



DEMOCRATIC AND ELECTORAL SERVICES

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Dear Councillor

SUSTAINABLE DEVELOPMENT POLICY ADVISORY GROUP

The next meeting of the Sustainable Development Policy Advisory Group will be held as follows:

DATE: THURSDAY, 13TH MARCH, 2014
TIME: 6.00 PM
VENUE: ROOM 6, CAPSWOOD, OXFORD ROAD, DENHAM

Please note that this meeting is not open to the public

Only apologies for absence received prior to the meeting will be recorded.

Yours faithfully

Jim Burness

Director of Resources

To: The Sustainable Development Policy Advisory Group

Mr Reed
Mr Bagge
Mr Denyer
Mr D Dhillon
Mr Egleton
Mr Lidgate
Mr Samson
The Earl of Stockton

Declarations of Interest

Any Member attending the meeting is reminded of the requirement to declare if he/she has a personal interest in any item of business, as defined in the Code of Conduct. If that interest is a prejudicial interest as defined in the Code the Member should also withdraw from the meeting.

A G E N D A

	(Pages)
1. Apologies for absence	
2. Minutes	
To receive the minutes of the meetings of the PAG held on 22 January 2014 and 21 February 2014 (virtual).	(1 - 6)
3. Heathrow Airport Expansion Options	
To receive presentations by:	
1) Matt Gorman, Heathrow Airport's Sustainability Director	
2) Captain Jock Lowe, Heathrow Hub	
4. Update on Airports Commission's Interim Report	
To consider report of the Director of Services.	(7 - 16)
5. Development Management Guidance Note for Burnham Beeches	
To consider report of the Director of Services.	(17 - 18)
<i>Appendix</i>	(19 - 30)
6. Duty to Cooperate and Planning for Strategic Cross Boundary Matters	
To consider report of the Director of Services.	(31 - 36)
7. Accommodating the needs of the Travelling Community in South Bucks: Draft Issues and Options and Call for Sites for Public Consultation	
To consider report of the Director of Services.	(37 - 40)
<i>Appendix</i>	(41 - 70)
8. Any other business	
Any other business which the Portfolio Holder considers is urgent.	

The next meeting is due to take place on Thursday, 12 June 2014

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SUSTAINABLE DEVELOPMENT POLICY ADVISORY GROUP

Meeting - 22 January 2014

Present: Mr Reed (Chairman)
Mr Bagge, Mr D Dhillon and The Earl of Stockton

Also Present: Mr Harding, Dr Matthews and Mrs Woolveridge

Apologies for absence: Mr Denyer, Mr Egleton, Mr Lidgate and Mr Samson

18. MINUTES

The minutes of the meeting held on 17 December 2013 were received.

19. WESTERN RAIL ACCESS TO HEATHROW (WRATH)

The PAG received a report which provided Members with information on the Western Rail Access to Heathrow (WRATH) project which will provide a new rail service (four times an hour) from Reading and Slough directly to Heathrow Terminal Five.

The PAG discussed the two options which were still being considered by Network rail as possible routes:

- a) Via the Colnbrook freight branch
- b) Via tunnel from south of the track between Langley and Iver

Maps were circulated to the PAG illustrating the proposed routes.

The PAG noted with concern the implications of these options for South Bucks, including the loss of Green Belt, increased noise levels from the trains, the possible visual impact of the new route, HGV traffic and noise concerns resulting from the construction process and the implications regarding the Safeguarded Waste transfer station.

The PAG were advised that officers from South Bucks District Council and Bucks County Council would pursue these issues in negotiations with the scheme promoters in the interests of residents and businesses of South Bucks.

The PAG noted that Network Rail had announced that it would decide on the preferred option by the end of January 2014 and would make a public announcement about the scheme in February. Network Rail would be giving a presentation on the WRATH project at the next Council meeting on 25 February. The Deputy Leader advised that this would give Members an opportunity to ask questions and raise any concerns that they had with Network Rail.

The PAG noted the report and supported the proposal to continue negotiations with appropriate parties to achieve the best outcome for the District.

20. HS2: UPDATE AND POSSIBLE PETITIONING ISSUES

The PAG received a report which provided Members with an update on the High Speed Rail Project. The report outlined the impact of the scheme on South Bucks, taking account of the project's Environmental Statement, and the Council's response to the Environmental Statement. The report also highlighted the potential petitioning points against the High Speed Rail (London-West Midlands) for approval by the Cabinet and Council together with the cost of pursuing this course of action.

With regard to the HS2 legal challenge, it was noted that the Supreme Court had dismissed both the appeals that had been made by HS2AA and the remaining local authorities.

The PAG noted the Council's response to the Environmental Statement. Members were advised that the Council now had until 27 February 2014 to respond to the Environmental Statement.

The PAG discussed the potential petitioning points against the High Speed Rail, which were set out in the report, and were of the opinion that these reflected current thinking. With regard to the evidence to be submitted to Parliament, the PAG were of the view that the Council should ensure that:

- the evidence is comprehensive;
- the important points are prioritised; and
- duplication with other authorities' evidence is avoided.

With regards to resources, it was noted that a fee of £20 for submitting a petition could be met within budget. Taking the petitioning process to the stage of presenting evidence to Parliament could incur additional unbudgeted costs up to £25,000 which would require the approval of Full Council.

The PAG were in full support of all the recommendations set out in the report, including the need to allocate a sum of up to £25,000 for the purpose of presenting evidence to Parliament. The PAG stressed the importance of ensuring that the residents of South Bucks are represented on this issue.

Having considered the advice of the PAG, the Portfolio Holder **AGREED** to **RECOMMEND** to Cabinet that

- 1) it notes the responses prepared by officers and experts to the formal Environmental statement on behalf of the Council.
- 2) it notes the issues raised in the report as matters of concern for the Council and that these reflect current thinking which will be developed by the officers/experts in the lead-up to the submission of the Petition to the Select Committee in April/May 2014.
- 3) it be **RECOMMENDED** to Council that
 - a) it is expedient for the Council to oppose the High Speed rail (London-West Midlands) Bill introduced in the Session of parliament 2013-14.
 - b) the Common seal of the Council be affixed to any necessary documents and that confirmation be given that Sharpe Pritchard (Parliamentary Agents) be authorised to sign the Petition of the Council against the Bill.
 - c) authority be delegated to the Chief Executive, in consultation with the Cabinet Member for Sustainable Development, the Head of Legal and Democratic Services and the Head of Sustainable Development, to take all necessary steps to finalise the matters of concern and carry the Resolution referred to above into effect.
 - d) a sum of up to £25,000 be allocated for the purpose of presenting evidence to Parliament.

21. A SHARED FRAMEWORK FOR THE BUCKINGHAMSHIRE COUNCILS ON DUTY TO CO-OPERATE ETC

The PAG a report outlining the vision for a Shared Framework for the Buckinghamshire Councils on the Duty to Co-operate and the Alignment of the Local Plan Timetables and Shared Evidence Base. The Shared Framework was noted to be the outcome of discussions between the Heads of Service and Cabinet Members responsible for planning at the Buckinghamshire Councils.

The PAG were advised that before the framework could be signed the following two issues would need to be addressed:

- a) The current wording in paragraph 14.1 of the Shared Framework would need to be made clearer as to the fact that relevant development plans (Local Plans) have been agreed by those authorities responsible for them, rather than collectively agreed, as could currently be inferred.
- b) The legend on the map would need to be made clear that whilst HS2 is a Government proposal, it does not have the Council's support. Accordingly, the legend would need to be made less ambiguous.

In order for these adjustments to be made, it was proposed that that Cabinet delegate authority to the Head of Sustainable Development and the Chief Executive, in consultation with the Cabinet Member for Sustainable Development, to agree the final wording and sign the Shared Framework Agreement.

The PAG were of the view that, subject to the wording of the framework in paragraph 14.1 and the map's legend being made less ambiguous, the Council should sign the Shared Framework Agreement.

Having considered the advice of the PAG, the Portfolio Holder **AGREED** to **RECOMMEND** to Cabinet that authority be delegated to the Head of Sustainable Development and the Chief Executive, in consultation with the Cabinet Member for Sustainable Development, to agree the final wording and sign the Shared Framework Agreement for the Buckinghamshire Councils on the Duty to Co-operate and the Alignment of the Local Plan Timetables and Shared Evidence Base.

22. **ANY OTHER BUSINESS**

None.

The meeting terminated at 6.54 pm

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SUSTAINABLE DEVELOPMENT POLICY ADVISORY GROUP

Virtual Meeting - 21 February 2014

Members of the PAG were invited to comment via email.
Comments received from Mr Bagge, Mr D Dhillon and Mr Lidgate.

23. AIRPORTS COMMISSION: APPRAISAL FRAMEWORK CONSULTATION

The Airports Commission (also known as the Davies Commission) published its Interim Report on 17th December 2013, which included three shortlisted options for increasing long term capacity at airports in the South East of England. The Airport Commission is carrying out a consultation on a framework to be used in Phase 2, which will examine and compare each option in detail. Members of the PAG were asked to comment via email on the proposed response to this consultation, prior to the matter being considered by Council on 25 February 2014.

All of the comments received were in support of the recommendations set out in the report.

RESOLVED that the Portfolio Holder advises Council of the comments received which were in agreement with the recommendations set out in the report.

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SUBJECT:	Update on Airports Commission's Interim Report
REPORT OF:	Officer Management Team - Director of Services

1. Purpose of Report

- 1.1. This report provides an update on the Airports Commission's Interim Report, published in December 2013, and is for information purposes only.

2. Links to Council Policy Objectives

- 2.1. The future of aviation in the South East could have an impact on the health and well-being of residents by affecting air quality, levels of noise pollution and the flora and fauna of the District. This could have a direct impact on the Council's corporate aim of delivering Health and Wellbeing.
- 2.2. The Government has stated that Councils must safeguard land which may be needed to develop infrastructure for airports, including that needed for surface transportation. This has a direct impact on the Local Plan and therefore the following corporate aims: a Thriving Economy and Sustainable Environment and indirect impacts on both Health and Well-being and Cohesive and Strong Communities.

3. Background

- 3.1. The Government set up the Airports Commission in autumn 2012, chaired by Sir Howard Davies (also sometimes referred to as the Davies Commission). This Commission was tasked with submitting a report to the government by the end of 2013, identifying and recommending options for maintaining the UK's status as an international hub for aviation and immediate actions to improve the use of existing runway capacity in the next 5 years. A final report is to be submitted by summer 2015, assessing the environmental, economic and social costs and benefits of various solutions to increase airport capacity.
- 3.2. The brief given to the Commission by the government for this interim report was to provide an assessment of the evidence on the nature, scale and timing of the steps needed to maintain the UK's global hub status; and provide a recommendation(s) for immediate actions to improve the use of existing runway capacity in the next five years - consistent with credible long-term options.
- 3.3. The final report will set out the Commission's recommendations for meeting any need for additional capacity, based on a detailed assessment of the three shortlisted long-term options, including their economic, social and environmental impacts. It will also make recommendations for ensuring that the need is met as quickly as is practicable, within the required timescale.
- 3.4. The final report will also recommend the appropriate legal and planning processes that should be used to expedite the delivery of new airport infrastructure.
- 3.5. This report provides an overview of the interim report published in December 2013.

4. Conclusion of the Airports Commission Interim Report December 2013.

- 4.1 The overall recommendation contained within the report is that one net additional runway is needed to be in operation in the south east by 2030, with the likelihood for the need for a second additional runway to be operational by 2050.
- 4.2 The Airports Commission intend to carry out a detailed study on their current proposed locations for the first runway, covering three options at Heathrow and Gatwick Airports.
- 4.3 The Gatwick Airport option is for a new runway at the south of the existing runway.
- 4.4 The Heathrow Airport options include building a new runway to the northwest of the existing airport or extending the existing northern runway to at least 6,000 metres, enabling it to operate as two separate runways (Heathrow hub option). Additional terminal facilities would also be required. For the Heathrow hub option, this includes a new terminal in Iver with surface transport to the rest of Heathrow.
- 4.5 See Appendix A for maps illustrating the Heathrow hub option and Heathrow Airport's own proposal for a second northern runway. Map 2 indicates the revised Heathrow Airport Ltd option (not as illustrated in the December Airport Commission report). The difference is that the new runway has been moved to the south and the new access roads for the proposed runway are no longer within South Bucks District. This revision will be the one subject to further assessment by the Airports Commission as the schemes are developed.
- 4.6 The Commission has not shortlisted any of the Thames Estuary options because they believe there are too many uncertainties and challenges surrounding them at this stage. They are also very expensive, with the Isle of Grain option (deemed the most viable) costing up to £112 billion, around five times the cost of the three options above. It intends to undertake further study of the Isle of Grain option in the first half of 2014 and will reach a view later this year on whether that option offers a credible proposal for consideration alongside the other short-listed options.
- 4.7 Additionally, the Commission has recommended a number of measures to optimise existing infrastructure until new capacity becomes operational. These include:
 - better gathering and sharing of information to manage flight times, driving better schedule adherence
 - more accurately managed routes for arrivals and departures, enabling noise respite to be better managed
 - better managed turnaround times of aircraft, so that stands are available when they are meant to be
 - time based separation of aircraft movements, enabling air traffic control to apply the same spacing between aircraft irrespective of wind conditions.
- 4.8 The Commission recommends the establishment of a Senior Delivery Group to drive forward airport strategy, the creation of an independent Aviation Noise Authority to provide independent and impartial advice on improvements to aircraft movements and a package of surface transportation measures to make airports with spare capacity more attractive to passengers and airlines. Interestingly, the latter includes a recommendation to improve access to Heathrow - already stated as running at 98% capacity by the Commission - from the south. This access is additional to the proposal for a western rail link to Heathrow.

5. Summary of the Airports Commission Interim Report December 2013.

- 5.1. The report recognises the importance of aviation to the economy and the need to balance local and national interests in making what can often be contentious decisions.
- 5.2. It also notes that the UK is in the unusual position of airports being commercially owned, therefore any decision for expansion needs to be commercially viable and seen to be so by the airport owner(s).
- 5.3. The Commission states that it engaged with a broad range of interested parties including local Councils, airport representatives, airlines, British Airline Pilot Association and various campaign groups, both for and against airport expansion.
- 5.4. The Commission believes that the world has changed since previous airport capacity reviews and says that economic, environmental and social factors have been taken into account in reaching their conclusions, commissioning new research and analysis to consider impacts across the whole of the system, including on air traffic and air space, surface access to airports, cost and deliverability.
- 5.5. Globalisation, technological innovation, the global economy's shift to the east have all impacted on the airline industry, with the Commission recognising two trends: alliances between airlines focussing on major aviation hubs and the emergence of new business models, particularly low cost and point to point markets.
- 5.6. The future of the nature of aviation is uncertain, with opinion split between the importance of hubs (whether through airline alliances or passengers self-connecting) and longer range aircraft enabling more long-haul destinations to be viable as point to point routes.
- 5.7. The Commission believes the UK aviation industry has managed to adapt well so far, with Heathrow becoming a major hub airport and other, particularly London, airports successfully operating dynamic point to point markets. Growth has been limited due to the economic downturn, however all London airports (apart from Stansted) are expected to be full by 2030.
- 5.8. The break-up of the British Airports Association has introduced more competition between airports and a new statutory framework for reducing emissions has changed the ground rules for airports and airlines.
- 5.9. Whilst the UK is still well connected and Heathrow still serves the most international passengers of any airport world-wide, it is now full, with Gatwick operating at 85% capacity. The Commission believes that the UK is approaching the limit of what can be achieved within existing airport infrastructure.
- 5.10. This imposes operational difficulties: when operating an airport at full capacity, there are no means of recovery when affected by outside factors such as weather problems; respite from noise for residents becomes less possible; Heathrow is well served for North Atlantic and European destinations, but not emerging markets.
- 5.11. The Commission has placed a financial value over the next 60 years, should airport capacity not be increased: £18-£20 billion of costs to users and providers of airport infrastructure; £30-£45 billion of costs to the wider economy.
- 5.12. The Commission recommends that one additional runway be provided in London by 2030, with a further runway by 2050, see section 4 above for more detail. 52 proposals were assessed on the UK's airport capacity shortfall, including 40 for new runway infrastructure. Proposals to satisfy demand through no new runways was analysed and discounted as being insufficient to deliver the required capacity.

- 5.13. It is intended to carry out further analysis on the Isle of Grain option in the first half of 2014, with the results announced by the end of the year.
- 5.14. Stansted has been discounted at present for a second runway, as volumes have fallen in recent years leaving considerable spare capacity. The option of building a large hub airport at Stansted has also been discounted due to high cost and that it would be highly disruptive to airspace whilst the same regeneration opportunities as an Estuary airport would not be realised. Stansted is thought to be a plausible option for any second additional runway in the 2040s.
- 5.15. Other rejected options which impacted on Buckinghamshire were: 1 the expansion of Luton to a four runway hub; 2 the expansion of Luton and link to Heathrow as one hub; 3 a new four runway hub airport west of Milton Keynes and east of Bedford. The first option, although the cheapest, was ruled out on grounds of distance from London as well as the belief that by closing Heathrow and Stansted, there would be an overall reduction in capacity. The second and third options were ruled out mainly because of logistics including distance from London.

6. Commission's next steps

- 6.1 The Commission moves into the second phase of its work, leading to the final report being published in the summer of 2015.
- 6.2 There will be public consultation on the shortlisted options towards the end of 2014.
- 6.3 An Appraisal Framework, said in the interim report as being published in spring 2014 for consultation, was published on 16th January 2014, with consultation closing on 28th February 2014. This sets out details of how scheme designs should be developed and how impacts will be appraised.
- 6.4 The Commission has also published details of how further analysis of a new Estuary airport will be taken forward on 16th January 2014, with two public consultations. The first relates to the Terms of Reference for this analysis, closing on 14th February 2014, the other is a call for evidence. Closing on 23rd May 2014.
- 6.5 The Commission has called upon the Government to act on any uncertainty the publication of the interim report may have on those areas close to the short listed options, particularly those who may need to move homes and are unable to sell.

7. Resources, Risk and Other Implications

- Financial - There could be financial implications if it is decided to lobby the Airports Commission.
- Legal - The Aviation Policy Framework places a duty on planning authorities to safeguard land required for future airport expansion, including surface links. With so much uncertainty around rail links to Heathrow and the possible expansion of Heathrow airport, it is unclear as to the extent of this duty and how it can be executed.
- Risks - There is a risk that the expansion of Heathrow Airport will threaten the Councils' objective of delivering a sustainable environment. Should Heathrow expansion go ahead, it increases the likelihood of the Heathrow link to the High Speed 2 railway being built.

Equalities - The impact on residents is likely to affect everyone without targeting any particular group.

Environment and Health implications

- Heathrow airport expansion could increase noise and air pollution which may impact on the environment and health of CDC's and SBDC's residents. With both current options at Heathrow, there will be considerable disruption to the Iver/Richings Park area.

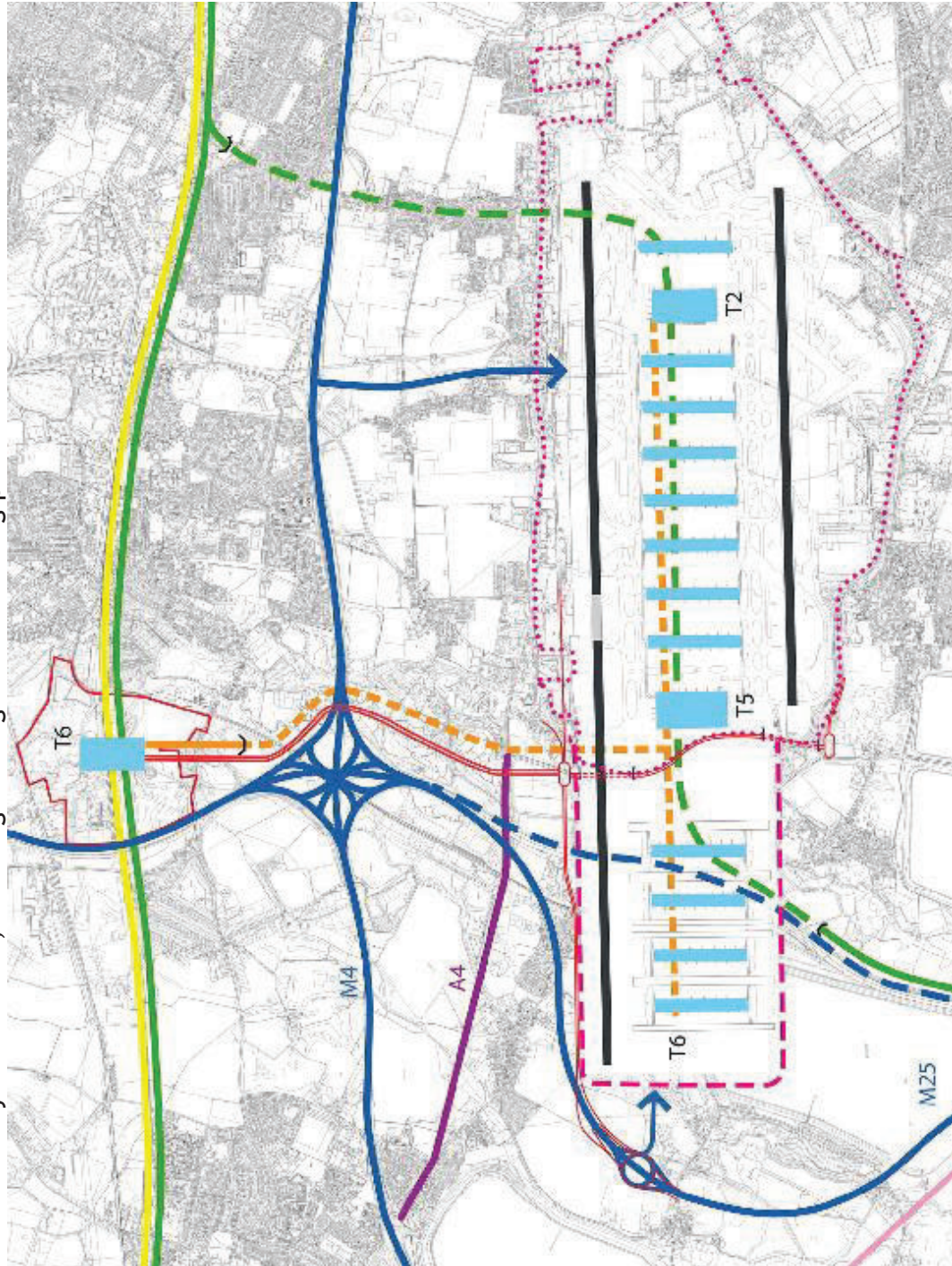
Economic - Should a new Estuary airport be built and Heathrow closed, there is likely to be a detrimental impact on the economy of the area.

8. Summary

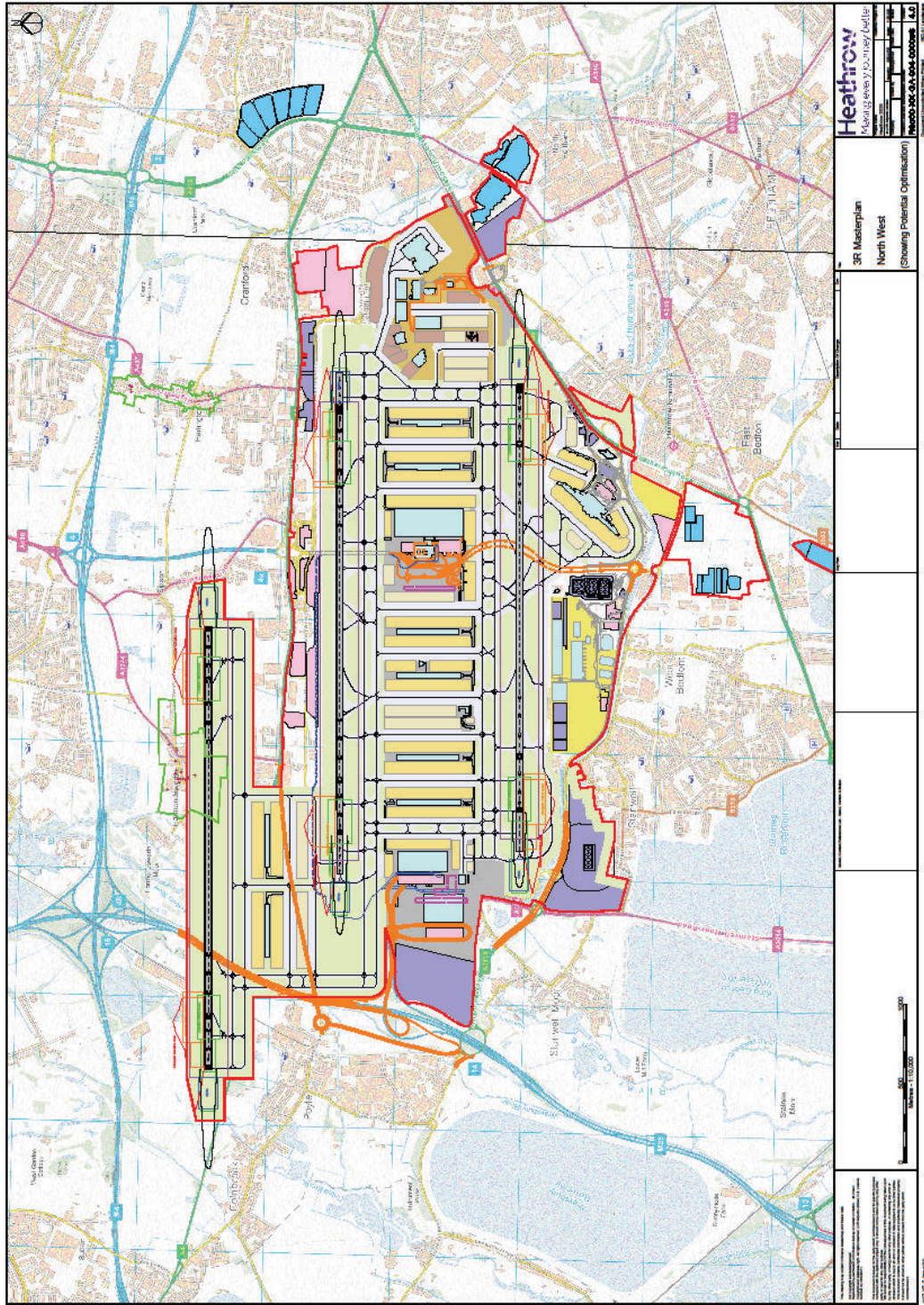
8.1. Policy Advisory Group to note this report.

Officer Contact:	Laura Campbell, SBDC Policy Officer, 01895 837236 Ben Coakley, CDC Principal Strategic Environment Officer, extension 01494 732060
Background Papers:	Airports Commission web site: https://www.gov.uk/government/organisations/airports-commission/about Airports Commission's Interim Report December 2013: https://www.gov.uk/government/publications/airports-commission-interim-report

Appendix A: Map 1: Heathrow hub option - diversion of the M25, a new transport interchange and terminal at Iver and the extension of the existing northern runway to the west, doubling its length and enabling planes to land and take off on the same runway:

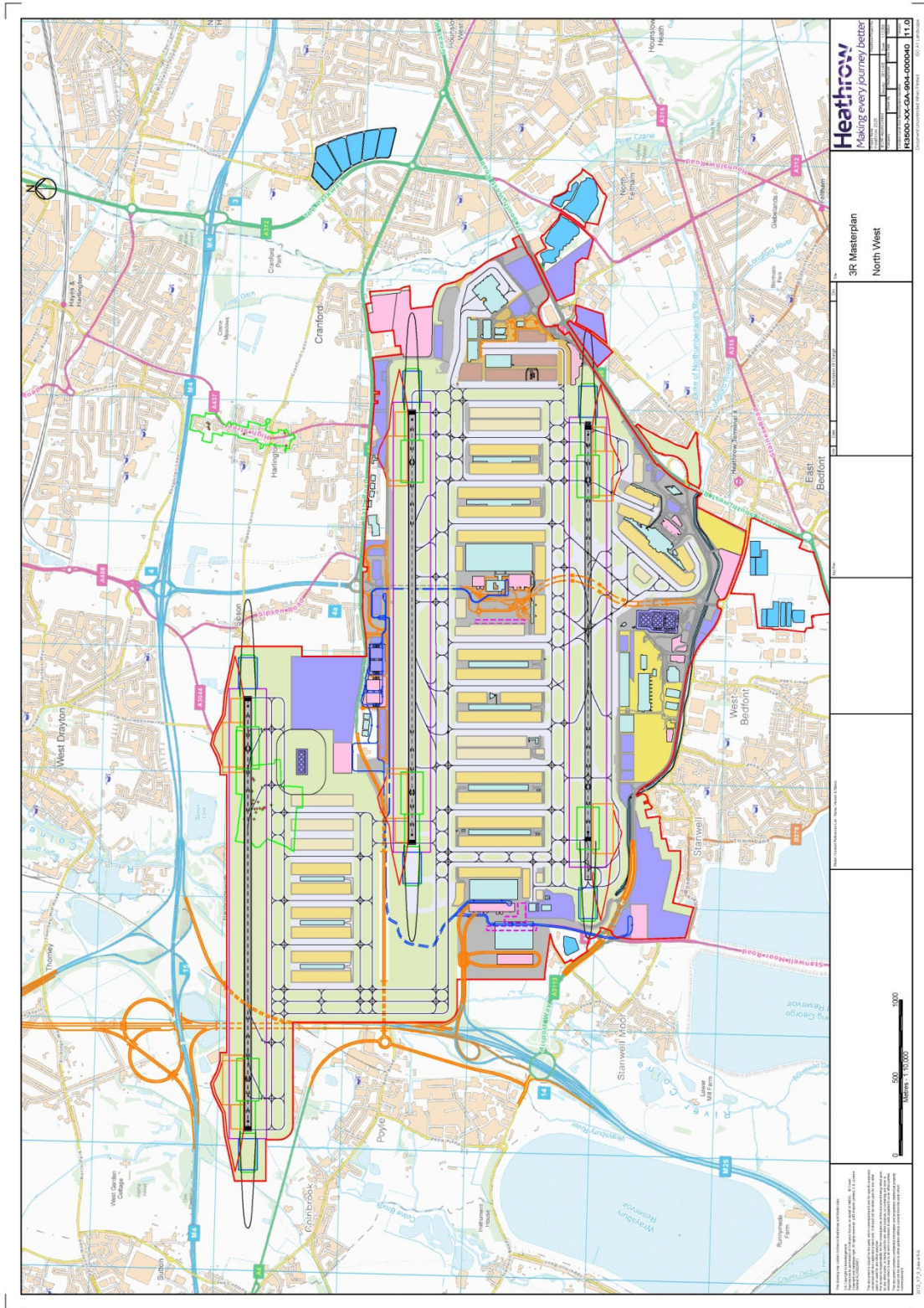


Appendix A: Map 2: Heathrow Airport Ltd proposal: the NW runway option, a new stand-alone runway and Terminal 6 independent of the operation of the rest of Heathrow, involving building over the M25.



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Appendix A: Map 3: Heathrow Airport Ltd proposal: the NW runway option as submitted to the Davies Commission. Note effect on Richings Park and Iver



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SUBJECT:	Development Management Guidance Note for Burnham Beeches		
REPORT OF:	Officer Management Team-	Director of Services	
	Prepared by	-	Head of Sustainable Development

1. Purpose of Report

- 1.1 The purpose of the report is to request Members to adopt this Guidance Note for use in development management.

2. Links to Council Policy Objectives

- 2.1 The Guidance Note links directly to Core Policies 1, 9 and 13 of the Council's Adopted Core Strategy.
- 2.2 The Core Policies and this Guidance Note directly support the objective within the Sustainable Community Strategy and Corporate Plan to support and maintain a sustainable environment.

3. Background

- 3.1 Burnham Beeches was designated a national nature reserve (NNR) in 1993 and a Special Area of Conservation (SAC) in 2005. This is a European designation also known as a Natura 2000 site. The UK is bound by the terms of the EC Habitats Directive, the aim of which is to conserve natural habitats and wild species across Europe by establishing a network of sites known as Natura 2000 sites. When preparing an application for certain plans and projects, developers should consider the potential effects on protected habitats. It is the responsibility of the Local Authority to assess potential impacts of a plan or a project upon a European site through a process known as Habitat Regulations Assessment or HRA. It is the responsibility of the developer to provide the necessary information where appropriate.

4. Planning Policy

- 4.1 Core Policy 1 of the Core Strategy states that
Further development at Farnham Common will be managed, to avoid a cumulative adverse impact on Burnham beeches. The mechanisms to achieve this will be set out in the Development Management DPD
- 4.2 Core Policy 9 Natural Environment of the Core Strategy states that
The conservation and enhancement of Burnham Beeches SAC and its surrounding supporting biodiversity resources, will be achieved through restricting the amount of development in close proximity to the site, and ensuring that development causes no adverse effect on the integrity of the SAC. Further details on mechanisms for achieving this will be given in the Development management DPD.
- 4.3 Core Policy 13 Environmental and Resource Management of the Core Strategy states that
The Council will seek to ensure the prudent and sustainable management of the District's environmental resources by: protecting and enhancing water quality. Particular regard should be had to maintaining the integrity of Burnham Beeches SAC.
- 4.4 South Bucks, City of London (owners of the publically accessible part of the Beeches) Natural England and Environment Agency have been working together to produce

evidence based planning policy to be included in the forthcoming Development Management Local Plan (DMLP). The City of London and South Bucks have jointly funded two evidence based studies - visitors' survey and hydrology. This development guidance note stems directly from the hydrology report and it is suggested should be treated as interim guidance until the DMLP is adopted.

5. Hydrology

- 5.1 The Hydrology study commissioned from WHS has identified 4 catchment areas from the 4 streams which flow into Burnham Beeches and has determined the importance of these streams to the ecology of the beech trees and the mire. Previously only the Withy stream catchment had been identified. Increasing urbanisation could have a detrimental impact on this hydrology which could be ameliorated by adopting simple measures. These measures include avoiding certain construction practices and implementing Sustainable Drainage Systems known as SUDs.
- 5.2 Currently the Local List specifies that applications within the Withy stream catchment area are not validated unless accompanied by a hydrology report. The new measures as set out in the Guidance Note no longer require individual hydrology reports. However unless applicants submit details of the SUDs measures that are appropriate for their site the applications will not be considered valid. This change to the local list is considered a minor change which can be made under previous delegation to the Head of Sustainable Development in consultation with the Portfolio Holder. It is categorised as a minor change as the new requirement is less onerous than the previous requirement to commission an independent hydrology report.
- 5.3 There is currently insufficient evidence to constrain development in Farnham Common although there is concern that increasing numbers of visitors, particularly those who walk with dogs, are having a detrimental impact on some of the features within the SAC. The results of the recent visitor survey and other evidence being compiled by the City of London will be examined by Natural England so see if further measures should be taken in the future. These will be considered in due course as further work is done for the Development Management Local Plan.

6. Resources, Risk and Other Implications

- 6.1 None.

7. Recommendation

- 5.1 Members of the Sustainable Development PAG advise the Portfolio Holder to recommend that Cabinet approve the new Guidance Note for Development Management purposes.

Officer Contact:	Jane Griffin, 01895 837315, jane.griffin@southbucks.gov.uk
Background Papers:	Development Management Guidance Note. Maps.

South Bucks District Council

Development Management Guidance Note: Hydrology in Burnham Beeches

February 2014



South Bucks
District Council

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1. Burnham Beeches Special Area of Conservation

- 1.1 Burnham Beeches was designated a national nature reserve (NNR) in 1993 and a Special Area of Conservation (SAC) in 2005. This is a European designation also known as a Natura 2000 site. The UK is bound by the terms of the EC Habitats Directive, the aim of which is to conserve natural habitats and wild species across Europe by establishing a network of Natura 2000 sites. When preparing an application for certain plans and projects, developers should consider the potential effects on protected habitats. It is the responsibility of the Local Authority to assess potential impacts of a plan or a project upon a European site through a process known as Habitat Regulations Assessment or HRA. It is the responsibility of the developer to provide the necessary information where appropriate.
- 1.2 Burnham Beeches is 382.76 Hectares in size. Only 200 hectares are publically accessible and managed for open access by the City of London. The remainder of the SAC is privately owned by the Portman Burtley Estate although public footpaths run through the site.
- 1.3 The primary reason for the designation of the site as an SAC are the presence of Annex 1 habitat Atlantic Beech forest with Ilex (holly) and sometimes Taxus (yew) in the shrub layer. The SAC is an extensive area of former beech wood-pasture with many old pollards and associated beech and oak high forest. It is also one of the richest sites for saproxylic invertebrates in the UK, including 14 Red Data Book species. It also retains nationally important epiphytic communities.
- 1.4 As well as being designated a SAC, Burnham Beeches is also designated a SSSI, the boundary of which covers the same area. It is divided into 4 SSSI units. Units 1, 3 and 4 are assessed by Natural England as in Favourable condition and Unit 2 is assessed as being in Unfavourable Recovering condition. Unit 2 is the part in private ownership. This status is mainly due to conifer plantations and lack of consistent beech regeneration.
- 1.5 Previous studies on the Beeches have highlighted concerns. In particular, an increased rate of veteran tree loss (probably due to a gap in the management of the trees including regular pollarding) and indications that the woodland as a whole may be suffering ill health from various causes. *Liley et al* in 2012 highlighted that there are a number of potential urban development related impacts on the nature conservation interests. The current (2010/11) estimates of visitor numbers are 585,000 per annum accompanied by c. 215,000 dogs. Visitor impacts including trampling and soil compaction, tree climbing, dog fouling, introduction of alien species and litter/flytipping, are of concern.

- 1.6 The City of London has a 10 year Management Plan to address some of these issues, particularly visitor use and behaviour. So far these have included reducing on site car parking, introducing parking charges, and attracting the majority of visitors to an area of open grassland where damage can be limited and visitor facilities provided, together with restricting access around vulnerable trees by installing fencing. There are currently plans to introduce a dog control order to restrict access for dogs off leads. A recent visitor survey surveyed the number of visitors, particularly local dog walkers, who visit regularly.
- 1.7 Other concerns include reduction in water levels and supply and reduction in air quality.
- 1.8 There are a number of watercourses that flow from the urban areas and into the Beeches. Two of these watercourses are either culverted or heavily managed.
- 1.9 The Withy Stream is primarily fed by surface water run-off and is therefore dry for much of the time. However, the Withy Stream feeds the mire, an important feature of the SSSI. Previous concerns about flows have led to the identification of the Withy catchment area in *Haycock* (a report commissioned by the City of London). This subsequently led to all planning applicants within the Withy Catchment being asked to submit a hydrology report (as per current Local List requirements) to assess the impact of the development on the catchment and propose mitigation. This satisfied the concerns of Natural England.

2. National Planning Policy Framework

- 2.1 Para 118 states that when determining applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
 - If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or as a last resort, compensated for, then planning permission should be refused;
 - Proposed development on land within, or outside, a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSI.

3. Core Strategy and Burnham Beeches

- 3.1 The Habitat Regulations Assessment for the South Bucks Core Strategy Screening Statement (March 2010) concludes that the Core Strategy will not lead to any significant effects on Burnham Beeches SAC either alone or in combination with other plans and projects.
- 3.2 The Spatial Vision states that high quality natural features such as Burnham Beeches SAC will be conserved and enhanced. The Core Strategy recognises the potential impacts that could result from housing development and states that new development over the Plan Period should not have an adverse effect on the integrity of Burnham Beeches SAC (p13). The Spatial Strategy recognises that particular protection should be given to Burnham Beeches.
- 3.3 Burnham Beeches is situated to the immediate west of the settlement of Farnham Common and it is important that the impacts of development and traffic on the SAC are minimised. (para. 2.2.26)

Core Policy 1 Housing provision and Delivery

- 3.4 The Strategic Housing Land Availability Assessment (SHLAA) 2009 showed that Farnham Common has capacity for new housing development but development will be carefully managed to avoid a cumulative adverse impact due to its proximity to Burnham Beeches. Mechanisms to achieve this will be developed in the DMLP. (para. 3.2.9 and Core Policy 1)

Figure 1	
Past Completions 2006-2013	165 Dwellings completed (Net)
Sites with outstanding planning permission	36 Dwellings (Net)
TOTAL	201

- 3.5 Figure 1 shows that housing completions are running substantially higher than the 123 predicted for the plan period from 2006-2014. The predicted total for the entire plan period from 2006-2026 is **201**.

Core Policy 9 Natural Environment

- 3.6 The highest priority will be given to the integrity of Burnham Beeches SAC. The conservation and enhancement of BB and its surrounding supporting biodiversity resources, will be achieved through restricting the amount of development in close proximity to the site, and ensuring that development causes no adverse effect on the integrity of the SAC.

Core Policy 13 Environmental and Resource Management

- 3.7 The Council will seek to ensure the prudent and sustainable management of the District's environmental resources by:
- Promoting best practice in sustainable design and construction. All new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible.
 - Protecting and enhancing water quality and encouraging the remediation of land affected by contamination to bring it back to beneficial use. Particular regard should be had to maintaining the integrity of Burnham Beeches SAC.
 - Seeking improvements in air quality, especially in the Air Quality Management Area adjacent to the motorways and close to Burnham Beeches SAC.
- 3.8 [Appendix 7](#) has a Monitoring target that new development over the Plan Period has not had an adverse effect on the integrity of Burnham Beeches SAC.

As a result of these policies, South Bucks, City of London as owners of the publically accessible part of the Beeches, Natural England and the Environment Agency are working together to produce evidence based specific planning policies to be included in the Development Management Local Plan for all applications which are likely to have a significant effect on the SAC in order to comply with the Habitat Regulations.

4. Current Guidance and the Local List

- 4.1 All applications within 500m of the Beeches are currently referred to the City of London and Natural England for their comments. At Natural England's request all applicants for developments within 500m were requested to submit a hydrology report to assess the proposal in hydrological terms.
- 4.2 Following the identification in the Haycock Report of the Withy stream catchment area and its importance to the Mire and the pond systems all planning applications since September 2013 within the Catchment are required to include a hydrology report (see current Local List requirements) to assess the impact of the development on the catchment and the Beeches generally and propose mitigation. This course of action has the approval of Natural England and has removed the requirement for hydrology reports in the rest of the 500m consultation zone. Mitigation measures are then conditioned if the application is recommended for approval.
- 4.3 The inclusion of this requirement in the Local List has meant that applications without the accompanying hydrology report have not been registered and have been declared invalid. **The local list will**

now be amended to reflect this Guidance Note requiring proposals for SUDs to be included with applications affecting all four catchment areas.

5. Wallingford HydroSolutions Ltd (WHS) report

Hydrological impacts

- 5.1 It was recognised that while we had identified the catchment of the Withy stream there were other watercourses which flowed into the Beeches and a better understanding of the hydrology of the Beeches was required together with an assessment of the effects of increasing urbanisation on the Beeches in hydrological terms. This would conform to Core Policy 13 and enable a new policy to be developed for the DM Local Plan. In a jointly commissioned study between the City of London and South Bucks, WHS has produced a report looking at these issues. The report's conclusions have also been endorsed by the Environment Agency, Natural England and Bucks County Council.
- 5.2 The report describes the potential hydrological effects of urbanisation as being the alteration of water balance and reduced water quality. These impacts are upon the draining streams which flow through the SAC. The beech trees are sensitive to changes in water balance and water quality.
- 5.3 Urban surfaces reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. The incorporation of Sustainable Drainage Systems (SuDS) in developments may minimise these effects and replicate the natural drainage pattern. Water main leakage and sewer infiltration may also influence the water balance. Leakage may represent a net import of water while sewage infiltration may remove water.
- 5.4 Water quality can be reduced through sedimentation, effluent discharges and pollution as well as increases in water temperature.
- 5.5 During construction there is the potential for temporary reductions in water quality through sedimentation. These arise from the necessary ground disturbance resulting in increased sediment supply and the potential mobilisation of this sediment resulting in wash off into the stream network and subsequent increased in-stream concentrations.
- 5.6 There is also the potential for pollution from the accidental spillage of chemicals and materials such as cement, fuel, oils and lubricants during the construction period. Measures to minimise this risk of contamination should be put in place during the construction period.

6. Catchment Areas

- 6.1 Surface water is delivered to Burnham Beeches by four catchments, as shown in Appendix 1 and 2 of this guidance note. From south to north these are the Withy stream, the Nile, an unnamed stream and the Portman Estate stream. The Withy stream has the smallest catchment from which water flows through three ponds along the course of the stream. This surface water system primarily responds to rainfall. The Withy and Nile streams and their catchments are heavily urbanised outside the SAC and the potential export of surface water runoff from paved areas and the presence of water mains and sewers may be expected to alter the water balance. Up to 22% of the natural run off may be exported from the Withy stream and up to 13% within the Nile stream via surface water drains. If further urbanisation takes place then without a sustainable approach to drainage to ensure that surface water is retained within the catchment the natural runoff rates could be reduced further.
- 6.2 The beech forests are found in the vicinity of the Nile stream. This stream together with the unnamed stream drains water from the SAC as well as conveying water from the upstream catchments. They may also have an effect on sustaining the beech trees.

7 Guidance

- 7.1 The purpose of this guidance is to take on the advice of the WHS report and ensure that future development does not result in further reductions in natural runoff within the catchments draining to the SAC and that the water quality of that runoff is not reduced. The overall aim is to minimise or negate any adverse impacts to the SAC arising from alterations to the hydrology (both quantity and quality) caused by new development and help maintain the natural hydrological functioning within the Beeches.
- **All applications within the designated catchments should comply with this guidance.**
 - **Pre-application consultations with the relevant bodies are encouraged.**
 - **Applications which do not include the measures set out below will be deemed invalid as per details in the Local List (as amended).**

Construction Best Practice within 10m of a Watercourse

Construction activities in or near water have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality and quantity of the water. The reduction of these potential impacts should form an inherent part of the layout design of any new development. The layout constraints should include a **10m built exclusion zone** in the vicinity of any watercourse. In accordance with Environment Agency guidance on pollution prevention, additional site specific mitigation measures are also required.

Refuelling and cleaning of plant machinery and equipment should take place off site.

Any fuels, lubricants or chemicals should not be stored within 10 m of the watercourse.

Sanitary facilities are to be provided on site.

Note: If any works affects an ordinary watercourse then the developer should check with Bucks County Council Flood Management team if Ordinary Watercourse Land Drainage Consent is required.

SuDS

Developers are required to adopt the principles of SuDS when submitting development proposals within the planning catchments identified in the catchment area map. **See attached map.** This is a versatile design approach which seeks to replicate natural drainage patterns and to reduce pollution from runoff and improve ecology.

SuDS Objectives:

Water Quality - help prevent and treat pollution in surface water runoff, protecting & enhancing the environment.

Amenity - visual and community benefits

Ecology - they provide the opportunity to create and improve habitats for wildlife, enhancing biodiversity.

SuDS Key principles:

1. Prevention - good maintenance & site design to reduce & manage runoff & pollution e.g. land-use planning, reduction of paved surfaces.

2. Source Control - runoff managed as close to the source as possible e.g. green roofs, rainwater harvesting, permeable paving, filter strips.

3. Site Control - runoff managed in a network across a site or local areas e.g. using swales, (shallow vegetated channels designed to store and/or convey runoff) detention basins, public realm SuDS components for attenuation & treatment. Also, flow should be slowed using overland conveyance routes.

4. Regional Control - downstream management of runoff for a whole site/catchment e.g. retention ponds, wetlands.

Developments should be designed to ensure that the following measures are incorporated:

Provision of permeable source controls promoting infiltration e.g. soakaways (where the water table allows), trenches, basins or rain gardens.

Provision of on-site storage in the form of ponds

Provision of on-site attenuation in the form of swales.

Developers should establish the soil conditions and hydrology on a bespoke basis to include storm water run-off, water table height and water quality. Local ground conditions, groundwater levels and hydrology will establish which SuDS measures are most appropriate. The measures should be well designed, implemented and maintained in accordance with current guidance. This will ensure that the best drainage solution for a particular site is found and incorporated into the final designs. **Details should be submitted with the planning application.**

Information sources

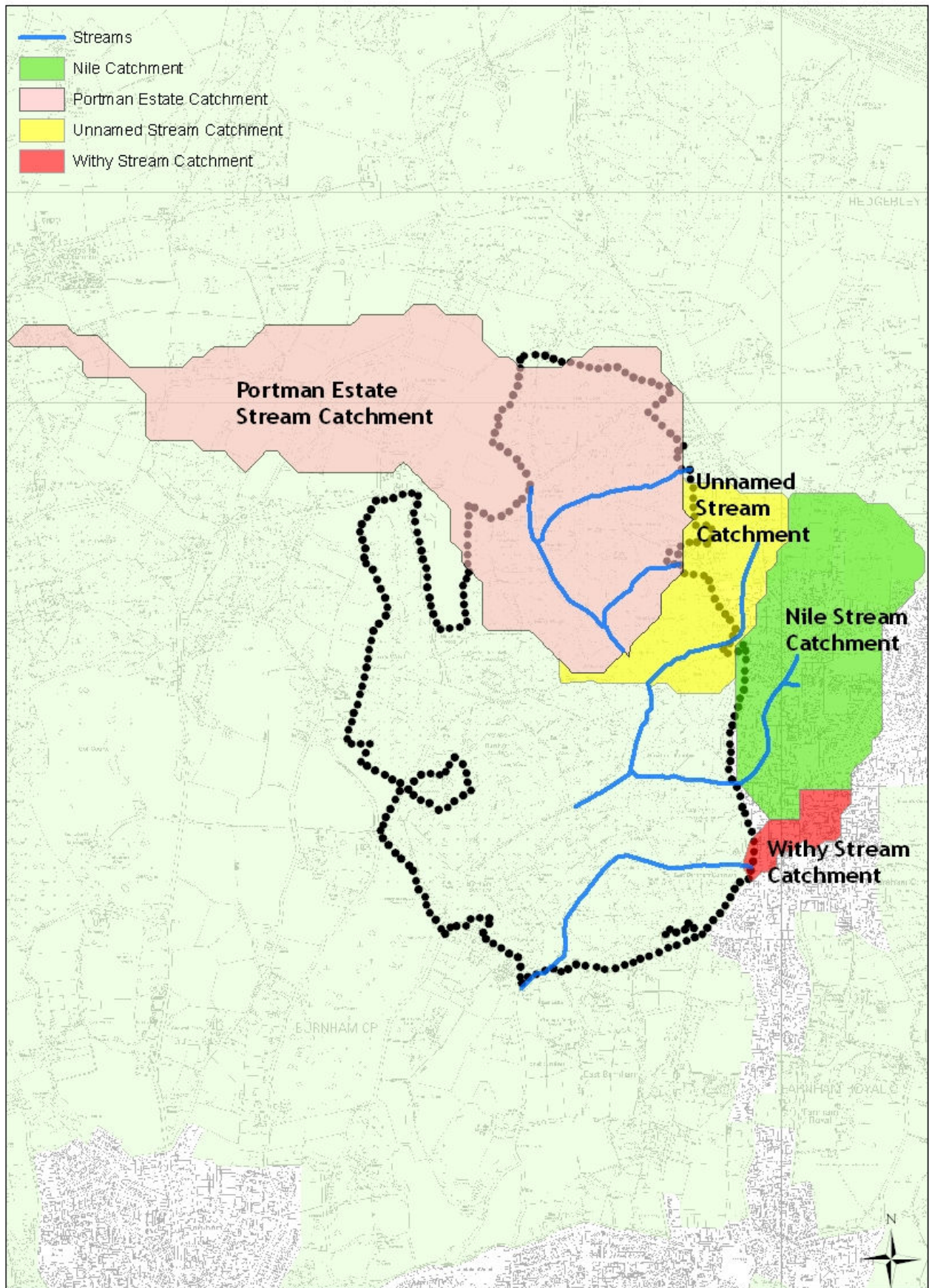
National Standards and SuDS Guidance documents to be introduced later 2014.

Local Flood Risk Management Strategy Bucks CC

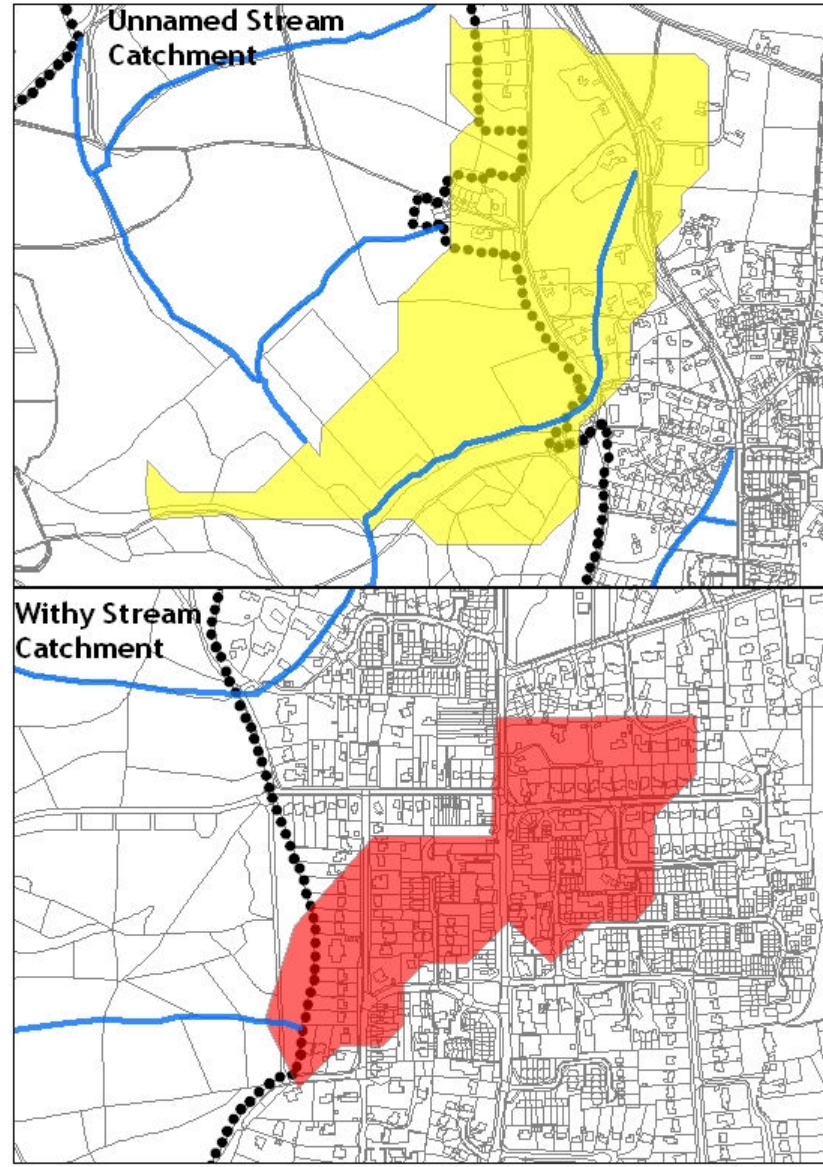
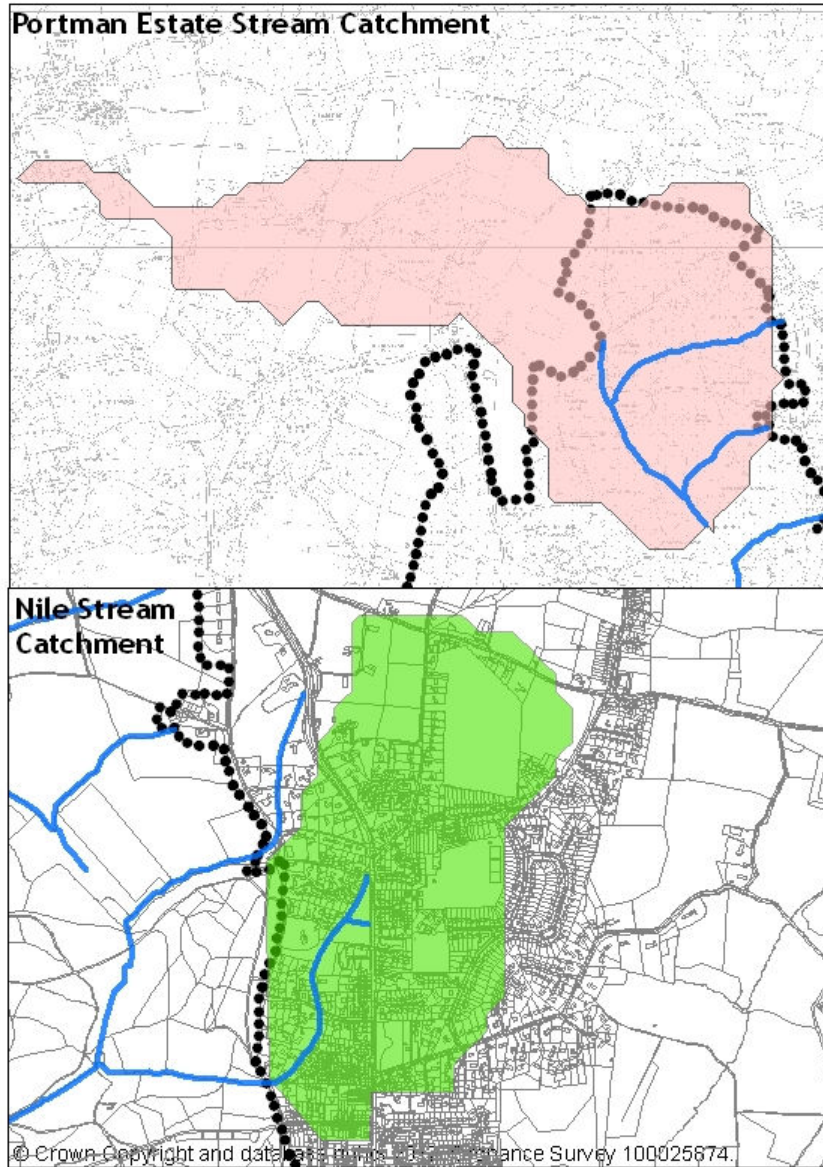
See also for further information

<http://www.susdrain.org/resources/ciria-guidance.html>

Appendix 1



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SUBJECT:	The Duty to Co-operate and Planning for Strategic Cross Boundary Matters
REPORT OF:	Officer Management Team - Director of Services Prepared by - Head of Sustainable Development

1. Purpose of Report

1.1 The purpose of this report is to:

- explain what the 'duty to co-operate' is;
- set out the likely implications of the duty to co-operate for local plan preparation in South Bucks District and for the way in which South Bucks DC will be required to work with other local planning authorities within and beyond Buckinghamshire;
- recommend that the Sustainable Development Policy Advisory Group notes this report and in future receives regular updates on the duty to co-operate together with suggestions for action where appropriate.

2. Links to Council Policy Objectives

2.1 Effective outcomes as a result of the duty to co-operate are linked to each set of priority action areas set out in the South Bucks Sustainable Community Strategy:

- A sustainable environment
- A thriving economy
- Safe communities
- Health and well-being for all
- Cohesive and strong communities.

3. Background

- 3.1 In the past, the strategic planning framework for South Bucks District was set out in the Buckinghamshire Structure Plan prepared by Buckinghamshire County Council, based on high level Regional Planning Guidance for the South East. More recently, strategic planning policies were set out in regional spatial strategies. In the case of South Bucks this was the South East Plan which included region-wide and sub-regional policies. The South East Plan was revoked in March 2013 and strategic planning is now the responsibility of local planning authorities who themselves must lead discussion, negotiation and action to ensure effective planning for strategic matters in their local plans¹. This responsibility - known as the duty to co-operate - is a legal requirement.
- 3.2 The duty to co-operate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils and specified public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters. The duty to co-operate came into effect in November 2011. A local planning authority must demonstrate how it has complied with the duty at the independent examination of its local plan. If a local authority cannot demonstrate that it has complied with the duty, the local plan will not be able to proceed further through the Examination and the Inspector will recommend that the plan is not adopted. The duty to co-operate is separate from, but related to, the local plan tests of soundness.
- 3.3 The duty to co-operate applies to all local planning authorities who are in the process of preparing and reviewing a local plan. Even if a local planning authority has an adopted local plan (such as South Bucks District), it is still required to co-operate with another local planning authority that is bringing forward a plan.
- 3.4 The National Planning Policy Framework identifies the strategic matters that a local planning authority is expected to include in its local plan and for which co-operation with other authorities is

¹ The National Planning Policy Framework (March 2012) uses the term 'local plan' instead of Core Strategy.

likely to be required. These include policies to deliver the homes and jobs needed in an area; retail, leisure and other commercial development; provision of infrastructure such as transport, water, flood risk, health and community facilities; climate change mitigation and adaptation; and conservation and enhancement of the natural and historic environment (paragraph 156).

- 3.5 At its meeting on 22 January 2014, the Sustainable Development PAG considered a Shared Framework for the Buckinghamshire Councils on Duty to Co-operate and Alignment of Local Plan Timetables and Shared Evidence Base. The shared framework agreement has now been finalised and is in the process of being signed by all four Buckinghamshire districts and by Buckinghamshire County Council.

4. Discussion

- 4.1 The duty to co-operate came into effect in November 2011. The system should therefore no longer be thought of as in transition. Over the last 6-months or so a consistent approach has begun emerging at Examinations. Inspectors are taking a stricter line on the duty to co-operate, with the bar being set very high and objectors (particularly developers) becoming much more proficient at challenging plans on co-operation grounds. As a result, a number of local plans - including the Vale of Aylesbury Plan - have recently failed the legal duty. There is no mechanism to retrospectively correct a failure to comply: a plan either meets the requirement or it does not. Where an Inspector finds that the duty has not been complied with, the most likely outcome is for the plan to be withdrawn and the local authority to need to hold further discussions, carry out additional work, re-publish the plan for consultation and re-submit for Examination.
- 4.2 There is now two years' experience of the duty to co-operate with important messages for local authorities in terms of both preparation of their own local plans and in working with other local authorities who are preparing or reviewing plans. The following boxes briefly summarise some recent examples.

Hart District Local Plan

Hart District Council was not able to persuade other relevant authorities with adopted Core Strategies to undertake a joint Strategic Housing Market Assessment (SHMA) update. It proceeded with a SHMA for Hart only, but this did not robustly identify the full, objectively assessed need for housing within the District or the wider Housing Market Area.

The Council's local plan was therefore not based on objectively assessed housing need and there was no agreement between the relevant local authorities as to the level of overall need, how it could be accommodated and how any unmet need from one authority could be met elsewhere.

The Council only initiated discussion with other local authorities on meeting housing needs very late in the process, after it had already determined the level of housing it was intending to plan for, leaving little scope for effective discussion and co-operation.

The Inspector concluded that the Council had not engaged constructively and on an ongoing basis and had therefore not complied with the duty to co-operate.

Plan withdrawn September 2013

Brighton & Hove City Plan

Although the Council engaged positively with neighbouring authorities and met the legal requirements of the duty to co-operate, the Inspector concluded that co-operation had not led to a positive outcome because no neighbouring Councils had offered to meet all or part of the objectively assessed housing needs that cannot be met in Brighton & Hove.

Given the significant shortfall in meeting housing needs within Brighton & Hove, the Council was advised to undertake a more rigorous analysis of the urban fringe sites it was seeking to protect from development. If the Plan is to be found sound, the Inspector wishes to be satisfied that the Council has left no stone unturned in seeking to meet as much of its need as possible within its own area.

Further work required from December 2013

Mid Sussex District Plan

The Inspector concluded that the Council had taken an ad hoc approach on the duty to co-operate rather than establishing a robust framework. There was little evidence of co-operation at an early stage, that the Council had approached engagement with nearby authorities in a helpful and positive way or that appropriate conclusions have been drawn and acted upon. The Council was also criticised for being too selective over which of its 'neighbours' it chose to co-operate with. There was no in-depth analysis of the issues facing local planning authorities in the area. Consequently, strategic housing priorities across boundaries were not properly addressed or co-ordinated and the Council was unable to demonstrate to the Inspector's satisfaction that adequate consideration had been given to meeting the development needs of nearby local planning authorities. The Council therefore did not comply with the duty to co-operate.

Council advised to withdraw Plan December 2013

Vale of Aylesbury Plan

No SHMA or other assessment of housing needs was produced jointly with other authorities and other authorities had not been formally approached to undertake joint work on housing needs and provision.

There are significant issues in terms of potential unmet housing need from other authorities within and beyond Buckinghamshire. The Council was aware of the issues from the start of the Plan preparation process and it is the Council's duty to have sought to address them through constructive, active and ongoing engagement. The Inspector concluded that the Council did not do so and that this undermined the effectiveness of Plan preparation in dealing with key strategic issues including the overall provision of housing and jobs. The Council therefore did not comply with the duty to co-operate.

Plan withdrawn February 2014

4.3 The key messages from these (and other examples) are as follows:

- Councillors have an important role to play in discussions, negotiations and actions to ensure effective planning for strategic matters.
- The duty to co-operate is not selective - if there is a strategic issue it must be addressed.
- The duty to co-operate goes beyond consultations and discussions: strategic co-operation must lead to evidenced and effective policy outcomes on cross-boundary matters.
- There is no definitive list of actions that constitute effective co-operation; the actions will depend on local needs which will differ.
- The activities that fall within the duty to co-operate relate to all stages of the plan preparation process, including plan scoping, evidence gathering and policy development.
- Local planning authorities are not required to reach agreement - there is no duty to agree. However, co-operation with partners who will play a role in delivering a local plan (by meeting part of another District's objectively assessed housing need for example) is central to the policy test of soundness.
- Even if an Inspector is satisfied that the duty is met, a local authority may still run into problems if the co-operation has not led to a positive outcome.
- Local authorities must give details of what action they have taken under the duty to co-operate in their Monitoring Reports, as well as the outcomes of the co-operation. There also needs to be a very clear and detailed audit trail of any strategic decisions.

4.4 The Shared Framework for the Buckinghamshire Councils will assist South Bucks District in complying with the duty to co-operate. However, the Council will also have to co-operate with other public bodies including (but almost certainly not limited to) the Environment Agency, English Heritage and Natural England, with neighbouring local planning authorities outside of Buckinghamshire, and possibly also other local authorities beyond our immediate neighbours. Exactly which bodies and authorities South Bucks District will need to co-operate with will depend on the strategic matters being planned for and the most appropriate functional geography to gather evidence and develop planning policies. For example, housing market and travel to work areas, river catchments and

landscape areas may be a more appropriate basis on which to plan than an individual district. For a new local plan to replace the adopted Core Strategy, in practice this is likely to mean different geographies for different issues, with a local planning authority working with different groups for different strategic matters.

- 4.5 South Bucks District's duty to co-operate activities will relate to its own plan-making activities and to those of other local planning authorities. The latter will include work on a new local plan for Aylesbury Vale. Following the findings of the Inspector undertaking the Examination of the Vale of Aylesbury Plan, Aylesbury Vale District has decided to withdraw the Plan and to start work on a new local plan. The Aylesbury Vale Cabinet Member for Strategic Planning's report to her Council on 5 February 2014 acknowledges that the new local plan will need to plan for higher levels of growth for Aylesbury Vale, as well as contributing towards the needs of other authorities, taking into account 'beyond the District' considerations.
- 4.6 The duty to co-operate does not apply to the Mayor of London in preparing the London Plan². The GLA Act does, however, impose duties on the Mayor to *consult* local planning authorities such as South Bucks District in connection with the London Plan. The situation on duty to co-operate regarding the Mayor and the preparation of local plans by authorities adjoining London (and the London boroughs) is different from that for the London Plan: the Mayor is bound by the duty as are the adjoining authorities (and London boroughs). South Bucks District Council will therefore be consulted by the Mayor on the London Plan, but there is a two-way duty to co-operate between South Bucks District Council and the Mayor on any local plans that the Council prepares.
- 4.7 To assist with strategic spatial planning co-operation, the Mayor has established an officer working group covering the wider South East. The group has no powers but is intended to provide a forum for discussion, act as a technical sounding board on the London Plan and disseminate information on particular technical issues. South Bucks District Council will represent the Buckinghamshire authorities at the meetings.
- 4.8 In order to comply with the Council's legal duty to engage on strategic cross-boundary matters on a constructive, active and on an ongoing basis, it is proposed that future agendas for Sustainable Development PAG meetings should include a standing item on the duty to co-operate. The reports to Sustainable Development PAG will include comprehensive updates on duty to co-operate activity and, where appropriate, suggestions for action. In addition, and because the Council is already receiving increasing numbers of requests as a result of the duty to co-operate, with many requiring responses to relatively short deadlines, it is recommended that the Head of Sustainable Development be given delegated powers to respond in consultation with the Portfolio Holder for Sustainable Development.
- 5. Resources, Risk and Other Implications**
- 5.1 The Shared Framework for the Buckinghamshire Councils reduces the risk of South Bucks District Council failing to meet its statutory duty.
- 5.2 There are potential resource implications for Planning Policy arising from the duty to co-operate. Although the duty to co-operate is not limited to neighbouring local authorities, with six neighbouring authorities plus Buckinghamshire County Council and the Mayor of London, the statutory duty to engage on strategic cross-boundary issues constructively, actively and on an ongoing basis is likely to be more demanding in terms of officers' and Councillors' time. Although South Bucks District will have control over the timing of duty to co-operate activities in relation to its own plan-making, co-operation in relation to the plans of others will be reactive, difficult to timetable with any precision and could make conflicting demands on the resources of the Planning Policy team.
- 5.3 Joint working with other authorities on the evidence base would be likely to reduce some costs. This was the case with the recent Buckinghamshire-wide GTANA.

² This is because the Mayor's London Plan is part of the Development Plan, but is not a Development Plan Document.

6. Summary**6.1** It is recommended that:

- i. Members of the Sustainable Development PAG advise the Portfolio Holder to recommend that Cabinet give delegated powers to the Head of Sustainable Development to respond, in consultation with the Portfolio Holder for Sustainable Development, to requests from other local planning authorities for input to their local plans/evidence base, and to provide comments to the Mayor of London on the London Plan.
- ii. Members of the Sustainable Development PAG note the contents of this report and in future receive regular updates on the duty to co-operate together with suggestions for action where appropriate.

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Background Papers:	None

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SUBJECT:	Accommodating the needs of the Travelling Community in South Bucks: Draft Issues and Options and Call for Sites for Public Consultation
REPORT OF:	Officer Management Team - Director of Services Prepared by - Head of Sustainable Development

1. Purpose of Report

1.1 The purpose of this report is to:

- outline the content of the Gypsy and Traveller Issues and Options and Call for Sites paper
- outline the future need for the travelling community in the district in light of the Gypsy and Traveller Needs Assessment
- recommend that the draft Issues and Options and Call for Sites paper be published for public consultation towards the end of March 2014.

2. Links to Council Policy Objectives

2.1 The Issues and Options and Call for Sites paper on Gypsies and Travellers relates directly to the delivery of Core Strategy Policy 4 in the Core Strategy. In addition, the paper addresses each of the five broad themes in the South Bucks Sustainable Community Strategy:

- Thriving economy
- Sustainable environment
- Safe communities
- Health and well-being
- Cohesive and strong communities

3. Background

- 3.1 In accordance with national policy on 'Planning Policy for Traveller Sites' (March 2012), and the Housing Act 2004, there is a need to demonstrate a five-year supply of deliverable sites to provide for the needs of Gypsies and Travellers.
- 3.2 The Council is preparing a Gypsies and Travellers Plan which will determine what additional provision should be sought within South Bucks to provide accommodation for Gypsies and Travellers.
- 3.3 The Issues and Options and Call for Sites paper is the first stage in the preparation of the Gypsy and Traveller Plan. It sets out to provide an understanding of Gypsy and Traveller communities and the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the ten year period from 2013 to 2023. The paper explores a series of options of how the Council could accommodate the future growth of the Gypsy and Traveller population, and seeks comments on such options.

4. Discussion

Context

- 4.1 The paper sets out the policy context relating to accommodation for Gypsies and Travellers, both from a national and local perspective. It summarises the content of

‘Planning Policy for Traveller Sites’ and of subsequent ministerial statements and sets out the content of the adopted Core Strategy on this matter.

- 4.2 The paper looks at some key facts about Gypsies and Travellers and the reasoning as to why the additional accommodation is required. It identifies the types of pitches that could be provided in South Bucks and looks at the recognised standard pitch sizes.

Gypsies and Travellers Needs Assessment (GTNA)

- 4.3 As part of the Gypsy and Traveller Plan, evidence of need has been gathered through a GTNA, undertaken by consultants on behalf of the four Buckinghamshire districts. The main objective was to provide Councils with robust, defensible, and up to date evidence about the existing and future accommodation needs of Gypsies, Travellers and Travelling Showpeople from 2013 to 2023.
- 4.4 This study identified a future need of 108 additional pitches over the next ten years from 2013 to 2023 in Bucks County, and identified a district need of 31 additional pitches in South Bucks to 2023.

Duty to Co-operate

- 4.5 In line with the Localism Act 2011, Duty to Co-operate was introduced. This places a legal duty on local authorities and public bodies to engage, constructively, actively and on an ongoing basis to maximise effectiveness of Local Plan preparation relating to cross boundary matters.
- 4.6 South Bucks has already worked alongside the four other Bucks authorities in the preparation of the Bucks GTANA as evidence base, and, at officer level, has been involved in Duty to Co-operate meetings with the London Borough of Hillingdon and the Royal Borough of Windsor and Maidenhead on Gypsies and Travellers, as well as on wider issues. The Council has also been consulted on the Three Rivers Draft Gypsies, Traveller and Travelling Showpeople Local Development Document (LDD), and has been in email correspondence with Slough Borough Council. Therefore, we have some understanding of the Gypsy and Traveller situation with all of our neighbouring authorities.
- 4.7 The Issues and Options and Call for Sites paper goes into more detail about situations in adjoining authorities regarding need and delivery on Gypsies and Travellers.

Meeting Future Need

- 4.8 The Issues and Options and Call for sites paper addresses a variety of options open to South Bucks as to how to meet the recognised need, set out in the GTNA. Options include:
- Extending existing sites where possible and appropriate
 - Allocating existing sites with temporary permission to make them permanent
 - Allocating new sites
 - Establishing whether neighbouring boroughs/districts would be able to meet some of the needs arising in South Bucks
- 4.9 Each of the options are presented in more detail in the paper, alongside the potential to protect, where suitable, existing sites across the district. All sites identified, whether by the council or through a representation, would be assessed against a site selection criterion which is also set out in the paper.

Future Policies

- 4.10 The paper also talks about possible policies which would aid assessments of applications received for temporary or permanent Gypsy and Traveller sites.

Next Steps

- 4.11 The Issues and Options and Call for Sites paper is attached to this report. Following consultation on the attached paper, it is intended that a draft plan would be prepared for consideration by this PAG and by Cabinet in the autumn of 2014. This would set out proposals relating to the accommodation needs of gypsies and travellers and the draft plan would then be subject to public consultation. Following consideration of comments received, this PAG, Cabinet and Council would be presented with a version of the plan for submission to the Secretary of State. There would then be an examination of the plan led by an independent Inspector and his/her views would be binding on the Council should it proceed with adopting the Gypsy and Traveller Plan.
- 4.12 A summary of views received on issues and options will be published after the public consultation.

5 Resources, Risk and Other Implications

- 5.1 There are no significant resource implications beyond officer time as a result of the proposed consultation. The results of this public consultation will be taken forward to inform the preparation of the Gypsy and Traveller Plan for the District. There could be considerable risk in not proceeding with the Gypsy and Traveller Plan as there would be more likelihood of applications for Gypsy and Traveller sites being allowed on appeal.

6 Summary

- 6.1 It is recommended that Members of the Sustainable Development PAG advise the Portfolio Holder to approve the publication of Issues and Options and Call for Sites paper on the accommodation needs of the travelling community for public consultation.

Officer Contact:	Hannah Butterfield, Senior Policy Planner, 01895 837278 hannah.butterfield@southbucks.gov.uk
Background Papers:	Accommodating the Needs of the Travelling Community in South Bucks: Consultation on Issues and Options and Call for Sites Paper

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Accommodating the needs of the Travelling Community in South Bucks

DRAFT

**South Bucks District Council
Gypsies and Travellers Plan (GTP)**

Consultation on Issues and Options and Call for Sites Paper

February 2014

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DRAFT

1. Introduction

- 1.1. South Bucks District Council is preparing a Gypsy and Traveller Plan in order to help meet its duty to provide sufficient accommodation to meet the needs of the Gypsy and Traveller population in the District. It is also a requirement of national policy to demonstrate a sufficient supply of traveller pitches to meet identified needs.
- 1.2. South Bucks, together with the three other District Councils in Buckinghamshire, undertook a Gypsy and Traveller Needs Assessment as part of its evidence base for the emerging Gypsy and Traveller Plan.
- 1.3. The study identified that there are currently 286 Gypsy and Traveller pitches across Buckinghamshire, of which 107 are located within South Bucks. The study set out that there is a future need for a further 108 pitches over the next ten years to 2023 in the county, and identified a need for 31 additional pitches to 2023 for South Bucks.
- 1.4. The Issues and Options Paper is the first stage in the preparation of the Gypsy and Traveller Plan. It sets out to provide an understanding of Gypsy and Traveller communities and the accommodation needs of Gypsy, Traveller and Travelling Showpeople to 2023. It outlines future needs and explains why the Council is required to identify land on which to provide new pitches.
- 1.5. The paper explores a series of options of how the Council could accommodate the future growth of the Gypsy and Traveller population, and seeks comments on such options.
- 1.6. It also provides an opportunity for interested parties to put forward or suggest suitable pieces of land for the Council to consider allocating as a Traveller Site.

Further Information

- 1.7. For more information on the Gypsy and Travellers Plan (GTP), please contact the Planning Policy team at ldf@southbucks.gov.uk or 01895 837200.
- 1.8. The document and supporting material can also be viewed on the Council website.

2. Background

- 2.1. The Housing Act 2004 requires local authorities to assess the accommodation needs of Gypsies and Travellers living in, or coming into, their District and prepare a strategy that addresses unmet need.
- 2.2. This paper sets out how the Council plans to meet the needs of Gypsies and Travellers in South Bucks to 2023. It sets out the number of pitches required and identifies options as to how this need can be met.

Policy Context

National Planning Policy Framework (NPPF), 2012

- 2.3. The NPPF 2012 set out the Government's planning policies for England and how these should be applied. At the heart of this framework is a presumption in favour of sustainable development, encouraging Councils positively to seek opportunities to meet the development needs of their areas.

Planning Policy for Traveller Sites (PPTS), 2012

- 2.4. The PPTS was published alongside the NPPF in 2012. It sets out the Government's approach to planning for Gypsy and Traveller and Travelling Showpeople Sites, with an overarching aim to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life whilst respecting the interests of the settled community.
- 2.5. *"To achieve this, the Government's aims in respect of traveller sites are:*
 - *that local planning authorities should make their own assessment of need for the purposes of planning*
 - *to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites*
 - *to encourage local planning authorities to plan for sites over a reasonable timescale*
 - *that plan-making and decision-taking should protect Green Belt from inappropriate development*
 - *to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites*
 - *that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective*
 - *for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies*
 - *to increase the number of traveller sites (with planning permission) in appropriate locations, to address under provision and maintain an appropriate level of supply*
 - *to reduce tensions between settled and traveller communities in plan-making and planning decisions*
 - *to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure*
 - *for local planning authorities to have due regard to the protection of local amenity and local environment."*
- 2.6. The PPTS requires local authorities to:

“...set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area...”

- 2.7. The PPTS then expects Council’s to identify a supply of sites to meet those pitch targets and keep that supply up-to-date.
- 2.8. In writing a Gypsies and Travellers Plan and evidence base, the PPTS states that local authorities should:
- a) *“pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups)*
 - b) *co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities*
 - c) *use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions”*
- PPTS plan-making
- 2.9. The PPTS sets out how Local Plans for traveller sites should be prepared. It reiterates that plans should contribute to achieving sustainable development and be in line with the NPPF, including the presumption in favour of sustainable development and the inclusion of specific policies for traveller sites.
- 2.10. Local authorities are required to set pitch targets for Gypsies and Travellers and plots for Travelling Showpeople to address the likely permanent and transit site accommodation needs, working collaboratively with neighbouring authorities; this also links into the requirement for authorities to demonstrate that they have fulfilled the Duty to Cooperate.
- 2.11. In plan-making, the PPTS sets out that, in their Local Plans, local authorities should:
- a) *“identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets*
 - b) *identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15*
 - c) *consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area, as stated above (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)*
 - d) *relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density*
 - e) *protect local amenity and environment”*
- 2.12. Criteria based policies should also be set in accordance with the PPTS, to help guide land allocations where there is an identified need. It also emphasises that all traveller sites should be sustainable economically, socially, and environmentally. Therefore, policies should:

- a) *“promote peaceful and integrated co-existence between the site and the local community*
- b) *promote, in collaboration with commissioners of health services, access to appropriate health services*
- c) *ensure that children can attend school on a regular basis*
- d) *provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment*
- e) *provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development*
- f) *avoid placing undue pressure on local infrastructure and services*
- g) *do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans*
- h) *reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.”*

- 2.13. Site suitability in rural and semi-rural locations should be assessed to ensure that the scale of sites does not dominate the nearest settled community. If a lack of affordable land is available to meet the needs of travellers in rural areas, where viable and practical, authorities should consider releasing sites solely for affordable traveller sites, using a rural exception policy in plan-making to manage such applications. This policy would enable small sites to be used for traveller accommodation in small rural communities, which would not normally be used.
- 2.14. Rural exception policies should only be used for affordable traveller sites in perpetuity by seeking to address the needs of the local community by accommodating households who are already residents or have family or employment connections, whilst ensuring rural areas continue to develop as sustainable mixed, inclusive communities.
- 2.15. Traveller sites are deemed to be inappropriate development within the Green Belt. PPTS states that Green Belt boundaries should not be altered, only in exceptional circumstances. Local authorities wishing to make an exceptional circumstance for a traveller site to be located within the Green Belt boundary should only do so through the plan making process rather than as a response to planning applications. If land is then removed from the Green Belt, it should be allocated specifically for the traveller site to safeguard against other inappropriate uses.
- 2.16. Having regard for safety and amenity, the PPTS notes that authorities should consider mixed used residential and business use sites for travellers, and if not practicable, then identify residential and business sites within close proximity to each other.

Ministerial Statements

- 2.17. Local Government Minister Brandon Lewis has released two ministerial statements in six months, which have placed emphasis on the importance of the Green Belt.
- 2.18. On 1 July 2013, the statement of **Planning and Travellers** reinforced the PPTS stating that both temporary and permanent traveller sites are inappropriate development in the Green Belt and that planning decisions should protect Green Belt land from inappropriate development. The Secretary of State made clear that the single issue of unmet demand, whether for travellers sites or for conventional housing, is unlikely to outweigh the harm to the Green Belt and other harm to constitute ‘very special circumstances’ justifying inappropriate development. The statement also placed emphasis on the desire to redress

the balance of fairness in the planning system, and put fairness back into local communities.

- 2.19. The most recent statement on **17 January 2014** on **Green Belt** reflected on the points made in the July statement and reinforced the note on inappropriate development. The Secretary of State remains concerned about the level of planning appeals with regards to Green Belt, and reiterated the importance of Green Belt protection. The other point made in this statement was that ministers are considering the case for changes to the planning definition of ‘travellers’ to reflect whether the definition should only refer to those who actually travel and have a mobile or transitory lifestyle. Consultation is planned on this issue.

Core Strategy

- 2.20. The Council’s Core Strategy was adopted in February 2011. This document contains 16 ‘Core Policies’ forming the strategic framework for future development within the District, against which planning decisions are taken. It is the Council’s intention to bring forward further detail in two additional plans to supplement the Core Strategy. One such plan is this Gypsies and Travellers Plan.
- 2.21. Core Policy 4 of the Core Strategy deals with Gypsies, Travellers and Travelling Showpeople. It commits the Council to identifying suitable additional provision for these communities over the plan period. The policy sets out a list of factors that the Council will take into account when assessing the suitability of potential new sites.

Core Policy 4: Gypsies, Travellers and Travelling Show People

The Council will identify suitable additional provision for gypsies, travellers and travelling showpeople. In the period to 2011 it will provide a minimum of 7 additional pitches, but will provide a further 4 pitches if these are not to be provided elsewhere in Buckinghamshire.

For the post 2011 period the Council will provide additional pitches in accordance with new regulations and guidance due to be published by the Government. The following factors will be taken into account in assessing the suitability of potential new sites. Sites should:

- Be located outside of the Green Belt, although where very special circumstances have been demonstrated, consideration may also be given to granting permanent planning permission on sites which already have a temporary permission, if they are suitable for permanent occupation¹
- Have good access to the highway network and not result in a level or type of traffic generation which would be inappropriate for the locality.
- Have access to local services, including health services, shops, education and other community facilities.
- Not be located in an area at high risk of flooding.
- Allow for adequate levels of privacy and residential amenity for the occupiers and local residents.
- Provide a safe environment with adequate on site facilities for parking, storage, play and water supply.
- Not result in a detrimental impact upon the local environment, including biodiversity and the landscape.
- Be compatible with surrounding land uses and not be visually intrusive.

¹ If sufficient provision cannot be secured from these sources, the Council may be forced to consider releasing one or two very small areas of land from the Green belt in order to meet the requirement.

What are Gypsies and Travellers?

2.22. For the purposes of planning policy, the Government² defines gypsies and travellers as:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus travelling together as such”

2.23. This definition covers the following common groups of travellers:

Romany Gypsies	A recognised ethnic group of nomadic people thought to have originated from the Indian subcontinent over 1500 years ago. Romany Gypsies are believed to have first moved to the UK sometime around the 16 th century.
Irish Travellers	A traditionally nomadic group of Irish origin. They have a very distinct culture to other travellers.
New Age Travellers	Nomadic people who travel between events such as festivals and fairs, often with people of similar beliefs.

2.24. It is estimated that there are currently around 300,000 Gypsies and Travellers living throughout the UK.

2.25. It is important to note that this definition does not include **Travelling Showpeople**, who are defined as a separate group organised for the purposes of holding fairs, circuses or shows.

2.26. Gypsies and Travellers are a distinct group of people with a unique history, culture and way of life.

Key Facts:

Equality and Human Rights Commission, 2009

- Both Romany Gypsies and Irish Travellers are legally recognised as ethnic groups. As such they are protected from discrimination by the Race Relations Act (1976, amended 2000) and the Human Rights Act (1998).
- Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average.
- Gypsy and Traveller mothers are 20 times more likely than the rest of the population to have experienced the death of a child.
- In 2003, less than a quarter of Gypsy and Traveller children obtained five GCSEs and A*- C grades, compared to a national average of over half.

Department for Education, 2012

- There is a strong link between deprivation and underachievement of Gypsies and Travellers. In primary schools, 43% of all registered pupils as Gypsy, Roma or Irish Travellers are eligible for free school meals; this figure rise to 45% in secondary schools and 57% in special schools.

² Planning Policy for Traveller Sites. CLG, March 2012

Profiles of Prejudice, Mori and Stonewall, 2003

- Almost two thirds of people in England (64%) can name at least one minority group towards whom they feel less positive - representing 25 million adults across the country. The most frequently cited are gypsies and travellers (35%).

Why identify additional need?

2.27. It is a requirement of national policy for local authorities to demonstrate a sufficient supply of traveller pitches to meet identified needs. There are also a number of social and economic benefits of bringing forward new pitches in a formal way. The Equality and Human Rights Commission³ has outlined some of the benefits of providing new pitches; these are set out below.

“The economic benefits

- *Currently, local authorities spend around £18 million a year of council tax payers’ money evicting Gypsies and Travellers from unauthorised sites. Evidence suggests these costs could be significantly reduced if councils invested in providing an authorised alternative. Since Bristol City Council created two authorised sites, it has seen its costs for enforcement drop from £200,000 in the mid-90s to a current yearly average of £5,000.*
- *Once Gypsies and Travellers are in authorised sites, significant returns can also be collected in rent, council tax and utility bills.*

The social benefits

- *Community tensions often arise when sites are developed without planning permission. Experience shows that well-run, authorised sites, like those in Fenlands, can be effectively integrated into local communities.*
- *Unauthorised sites are often located in unsafe or unsuitable places, such as close to motorways or rubbish dumps, and lack basic toilet and waste disposal facilities. As well as being a health hazard for those who live there, such sites cause environmental damage and create an eyesore for neighbours.”*

2.28. From time to time Gypsies and Travellers stop illegally in South Bucks on land they do not own, often because they have nowhere else to go. The Council has a good record of dealing effectively with these unauthorised traveller encampments.

2.29. The Council is required to demonstrate that it has a supply of specific deliverable sites sufficient to provide five years’ worth of sites against locally set targets. If this cannot be demonstrated, this would be a factor when assessing future planning applications on unauthorised Traveller Sites.

2.30. It is therefore imperative that the Council searches and seeks to identify suitable sites for Gypsies and Travellers to avoid unauthorised encampments across the District or permissions being granted by appeal.

Pitch Types and Size

Permanent pitches

2.31. Pitches are defined as permanent once they have full planning permission. As a general guide, one pitch normally accommodates a single household.

³ Equality and Human Rights Commission, 2009.

- 2.32. Each pitch would have sufficient space for one large trailer and one touring caravan together with an amenity block and parking for two vehicles. In some cases pitches may also contain a small garden area and/or paddock for keeping animals including horses. It is generally accepted that to accommodate all of the above, a pitch needs to be around 500sqm.

Transit pitches

- 2.33. Transit pitches are permanent pitches that can be used temporarily by a gypsy or traveller household as accommodation for a limited period of time. In some areas, transit pitches may be needed as some Gypsies and Travellers still travel throughout the year to visit relatives or attend fairs. Length of stay can vary, but they are not intended to be a permanent base for a traveller household.
- 2.34. Transit sites should have similar amenities to permanent sites i.e. they should be supplied with water, gas, electricity and have adequate sewerage and drainage.

Temporary stopping places

- 2.35. Temporary stopping places accommodate Gypsies and Travellers on a very short term basis. They can be used by any member of the travelling community for no more than 28 days, without planning permission.
- 2.36. Where a Council is seeking to evict unauthorised encampments or developments, temporary stopping places are often used as somewhere acceptable for the travelling household to stop and enable them to find somewhere more suitable to live.

Site size

- 2.37. Government guidance⁴ recommends that a maximum of 15 pitches per site is conducive to providing a comfortable environment which is easy to manage. However, the size of sites will depend on the constraints of a particular site and the circumstances of individual families and their local Gypsy and Traveller community.

⁴ Designing Gypsy and Traveller Sites: Good Practice Guide. CLG, 2008

3. Gypsies and Travellers Needs Assessment

- 3.1. In line with national requirements, South Bucks District Council, together with the three other District Councils within Buckinghamshire⁵ commissioned consultants to undertake a Gypsy and Traveller Needs Assessment (GTNA) as part of its evidence base for its emerging Gypsy and Traveller Plan to effectively assess Gypsy and Traveller needs on a wider scale.
- 3.2. The main objective of the study was to provide each Council with robust, defensible and up to date evidence about the existing and future accommodation needs of Gypsies, Travellers and Travelling Showpeople in the period from 2013 to 2023.
- 3.3. In accordance with national guidance, the calculation of need comprised 3 elements:
 - supply of pitches
 - current need
 - future need
- 3.4. Household surveys were undertaken with a large sample (over 65%) of households in the local traveller population. This also included a small number of households currently living within bricks and mortar accommodation. The surveys asked respondents questions about their current accommodation, family circumstances and travelling habits to estimate their genuine need for additional pitches over the next 10 years.
- 3.5. A number of interviews were also undertaken with key stakeholders such as housing associations, advocacy groups, NHS Buckinghamshire, Council officers and representatives of neighbouring District and County local authorities.
- 3.6. It was also important to ensure the interests of the Traveller population were balanced against those of the wider settled community and therefore interviews were undertaken with elected District members, and questionnaires were sent to Parish Councils and local Residents Associations. Unfortunately, only 49 responses were received, therefore only a summary of comments could be gathered. It was noted that a significant number of respondents said they had little/no interaction with Gypsies and Travellers and/or had no problems with them. However the consultants were wary of the validity of some comments as opinions and experiences of some communities can sometimes be presented in a bias manner.

Existing Accommodation in South Bucks

Gypsy and Traveller Sites

- 3.7. The GTNA identified that there are currently 286 Gypsy and Traveller pitches across Bucks.
- 3.8. In South Bucks, there are estimated to be 107 pitches existing across the District, of which 98 have the benefit of permanent permissions. This represents the largest number of pitches in the Bucks study area.

⁵ Aylesbury Vale District Council, Chiltern District Council, Wycombe District Council along with South Bucks District Council

Number of Gypsy and Traveller pitches by Local Authority

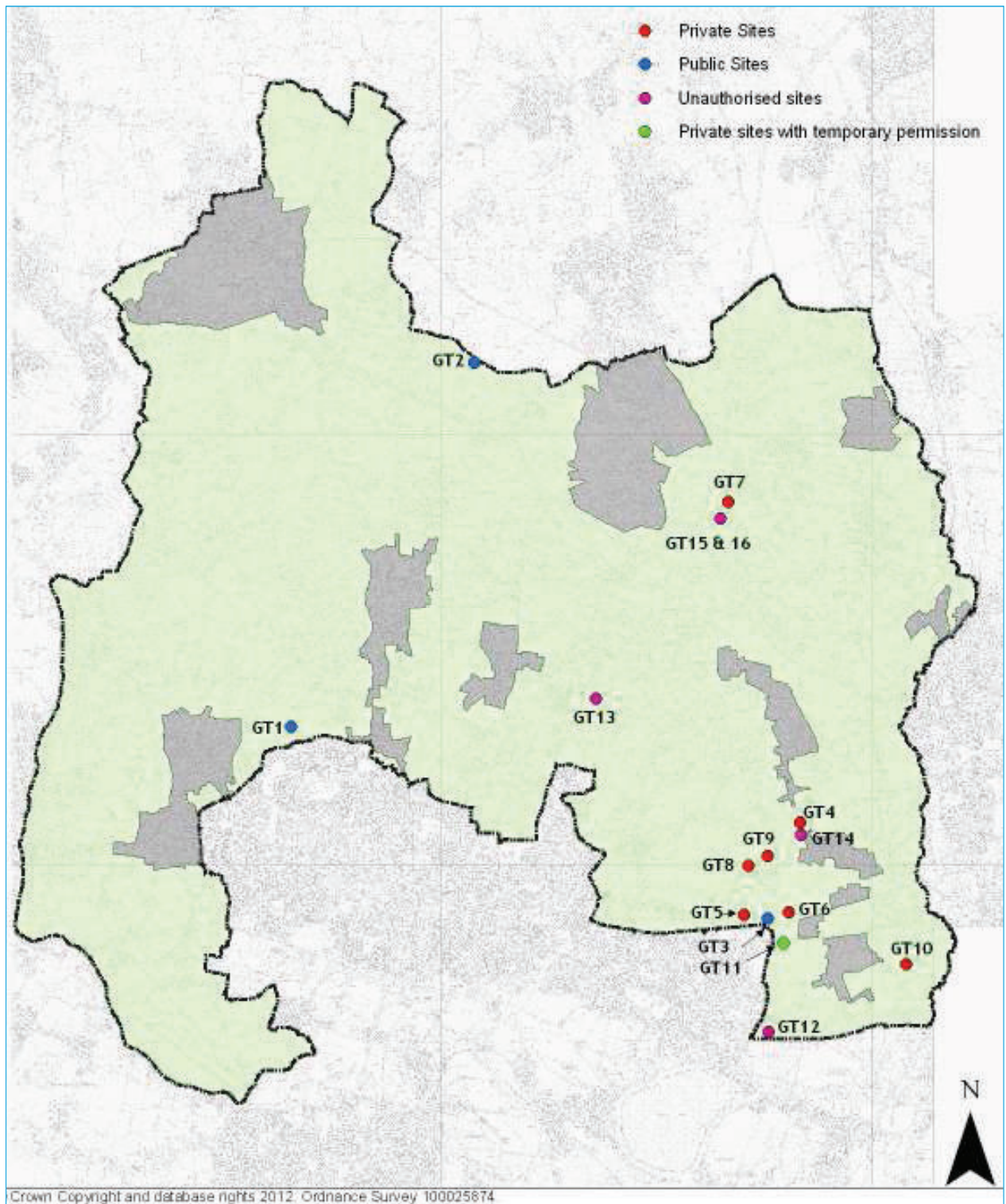
Local Authority	Permanent permission and developed	Temporary permission	Unauthorised	Total
Aylesbury Vale	62	21	17	100
Chiltern	21*	2	1	24
South Bucks	98	2	7	107
Wycombe	46	3	6	55
Total	227	28	31	286

*includes 2 long term unauthorised pitches which are now immune from enforcement

- 3.9. At the time that the GTNA was completed, 107 pitches existed in the following locations as set out below:

South Bucks District Council	Site Refs	Site	Number of pitches
Local Authority Sites (owned by Bucks CC and managed by Bucks/Oxon Gypsy and Traveller Service)	GT1	Bottom Waltons Caravan Site, Burnham	10
	GT2	Wapseys Wood caravan Site, Gerrards Cross	17
	GT3	Mansion Lane Caravan Site, Iver	35
	Total		
Private Sites with Permanent Permission	GT4	Willow Tree Farm, Iver	1
	GT5	Dudley Wharf, Iver	20
	GT6	Dudley Lodge, Iver	4
	GT7	Wickford Farm, Denham	7
	GT8	Garry Owen, Iver	1
	GT9	Renard, Iver	1
	GT10	Thorney Mill Road, Iver	2
Total			36
Private Sites with Temporary Permission	GT11	Land South of Mansion Lane, Iver	2
Total			2
Unauthorised Developments	GT12	Little Sutton Lane, Iver	1
	GT13	The Warren, Wexham	2
	GT14	Ponderosa, Iver	1
	GT15	Land r/o Alderbourne Cottage B (Area 1), Fulmer	2
	GT16	Land r/o Alderbourne Cottage (Area 2), Fulmer	1
	Total		
Total Pitches			107

Figure 1: Map showing Gypsy and Traveller sites in South Bucks



Travelling Showpeople

3.10. The GTNA also identified the need for Travelling Showpeople and looked at the existing provision across the county. This highlighted that although there are 30 plots across the county, there are no known yards containing Travelling Showpeople plots within South Bucks.

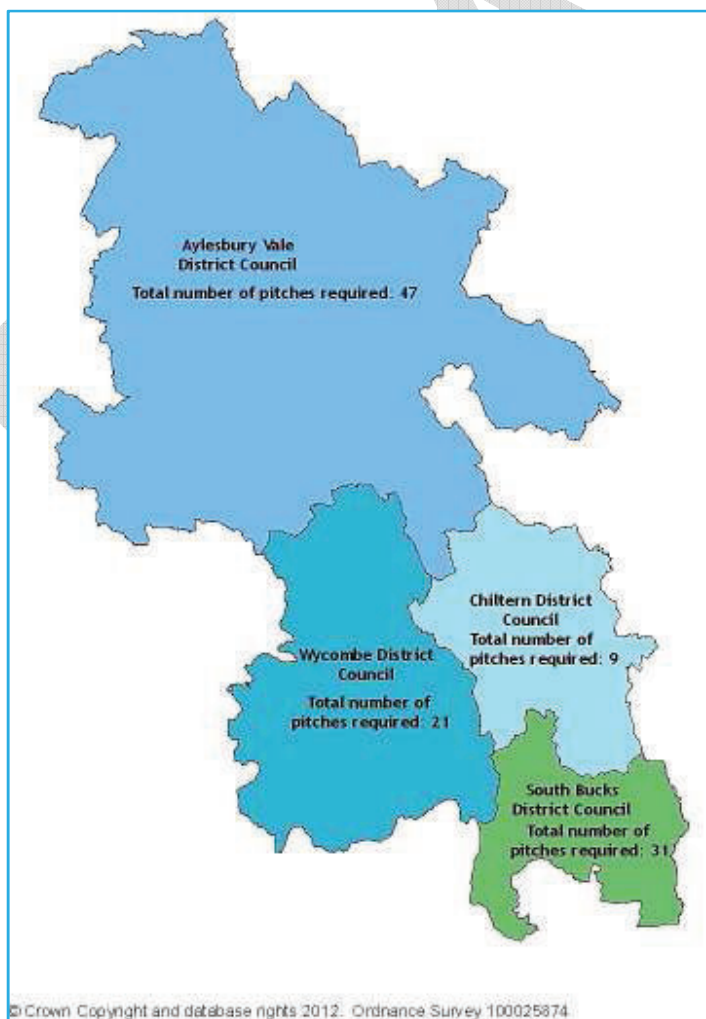
Future Need

3.11. The GTNA has identified a need for extra pitch provision for the four local authorities surveyed of an additional 108 pitches over the next 10 years between 2013 and 2023. This need includes existing households on unauthorised sites, those on waiting lists for a public site, those currently seeking to develop private sites and growth in household numbers due to new household formation on the basis of the GTNA. **The GTNA has identified a requirement for 31 additional pitches from 2013 to 2023 to meet needs in South Bucks.**

Extra pitch provision by local authority according to the GTNA

Local Authority	2013-2018	2018-2023	Total
Aylesbury Vale	33	14	47
Chiltern	5	4	9
South Bucks	18	13	31
Wycombe	13	8	21
Total	69	39	108

Figure 2: Map of Buckinghamshire Districts showing future pitch provision



Duty to Co-operate

- 3.12. In line with the Localism Act 2011, the Duty to Co-operate was introduced. This places a legal duty on local authorities and public bodies in England to engage, constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to cross boundary matters.
- 3.13. In relation to the Gypsies and Travellers Plan, it is useful to gain an understanding of the statistics for each of our neighbouring authorities to gauge whether recognised need can be met and if not, whether it can be shared or distributed across boundaries. The table below sets out the position of each authority in relation to Gypsies and Travellers need within their District or Borough.

Local Authority	Evidence Base	Identified Need	Commentary
Wycombe	Bucks GTNA, 2013	21 pitches for Gypsies and Travellers (13 to 2018 and 8 to 2023) 1 plot for Travelling Showpeople to 2023	<p>Since the GTNA study has been carried out, 5 pitches have been granted planning permission, meaning that the remaining requirement for traveller pitches in the District is 16, (8 to 2018 and a further 8 to 2023).</p> <p>Two approaches for meeting the future need are set out in the New Local Plan which is being consulted upon at present:</p> <ul style="list-style-type: none"> Option 1: Shorter term target - aim to meet the Bucks GTNA need of 21 pitches for Gypsies and Travellers and 1 plot for Travelling Showpeople between 2013 and 2023. A target will be set based on the GTNA, however may increase. A future Local Plan document will set a target for additional accommodation beyond 2023 to 2031. Option 2: Longer term target - To extrapolate the requirement beyond 2023 in this Local Plan. No target for new transit sites or emergency stopping places would be set. However, applications for such sites could be assessed through a criteria-based policy for traveller sites.
Chiltern	Bucks GTNA, 2013	9 pitches for Gypsies and Travellers (5 to 2018 and 4 to 2023) 4 plots for Travelling Showpeople to 2023	<p>Chiltern plan to consult on its Draft Delivery Development Plan Document from mid-February. This document includes Gypsies, Travellers and Travelling Showpeople within it.</p> <p>Sites have been identified within the Green Belt to meet the need set out in the Bucks GTNA. However these are proposed only to be considered where very special circumstances can be demonstrated due to their location in the Green Belt. Therefore, Chiltern are taking a Plan-Monitor-Manage approach, which would be to give priority to non-Green Belt sites, and to protect their proposal</p>

Local Authority	Evidence Base	Identified Need	Commentary
Three Rivers	Dacorum and Three Rivers Travellers Needs Assessment, 2012 and Three Rivers Traveller Needs Assessment 2013 Update	7 pitches for Gypsies and Travellers (5 pitches to 2018 and 2 to 2023) No plots required for Travelling Showpeople	sites from inappropriate development in the Green Belt. Therefore, Chiltern is looking to neighbouring authorities, including South Bucks to share its need. Three Rivers is currently out for consultation on its Draft Gypsy, Traveller and Travelling Showpeople Local Development Document. The Council has identified two sites which it believes will be suitable, available and achievable to deliver the future need of 7 pitches within the District. The sites offer an immediate opportunity to meet the identified current and future needs of the travelling community to 2023.
Hillingdon	An in-house Gypsies and Travellers Needs Assessment is being prepared at present as part of the evidence base for Part 2 of the Local Plan.	No figures identified to date	The London Borough of Hillingdon adopted their Part 1 Local Plan, A Vision for 2026 - Strategic Policies in 2012. This includes a policy on Gypsy and Traveller Pitch Provision, which states that the existing Colne Park site will be protected for its current use. The policy considers need and states that targets for additional pitch provision should take account of need and availability of suitable sites. The policy also includes some site selection criteria to ensure proposals for sites take account of the specific needs of Travellers, Gypsies, Roma, Sinti and Travelling Showpeople. Hillingdon mention in their Part 1 Local Plan that they will seek to meet the need of travellers and identify deliverable sites by working collaboratively with local authorities, as stated in Planning Policy for Traveller Sites. Part 2 - Site Specific Allocations Local Development Document will include this information and will balance the requirement for additional pitch provision with the availability of suitable sites. Hillingdon note that specific consideration will be given to the needs information and pitch provision targets associated with the production of the London Plan.
Slough	Berkshire Unitary Authorities Proposed	6 new pitches for Gypsies and Travellers by 2016	Slough have both a Core Strategy (2006-2026) and a Site Allocations Development Plan Document, 2008 adopted.

Local Authority	Evidence Base	Identified Need	Commentary
	Gypsy Site Distribution, 2007		<p>The Core Strategy sets out that given the dense and compact nature the borough and the shortage of land for other purposes, it is not considered appropriate or practical to seek to provide a site within the urban area. As a result, Slough note that if there is a proven need for a Gypsy or Traveller site it would have to be provided in the Green Belt.</p> <p>The Site Allocations DPD recognised a need for additional Traveller and Gypsy sites in Slough, although the exact numbers are not determined through the DPD. Core Policy 4 (Type of Housing) sets out the criteria for identifying Gypsy or Traveller sites and the Core Strategy explains that a new site is likely to be in the Colnbrook or Poyle area. A specific site in Poyle has now been identified, but it is not considered appropriate to include it as a Site Specific Allocation because land ownership and flooding issues need to be resolved.</p>
Windsor and Maidenhead	Windsor and Maidenhead Gypsy and Traveller Accommodation Needs Assessment, 2013	<p>20 pitches for Gypsies and Travellers</p> <p>4 plots for Travelling Showpeople in Berkshire</p>	<p>RB Windsor and Maidenhead is currently out for consultation on its Borough Local Plan Preferred Options Consultation. Gypsies and Travellers are covered in this document under Preferred Policy Option HOU6.</p> <p>Work undertaken to assess the likely accommodation needs suggest a need for 20 additional Gypsy and Traveller pitches within the Borough in the period to 2027, and an addition 4 Travelling Showpeople plots across Berkshire in the period to 2017. At present, there is insufficient information available to assess whether there is a need for a transit sites or emergency stopping place within the Borough.</p> <p>The preferred policy approach is to ensure provision for the delivery of 20 net additional permanent Gypsy and Traveller pitches in the following broad phases:</p> <ul style="list-style-type: none"> • April 2012 - March 2017: 7 pitches • April 2017 - March 2022: 7 pitches • March 2022 - April 2027: 6 pitches <p>No sites have been identified to date in Windsor and Maidenhead.</p>

Meeting Future Need

- 3.14. The GTNA set out that South Bucks should be seeking to meet the need of 31 additional pitches for Gypsies and Travellers in the period 2013 to 2023. The Council could look to provide these additional pitches in a number of ways, which are:
- Extending existing sites where possible and appropriate
 - Allocating existing sites with temporary permission to make them permanent
 - Allocating new sites
 - Establishing whether neighbouring boroughs/districts would be able to meet some of the needs arising in South Bucks
- 3.15. Each of the options listed above will be explored for their possibility of providing for the identified need as set out in the GTNA. It is likely however that multiple options will be required to meet the need for 31 pitches.
- 3.16. In light of national planning policy and the ministerial statements placing emphasis on the protection of the Green Belt, the likelihood of site extensions and converting temporary permissions to permanent allocations may not be acceptable due to locations on established Green Belt land. All non-Green Belt land will be assessed for the potential to be allocated as a new Gypsy and Traveller site. However, due to policy reiterating that Traveller Sites (temporary or permanent) in the Green Belt are inappropriate development, and the District having 87% of its land covered by Green Belt designation, it is unlikely that the Council will be able to meet the recognised need of 31 pitches to 2023. Therefore, South Bucks may have to rely on neighbouring authorities to help meet the need identified within the District.
- 3.17. Assessing the existing stock of sites within the District is necessary. These sites should be assessed for their suitability and deliverability to remain as a Gypsy and Traveller site, and if so, their current use could be safeguarded so that the existing needs could continue to be met in perpetuity. Again, the issue of Green Belt land will have to be considered.

Site Selection

- 3.18. Each site or pitch identified through the options presented below will be required to be assessed for their suitability as a Gypsy and Traveller site. A set of criteria has been developed for this suitability testing; this can be seen in Appendix 1.
- 3.19. Each criterion has a different weighting, according to the importance of each issue. The location of a site is key to supporting good community relations and maximising the success of a site. The location of sites, as for all forms of housing, is imperative, including having access to major road networks or public transport services. Communications are imperative to:
- Seeking and retaining employment
 - Attending school, further education or training; and
 - Obtaining access to health services and shopping facilities.
- 3.20. Planning designations, for example Green Belt and flood risk are also listed in the table, alongside site size, access, and surrounding environmental issues.

Safeguarding existing sites

- 3.21. Safeguarding sites within the District would mean that existing sites could be protected from conversion to alternative uses in the future. If the use of existing sites were to change, this would increase the need for new pitches and sites elsewhere in the District, meaning that new locations would have to be found by the Council. It would be logical for the Council to safeguard authorised sites, as listed in the GTNA, as this would enable the District to maintain its current supply of pitches, in accordance with national policy requirements.

Q1

Should the Council use the Gypsies and Travellers Plan to safeguard authorised permanent Traveller sites in the District?

Extending existing authorised sites

- 3.22. Many of the existing Gypsy and Traveller sites within the District are settled and established within the community. Extending these sites would allow for households to expand and accommodate new families where possible. This would also minimise the need for new additional sites elsewhere in the District.
- 3.23. The problem is however that all of the existing authorised sites in South Bucks are located within the Metropolitan Green Belt and therefore any extension would have some impact on the openness of the established Green Belt, and could be deemed inappropriate in policy terms.
- 3.24. There are also sites within the District that are larger than the recommended site size of 15 pitches; therefore the expansion of such sites may be inappropriate in some cases. Each site would need to be appraised for its sustainability and suitability to remain as an existing site. Studies of sites and surrounding areas have not been undertaken to date.

Q2

Should the Council consider meeting some of its need by extending existing sites, where possible and appropriate? If so, which sites would be suitable for extension?

Sites with temporary permission

- 3.25. Core Policy 4 of the Core Strategy states that the Council will consider granting permanent planning permission on sites which already have a temporary permission, if they are suitable for permanent occupation.
- 3.26. The District currently has two sites with temporary planning permission and one which has an expired permission, which is the subject of a planning application.

Land south of Mansion Lane, Iver

- 3.27. There are two sites at Mansion Lane; one is owned by the County Council, and the other is the land to the south of the county site. The land south includes two pitches, which have temporary permission; this expires in spring 2014. Both pitches have permission for two caravans with associated outbuildings and hard-surfacing.

Ponderosa, Love Lane, Iver

- 3.28. There is one pitch here comprising one mobile home, one touring caravan, one mobile stable and the use of two existing buildings as ancillary accommodation. Temporary permission on this site was granted for four years and expires in 2017.

The Warren, Rowley Lane, Wexham

- 3.29. There are two pitches here, incorporating two caravans, two mobile homes and two stable buildings used as day rooms. Temporary permission expired on this site in 2011; however there is an application in with the Council at present which remains undetermined. The family living here have occupied this site since 1975.
- 3.30. There could be advantages to turning sites with temporary planning permission into permanent sites as they are often already established within the community and can aid the contribution towards the need for future pitches across the District.
- 3.31. However, by their nature, temporary sites are not always located in the most sustainable of locations, nor may they be suitable for the long term residency of communities. Sites with temporary planning permission may also be subject to constraints, for example being located within the Green Belt or have poor means of access to the public highway.

Q3

Should the Council seek to allocate non Green Belt sites with a temporary permission (as listed above) as permanent authorised sites? If so, which sites do you recommend?

Allocate new sites

- 3.32. An option for meeting the need of Gypsies and Travellers is to allocate new sites within the District. Sites can be found in a number of ways; however, in South Bucks there are multiple land uses and restrictions, including Green Belt as the major issue, restricting development on 87% of the District Council's land area. The starting point therefore is to assess all land which is excluded from the Green Belt (see map in Appendix 2).
- 3.33. Sites can be found in a number of ways including assessing land identified as potentially available for housing; this is work taken from the Strategic Housing Land Availability Assessment (SHLAA). See Appendix 3 for more detail.
- 3.34. As well as potential housing sites, the Council must also look at the potential for sites in other locations including, land surrounding industrial estates, offices, commercial developments, edges of urban areas, and then ultimately Green Belt. It is also necessary to liaise with neighbouring authorities to assess the possibility of sharing need where it cannot be met within the District.
- 3.35. Land in public ownership could be assessed for the possibility of becoming a Gypsy and Traveller site.

Q4

Should the Council consider allocating new sites to accommodate future need for Gypsies and Travellers? If so, where?

- 3.36. In the event that locations cannot be found for allocation as Gypsy and Travellers sites from the SHLAA work and other land assessments, the Council must look to identify sites in other ways.
- 3.37. The Council is asking for suggestions about land which may be considered suitable as a Gypsy and Traveller site. Each site submitted would be tested for its suitability against the site selection criteria set out in the appendices.

Q5

Do you own or know of any pieces of land that may be suitable for use as a Gypsy or Traveller site? If so, please submit site information as part of your consultation response.

Allocations within the Green Belt

- 3.38. Gypsy and Traveller sites are not deemed to be an acceptable use within the Green Belt (in line with PPTS). Therefore allocating new sites in such locations would be regarded as a last resort, as it would be contrary to national policy.
- 3.39. It is imperative that all potential land in the District is assessed for its possibility of accommodating Gypsies and Travellers pitches prior to considering Green Belt land. Encroachment on Green Belt to meet the need for pitches would be considered only when all other land availability options have been explored; at which point, the Council would have to consider whether the de-designation of Green Belt would be appropriate in such exceptional circumstances. Previously developed land within the Green Belt (brownfield land) would be likely to be a better option than undeveloped land.

Q6

Where the need cannot be met through any other means, should the Council consider allocating new sites to accommodate the future need for Gypsies and Travellers on designated Green Belt land?

Future Policies

- 3.40. Gypsy and Traveller pitches could be identified in another way, other than safeguarding, extending or allocating sites. There is a possibility that sites could be submitted to the Council for approval through the planning application process, which would require determination by planning officers against a set of adopted planning policies.
- 3.41. These policies would aid the assessment of sites for their suitability of being a temporary or permanent Gypsy and Traveller site.
- 3.42. Policies would be structured in a way to reflect national legislation and guidance, and also include a list of factors in which to comprehensively assess sites. These could cover similar principles to those listed in site selection criteria in Appendix 1.
- 3.43. It will therefore be necessary for the Council to develop planning policies by which applications can be considered against.

Q7

Do you agree that the Council should develop policies to assess planning applications for additional Gypsy and Travellers sites?

Transit sites and Temporary Stopping Places

- 3.44. The GTNA identified that there are no existing operational transit sites or emergency stopping places in the Buckinghamshire study area. It noted that, through research, all households interviewed said they were generally seeking permanent accommodation as opposed to travelling through or visiting the study area. The study also suggested that there was little evidence to suggest that there are currently any regular and established travelling routes through Buckinghamshire.
- 3.45. In conclusion, the GTNA study suggested that there was no current need for transit sites and stopping places throughout the whole of Buckinghamshire. However, it emphasised that authorities should monitor the situation over time and adapt accordingly should circumstances change. The authority will have to consider whether the evidence from the GTNA is sufficient to accept that no sites should be provided.
- 3.46. At this time, the Council is not contemplating providing any transit or temporary stopping places for Gypsies and Travellers. However, it will monitor the situation throughout the plan period.

Q8

Do you agree with the GTNA conclusions that no transit sites or temporary stopping places are required for Gypsies and Travellers within the District?

Travelling Showpeople

- 3.47. Evidence already presented demonstrates that there is currently no future need for Travelling Showpeople plots within South Bucks to 2023.
- 3.48. Although there is no immediate or future need identified in the District, it is important to recognise that this may change. Therefore, the Council is currently intending not to seek to provide any plots for Travelling Showpeople through this plan, but it will adapt and plan accordingly should the situation change and the need arise during the plan period.

Q9

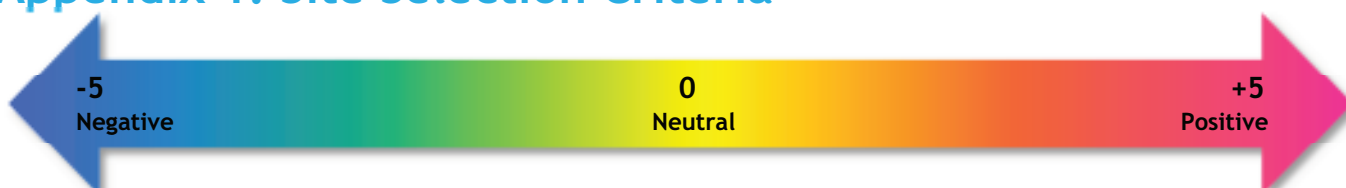
Do you agree with the GTNA conclusions that no plots for Travelling Showpeople are required in the District?

4. What Next

Stage	Indicative Date
Scoping and evidence gathering Undertake need assessment and scope Sustainability Appraisal	May 2013 - January 2014
Issues and Options / Call for sites Consultation paper setting out options to meet identified need, including Call for Sites consultation	Current stage
Publication of Draft Plan This will formally identify the sites that the Council feels are suitable for use as Gypsy and Traveller sites and invite comments on the chosen ones.	Autumn 2014
Submission to Secretary of State At this stage the Plan will be formally submitted to the Government along with all the comments received. An independent Inspector will then be appointed to examine the document.	February 2015
Examination in Public Formal examination of the Plan by the Government appointed inspector	June/July 2015
Adoption	December 2015

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Appendix 1: Site Selection Criteria



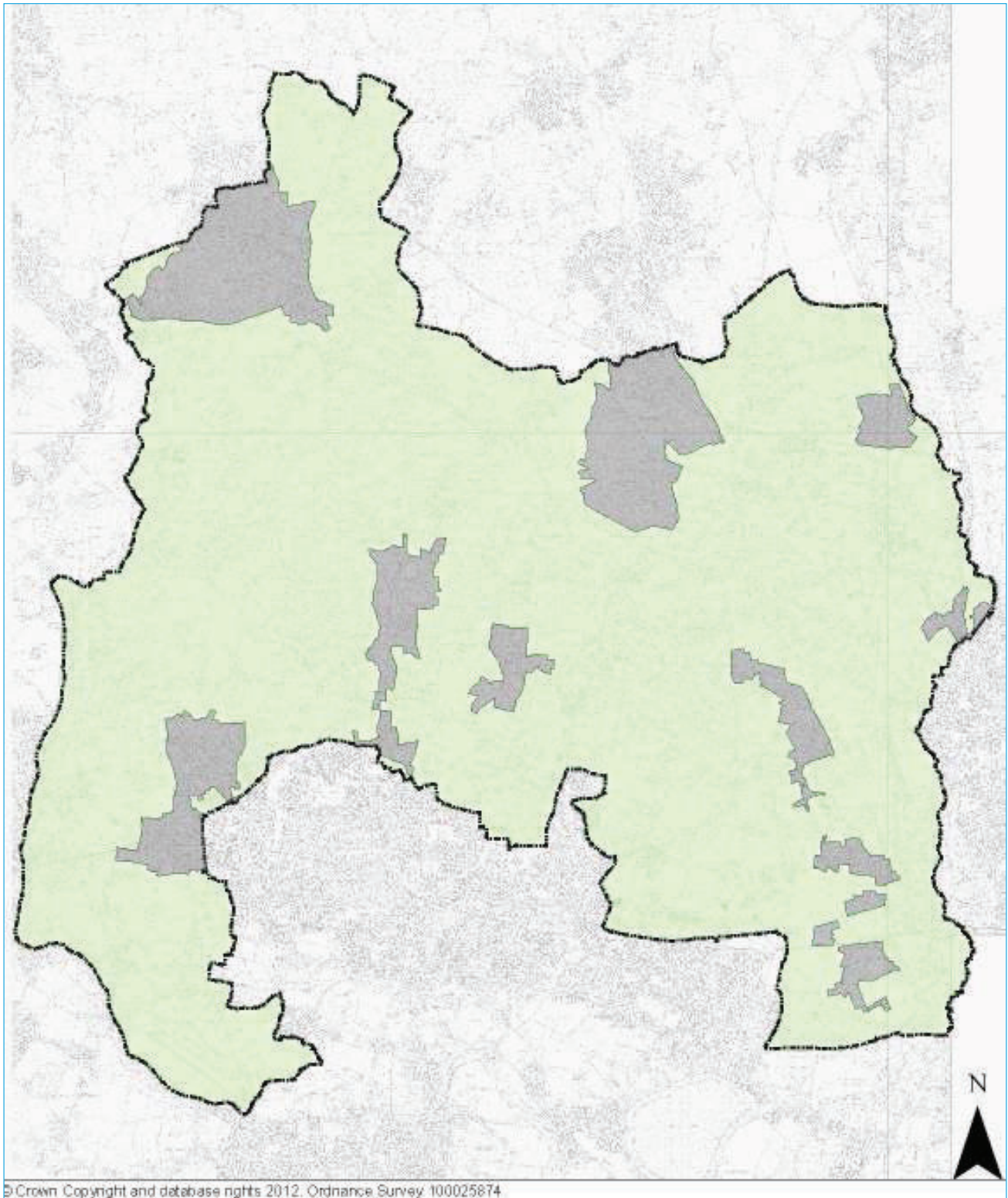
Issue	Criteria	Weighting
Location	<ul style="list-style-type: none"> Is the site within or in close proximity to an existing settlement boundary? 	+5
Green Belt	<ul style="list-style-type: none"> Is the site located within the Metropolitan Green Belt? 	-5
	<ul style="list-style-type: none"> Is development of the site for Gypsies and Travellers likely to cause significant harm to the openness of the Green Belt? 	-4
Brownfield	<ul style="list-style-type: none"> Would the site make efficient use of previously developed (brownfield) land? 	+3
Size	<ul style="list-style-type: none"> Is the size large enough to accommodate the required facilities for at least 1 pitch (i.e. amenity building, large trailer, touring caravan, 2 parking spaces and amenity/garden area)? 	+5
Access	<ul style="list-style-type: none"> Does the site have (or is it capable of having) a safe access onto the highway network? 	+4
	<ul style="list-style-type: none"> Would development of the site generate a level or type of traffic that is inappropriate for the locality? 	-4
	<ul style="list-style-type: none"> Is there reasonable access to public transport services? 	+3
Local services	<ul style="list-style-type: none"> Does the site have access to appropriate health services? 	+5
	<ul style="list-style-type: none"> Does the site have access to local schools? 	+5
	<ul style="list-style-type: none"> Does the site have access to either a District or Local Centre? 	+5
Flood Risk	<ul style="list-style-type: none"> Is the site located within flood zone 2, 3a or 3b? 	-5
	<ul style="list-style-type: none"> Does the site lie within a Critical Drainage Area? 	-4
Privacy / Amenity	<ul style="list-style-type: none"> Is there amenity space for future residents? 	+4
	<ul style="list-style-type: none"> Will the site offer sufficient privacy for future residents? 	+3
	<ul style="list-style-type: none"> Is development likely to compromise the amenity and privacy of the nearby residential properties? 	-4
	<ul style="list-style-type: none"> If a mixed use site were proposed (Gypsies and Travellers accommodation and associated business activities), would nearby residential properties be detrimentally affected? 	-4
Safety	<ul style="list-style-type: none"> Is the site on contaminated land which cannot be remediated? 	-5
	<ul style="list-style-type: none"> Is the site in close proximity to a potential hazard? (e.g. heavy industry, motorway, railway line, electricity lines) 	-5
Local environment	<ul style="list-style-type: none"> Is the site in or in close proximity to a national or local wildlife designation? 	-4
Visual impact	<ul style="list-style-type: none"> Can the site be easily screened to reduce impact on surrounding areas? 	+2
Historic environment	<ul style="list-style-type: none"> Is the site within a designated conservation area? 	-2
	<ul style="list-style-type: none"> Would development adversely affect the setting of a heritage asset (such as a listed building or scheduled ancient monument)? 	-3

Q10

- Do you agree with the site selection criteria?
- Do you agree with the weighting given?
- If not, how could the methodology be improved?

Appendix 2: Map of Green Belt land in South Bucks

Figure 3: Map showing the extent of the Green Belt in South Bucks



Appendix 3: SHLAA sites

Strategic Housing Land Availability Assessment (SHLAA)

When looking for land for housing, the Council produces a document called a Strategic Housing Land Availability Assessment (SHLAA). This study aims to identify potential sites to accommodate future housing development and assesses whether there are likely to be suitable, in principle, for residential development. The SHLAA is a good indicator of the land currently available within the District.

The Council has calculated that there are 51 sites identified in the SHLAA that remain undeveloped. However, all are situated within built-up residential areas and the vast majority would either involve the demolition and redevelopment of an existing house and/or development of a back garden.

Further, in South Bucks it is unlikely that these sites could be considered to be 'deliverable' for Gypsy and Traveller purposes. In simple terms, land which has the potential for housing is expensive. It would be too costly for either the Council or another body to purchase such land (to provide a public site) or for the Gypsy and Traveller community to purchase (to provide a private site). When developing land for housing, it is possible for a developer to afford the land, as, once redeveloped with new housing they would most likely see an up-lift in value. However, this up-lift does not exist for Gypsy and Traveller sites.

All undeveloped SHLAA sites are listed below.

Small SHLAA Sites (included in years 6 - 15 in the Housing Trajectory)

SHLAA ID	Site Address	Settlement	Existing Use	Site Size (ha)	Net Developable Area (ha)	Access
BEA02	39 Walkwood Rise and 6 Walkwood End	Beaconsfield	Residential and back gardens	0.37	0.26	Use existing access
BEA05	Land rear of 1-3 One Tree Lane	Beaconsfield	Back Gardens	0.35	0.25	Using existing access from One Tree Lane
BEA10	3 North Drive	Beaconsfield	Existing dwelling and back garden	0.1	0.1	From North Drive or Cherry Tree Lane
BEA18	53a & 55 Candlemas Lane	Beaconsfield	Royal British Legion Club and Dwelling with garden	0.28	0.28	Existing access from Candlemas Lane
BEA29	Rear of Cherry Tree Road and Rowan Close	Beaconsfield	Underused garages	0.13	0.13	Access from Rowan Close will require upgrading
BUR06	20 & 21 Barrs Road	Burnham	Existing dwellings and gardens	0.15	0.15	Existing access from Barr Road
BUR07	The Orchards, Lent Green	Burnham	Existing dwelling with garden	0.2	0.16	Existing access from Lent Green

SHLAA ID	Site Address	Settlement	Existing Use	Site Size (ha)	Net Developable Area (ha)	Access
BUR08	234 & 236 Windsor Lane	Burnham	Existing dwelling with garden	0.2	0.16	Existing access from Windsor Lane
BUR10	19 & 19a Green Lane	Burnham	Existing dwellings with gardens	0.3	0.24	Existing access from Green Lane
BUR11	34 Pink Lane	Burnham	Existing dwelling in gardens	0.23	0.18	Existing access from Pink Lane
BUR15	Garages behind 20 Grenville Close	Burnham	Underused garages	0.13	0.13	From Grenville Close
DEN01	Garages rear of St Mary's Road	Denham	Garages	0.14	0.14	Existing access from St Mary's Road
DEN14	Denham House, Village Road	Denham	Existing dwelling and garden	0.39	0.31	Existing access from Village Road
DEN15	The Homestead, Redroof, Hill Crest and Woodside at Old Amersham Road	Denham	Existing dwellings with gardens	0.27	0.27	Existing access from A40 and Old Amersham Road
DEN16	The Gardens, Pinstone Way	Denham	Residential	0.16	0.16	Existing access from A40 and Pinstone Way
FAR02	Alderly Cottage, Collinswood Road & Two chimneys, Christmas Lane	Farnham Royal and Farnham Common	Existing dwellings with gardens	0.32	0.32	From Christmas Lane
FAR05	Fold Cottage & Linden Lea, Victoria Road	Farnham Royal and Farnham Common	Existing dwellings with gardens	0.2	0.2	Victoria Road or Beaconsfield if garage site is redeveloped.
FAR06	Idlewood and Ty Gwyn, Beaconsfield Road	Farnham Royal and Farnham Common	Existing dwellings with back gardens	0.25	0.2	Existing access from Beaconsfield Road
FAR07	12 Scotlands Drive and land rear of the Small House, Hawthorn Lane	Farnham Royal and Farnham Common	Existing dwelling with back garden	0.3	0.24	Existing access from Scotlands Drive
FAR09	Stony Stack and The Larches, Blackpond Lane	Farnham Royal and Farnham Common	Existing dwellings with back garden	0.35	0.28	Existing access from Hawthorn Lane
GEO01	Land at Elizabeth Cottage, George Green Road	George Green	Existing dwelling with garden	0.15	0.12	Extension of access through Thorn Drive
GEO02	Sunnybrook & Kismet, George Green Road	George Green	Existing dwellings with gardens	0.22	0.22	From George Green Road, through an unpaved uneven access road
GX01[1]	6 South Park Drive and White House, Lower Road	Gerrards Cross	Existing dwellings with gardens	0.2	0.2	From South Park Drive

SHLAA ID	Site Address	Settlement	Existing Use	Site Size (ha)	Net Developable Area (ha)	Access
GX05	Land to rear 71,73 & 75 Dukes Wood Drive	Gerrards Cross	Back Gardens	0.12	0.1	From Coombe Vale
GX08	Kingsclere & Acarsaid, Dukes Wood Drive	Gerrards Cross	Existing dwellings with back garden	0.4	0.32	Existing access from Dukes Wood Drive
HED02	Woodcrest, Gregory Road	Hedgerley Hill	Residential	0.1	0.08	Existing access from Hedgerley Hill or Gregory Road
HED03	Tree Tops, Gregory Road	Hedgerley Hill	Residential	0.2	0.16	Existing access from Gregory Road
HED04	Old Stock Cottage	Hedgerley Hill	Residential	0.12	0.12	Existing access from an unpaved road off Hedgerley Hill
HED05	5 & 6 Longfield	Hedgerley Hill	Existing dwellings with gardens	0.13	0.13	Existing access from Longfield
IVE01	Land rear or 14 & 15 Rostrevor Gardens	Iver Heath	Scrubland	0.1	0.1	Construction of access needed from Trewarden Avenue
IVE02	Land rear of 61 & 63 Swallowdale	Iver Heath	Back Gardens	0.2	0.2	Construction of access from Swallowdale, possible from garage courtyard
IVE15	Garage courtyard to rear of 65-71 Swallowdale, Iver Heath	Iver Heath	Underused garages	0.1	0.1	Very narrow access from Swallowdale, need widening
IVE04	Land rear of Chinthurst & Remuera on Love Lane	Iver Village	Back Gardens	0.1	0.1	Construction of access from Stonecroft Avenue
IVE10	37 & 38 Colne Orchard	Iver Village	Residential dwellings and back gardens	0.13	0.1	Existing access from Colne Orchard
IVE11	15-18 Victoria Crescent	Iver Village	Residential dwellings and back gardens	0.27	0.27	Existing access from Victoria Crescent
SP02	30 & 31 Penn Meadow and land to rear and side.	Stoke Poges	Existing dwellings, gardens and scrubland	0.28	0.28	Access from Penn Meadow
SP06	29-30 Freemans Close	Stoke Poges	Residential dwelling and back garden	0.27	0.21	Existing access from Freemans Close
WEX01	Land at Amberley, Acorns and Red Chimneys, Church Lane	Wexham Park Lane	Existing dwellings with gardens	0.26	0.2	Extension of access through the road to Nelaston House or the road to Cleath
WEX02	3 & 4 Valley End and 5 & 6 Church Grove	Wexham Park Lane	Existing dwellings with gardens	0.4	0.32	Extension of access through Valley End

Large SHLAA Sites (Included in years 0 - 15 of the Housing Trajectory)

SHLAA ID	Site Address	Settlement	Existing Use	Site Size (ha)	Net Developable Area (ha)	Access
BEA04	Land rear of 7 Woodside Road & 2-4 Woodside Close	Beaconsfield	Back gardens	0.5	0.35	Access from Woodside Close
BEA08	86 Holtspur Top Lane and Land at 82 and 84 Holtspur Top Lane	Beaconsfield	Existing dwelling and back garden	0.82	0.57	Possible use of existing access to 86 Holtspur Top Lane
BEA12	Orchard Dale, Byways, Frogmead and Kimble, Gregories Farm Road	Beaconsfield	Dwellings with large gardens	0.6	0.42	Existing access from Gregories Farm Road
BEA15	26-28A Grove Road	Beaconsfield	Dwellings with large gardens	0.48	0.34	Existing access from Grove Road
BEA19	5-7 One Tree Lane	Beaconsfield	Dwellings with gardens	0.55	0.39	Existing access from One Tree Lane
FAR08	The Old Orchard and Forest View, Hawthorn lane; land rear of Robinscroft and Belmont, Blackpond Lane	Farnham Royal & Farnham Common	Existing dwellings with back garden	0.5	0.4	Existing access from Blackpond Lane
FAR10	Perrywood, Kadima Place and White Lodge, Blackpond Lane	Farnham Royal & Farnham Common	Existing dwellings with back garden	0.65	0.52	Existing access from Blackpond Lane
GX04	Land to rear of 33,35,37, & 39 Bulstrode Way	Gerrards Cross	Back Gardens	0.6	0.48	From Bulstrode way. Access through existing private driveway?
HED01	The Bramblings and The Garden Cottage, end of Elkins Road	Hedgerley Hill	Residential and back gardens	1	0.7	Existing access from Elkins Road
IVE07	Land rear of 199-201 The Parkway	Iver Heath	Existing dwellings with back garden	0.35	0.28	Existing access through The Parkway
RP01	Land rear of 15,17,19 & 21 Syke Cluan and land rear of 1-13 maybe required for access	Richings Park	Back Gardens	0.35	0.35	2 options for access: through new development at adjoining properties
SP05	Edzell, Stoke Court Drive	Stoke Poges	Residential dwellings and back gardens	0.35	0.35	Existing access from Stoke Court Drive