semi-natural components of the environment at whatever scale, everything from the Chilterns escarpment to individual gardens or trees, whether carrying a formal designation or not. It includes land and water habitats (sometimes called blue infrastructure) essential for biodiversity, areas and features important to our appreciation of the landscape, and areas created or managed for human enjoyment which bring us closer to nature, such as parks and cycle ways, and greenspaces. Green Infrastructure is hugely valuable – it provides us with multiple benefits from ecological to social and economic. These are known as "ecosystem services" and need protecting and enhancing. **Biodiversity refers to the diversity of species and habitats in the environment and biodiversity assets are those parts of the environment that contribute to biodiversity.**
	Paragraph 6.146 Page 363	6.146	In assessing net gains in biodiversity, a best practice methodology for biodiversity accounting is expected to be used**, for example based on the Defra metric, unless or until a local approach is set out in a future Supplementary Planning Document**. Gains in other types of green infrastructure are likely to be measured both qualitatively and quantitatively.

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	Paragraph 6.148 Page 363	6.148	~~Wooded areas account for 18.8% of Wycombe District; this represents over 32,000ha of woodland.~~ **Woodland areas account for some 19% of the District, amount to some 6,245HA, and overall there are estimated to be 1.1M trees providing 25% canopy cover.** In both urban and rural areas woodlands play an important role in defining the Chilterns landscape and supporting Chilterns ecology, and, particularly in rural areas, in supporting the economy. Trees, woodlands and hedgerows also help to secure sustainable development, through air quality enhancement, storm water control, habitat provision and helping to reduce the rate of global warming by trapping carbon dioxide. They can also be used as a resource for both recreation and education, and, historically, influenced the development of the furniture industry in the District.
	Paragraph 6.151 Page 364	6.151	Part 3 of the Policy specifies a number of design solutions that are required as a minimum on relevant developments. The Council ~~may~~ **will** publish a Supplementary Planning Document to provide further detailed guidance on the measures set out. Until this guidance is adopted developers should work with the Council's Natural Environment and Arboricultural Officers to agree the approach to their scheme.
	Paragraph 6.152 Page 364	6.152	Protected habitats are highly vulnerable to direct and indirect impacts from development and adequate buffers are necessary to ensure their continued protection. Some of these are already well established in national guidance or best practice (e.g. 10 metres for **most** streams or rivers, **a minimum of** 15 metres for **irreplaceable habitat, including** Ancient Woodland).
	Paragraph 6.153	6.153	Canopy cover within urban areas provides a range of ecosystem services including biodiversity and climate change benefits such as increased habitat, increased rainwater control, and improved air quality. It also

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	Page 364 - 365	improves the quality, amenity value, and sense of place of an area. In most cases trees will be the optimum solution for increasing canopy cover, but alternatives such as green roofs and green walls will have an important role to play in more constrained sites, especially in town centre locations**, a Supplementary Planning Document will provide further detailed guidance on how other forms of Green Infrastructure can be designed into developments to provide similar benefits to tree canopy cover.** Sufficient space above and below ground for trees and other plants to meet their potential must be provided.
MM67	Policy DM35 Page 365 - 366	POLICY DM35 – PLACEMAKING AND DESIGN QUALITY 1. All development is required to improve the character of the area and the way it functions. 2. Development is required to evidence a thorough and holistic understanding of the functions, qualities, and character of the proposed development's natural and built context and demonstrate a positive response to this context including how: a) Existing positive characteristics will be retained; b) Opportunities for improvements and enhancements have been maximised; c) A sequential approach has been taken to avoid, minimise and mitigate any harm. 3. Development is required to: a) Creating positive and attractive buildings and spaces; b) Take a comprehensive approach to site layout and design including adjacent sites where these are suitable for redevelopment; c) Provide a robust and legible structure of public realm and private spaces;

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		d) Direct most activity to the public realm; e) Provide good surveillance of the public realm through layout and building design; f) Provide a level of privacy and amenity for future occupants appropriate to the proposed use; g) Prevent significant adverse impacts on the amenities of neighbouring land and property; h) Demonstrate attractive and high quality design, and appropriate character in the scale, form, layout and detailed design of buildings, and the structures and spaces around them. **i) Demonstrate the efficient use of land through the scale and height of buildings.** 4. Where the scale of development in its context provides the opportunity to do so, development will also be required to provide a robust and legible network of connected green infrastructure, streets and other spaces which is integrated both within and beyond the site. 5. Streets and off-site highway improvements should be designed to strike an appropriate balance between all of the five principle functions of a street: place, movement, access, parking, and utilities.
	Paragraph 6.160 Page 367	6.160 Further general guidance is given in the NPPG. Alongside this, the Council ~~has adopted a local~~ **intends to update and seek to re-adopt its own** Residential Design Guide Supplementary Planning Document. ~~The SPD confirmed as SPD to this Policy as soon as the Plan is adopted.~~ **The Chilterns Building Design Guide (and the related technical guides) will also be relevant in the Chilterns AONB.**
	Paragraph 6.163	6.163 Good design can also assist with achieving better use of resources, **in particular ensuring that development proposals demonstrate that an efficient use of land is achieved in terms of site coverage and building**

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	Page 367	**heights, as well as** through the choice of materials, form and layout and how effectively renewables can be integrated into the design. **Where single storey developments or surface-level car parks with nothing above are proposed, these will need to be supported by robust justification and appropriate only in** limited circumstances.
MM68	Policy DM36 Page 369 - 370	POLICY DM36 – EXTENSIONS AND ALTERATIONS TO EXISTING DWELLINGS 1. Development will be required to: a) Achieve a high quality in the detail of the design; b) Respect the character and appearance of the existing property; c) Be subservient in scale and ancillary in function to the existing dwelling; d) Respect the character and appearance of the surrounding area; e) Preserve the amenities of neighbouring properties. 2. ~~Applications submitted as householder applications for outbuildings or annexes~~ ~~which are equivalent~~ **Proposals to extend or alter an existing dwelling that would be tantamount** to the creation of a new dwelling in ~~their~~ **respect of their** layout, scale, **massing,** ~~or~~ form, **access, or scope for independent occupation** will be refused. ~~Genuine applications for new dwellings may be acceptable, subject to other policies in the Plan.~~
	Paragraph 6.174 Page 371	*Add new paragraphs after paragraph 6.174* **It is recognised that small-scale development of residential properties through the addition of extensions, outbuildings or residential annexes may be required as the needs of residents change. These should fulfil an**

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		ancillary function to the existing dwelling, and not be used as a means to circumvent planning control and lead to the creation of accommodation which is capable of occupation as an independent dwelling. Proposals for new dwellings may of course be acceptable, subject to other policies in the Plan. **For the purposes of this policy, development tantamount to the creation of a new dwelling is considered to be a combination of factors. This includes how the development relates to an existing dwelling in terms of its size and massing; how it relates in respect of its overall position within a plot; if the development proposes to create a new access; whether the proposed use is demonstrably ancillary to the use of the existing dwelling; and if the development involves the partitioning of an existing plot.**
MM69	Policy DM37 Page 370	POLICY DM37 – SMALL SCALE NON-RESIDENTIAL DEVELOPMENT 1. Development is required to: a) Achieve a high quality in the detail of the design; b) Respect the character and appearance of the building and its surroundings; c) Preserve the amenities of neighbouring properties. 2. Alterations to shop-fronts and similar developments will be required to: a) Reflect the underlying rhythm of traditional plot divisions and the upper floor of the buildings affected; b) Give priority to the retention and repair of existing traditional shopfronts and shopfront elements. 3. Security shutters to protect the windows of shops or other buildings within local or town centres, or fronting a public ~~route~~ **highway**, are required to be internal and visually permeable using open lattices or laminated glass.

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		4. Plant and equipment are required to be sited so as to minimise their visual impact on the character and appearance of the building and its surroundings.
MM70	Paragraph 6.183 Page 374	6.183 This Policy builds on the sequential approach to flood risk and development in the NPPF as well as the strategy for Climate Change in Policy CP12 of this plan. The overall objective in part 1 of the Policy reflects the guidance in ~~paragraph 100 of~~ the NPPF that Local Plans should, amongst other things, manage flood risk by ~~"~~using opportunities offered by new development to reduce the causes and impacts of flooding~~"~~.
	Paragraph 6.193 Page 377	6.193 For information, a separate Flood Defence Consent may be required for: • ~~Works in, over, under or adjacent to main rivers. the Water Resources Act 1991 and associated byelaws require developers to apply for consent from the Environment Agency~~ **Any development or works within 8 metres, or in the floodplain, of a Main River may require a permit from the Environment Agency. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.** • Under Section 23 of the Land Drainage Act 1991, developers will need the consent of the internal drainage board, or unitary or county council to construct or alter a culvert or flow control structure (such as a weir) on any ordinary watercourse.
MM71		POLICY DM40 – INTERNAL SPACE STANDARDS

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	Paragraph 6.197 & new appendix Page 378	6.197 The current standards ~~can be accessed at https://www.gov.uk/government/publications/technical-housing-standardsnationally-described-space-standard~~ **are set out in appendix J.** *Notes:* *The new appendix will be the whole document from gov.uk* *Later appendices will therefore be renumbered*
MM72	Paragraphs 6.207 – 6.209 Pages 380 – 381	*Combine paragraphs 6.207 – 6.209 and reword as follows:* 6.207 The Green Belt is a policy tool which aims to prevent development within designated areas unless development is identified as being appropriate as set out in the NPPF. Any other development is inappropriate and as such will not be permitted.¶ ~~6.208~~ The NPPF identifies **various exceptions to this, which are relevant to Policies DM42 and DM43.** ~~appropriate development as:~~ • ~~Buildings for agriculture and forestry;~~

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		~~• Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;~~ ~~• The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;~~ ~~• The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;~~ ~~• Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or~~ ~~• Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.¶~~ ~~6.209~~ The following set of policies respond**s** to local circumstances and provide**s** clarity and interpretation of a number of the terms set out in the NPPF.

No.	Reference and page no. in the Plan	Proposed Main Modification
MM73	Policy DM42 Page 381 - 382	POLICY DM42 – MANAGING DEVELOPMENT IN THE GREEN BELT 1. Development in the Green Belt is ~~required to be appropriate development~~ **inappropriate**~~. Appropriate development~~ **Exceptions to this** in Wycombe District comprise~~s~~: a) Development that accords with a made Neighbourhood Plan, or; b) Development that the NPPF classifies as not inappropriate, but only when subject to the following clarifications: i. Development for agriculture and forestry ~~is~~ only ~~appropriate~~ when it **is** reasonably necessary for an existing agricultural trade or business; ii. ~~Appropriate development for agriculture and forestry may include e~~**E**ssential rural workers dwellings in accordance with DM27; iii. The replacement or extension of dwellings ~~will~~ only ~~be appropriate~~ when they accord with DM43; iv. Limited infilling ~~is~~ only ~~appropriate~~ within the built-up villages identified on the Policies Map and in accordance with the definition in paragraph 6.214 below; v. Limited affordable housing for local community needs ~~is~~ only ~~appropriate~~ in accordance with DM25. 2. ~~All other development is inappropriate.~~ Inappropriate development will be refused unless there are very special circumstances. Very special circumstances will exist when the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
MM74	Policy DM43 Page 384 - 385	POLICY DM43 – THE REPLACEMENT OR EXTENSION OF DWELLINGS IN THE GREEN BELT (INCLUDING OUTBUILDINGS)

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		1. The extension or replacement of a dwelling will only be considered appropriate development in the Green Belt when it satisfies one (or more) of these conditions. The volume of existing outbuildings will not be included in any calculations. a) It accords with a made Neighbourhood Plan; b) The dwelling is within a built-up village shown on the Policies Map; c) The dwelling is within a ribbon of development that presents a substantially built up frontage and the resultant dwelling would not exceed the average volume of its two directly adjacent neighbours; d) Where the volume of the original dwelling is less than 240 cubic metres, the total volume of the resulting building is no more than 360 cubic metres; e) Where the volume of the original dwelling is between 240 and 720 cubic metres, the total volume of the resulting building is no more than the volume of the original building plus 50%; f) Where the volume of the original dwelling is more than 720 cubic metres, the total volume of the resulting building is no more than 1080 cubic metres; g) The total volume of the resulting dwelling is no more than the volume of the dwelling which is being replaced. 2. The erection of residential outbuildings will be considered appropriate development in the Green Belt within a built-up village identified on the Policies Map or in accordance with a made Neighbourhood Plan. Elsewhere in the Green Belt, any increase in the volume of residential outbuildings will only be considered appropriate development when ALL of the following conditions apply:

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		a) The total volume of all existing and proposed outbuildings on the property would not exceed 25% of the volume of the original dwelling; b) The total volume of all existing and proposed outbuildings on the property would not exceed 140 cubic metres; c) No more than 50% of the curtilage outside of the dwelling would be occupied by outbuildings; d) No part of the building has more than a single level ~~of habitable accommodation~~; e) No part of the development would exceed 4 metres in height (measured from the lowest adjoining pre-existing ground level). 3. In all cases (either the extension or replacement of a dwelling or the erection of an outbuilding) development will also be required to respect the open character of the Green Belt and appear proportionate to the original dwelling, taking particular account of visual impact.
	Paragraph 6.216 Page 385	*Delete footnote 171*: ~~171 National Planning Policy Framework (2012) paragraph 89~~
	Paragraph 6.217 Page 386	*Add new paragraphs after paragraph 6.217* **The policy also allows for residential outbuildings to be not inappropriate in principle, provided they are within the existing site (i.e. the curtilage of the house) and they comply with the relevant limitations. The limitations are designed to respond to the overarching objective of maintaining the overall openness of the Green Belt.** **Because every site is different this is a combination of assessing proposals against the original size of the main**

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		dwelling, the total volume of all outbuildings, the proportion of the site (curtilage) occupied by outbuildings, and the scale and design of the proposal. **In terms of cumulative impacts, part one of the policy requires all past and proposed extensions to the house to be considered together, and part two requires all past and proposed outbuildings to be considered together. It will not normally be necessary to consider the cumulative impact of extensions and outbuildings together unless, exceptionally, this results in unacceptable impacts on the open character of the Green Belt around the site, for example by concentrating buildings on the most prominent part of the site, or by creating an urban or suburban frontage along a street or footpath.**
MM75	Policy DM44 Page 386 - 387	POLICY DM44 – DEVELOPMENT IN THE COUNTRYSIDE OUTSIDE OF THE GREEN BELT 1. Within that portion of the countryside outside of the Green Belt, and subject to other relevant policies, permission will only be granted for: a) Development that accords with a made Neighbourhood Plan; b) Development for agriculture and forestry, outdoor sports and recreation, and for cemeteries where there is a genuine need; c) Additional buildings ~~for employment~~ where these are required to support an existing rural enterprise or business located in the countryside, which are proportionate to the existing; d) The construction of additional dwellings and other buildings only within settlement boundaries identified in accordance with CP3 and DM21 as shown on the Policies Map;

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		e) Rural exceptions housing in accordance with DM25; f) Sites for travellers in accordance with DM26; g) Housing for rural workers in accordance with DM27; h) Extensions and alterations to existing dwellings in accordance with DM36; i) The conversion of existing buildings in accordance with DM45; j) The redevelopment of previously developed land, provided this respects the rural character of the surroundings.
	Paragraph 6.222 Page 387	*Add new paragraph after paragraph 6.222* **This policy aims to support rural enterprises and businesses located in the countryside, recognising that there may be a need for additional development that supports them and the employment generating uses they provide, so that any new development can have a positive impact on the local economy without any further significant impact on the countryside. This will ensure that the existing character is maintained whilst managing development appropriately in the countryside**.

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MM76	Policy DM45 Page 388	POLICY DM45 – CONVERSION OF EXISTING BUILDINGS IN THE GREEN BELT AND OTHER RURAL AREAS 1. The conversion of existing buildings to new uses in the Green Belt, the Area of Outstanding Natural Beauty, and elsewhere in the countryside is acceptable where: a) The existing foundations, floors, walls and roof of the building are of sound and permanent construction suitable for the proposed use; b) The building is not a building that was erected ~~for the purposes of agriculture or forestry~~ within the preceding 10 years; c) The proposed use will support the vitality and sustainability of the local rural community, the rural economy, or local services.
MM77	Appendix D - List of Housing Allocations (or mixed use with Housing) Page 407 - 415	*Appendix D is to be revised to:* • *Add columns on net developable area and net density.* • *Reflect changes made to the capacity on some sites.* • *Reflect the deletion of policy HW15 (land to the rear of Hughenden Road, High Wycombe)* • *Remove sites which have been granted planning permission between April 2016 and April 2018.* *See Annex 1 for the revised version of Appendix D which is proposed to replace the existing Appendix D in the regulation 19 publication version of the Wycombe District Local Plan (submitted - March 2018).*

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<tr><td>MM78</td><td>Appendix G
Pages 418 - 420</td><td>Revision of employment areas to transfer a 0.6ha area of the Meadow Bank local employment area into the adjacent Millboard Road strategic employment area.
<table>
<tr><th>Policy reference</th><th>Site</th><th>Settlement</th><th>Site Area (Ha)</th></tr>
<tr><td></td><td colspan="3">STRATEGIC EMPLOYMENT AREAS</td></tr>
<tr><td></td><td>Millboard Road</td><td>Bourne End and Wooburn</td><td><s>3.5</s> <u>4.1</u></td></tr>
<tr><td></td><td colspan="3">LOCAL EMPLOYMENT AREAS</td></tr>
<tr><td></td><td>Meadow Bank</td><td>Bourne End and Wooburn</td><td><s>1.2</s> <u>0.6</u></td></tr>
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<tr><th>No.</th><th>Reference and page no. in the Plan</th><th>Proposed Main Modification</th></tr>
<tr><td>MM79</td><td>Appendix H
Page 425</td><td>Add further monitoring indicator and target below existing target and indicator for CP2 (2).
<table>
<tr><th>Policy</th><th>Target</th><th>Indicators</th><th>Frequency</th><th>Source</th></tr>
<tr><td><u>CP2(2)</u></td><td><u>...within a wider sub-regional strategy for growth</u></td><td><u>Not a statistical measure: indicator not relevant</u></td><td><u>Annual</u></td><td><u>The Council will engage on strategic matters through the Duty to Cooperate, and this is reported through the Annual Monitoring report as a requirement.</u></td></tr>
</table></td></tr>
<tr><td>MM80</td><td>Appendix K
Page 457</td><td>Removal of reference to deleted policy HW15 (land to rear of Hughenden Road, High Wycombe)</td></tr>
</table>

Annex 1 revised Appendix D List of Housing Allocations (or mixed use with Housing)

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
HW4	Abbey Barn North	High Wycombe Area	11.32	**3.5**	100	**29 dph**
HW5	Abbey Barn South and Wycombe Summit	High Wycombe Area	34.3	**17.3**	~~505~~ **550**[10]	**32 dph**
HW6	Gomm Valley and Ashwells	High Wycombe Area	74	**17.2**	~~530~~ **520 to 720**	**30 to 42 dph**
HW7	Terriers Farm and Terriers House	High Wycombe Area	24.6	**15.2**	~~500~~ **500 to 540**	**33 to 36 dph**
HW8	Land off Amersham Road including Tralee Farm, Hazlemere	High Wycombe Area	12.87	**10**	350	**35 dph**

[10] Without Wycombe Summit, which has already been permitted for 30 dwellings – net density also calculated on ABS alone

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
HW9	Part of Greens Farm, Glynswood, Green Hill, High Wycombe	High Wycombe Area	1.62	**1.42**	50	**35 dph**
HW10	Horns Lane, Booker, High Wycombe	High Wycombe Area	2.04	**1.82**	64	**35 dph**
HW11	Clay Lane, Booker, High Wycombe	High Wycombe Area	1.97	**1.18**	30	**25 dph**
HW12	Leigh Street, Desborough Area, High Wycombe	High Wycombe Area	1.21	**1.21**	275	**227 dph**
HW13	Former Bassetsbury Allotments, Bassetsbury Lane	High Wycombe Area	2.08	**1.3**	30	**23 dph**
HW14	Highbury Works/Hazlemere Coachworks, Chestnut Lane, Hazlemere	High Wycombe Area	0.62	**0.53**	14	**26 dph**
	~~JC and MP Smith, Princes Gate (also known as Ricketts road,~~	~~High Wycombe Area~~	~~0.16~~	**~~0.16~~**	~~32~~	**~~200 dph~~**

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	~~Ryedale), High Wycombe, HP13 7AB~~					
	~~46 West Wycombe Road High Wycombe Buckinghamshire HP11 2LW~~	~~High Wycombe Area~~	~~0.08~~	**~~0.08~~**	~~12~~	**~~163 dph~~**
	~~193-197 West Wycombe Road High Wycombe Buckinghamshire HP12 3AW~~	~~High Wycombe Area~~	~~0.19~~	**~~0.19~~**	~~9~~	**~~63 dph~~**
	Edie Pusey House 9A Amersham Road High Wycombe Buckinghamshire HP13 6PN	High Wycombe Area	0.18	**0.18**	8	**50 dph**
	Delafield Heights South, Longland Way / Pettifer Way, previously known as Flats off Chairborough Road	High Wycombe Area	0.7	**0.7**	40	**96 dph**[11]

[11] Based on gross dwellings 67; net 40

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	Frank Hudson Furniture Factory, Rosebery Avenue, High Wycombe	High Wycombe Area	0.11	**0.11**	11	**100**
	~~Kitchener Works, Kitchener Road, adjacent to Smewin Court, High Wycombe~~	~~High Wycombe Area~~	~~0.24~~	**~~0.24~~**	~~14~~	**~~58 dph~~**
	Notcutts Garden Centre, Clay Lane, High Wycombe	High Wycombe Area	0.91	**0.91**	15	**16 dph**
	Delafield Heights North, (Longland Way / Pettifer Way, also known as Castlefield Estate, High Wycombe)	High Wycombe Area	1.74	**1.74**	32	**59 dph**[12]
	~~Casa Mia, Gillets Lane, High Wycombe, HP12 4BB~~	~~High Wycombe Area~~	~~0.23~~	**~~0.19~~**	~~12~~	**~~63 dph~~**

[12] Based on gross dwelling number 102 ; net 32

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	~~7-8 High Street, High Wycombe~~	~~High Wycombe Area~~	~~0.06~~	**~~0.06~~**	~~12~~	**~~233 dph~~**[13]
	~~17-19 Frogmoor, High Wycombe~~	~~High Wycombe Area~~	~~0.04~~	**~~0.04~~**	~~11~~	**~~275 dph~~**
	27 High Street, High Wycombe	High Wycombe Area	0.01	**0.01**	5	**500 dph**
	~~Rear of 154-156 West Wycombe Road, High Wycombe~~	~~High Wycombe Area~~	~~0.1~~	**~~0.1~~**	~~10~~	**~~100 dph~~**
	~~Burleighfield House (Mayflower House), London road, Loudwater~~	~~High Wycombe Area~~	~~1.55~~	**~~0.032~~**	~~11~~	**~~344 dph~~**
	Dashwood Avenue, High Wycombe	High Wycombe Area	0.89	**0.89**	70	**79 dph**

[13] ~~Based on gross dwellings 14 and net 12~~

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	34 Dashwood Avenue High Wycombe Buckinghamshire HP12 3DX	High Wycombe Area	0.02	**0.02**	5	**250 dph**
	Ogilvie Road, High Wycombe	High Wycombe Area	0.21	**0.21**	9	**43 dph**
	Land to the rear of Quebec Road, High Wycombe	High Wycombe Area	0.18	**0.18**	5	**28 dph**
	Netley Works, 89 Queens Road, High Wycombe	High Wycombe Area	0.08	**0.08**	11	**138 dph**
	Garages between Chiltern Avenue and Rutland Avenue, High Wycombe	High Wycombe Area	0.38	**0.38**	10	**26 dph**
	Garages at Tyzack Road, High Wycombe	High Wycombe Area	0.25	**0.25**	6	**24 dph**
	Garages at Havenfield Road, High Wycombe, HP12 4ST	High Wycombe Area	0.03	**0.03**	5	**167 dph**

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	1-9 Shaftesbury Street, High Wycombe, HP11 2NA	High Wycombe Area	0.03	**0.03**	9	**300 dph**
	~~The Gordon Arms, Gordon Road, High Wycombe~~	~~High Wycombe Area~~	~~0.11~~	**~~0.11~~**	~~11~~	**~~100 dph~~**
	Sunnyside and St Johns House, High Wycombe	High Wycombe Area	0.09	**0.03**	5	**167 dph**
	Westside Fruit/The Apple Orchard, Clay Lane	High Wycombe Area	0.62	**0.46**	11	**26 dph**[14]
~~HW15~~	~~Land to the rear of Hughenden Road, High Wycombe~~	~~High Wycombe Area~~	~~2.55~~	**~~Unknown~~**	~~Further work required~~	**~~No specific figure in the plan~~**
	~~Beaumont, 3-13 Holmer Green Road, Hazlemere~~	~~High Wycombe Area~~	~~0.31~~	**~~0.31~~**	~~28~~	**~~110 dph~~**[~~15~~]

[14] Based on gross dwellings 12 net 11
[15] Based on gross dwellings 34; net 28

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	~~Thame House, Castle Street, High Wycombe~~	~~High Wycombe Area~~	~~0.25~~	**~~0.10~~**	~~120~~	**~~1200 dph~~**
MR6	Land at Seymour Court Road, Marlow	Marlow	0.3	**0.25**	9	**36 dph**
	~~Police Station, Dean Street, Marlow, Bucks, SL7 3AB~~	~~Marlow~~	~~0.24~~	**~~0.24 (assumed to be the same)~~**	~~29~~	**~~119 dph~~**
	Foxes Piece Marlow Buckinghamshire	Marlow	1.52	**0.16**	10	**63 dph**
PR3	Princes Risborough Expansion Area	Princes Risborough	177.25	**68.7**	~~1,662~~ **2298**[16]	**32 dph**

[16] **1662 dwellings** ~~W~~**w**ithin the plan period to 2033 and excluding the Leo Labs site which is counted separately as it has a planning permission.

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
PR11	Land to the Rear of Poppy Road, Princes Risborough	Princes Risborough	3.74	**2**	58	**30 dph**
PR16	Land at Princes Risborough Station, Princes Risborough	Princes Risborough	2	**0.91**	45	**49 dph**
	~~Greensleeves, Maryland, Longwick Road and Aylesbury Road, Princes Risborough~~	~~Princes Risborough~~	~~0.33~~	**~~0.33~~**	~~32~~	**~~109 dph~~**
BE1	Slate Meadow, Bourne End and Wooburn	Bourne End and Wooburn	10.26	**4**	150	**38 dph**
BE2	Hollands Farm (north), Bourne End and Wooburn	Bourne End and Wooburn	23.74	**14.6**	467	**32 dph**
	Windrush House, Bourne End	Bourne End and Wooburn	0.15	**0.15**	8	**200 dph**[17]

[17] Based on gross dwelling number 30; net 8

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
RUR1	Land south of Finings Road, Lane End	Lane End	0.86	**0.34**	~~19~~**10**	**34 dph**
RUR2	Land between Chalky Field and Marlow Road, Lane End	Lane End	1.27	**0.74**	27	**37 dph**
RUR3	Land at Sidney House, Lane End	Lane End	1.14	**Unknown**	Further work required	**Unknown**
	~~Land off Simmons Way (remainder of Springbank House)~~	~~Lane End~~	~~0.26~~	**~~0.26~~**	~~17~~	**~~65 dph~~**
RUR7	Land off Clappins Lane, Naphill	Naphill	2.24	**1.84**	64	**35 dph**
RUR8	Land off Mill Road, Stokenchurch	Stokenchurch	4.97	**3.32**	100	**30 dph**
RUR9	Land at Wood Farm, Stokenchurch	Stokenchurch	0.9	**0.60**	28	**47 dph**

Policy reference	Site	Settlement	Site area (ha)	Net developable area (ha) for residential	Indicative dwelling numbers	Net density (dph)
	~~Land Adjacent to Longburrow Hall, Park Lane, Stokenchurch~~	~~Stokenchurch~~	~~0.6~~	**~~0.6~~**	~~14~~	**~~23 dph~~**
RUR11	Land at Heavens Above, Marlow Bottom	Marlow Bottom	0.9	**0.87**	20	**23 dph**
	Westhorpe House, Westhorpe Park, Little Marlow, SL7 3RQ	Little Marlow	1.86	**0.12**	12	**100 dph**
	Coal Yard Smalldean Lane Saunderton Buckinghamshire	Saunderton	0.67	**0.64**	6	**9 dph**
RUR12	Uplands Conference Centre	Cryers Hill	7.6	**2.95**	59	**20 dph**

The following identified Parishes intend to produce a Neighbourhood Development Plan:

Policy reference	Identified settlement	Settlement	Required dwellings to be delivered
RUR5	Longwick-cum-Ilmer Parish	Longwick	300
RUR6	Great and Little Kimble-cum-Marsh Parish	Great and Little Kimble	160