

## UPDATE REPORT OF THE LOCAL PLAN TASK AND FINISH GROUP

### Appendix A

Comments received from Task and Finish Group meeting on August 1<sup>st</sup> 2017

Comment	Response
<p>Page 1 clarify consultation period can we start 1st October to allow up to 8 weeks ? Windsor and maidenhead have just had to extend their consultation for an additional 4 weeks.</p>	<p>We don't have a firm date for Special Council yet so can't commit precisely to 1<sup>st</sup> Oct. RBWM made a mistake in their consultation which is why they are extending it, not because they wanted to allow more time.</p> <p>To ensure we hit the Government 31<sup>st</sup> March 2018 deadline for submitting the plan after which the basis for assessing our housing need will change (and potentially go up) we will want to stick to 6 week consultation period to minimise risk of not hitting the deadline.</p>
<p>Page 11 please change map so only pink area is highlighted so clear that is our housing market area</p>	<p>There is some merit in making this clearer to highlight the Bucks HMA more than the other HMAs</p>
<p>Page 19 2.5 agree with the paragraph Can we have more detailed evidence to back it up?</p>	<p>More detail is set out in section 4 so no need to repeat it here – this is a high level review of the issues.</p>
<p>Page 29 Policy CP1 Can we strengthen point so all developments deliver sustainable not just contribute towards?</p>	<p>The reason why this is “contributing” is that you need to see the Plan as a whole as the vehicle for delivering sustainable development. Development could be a house extension and it is a bit difficult to argue that it on its own delivers sustainable development, but it could contribute.</p>
<p>Policy CP2 Can we change point 1 so delete major development in ANOB so not allocate sites for development in ANOB?</p>	<p>The strategy is carefully constructed to be in conformity with the NPPF on this point. The NPPF does not rule out any development in the AONB and we are only ruling out “major development in AONB” on the basis that it can go elsewhere in the housing market ie Aylesbury Vale.</p>

Point 2 green belt add only if deliver on a sustainable way	There is no need to say this as the whole plan is about delivering sustainable development – if we say this for sites released from the Green Belt but we don't say it for other sites we are releasing from development we would be inconsistent and arguably worse would be suggesting other sites don't need to be delivered in a sustainable way.
Page 40 change colour of tier 3 to purple as colour to close to tier 4	We will change the colour
Page 43 Policy CP4 do we need to show need is 13,200?	We definitely don't want to say this in the policy because the policy is setting out what we are proposing to deliver by way of housing and that is not the same as the need for reasons we talked through at TFG. The first para after the policy (Para 4.28) explains that the need is 13,200.
Do we need to show split for tier 3-6?	We haven't done this to retain some flexibility – the numbers get pretty small for the lower tiers and we wouldn't want to effectively set an albeit broad target for say 10's of houses when you get to tiers 5 and 6.  Where there is more substantial growth anticipated – ie Kimble and Longwick policies later in the plan do set numbers for these villages
Page 45 Point 4.31 is there additional evidence to support this point can we reference it?	If this is referring to the 10,925 then the HELAA (land availability assessment) report which we will publish with the plan will set all this out.  Suggest ADD A FOOTNOTE TO REFER TO HELAA to make the link
Please reformat the tables on page 47 so mirror style from presentation	Agree
Page 49 map you say 2400 for but we say 2050 suggest amend or add footnote	Agree
Page 50 now shows capacity 2891 developers will push for the higher number	Not sure what point is being made here. 2,891 include Princes Risborough but also other sites of 500+ = eg Gomm

	Valley/Ashwells.
Page 51 table at top should be added to page 50	Agree – will be picked up in final formatting
Why is affordable housing 3140 in HEDNA when affordable 40% so should be 4000?	3,140 is the assessed need.  40% is our policy requirement. They are not the same, partly because not all sites qualify for affordable housing because some sites are too small, so subject to viability you have to set the requirement above the need. Also not all sites require 40%, some are less for viability reasons.
Page 54 Please use the tables from presentation as much clearer	Agree to amending table formatting
Page 57 table makes no sense please use presentation tables	Will look at table formatting
Page 59 where is figure YY?	Text reference needs to be updated to refer to the related figure – will be amended in the final formatting run if not before.
Page 65 Policy CP7 can we remove the word justified? That strengthen policy	We cannot ask all development to contribute to all the infrastructure in the list. It has to be justified by reference to the tests set out in the regulations. So whilst we would love all development to contribute we can't require it.
Page 67 point 4.67 we need greater requirements on builders to pay for mitigation from ground water flooding as the modern houses have all concrete	This will be picked up as part of the Flood Risk Assessment and the use of sustainable drainage where one is required and there are groundwater issues
Page 76 policy CP10 can we amend it so no development in ANOB apart from sites released in this plan?	No – for reasons set out above if would not be in conformity with NPPF. However we do for main villages in the AONB and elsewhere we identify settlement boundaries and include a policy later in the plan to restrict development beyond those boundaries which has a similar effect. This would not prevent development of appropriate land within the villages – eg brownfield sites.
Point 4 include all flooding including ground water flooding	Flooding is covered in policy DM39
Page 81 can we include air quality area for high Wycombe and Marlow point	This policy is about the historic environment so not sure the

4.95	relevance of air quality
Page 89 Point 7 add develop river Wye look to reduce congestion	High Wycombe TC dealt with in more detail in the DSA
Page 90 need to explain where are HW 10,11,16 and 17 are and in table opposite which is which	We will add site references to list of sites
Also change tables style for ones in presentation	Agree to adjusting table formatting for extra clarity.
Before policy HW4 need summary of HW 1,2 and 3	Agreed list out the policies number and name and which document they are in – add general point to the introduction
Page 95 can you include density and also the mix of housing	We do not specify mix of housing and not appropriate to add density
Page 97 can we increase employment land ? 1.6 HA seems very low. Also they have to provide major contribution to London road and Abbey barn lane	The amount of employment land is appropriate given the location and existing road network in the area.  Transport contributions already covered in the policy
Page 99 Figure 11 not clear at all also can we specify contribution to 1fe school and secondary school.	Key identifies where the primary school will be located the following text to be added to policy:  <i>A commensurate financial contribution secured by planning obligation will be required to enable the expansion of the proposed school on the Pine Trees site (formally RAF Daws Hill) to a two form of entry school to meet the need for primary school places from the development.</i>  Secondary contribution is part of CIL currently
Can numbers be maximum rather than indicative?	At this level it is not possible to be that specific work we have done suggests that this is what the site can deliver
Page 100 can the development brief for Daws Hill be added as an appendix?	No - this site has planning permission and there is no policy for it in the plan
Page 101 gomm valley cab we increase employment land designation?	The amount of land is limited by the landform.

Page 102 can we specify maximum number of HA that can be developed for housing as we have for employment?	The adopted development brief deals with this in more detail identifying those areas of land suitable for development
Page 107 Can we add require additional net gain that enhance public recreation facilities?	This is already covered in the policy
Also developed pays for all additional parking?	Has to be in proportion to additional demand generated by the development
Can we propose a minimum of 3 access points and not subject to feasibility?	We cannot specify something that is not feasible – currently we are awaiting a report into the feasibility of more than access point into the development
Page 108 can we have a bigger illustrative map as not clear?	We will see if this is possible
Page 111 do we have an employment land requirements?	No this site is probably one that the the commercial market would not support employment on given difficulties in accessing the M40 form this location
What is the density in on site next door? We should mirror so it is a comprehensive scheme	We cannot always base housing numbers on adjacent area density – we need to strike a balance between maximising housing delivery and a design that fits in with the surrounding area through the DM process
Page 114 can we specify maximum 50 as only has one access to the site?	Dwelling numbers based on assessment of the site not only on access – BCC have not suggested the access should restrict housing numbers
Page 118 horns lane is it worth making it an option for employment land requirements in case it is an off site location that can deliver greater benefits?	Not sure I understand the question reducing housing here means need to find sites/capacity elsewhere
Page 120 policy HW11 please show a map of site	This is on the policies map at the back of the plan
Page 121 policy please provide a map of the site also can we specify the mix for 275 units	This is on the policies map at the back of the plan
Page 123 policy HW13 can we specify the number of houses? I think we have earlier in the document?	Yes, it should say that it is allocated for 30 dwellings.
Page 124 policy HW 14 as it was a badly sited user and it is all residential can we suggest offices are provided offsite?	No. The existing coachworks site is poorly suited to the residential character of the area but the area would support

	light B1 class uses. The policy is based on the submission of Brocklehurst Architects, who put forward a mix of offices and residential which has a form that integrates into the local neighbourhood.
Page 132 figures 19 can you outline the whole of the air park site and include requirements for additional sporting facilities in green belt or close to green belt such as Churchill shooting ground?	All of the airpark is shown on the policies map – we will be leaving the shooting proposals to the DM process
Page 134 Policy HW 17 Existing Barns are taller than single story can we change it to be prefer no taller than existing but exceptional case if no impact on green belt and ANOB?	Yes to first part subject to the uses we are proposing on the site
Page 138 policy HW 18 Show a map .development must contribute in full to access not may be required	This is on the policies map – not clear what second point is
Page 137 policy HW 19 Allow for ground level parking the same as Tesco Slough so building on stilts it can be many storeys high want it to be be a gateway building to complement new BNU building.	No – this approach would undermine the desirability and accessibility of the A class retail units. Building height and appearance would be finalised by a planning application, but agree with the desire for this to be a gateway and complimentary to the surrounding buildings
Page 139 Local development order can we keep that outside EDEN for whole town and a second for rest of district?	We are not proposing a new development order – this text deals with an existing one for a small area that has expired  New ones can be designated outside of the local plan if necessary
Page 143 Please provide a summary of policy M1,2,3,4 and 5 plus full policy in appenedid	See earlier comment in relation to HW1 – HW3 we cannot reproduce the DASA as an appendix to the plan however
Please also put in a copy of the delivery and site allocations policy in the appendix	See above comment
Page 144 Add in improve car parking capacity to serve the town to ensure long term success	Unless we have a specific scheme or intention to do this we cannot say that
Point 6 delete the word unnecessary	We will replace with inappropriate as this is terminology used in the NPPF

Page 146 policy MR6 What is the density on the next door site? As this may be more accurate density.	We cannot always base housing numbers on adjacent area density – we need to strike a balance between maximising housing delivery and a design that fits in with the surrounding area through the DM process
Page 149 globe park can we add in egress as well as access to facilitate its regeneration?	Yes we can do.
<b>Princes Risborough</b>	
Page 154 Point 4a can we be more specific that all developments will have to contribute fully to all infrastructure not just highways? Such as Cycle Paths and train station improvement	This is the principles box, not policy. The detail of what development contributes to what infrastructure is set out in individual policies and the IDP. The rest of point 4 covers all the other infrastructure requirements anyway.
Point 5 can we be specific and make it clear more employment land requirements due to East West rail?	Not due to East West Rail, or at least we have no evidence to suggest this.
Page 157 Draw a line around expansion areas have a key below what is pink stripped area?	Yes, can put line round expansion area. Pink striped area is keyed. Will arrange for final doc to have these on same page – formatting issue
Page 158 please can you reformat table	Nb the table in their version had lost the gridlines
Page 162 figure 25 please put relief road in purple or green to stand out	Yep. This figure needs revision anyway
Page 168 figure 26 key is too busy to understand	Appreciated... think we would arrange to have key on facing page in that case – allows more room for both map and key then.
Page 174 developers to pay for sports facilities and to be all co located to gain economy of scale see Marlow Sports club	This is all set out in policy PR7. Most facilities are co-located but we can't get them all on one site. Plus we need the strategic sports areas to protect the town from further growth. We are also advised that rugby and soccer should be separate.
Page 181 policy PR7 can we be more specific in housing mix and affordable requirements?	No, refer to DM policies in RJ
Page 195 rugby pitch should be co located	See above
Also 8 tennis courts and 3 3g as this is what Marlow has and Princes Risborough	Sports requirements are based on the Sports facilities

will become sub regional centre due to its location	strategy – we can only ask for what is justified. Plus we can't be too specific or we will incur objection from Sport England
Page 199 Town centre what is the error?	Don't understand this comment
Page 200 Car parking what is current number in Princes Risborough what is number in Marlow. Risborough needs at least the same as Marlow currently does and Marlow we are looking to expand parking so may need to be higher number than 200 for Princes Risborough	About 600 spp on street and off street in PR town centre. The number required for PR is based on the evidence of the parking review. We can't ask for more than what is evidenced and frankly will be hard pressed to find space for even these.
Page 212 figure 31 what is future expansion area for? Employment or housing? At this stage leave options open	The whole site is for employment. We have shown a concept for area required by potential relocation of Hypnos.
Policy PR 13,14 and 15 please can we have maps of the sites individual and also as you did on HW map showing each parcel of land in context of whole town.	We will update the town centre diagram to show the red lines for PR13 and 14. We don't have a concept for PR15 as it is for sports – what's to show? Will ask EH if she has capacity to prepare index map of sites.
Page 240 Table 8 please reformat	Same problem as above – gridlines have been lost

It is a development plan; primarily concerned with provision of housing in the district. However, we cannot consider it in isolation and as a forward thinking council we ought to be posing some or all of the following questions as well:

1. The draft local plan has identified a number of sites within the District for housing development and it may seem that all the housing sites have been exhausted, if so, what happens after 2033?	There are likely to be further sites that could be redeveloped for housing by then either brownfield sites, government policy might change in relation to constraints, but we would also need to co-operate with our neighbours in meeting our needs in the same way we have done on this plan, this may well mean that we have a higher unmet need figure that neighbouring authorities would need to help accommodate.
2. There is no provision for improving the existing infrastructure of roads, schools, GP surgeries. The new housing development will only make the situation worse for people already in these areas; are they not entitled to a good standard	New development will need to make provision to ensure that they meet the needs of the new residents, this includes schools, transport etc.. where it has been



<p>of living? Therefore, we must seek support from BCC to rectify historical 'wrongs' as well as make it easier for the new development to be 'slotted' in.</p>	<p>identified that is required as part of the assessment of infrastructure needs. We cannot require them to make good existing deficits or problems.</p>
<p>3. We need to consider road widening, where appropriate (Could the path alongside London Road, at the Rye not be moved across the RIVER?)</p>	<p>This would not offer a solution as it would only be widening a small stretch of the London Road – increasing road capacity is always taken up rather and tends not to reduce congestion</p>
<p>4. There are no new Green spaces. We should think of how Green Spaces may be created especially in densely populated and topographically challenging areas such as Bowerdean.</p>	<p>Many of the allocations will provide new open space on site to meet their needs, these are shown on the illustrative diagrams. It is not for the local plan to create new ones for existing areas with existing problems – site allocations</p>
<p>5. What can be done in the Short/Medium &amp; Long Term about reducing number of vehicles on roads?</p>	<p>High Wycombe has a challenging topography meaning that achieving a significant shift to non- car based uses is challenging. New developments will contribute towards bus services, enhancing facilities, improving frequency and if apt re-routing to make more accessible.</p> <p>In addition ensuring that new development is in sustainable locations where there is accessibility to both bus and rail services.</p>
<p>6. How can the Schools traffic be reduced? As an example, it normally takes me 20 to 30 minutes to travel to my Doctor's surgery in George Street from Totteridge. (Going up Arnison Avenue, past the RGS, down Hamilton Road, Hughenden Road and then past Morrisons and onto West Wycombe Road, Ship Street and George Street. However, on Monday, (7 Aug) I had to drop my wife at the surgery and as there was no schools traffic, I was able to drop her in George Street and then make it to WDC offices for the 'Taxi working group' meeting in 25 minutes all told. It was practically without any halts.</p>	<p>We have no control over school traffic other than ensuring that new schools are located close to where the demand from new development arises – often on the proposed allocation itself.</p>
<p>7. Removing commercial vehicles from residential areas, by provision of secure</p>	<p>I am not sure that it is as simple as that or what is meant</p>

lock up yards?	here – parking, driving ??
8. Can WDC become proactive in encouraging improvements to private properties (say offer 25% to 30% towards improvements) and encouragement of Downsizing to free valuable housing stock? Linked with proper provision for social care for the elderly; concentrated services for them; if they are grouped together? (One for the long term)	This is not a planning issue
9. Tunnels - Have we given any thought to relieving traffic by thinking of tunnelling out of Wycombe?	There are substantial costs associated with an option like this and no funding available to deliver.
10. Building on 'vacant' space above say railway lines?	We have not assessed this but it is likely to be a very expensive and probably undeliverable type of development
11. To get the right number of dwellings for the next 15 or so years, is there any place for 'prefabricated, but not lightweight houses? (A prefabricated house can be erected within a fortnight according to a recent TV report).	WDC is considering the use of this sort of development on Abbey Barn North and the former Bassetsbury Allotments
12. Contract negotiations need a firmer grasp of the need to protect WDC & its residents and any guarantees/warranties have to be backed by financial penalties and should cover 'known unknowns' as well as 'unkown unknowns' a la Rumsfeld.	Not sure what is meant here.
As for the presentation of the report:	
(i) An executive summary should help and enhance the feel of the report.	We will be producing an Exec. Summary
(ii) some of the maps are too small and not much in understanding the area. I would like simpler but bigger & clearer maps, overlaid by transparent paper, which can have 'Contours' and other information to give some idea about the relief & and topography.	We will look into how we can make the maps easier to read and the level of information they show, it is impractical to include transparencies and adding contours to plans may well make them harder to understand
(ii) We should ensure that any promises the developers make are adhered to, especially about the percentages of dwellings for social housing and categorised as 'affordable'.	This is why we are writing into policies that development is “required” to provide xyz in terms of specific requirements. Affordable housing reqts are always subject to viability as some sites have specific issues that affect this.
(iii) Make on street parking easier; there is at least One ticket machine in rectory Ave, which has been out of action for a number of years. You have to drive past it	We will be using new parking standards part of which will allow for on-street parking as part of the design of new

to the next machine, get the ticket and drive back to an empty space, with the hope that it has not been taken up, whilst you go to get a ticket.	developments. Planning does not control on street charges for parking or parking metres
(iv) encourage /educate residents to take pride in their locality and keep things neat and tidy.	This is not a planning policy issue – although through good design it is possible to influence how residents feel about their living environment and sense of responsibility.

Further comment	Response
page 248 point D iii delete if appropriate so it is a requirement to upgrade the pedestrian crossing as developers will always try and find any excuse as why not appropriate .	Until an application with a transport assessment is submitted we do not know if this is required – hence “if appropriate”
Page 249 Flood risk chance so all developments will provide measures and contribute to the district schemes to reduce flood risk including surface water and ground water flooding.	Cannot require developments to contribute to schemes unrelated to a development unless through CIL – for which there are competing demands
Page 252 point 4 can we add with scope to increase to 2 form entry primary school in future plans?	There is no evidence of demand for a 2 form of entry, and this has not been required by BCC, this plan is up to 2033
Page 264 19 dwellings seem very low density and the area to the South on figure seems developable?	This figure is based on cosideration of the landscape, proximity to the an area of ancient natural woodland on the west and the conservation area to the east
Policy RUR2 again seems very low density?	This is based on assessment of the site in particular impact on the AONB
RUR4 so little Marlow lakes County park can be developed can we include an access road this could be paid for by contribution from globe park development and highway England	At this stage there is no overall plan for how the park will take shape and as such if a new access road is required. There is no new development proposed in Globe Park. Highways England are responsible for the Strategic Road Network and as such no mechanism or justification for requiring them to contribute.
Such as development in point 5.5.52	Not sure what is being referred to here
Policy RUR5 and 6 infrastructure should be provided to be self sufficient and enhance the delivery of infrastructure for Princes Risborough. Make it a positive	This point is referring to making sure that anything proposed does not prevent delivery of the new road or

<p>not a negative. Means developers have expectations to contribute to wider expansion not just there little bit.</p>	<p>other elements of Infrastructure required to support the expansion of PR , not about the provision of the infrastructure for those areas Infrastructure requirements would be be considered as the Neighbourhood plan is worked on</p>
<p>Page 279 Naphill please can we have 2 access points as 64 is above the maximum of 50 normally allowed</p>	<p>We have been advised by BCC that one access is acceptable</p>
<p>Policy RUR8 density seems very low?</p>	<p>This is based on assessment of the site in particular impact on the AONB and the requirement to provide open space</p>
<p>Policy RUR12 need a map to justify why such low density.</p>	<p>This policy is attempting to put into policy what was permitted – restricting development to the existing buildings and protecting setting of the listed building</p>
<p>Page 302 HMO' s will we reduce planning permission be required for 3 beds and up ? I understood from Alistair Nicholson that this change would be part of the new plan</p>	<p>This would not be in line with the definition of a HMO which refers to number of occupants and not number of bedrooms</p> <p>As it starts at 3 individuals in theory this would be picked up by your point in any case.</p> <p><i>Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.</i></p>
<p>Policy DM 24 Other authorities require affordable housing on 5 dwellings or 500 sqm please can we amend ours please? And in rural areas make financial contribution from 1 to 5 dwellings</p>	<p>Our policy is based on government policy as per the National Planning Guidance#</p> <p>These circumstances are that;</p> <ul style="list-style-type: none"> <li>• contributions should not be sought from</li> </ul>

	<p>developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)</p> <ul style="list-style-type: none"> <li>• in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under <a href="#">section 157(1) of the Housing Act 1985</a>, which includes National Parks and Areas of Outstanding Natural Beauty</li> <li>• affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home</li> </ul>
Please provide para 6.44 policy DM25	Policy DM25 sets out how we intend to assess applications for development on small sites where there is a need for housing for the local community, and there is a lack of sites that would accord with policy in the locality.

<p>Policy DM 30 Add presumption apart from sites already identified in the local plan no development. On an exceptional basis council require...</p>	<p>That is contrary to the NPPF which sets out that 115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads<sup>2</sup>.</p> <p>116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> <li>• the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy</li> <li>• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way</li> <li>• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated</li> </ul>
<p>DM 38 add All at the beginning of the policy.this makes it explicit</p>	<p>It would not be appropriate to apply this to ALL development such as small scale minor applications</p> <p>We will clarify in policy what this policy applies to</p>

<p>DM 39 number 5 remove reference to any site greater than 1 hectare. This will mean all developments have to show site specific mitigation for flood risk.</p>	<p>There is an inconsistency in the policy as drafted, we will review and revise</p>
<p>It must also specify how it deals with surface and groundwater flooding. Especially as these type of floods are more common than river flooding.</p> <p>We must also make it clear that all developments will make a contribution through CIL and section 106 towards any future schemes.</p>	<p>This is already covered in the policy</p> <p>See comment in relation to Slate Meadow</p>
<p>DM 31 point 2 affordable housing this should be 40% ? Not 30%</p>	<p>This based on viability evidence</p>