

Burnham Beeches Special Area of Conservation

Strategic Access Management and Monitoring Strategy Supplementary Planning Document

Representations Submitted on the Draft Supplementary Planning Document



Representations Received - Consultation Dates 29 July 2020 – 3 September 2020

Full Name	Organisation Details	ID	Introduction - Do you have any general comments?	Public Access and Disturbance impacts - Do you have any comments on the Public access and disturbance impacts or the evidence base?	Strategic Access Management and Monitoring Strategy (SAMMS) - Do you have any comments on the Strategic Access Management and Monitoring Strategy (SAMMS) projects?
Mrs Susan Robinson		3	I am appalled that more & more of our green space is being invaded. Once gone it is gone forever. We have many areas of outstanding beauty, that are under threat in Buckinghamshire. Burnham Beeches being another. We do not have the capacity for so many houses, if necessary use brownfield sites, not green. HS2 is destroying our countryside as it is, with large swathes of land being closed to public & ruined, regardless of wildlife. Even in spring & summer destroying nesting sites, & dens for other wildlife (badgers, foxes etc) Since I was a child I regularly walked & played in the beeches, & now as a grandmother, taking grandchildren to do similar. We cannot loose these woods. Shocked of Asheridge!!!		
Lois Partridge		6		Paragraph 2.2.4 notes that: 'One house within 500m of the SPD would be expected to generate a similar number of visits to 57 homes located 4km from the SAC.' On this basis, there are likely to be proportionally fewer visits generated from the very edge of the 5.6km zone, than from closer to the SAC. There should be a similar proportional reduction in financial contributions from sites which lie further from the SAC than those which are closer. This could be banded in 1km zones within the 5.6km zone identified.	
Lois Partridge		8			Paragraph 4.1.1 states that: 'All new homes granted planning permission from 1st March 2020 will need to contribute towards the SAMMS projects listed in Table 3.1, or as superseded.' The SPD does not differentiate between the levy on market housing and on affordable housing in the SPD. Other authorities recognise that people moving into affordable housing are significantly more likely to come from within the District, and would not represent an additional generation of trips. In recognition of this, and being consistent with the approach that a reduction is required from affordable housing on other S106 contributions, the levy on affordable homes should be less than on market housing, which reflects the reduced impact of the residents of this new housing. We note that the levy comprises a flat rate for each house, irrespective of the size of the house. Elsewhere in the country, SAMM contributions vary depending on the number of bedrooms in a property, which is a fairer approach as it reflects the proportional impact of the numbers of people living in the household. This should be reviewed for potential inclusion in this SPD. Paragraph 4.2.3 states that the mitigation strategy will be reviewed every 5 years and that: 'This will enable housing growth over and above the level proposed in the Local Plan to be considered.' The SPD should also make

					clear that it could allow for reductions in housing numbers, changes to the spatial strategy set out in the Local Plan, or for improvements to the condition of the Special Area of Conservation, which could enable mitigation measures to be relaxed, and reduce the need for funding.
Mr Geoffrey Gudgion		11		The evidence base makes no reference to the massive increase in commercial space proposed within Policy SP BP9 of the draft plan. Burnham Beeches would undoubtedly suffer from additional traffic from this development at lunchtimes and evenings.	
Ms Diane Clarke	Town Planning Technician LNW Network Rail	16		No comment	
Mr Chris Granville	Field Planning Officer - Beaconsfield & Penn The Chiltern Society	18			The Chiltern Society supports the projects included in the SAMMS to mitigate the impact of additional visitor number to Burnham Beeches. However we would make following observations:- 1. As previously stated in our consultation response, The Chiltern Society maintains its objection to the scale of housing proposed in the Green Belt around Beaconsfield in the 5.6km 'Zone of Influence'. The projects will need to be costed in such a way they are proportionate to the number of houses built. 2. The projects do not appear to be in order of prioritisation. Project 6 (Production of Action Plan / carrying capacity study) as stated suggests this would inform the sequencing of the other projects and should therefore be given priority. 3. There is no provision for any additional capital costs to support infrastructure / facilities improvement associated with the proposed increased in visitor numbers. 4. It is noted that the costs of the projects are assumed to be constant over an 80 year period at 2020 prices. Reference is made to an inflation adjustment but the proposed contribution collected is based on an assumption of the number of net new units built at the start of the process. It is unclear how future inflation is accrued in the figures provided. One way to help sustain an ongoing income would be to consider a small annual charge for each household.
Mr Stuart Fletcher		20			I am extremely concerned at the proposal for Burnham Beeches and the impact it will have on a precious and rare area of conservation and special interest. The current proposal does not address the following points: There is no reference whatsoever to 'Suitable Alternative Natural Greenspace'. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. In

				it's current form I strongly believe the proposed plan should be refused.
Oliver Payne		22		I object to this proposal: There is no reference whatsoever to Suitable Alternative Natural Greenspace. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy. I believe protecting the green belt is vital to this area and I am very concerned about the environmental impact any changes will bring Beaconsfield and the surrounding area.
Mr Michael Tackley		24		Why is there is no reference whatsoever to Suitable Alternative Natural Greenspace anywhere in the document? There is no reference to an Air Quality Management Strategy, this should be a key element of environmental mitigation and which should theoretically already part of the Council's draft plan?
Mr Simon Iley		27		This proposal is deficient on at least the following points: - it makes no reference to the provision of Suitable Alternative Natural Greenspace - what is the proposed to satisfy this requirement? - BCC's Green Belt proposals include release of land within the scope of this proposal - there is no coverage of the visitor and environmental impact on Burnham Beeches of the Green Belt proposals. - what happened to the Air Quality Management Strategy, that should be a key element of environmental mitigation.
Mr James Forster		76		I object that the 'Burnham Beeches Supplementary Planning Document' apparently omits the following issues. There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Daniela Gill-Carey		78		Firstly the document makes no mention at all of "Suitable Alternative Natural Greenspace" that would be necessary as a result of the proposed building in the area. Secondly there is no consideration of the impact (environmental and visitor) on Burnham Beeches from the creation of 20000 square feet of Commercial space being proposed for Beaconsfield. Thirdly there seems to be no reference to an Air Quality Management strategy.
Tristan Gleave		80		1. You do not reference whatsoever to Suitable Alternative Natural Greenspace in this document. It has to be factored in. 2. You do not mention environmental or visitor impact on Burnham Beeches of the 20,000 sq ft

					of commercial space unwisely being planned for in Beaconsfield. 3. Air Quality Management Strategy is also not mentioned, which is a topic addressed in the Council's draft plan, yet strangely absent here.
Alexa Collins	Beaconsfield Town Council	72		Beaconsfield Town Council are concerned with this SPD in a number of areas. Given the inconclusive status of the Draft Local Plan, we are conscious that other documentation such as the Local Plan, should not be relied upon to give the necessary protections the Burnham Beeches Special Area of Conservation. Given the proposals included in that draft plan and the amount of development currently implied for Beaconsfield, it is by no means guaranteed that Suitable Alternative Natural Greenspace could be accommodated if all proposals were to go ahead. This would leave Beaconsfield vulnerable to overdevelopment without provision of Suitable Natural Green Space and likely to suffer further detriment to air quality in the area, which we have already commented on in our consultation response to the Local Plan.	
Mr TREVOR CLAPP		4			Despite serious pressure from the Parish Councils the Council has never agreed to recover developer contributions such as CIL to help the Parishes to mitigate the impacts of development and help them provide for the requirements that this development change brings. So it is surprising that now the Council supports recovery of developer contributions on behalf of a third party. These contributions will see no benefit returning to the community in the way that CIL would do and at the very least the Council should be moving forward with a development levy that also returns part of that contribution to the community. As they are legally able to do now. But choose not to. The presumption against no development in the 500m zone requires clarification. As I understand it the principle is predicated upon the desire to prevent an increase in the local population so as not to increase pressure on the SAC. This will have serious implications for the future of the Farnhams villages if left as a blanket ban. Without clarification the ban would prevent any new buildings, alterations and changes of use that require planning permission (anything that requires planning permission is development). This would not allow houses to adapt to occupants requirements or to be re built. More importantly it would prevent re use of existing buildings in the villages and the redevelopment of brownfield sites. Something which Central Government wishes to see. Indeed the recent green belt review relies on the bringing forward of brownfield sites in order to reduce the need to release green belt land for development. However one might argue that any permitted development, such as the change from B1 to C3 might still be able to take place thus making the development restriction toothless. Nor would it allow for future sustainable housing schemes, which by their very nature

					<p>will need to be located close to the villages. This is something that, in the medium term, will prevent the villages prospering and reduce their vitality. We all know that the villages have been suffering from the change in shopping habits and now from the move from offices to working at home. Re vitalization of the high streets requires the adoption of multi use approach and this must include much needed housing. The need for proper affordable housing is known and the village centers the obvious place for such provision. The principle of using development restriction to maintain numbers of visitors is flawed in itself. As we know, from evidence put to the Parish Council by the Corporation a significant proportion of visitors travel to the Beeches from outside of this 500m zone and the significant impact that such a policy would have on the future vitality of the village centres would not be proportionate in relation to the likely outcome in reducing visitor numbers. It is likely that the Corporation have considered other measures to regulate visitor numbers but these are not published. The simplest one, though that might not find general favor, would be to regulate visitor numbers on site. All other "attractions" do this the National Trust included. The Corporation have been at pains to constantly remind us of the private ownership of the SAC and we are grateful for their allowance of our residents to come on to their land. There comes a point however where one needs to evaluate the benefits of doing so when such significant restrictions fall to the community in other areas. Perhaps such a scheme as the National Trust use could be adopted here. Those using the SAC contribute to its maintenance and such access is controlled. It happens everywhere else. That then leaves the mitigation strategies and financial contributions as a blanket requirement which is a tangible, evidence based, requirement. A much better approach, particularly if the community also are included in the monies recovered.</p>
Lois Partridge		5	<p>In response to section 1, we do have a general comment about the principle of the preparation of the SPD at this time. Paragraph 008 Ref ID: 61 008 20190315 of National Planning Practice Guidance states that: 'Supplementary Planning Documents should build upon and provide more detailed advice or guidance on policies in an adopted Local Plan.' While we accept that Policy CS 24 in the adopted Chiltern Local Plan, and Core Policy 9 in the adopted South Bucks Local Plan both provide a general basis for the SPD, the timing of this SPD seems premature in light of the delays to the current Local Plan Examination for the draft Chiltern and South Bucks Local Plan. The assumptions within the SPD on housing numbers</p>		

			and strategy are yet to be confirmed through the Local Plan process and could yet be subject to significant change. Further, as the SPD impacts on two planning areas of the new Bucks Authority, it may be more appropriate to wait for the new Buckinghamshire Plan to be prepared and adopted, which will provide more certainty on the level of housing growth and the spatial strategy. Specifically, the SPD does not currently consider the possibility of a Slough Northern Extension, as this is not included in the draft Chiltern and South Bucks Local Plan.		
Lois Partridge		7			Table 3.1 sets out costs over an 80 year period. We note that other local authorities have sought SAMM funding for two separate elements; to fund only the capital investment necessary to fund projects 'in perpetuity' (over 80 years), and separately to fund the delivery of the projects over the plan period. However, this draft SPD appears to seek the funding for the entire range of mitigation strategies over the whole 80 years. This is unreasonable and should be reviewed.
Mr Geoffrey Gudgion		10		Surely this SPD can not be the whole protection environment planned for Burnham Beeches SAC? What happened to the requirement to provide 'Suitable Alternative Natural Greenspace'. At present it reads like an attempt to remove protections by stealth in order to enable the massive over-development of Beaconsfield planned in the Chiltern & South Bucks draft plan. Such an underhand initiative should have the widest possible visibility within the affected communities.	
Dr Ronald James		15	I have no comments to make on this proposal other than that it seems a good idea and should be adopted		
Mr Chris Granville	Field Planning Officer - Beaconsfield & Penn The Chiltern Society	17		The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators. The Society has published its Manifesto for Chilterns Wildlife (http://chilternsociety.org.uk/chiltern-manifesto/) which is a commitment to restore, enhance and protect wildlife and habitats in the area. The Chiltern Society is supportive of the principle of additional payments by developers, as proposed in the Strategic Access and Management Strategy for Burnham Beeches, to mitigate the detrimental impact on the local environment and wildlife arising from increased visitor numbers. The Chiltern Society maintains its objection to the scale of housing proposed in the Green Belt around Beaconsfield. However if the Council decides, following the Local Plan Examination, to allow the housing then mitigation payments are essential to manage increased visitor use of Burnham Beeches. The projects will need to be costed in such a way that they are proportionate to the number of houses built	

				rather than requiring the whole Local Plan allocation to be completed before projects can be undertaken. It would be helpful for the SPD to clarify that the proposed payments would be in addition to the provision of suitable alternative natural greenspace as stated in Table 1.1 Policy Context for SPD Policy SP BP9 Building - Beaconsfield.	
Miss Janet Beal		19			There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Mr Jon Pender		21			I am concerned that there may be some unintended consequences arising from omissions in this report which could have a detrimental impact on the Beeches as well as the surrounding areas, including Beaconsfield. I am concerned that: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Mrs Laura Hall		25			What is the mitigation factor. You are planning a huge increase in housing and office space within 5.6km of the SAC. Surely this is not conducive to the SAC remaining a free and open space. The extra numbers may well overwhelm it.
Ms Bridget Fox	Woodland Trust	66		The SPD is silent on the benefits that public access to woodland offers, in terms of people's health and wellbeing. We support the right of everyone to access woodland close to home and to enjoy and value woodland and trees. The Woodland Trust supports management approaches that balance the benefits of recreational access with the protection, enhancement and restoration needs of ancient woodland and other protected sites. Ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable. While access is important, we recognise that it needs to be appropriate, and should not override the need to safeguard ecological value, particularly in sensitive ancient woods. We support the principle of buffers to protect ancient woodland from edge effects, including damage from pollution and fragmentation. The SPD proposes avoiding new homes within 500m of the Burnham Beeches SAC boundary. The Trust would encourage making positive use of such a buffer zone to allow for natural regeneration of the ancient woodland, to improve	

				<p>connectivity with the surrounding landscape. The consequent increase in ecological connectivity between areas of ancient woodland will create the resilient landscapes recommended in Making Space for Nature (Defra 2010). The Woodland Trust supports the principle that residential developments should have access to the natural environment, including to woodland, and that local plans should include policy standards for residential developments that support access to the natural environment and woodland for informal recreation. Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space: Of at least two hectares in size, no more than 300m (five minutes walk) from home. At least one accessible 20-hectare site within 2km of home. One accessible 100-hectare site within 5km of home. One accessible 500-hectare site within 10km of home. A minimum of one hectare of statutory local nature reserves per 1,000 people. The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes. In adopting the 500m development buffer for the SAC, we would encourage complementary policies that support retention of existing trees and creation of new woodland as part of new residential developments, to ensure that future residents can enjoy access to woodland while continuing to protect the SAC. We recommend the approach taken by Wycombe Area (formerly Wycombe District) in its Canopy Cover SPD, setting a target for tree canopy cover on development sites, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.</p>	
Tristan Gleave		81	The SPD is based upon the deeply misguided draft Local Plan, which is being strongly challenged and likely to be superseded by a new plan under the Unitary Council.		
Kirsty Godfrey		75		Amongst other things, where is the Suitable Alternative Natural Greenspace location? What is your Air Quality Management Strategy, there is no reference of that! A very important issue for climate control and the locals wellbeing, and what about the impact, environmental and visitor, to Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. I am objecting to this plan.	
Mr Jonathan Harbottle		42		Contradictory evidence needs to be clarified: Part of the evidence base is the Visitor Survey 2015/16 by C. Philip Wheater and Penny A. Cook and the data collected as part of the survey confirms the estimate of 69% of respondents to the Public Consultation in 2009 stating that they travelled by car (Wheater 2009). It is clear from this evidence that visitors living at driving distance - likely more than 500m - make up most of the recreational activity at the SAC.	

				<p>The blanket ban on the development of new homes within a 500m radius would therefore not be likely to have a significant impact upon visitor levels. With nearly 70% of the 551400 visitors each year arriving by car, any impact from the proposed SPD upon the numbers walking in from within 500m would be inconsequential. Dog walking is purported to contribute to impacts upon the SAC and according to the same survey document just over 60% of dogs arrived in cars with their owners. Residents walking into the site from within 500m of the SAC could therefore not be significant contributors to recreational pressure because, according to the 2015/16 visitor survey, there are far less visits of this type; the visits do not contribute to air pollution from car travel and; they are less likely to bring dogs to the SAC. However, the data on frequency of visits is in direct conflict with the Footprint Ecology work which says that more visits arise from within 500m of the site. This conflict between the evidence bases casts doubt upon the reliability of the evidence as a whole. Before the SPD is adopted this apparent inconsistency should be clarified. Hydrology: Potential hydrological impacts should have some influence upon the zone precluding development of additional net dwellings. Some areas are unconstrained in this respect whereas others within the zone would have hydrological implications, and clearly the former should be considered more favourably. Some development will not have any impact upon the SAC by virtue of its use. The SPD is not clear what use classes of development are precluded by the SPD whereas SPDs for a similar purpose in other areas are usually explicit in terms of what type of development is affected. The evidence and the SPD seems to read as if it applies to C3 Dwellinghouses. The restrictions should not apply to other use classes that will not generate additional visits to Burnham Beeches. It should also not apply to C2 Residential Institutions because it would be unlikely that residents of these developments would place any significant pressure upon the SAC. Care homes and similar institutions are not likely to accommodate people who regularly walk dogs or visit the SAC at a frequency comparable to residents of a C3 family house.</p>	
Alexa Collins	Beaconsfield Town Council	74			We would ask that SANGs be explicitly noted in the mitigations for development and request that further impact measurement be carried out on air quality.
Mr William Smith	Senior Planning Manager Berkeley Strategic Land Ltd	43		<p>1. The draft SPD (Table 1.1 and paragraph 2.2.3) refers to the draft Chiltern and South Bucks Local Plan as being a relevant policy consideration. However, it is now likely that the draft Local Plan will not proceed to adoption following the Inspectors' letter advising of concerns about the Duty to Cooperate (Ref: EXAM 34 / 7th May 2020). It is also noted that currently the Council is not seeking a Local Plan examination hearing relating to this issue virtually and the whole process has therefore stalled. As a consequence, the housing growth proposed by the Local Plan, in particular the new allocations proposed within the Green Belt that could impact the SAC, and the draft policy relating to the SAC itself (Policy DM NP3), are uncertain. We consider that the SPD should be revised to take account of the latest position in relation to the</p>	

				<p>Local Plan because as drafted it assumes that the Local Plan will be adopted as originally planned. 2. The publication version of the draft Local Plan (June 2019) Policy DM NP3 proposed a 400m buffer to the SAC rather than 500m now proposed. We do not support the presumption against all residential development within the more extensive area of 500m of the SAC and consider that a 400m buffer as proposed by Policy DM NP3, alongside the other measures proposed (i.e. SAMM), would offer sufficient protection. We consider that a 500m buffer could unduly restrict the potential to deliver growth in the area which is needed to address the very significant level of local housing need, including a proportion of housing need arising from Slough. A more detailed technical explanation of why the 500m is not justified and a 400m buffer would be more appropriate is set out in the accompanying paper by Aspect Ecology which is submitted alongside this response (via email). This includes reference to the Footprint Ecology reporting and other comparable protected sites such as Thames Basin Heaths where 400m has been found to be appropriate. Berkeley has previously made representations to the draft Local Plan examination in relation to this matter and, given that the Local Plan process is not proceeding as planned, there has not yet been any opportunity for the extent of the buffer to be independently scrutinised. We consider that the buffer should not be introduced via the SPD at this time and a more flexible approach that considers each site individually should be employed. Alternatively the buffer should be amended to 400m as originally proposed by the Local Plan (Policy DM NP3). We note in any event that an SPD would not carry the same level of weight as a Local Plan policy and in this regard there will still be a need for the impact of development on the SAC to be considered on a case by case basis through discussions with the Council and Natural England.</p>	
Mrs Shae Withers		30			<p>Unfortunately there are omissions when compared with the current regulatory regime: 1. requires that any housing development within the 5.6km zone must be accompanied by a Suitable Alternate Natural Greenspace provision. This is omitted from the draft and the SPD should not be accepted without such inclusion. 2. Where is the Air Quality Management Strategy, which would seriously impact the survival of the Beeches 3. Where is the reference to the environmental or visitor impact on Burnham Beeches arising due to Additional commercial space proposed for Beaconsfield</p>
Ms Barbara Richards		34			<p>There does not seem to be any assessment of increased traffic in the surrounding area and on surrounding roads on the ecology and air quality. Any major developments within 5km would see increased local traffic using these roads as access or drive through to Slough or High Wycombe from people living or working in or delivering from/ to these new developments.</p>
Mrs edwina glover		41	Its amazing how money can be the overruling and overriding factor when it comes to allowing		

			<p>planning permissions. It is very obvious you cannot replace the age old varieties of flora and fauna with modern planting, it is obvious you can give yourself a let out clause as it states it can be open again to be reviewed in the future and of course, you will have already set out the precedent by then for mitigation. You should be ashamed of yourselves for even considering this and go for a refusal. Does anyone even sit on the planning committee that represents Burnham. I think not!!!!</p>		
Mr. Mark Carter	Planning Consultant Carter Planning Limited	38		<p>Thank you for consulting us on the above document. We welcome the opportunity to comment. In general the approach echoes that successfully used elsewhere, e.g. The Thames Basin Heaths and represents a pragmatic approach to future development. However the glaring omission is the failure to consult the adjoining Authorities, Wycombe, the Royal Borough of Windsor and Maidenhead and in particular Slough and to seek their agreement to the approach since the SAC affects those Boroughs under the HRA. The Recreation Report makes it clear that of the 11% increase in visitor numbers most of these (7%) will be from the adjoining Authorities, in particular Slough (5%). The estimate of new residential development in those Boroughs is very sketchy, presumably since those Boroughs have not contributed. Clearly the mitigation will be mainly supplied in Burnham Beeches itself but it may be elsewhere in the form of SANGS etc. This requires a joint approach to the problem, to the assumptions of charging for mitigation and a joint approach to the provision of that mitigation. The failure to approach the topic in a comprehensive and co-ordinated manner may be inequitable and undermine the SPD.</p>	
Mr Mike Stubbs	Chilterns Conservation Board	47		<p>The Chilterns Conservation Board (CCB) supports this supplementary planning policy and we are aware that other LPAs in the Chilterns area, within the AONB statutory boundary, are considering a similar approach in the management and mitigation of impacts as they affect the Chilterns Beechwoods SAC. Similar issues of recreational impacts and the mitigation of visitor pressures also arise. As you know Burnham Beeches is not within the AONB boundary and some 5.8 km at the closest point as measured to the east at Flackwell Heath. Nevertheless there is a strong degree of habitat connectivity and the nearest Chilterns Beechwoods SAC site is at Bisham/Cookham. The Chilterns Beechwood SAC is a very extensive tract of Asperulo - Fagetum Beech forest. It defines the Chilterns and is one of three SACs in the AONB as well as 64 SSSIs and 494 local sites recognised for their wildlife or geology - some 9,507 hecatres of sites designated for their wildlife value. For this new SPD the CCB is interested in the habitat connectivity that is promoted and the material impact of air quality monitoring and management. The air quality issue can also be a part of the evidence base. CCB is aware that this SPD links to submission policy DM NP3 and section 9.3 in supporting text. The SPD equally could be a 'standalone' supplementary policy and one which is material in the consideration of any planning</p>	

			<p>application within a 5.6 km threshold and to which planning weight can appropriately be given. On air quality matters we are aware that, within the Chilterns AONB wider area air pollution issues exist at Windsor Hill SSSI, Bradenham Woods, Park Wood and the Coppice SSSI, and Bisham Woods SSSI (components of the Chiltern Beechwoods SAC), Aston Rowant SAC and Burnham Beeches SAC, together with recreational pressure at Windsor Hill, (components of the Chiltern Beechwoods SAC) and Burnham Beeches SAC. Parts of the Chilterns Beechwoods SAC already breach critical loads for nitrogen deposition, acid deposition and (partly) ammonia. This is evidenced in the Wycombe District Local Plan Revised Habitats Regulations Assessment Report (Jan 2019). CCB notes the reference to air quality in the evidence base. In the Chilterns and the wider area as covers Burnham Beeches, we remain concerned as to the levels of atmospheric nitrogen deposition and its impacts on flora and fungi, resulting in the eutropication and acidification of habitats. The Chiltern Beechwoods SAC has already breached critical loads for air pollution. (see Natural England's Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018). http://publications.naturalengland.org.uk/publication/4808896162037760. This explains (page 12) that "The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it. The Plantlife Report 'We Need to Talk about Nitrogen' is an additional component of the evidence base, as is the UK's Natural Ecosystem Assessment (2011) which makes the point that atmospheric nitrogen deposition is one of the top two drivers of change in plant diversity, along with climate change. Further, the UK is also a party to the UNECE convention on long range transboundary air pollution (CLRTAP) and its 2012 Gothenburg Protocol. We take the view that these reports and associated air quality monitoring (for example, www.pollutantdeposition.ceh.ac.uk) support the case for greater weight to be afforded to air quality monitoring and management issues. The need to exclude development from the immediate location around the SAC is supported. The mitigation and management within a wider threshold to 5.6 km is itself supported by other studies, especially the Thames Basins Heath. The Chilterns Conservation Board would recommend that the evidence base is further underpinned by reference to the studies as above. One of the principal issues here is to avoid the deposition of additional nutrients and acidification, which will cause a negative effect on natural and semi natural habitats. 64% of the UK has ammonia concentrations above critical levels for lichen and bryophyte species, for which the UK has internationally important communities. CCB supports the mitigation strategy proposed in this SPD, which is itself supported by evidence in the submitted HRA. This work can become a template and model for further such</p>	
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				<p>supplementary studies within and near to the AONB. Promoting habitats connectivity is a matter of considerable importance and can be delivered by such policy, alongside other objectives. That objective itself is supported by national policy in the NPPF at 170 and in the Environmental Bill and forthcoming targets and measures to promote biodiversity net gain objectives. The Chilterns Conservation Board is grateful for the opportunity to submit these comments.</p>	
Mr Graham Thomas		59			<p>There should be a project and plan to address visitor parking. Car parks are needed at the site, but could be reconfigured and landscaped to reduce their impact, e.g. instead of a long line of parking area stretching along Lord Mayor's Drive to the centre, put a square car park at the Eastern edge. The need for public parking in the nearby village streets should be managed and reduced in cooperation with the Parish Council. Purchasing land just outside the SAC for replacing and supplementing on-SAC parking should be considered. For example, more could be done in and around the Estate Office on Hawthorn Lane.</p>
Mrs P Relf		63			<p>There is no reference to the impact on Burnham Beeches of the 20000sqft of proposed commercial space. The commercial properties would be completely inappropriate for the area. Burnham Beeches is an area of ancient, very ancient woodland. it has been protected and preserved for centuries.</p>
Mrs Tricia Barker		51			<p>As a Beaconsfield resident and. Walker at Burnham Beeches i would like to point out that this document that I have scrutinised carefully amongst other objections I have has no Provision for Sang which would cause irreparable damage Also lack of SANG would damage Burnham Beeches for ever Also residents of Beaconsfield would be seriously affect without SANG in place</p>
Mr Hamish Broom		53			<p>Why is there no reference to a Suitable Alternative Natural Greenspace being offered in this proposal? This is a known requirement for Planners and the Council to be compliant with, yet this proposal being put forward is silent on this point? Why is this? Without proper and suitable alternative green space being provided, our natural world will suffer. Animals will loose their habitats, equally important people will be worse off without natural places to visit to maintain their well being and stimulate good mental health. For the sake of having the best environment for animals, wild life, and humans there needs to be suitable and proper alternative green spaces offered! lack of any reference to Air Quality Management Strategy. Have you taken into account the impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield? I am not sure that it has been fully discussed and considered. The amount of extra road usage and potential environmental and air</p>

					pollution coming from this new complex of commercial units, will only bring more strain on the natural environment. Its not going to be possible for animals, wild life, vegetation, trees and woods of this area to be unaffected by a new development such as this. I have already mentioned the absence of an Air Quality Management strategy, I wonder if this is the only thing missing?
My Olakunle Babarinde		69		Thank you for this. Whilst the protections for Burnham Beeches are appreciated and I hope they are adopted, I do feel that there should be reference to the massive Beaconsfield development of 1,600 homes and the potential impact it will have on the local area, especially Burnham beeches. Thought should be given to the following: - There is no reference to the need for such a large development to have Suitable Alternative Natural Greenspace despite the Beaconsfield development being on the edge of the proposed 5.6km Zone Of Influence. - There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield - There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. I appreciate that the Statutory Consultees, including the City of London are in support, however this massive development is within the council's remit and should be a consideration now rather than prior to the development getting underway.	
Mr Leon Taylor		57		I object to these proposals on the grounds that they will adversely affect Burnham Beeches and result in green belt land being built on. The whole motivation behind these changes is profit making for land owners and developers. The Council should be opposing these plans, not supporting them should be protecting local residents	
Mr William Smith	Senior Planning Manager Berkeley Strategic Land Ltd	44			3. Notwithstanding the above concerns about the proposed 500m buffer, we support in principle the use of SMM contributions and consider that this is a pragmatic approach to mitigating the impact of new development on the SAC (compared to a requirement for SANG for example). Further explanation is set out in the accompanying paper by Aspect Ecology which is submitted via email alongside this response.
Mrs Alison Clifford-King		29		I wish to object to this proposal to strip away Burnham Beeches key protections as a Special Area of Conservation. These rules are also a crucial barrier that protect Beaconsfield from over-development. Beaconsfield is already over developed and there is huge pressure on the existing infrastructure and this proposal omits some key points that the current protection provides.	
MR Michael Bracken		31			1. I believe this change results in a loss of a requirement to find Suitable Alternative Natural Greenspace - this is a material change that is not warranted 2. Please consider the impact of the proposed developments in Beaconsfield - this would have an environmental impact on Burnham Beeches 3. Please consider the impact on Air Quality Management Strategy

Mr John Ives		33			<p>No reference is made to the environmental or visitor impact that is likely to be caused by the Councils own proposed future development of some 20000 sq ft of commercial offices and 1700 new houses which are close enough to Burnham Beeches and should have been considered within these proposals Neither is there ref to Air Quality impacts likely to be caused by increased traffic generated by these Council proposals With ref to the mitigation proposals set out by the Council- this has been carefully constructed by the Council to make it appear as if these are additional measures to existing statutes that they wish to impose so as to protect this SAC whereas in fact they are at the same time proposing to delete and changing existing legislation which would require them to address the issues to which I have referred above The Council should be required to set out everything they propose to change, not just the bits they think look good, clearly setting out the details of the removal and any changes to existing contained elsewhere in their proposals that they know would highlight what is really going on - Not to do so is deceitful and a failure to discharge their duties properly. They should ask for consent for their proposals based upon complete information.</p>
Mr Roger Sherrard		39			<p>Being a regular user of Burnham Beeches and a Beaconsfield resident I am very disappointed with the quality of this document and believe it deliberately sets out to deceive the public. For example the document makes no reference to the following 3 points of significant content with regard to this subject matter: 1. No reference to Suitable Alternative Natural Greenspace. 2. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield 3. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation.</p>
Mr David Archer		48			<p>I'm not sure what the arrangements will be for SANG or new recreational space considering there are plans for 1600 new homes in the west of Beaconsfield. Increased pressure on the Burnham beeches SAC is likely to cause damage and limit enjoyment for those who appreciate its unique qualities and special fauna and flora. The danger is it will gradually evolve into a park with loss of habitat unless the pressure is reduced by green spaces catering for these new developments. What are the plans for managing air quality. Therefore I would like to state my objections to these changes</p>
Mr Graham Thomas		58		<p>"CLARIFICATION OF DEVELOPMENT"2.2.4 (and 3.1.4 and 3.2.1) refer to "presumption against residential development" but 3.2.2 refers to "presumption against any net new homes". This is not the same and the SPD should be clarified to be clear that existing</p>	

			<p>homes can be developed (with extra rooms, for example) and existing homes can be replaced one-for-one with a new home. This seems to be the intention of 3.2.2, and I support that intention, and it must be clarified throughout in order to avoid confusion and misinterpretation. For example, in 2.2.4, where the recommendation of Footprint Ecology must be what it is, the document should immediately say "This document clarifies that this is applied as "no net new homes" while permitting development or replacement one-for-one of existing homes"</p> <p>FARNHAM COMMON VILLAGE CENTRE Figure 2.1: the 500m zone is not only residential, there is a village High Street with offices and shops. Farnham Common village centre is a small area that needs to be not constrained by the "no net new homes" restriction, because offices and retail are expected to change due to increasing web-based business. Change of use must be permitted in order to avoid the risk of empty buildings, becoming derelict and a blight on the village. Within the 500m zone boundary there should be an "exclusion zone" from Kingsway to Beeches Road to include all buildings fronting onto the Beaconsfield Road (High Street) and their associated land. Planning process in this zone should be subject to the same approval process, conditions and restrictions as within the 5.6km zone (to keep it simple).</p>	
Mr John Keith Barker		52		There is no reference to an air quality management strategy No provision for SANG No provision for environmental impact on Burnham Beeches from 20000 sq ft of commercial space proposed for Beaconsfield
Paul Mason		60	<p>Within this Planning Document, it states quite clearly: 3.2.2 Taking this forward for the determination of planning applications the Council's standard Appropriate Assessment for this 500m zone provides for this presumption against any net new homes.</p> <p>Appendix 1(a): 3: Buckinghamshire Council considers that that the likely significant effects of proposals within a 500 metre linear distance of the Burnham Beeches SAC boundary zone are so likely to harm the integrity of the conservation purposes of the Burnham Beeches SAC that net new homes should be avoided as it would not be possible to mitigate the impacts from the recreational disturbance. 2.2.4 ...the data demonstrates that one house within 500m of the SAC would be expected to generate a similar number of visits to 57 homes located 4km from the SAC. On this basis, building 3000 homes under the C&SB Local Plan and the 800 homes in the Wycombe Local Plan (Bourne End), both close to Burnham Beeches might have a direct impact on Burnham Beeches equivalent to the building of at least 52 - 66 homes within 500m of Burnham Beeches, which in themselves would so likely to harm the integrity of the conservation purposes of the Burnham Beeches SAC. Where is the joined-up thinking between this Planning Document and the current C&SB Local Plan? It is a disgrace that under 1.4.4 of this document it states: The existing Chiltern District Council Core Strategy, South Bucks District Core Strategy and the Publication Chiltern and South Bucks Local Plan have already been subject to full Sustainability Appraisal (including SEA) and assessed as having no significant environmental effect whilst at the same</p>	

				time in 2.2.4 it clearly states that development within 5.6km of Burnham Beeches would have a direct impact on Burnham Beeches. It surely can't be both! The C&SB Local Plan must therefore be damaging to Burnham Beeches, and is yet another justification for Buckinghamshire Council to now withdraw the C&SB Local Plan which is currently before the Planning Inspectorate. A new and re-thought Buckinghamshire Council Local Plan is required that protects both Burnham Beeches and the Green Belt.	
Cllr Carol Gibson	The Ivers Parish Council	71			The Ivers are just beyond the 5.6km zone of influence and therefore development will not be directly affected by the proposals in the Strategy. There is concern that development pressure could be increased in The Ivers and areas adjacent to the 5.6km zone, due to the Strategy. We see no way of predicting the effect on existing Green Belt but trust that any encroachment will be strongly resisted.
Paul Mason		61			Current regulations require new housing development to include Suitable Alternative Natural Greenspace (SANG) or new recreational space to mitigate increased visitor pressure on such a crucial conservation area. I can see no reference to a SANG within this document. Burnham Beeches is a Site of Special Scientific Interest, a National Nature Reserve and Special Area of Conservation. SANG's role is to provide alternative open spaces to divert visitors from visiting Burnham Beeches. SANGs are intended to provide mitigation for the potential impact of residential development on Burnham Beeches by preventing an increase in visitor pressure on Burnham Beeches. The effectiveness of SANGs as mitigation will depend upon the location and design, which should provide a site(s) as equally as attractive as Burnham Beeches. The Council should ensure that nothing within this document would supercede the need for a SANG in relation to development within 5.6km of Burnham Beeches. Within this document, I can see no reference to the impact on Burnham Beeches from the approximate 20,000 sq ft of new commercial space highlighted in the Chiltern & South Bucks (C&SB) Local Plan proposed for Beaconsfield, nor any potential impact from the Slough District Council Local Plan request to 'expand' into South Bucks. Within this document there is also no reference to an Air Quality Management strategy that should be a key element of environmental mitigation. This document speaks only about mitigation- no mitigation can ever cover the 'damage' that development might have on Burnham Beeches. Nearly 3000 homes are planned to be built under the C&SB Local Plan within 5.6km of Burnham Beeches, plus a further 800 in Bourne End plus the demand from Slough. Some of these Local Plan developments will in themselves impact Burnham Beeches through loss of Green Belt land to housing

					development, yet the SANG is meant to explicitly protect green spaces to act as an alternative for members of the public visiting Burnham Beeches. I absolutely support the protection of Burnham Beeches and the desire to mitigate where possible the impact of increased visitor numbers to Burnham Beeches. I would question why the financial contribution towards Strategic Access Mgmt & Monitoring Strategy (SAMMS) is set at a single cost per net new household. Surely larger houses = potentially more people = more impact on Burnham Beeches. I would propose that the Council considers differentiating the contribution towards SAMMS between 1, 2, 3, 4 and 5 or more bedrooms accordingly.
Mrs Evans		82			A Special Area of Conservation, is a Special Area of Conservation. It is not an area which should be subject to random development or hastily put together solutions. It is a concern that the omission of this point could expose the area to overdevelopment generally and housing development at a minimum, within the 5.6 km zone around Burnham Beeches, unless a Suitable Alternate Natural Greenspace is included to safeguard against such development.
Mr Max Lipman		109			I am concerned that the above document fails to consider factors which are relevant to Taplow and neighbouring areas. In particular the vital role of Burnham Beeches as a Special Area of Conservation. The proposal, to build 1600 new houses in Beaconsfield to the North of Taplow, is obliged to provide suitable alternative green space. Please advise how this requirement is to be met. The increased activity arising from the new housing and commercial development is bound to have a detrimental effect on the environment in Burnham Beeches. How will this be mitigated? You should take this to be an objection, should these issues be unresolved.
Mrs Deirdre Smaje		157			I am writing to register my objection to the proposals contained within the Burnham Beeches Supplementary Planning Document, in particular to mitigate the impact of new housing developments on this nationally and locally important site. Any threat to this irreplaceable environment will have a long-term detrimental impact on the quality of life of people in the existing settlements that it serves. there is no reference to providing sustainable alternative green spaces, which would be vital in reducing the numbers visiting Burnham Beeches itself. We have learned this summer how vital locally available green spaces are, however small. New parks and greens, nature reserves etc must surely be a key part of any sustainable development strategy for South Bucks and Slough. Burnham Beeches should not be expected to bear the brunt of development alone. The document also fails to include reference to the wider impact of

					commercial developments, such as from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. If I remember correctly, in the early stages of public consultation on the Wilton Park site when it was a far smaller proposal there was already mention of the impact of development on Burnham Beeches including on the water table. A far larger development will presumably pose a greater threat. There is no reference to any strategy to manage air quality, which will also be heavily impacted by new developments. This is already acknowledged in the Council's draft plan and should be included. Traffic increase will be substantial, especially if people have to travel to reach open spaces (see above)
Mr Joseph Marais		88			1. There is no reference to the Burnham Beeches as a "Suitable alternative natural greenspace". I believe this omission was intentional and is a crucial protection to the woodland. 2. There is no reference by the Council to the additional environmental impact on the Beeches (and the area generally) to the additional 20,000sq.ft of commercial development proposed near Beaconsfield. 3. There is no reference to an Air Quality Management Strategy. Once again, I believe this omission is an intentional one.
Mrs Kate Morris		86			This document fails to set out a full Suitable Alternative Natural Green Space policy. There is also an omission of an Air Quality Mitigation Scheme, how even are planners/Bucks Council to consider changes if this data is not available. In addition, this document only takes account of increased visitor pressure from the new proposed residential development and does not include figures for pre-existing pressure, nor other potential or planned local changes which may impact on this green space. Please supply all the above detail in the document and republish.
Mrs Rachel Ferguson		171	I have significant concerns with the Burnham Beeches Supplementary Planning Document as follows: 1.1.7 If the HRA mitigation is not legally binding, then developers will find a way to avoid complying with it and/or pay to move the obligations elsewhere as has been seen so many times with other legal obligations. It is not a valid assumption that the HRA mitigation will be implemented, and additional protection measures must be in place to absolutely ensure that this happens. 1.3.1 & 1.4.4 - This document is based on the assumption that the Chiltern and South Bucks Local Plan will come into effect- this is not a valid assumption as the Inspectors have already given their initial view that it is not sound. This therefore needs to be reflected in the recommendations. 1.4.4 - This states that the Chiltern and South		

			Bucks Local Plan has "already been subject to full Sustainability Appraisal (including SEA) and assessed as having no significant environmental effect". This is not true - the assessment states that the Draft Plan will increase carbon emissions locally by 21%. This is a significant amount and is not acceptable in the current climate emergency. 1.4.3 Consulting on this document in the height of the pandemic lockdown is insufficient to ensure that statutory consultees are able to review the proposals properly. 1.6.1 This consultation has taken place over the summer holidays when many people are away or having to provide childcare and in a period where communication with interested parties has been made more difficult by the pandemic. A reasonable adjustment would have been to extend the consultation period as requested by the Beaconsfield Society- not to do this does not engender trust of the Council's motives in pushing this through.		
Ms Tatiana Poliakova		121			I strongly object to Beaconsfield Council attempt to re-write the rules protecting Burnham Beeches, stripping away its key protections as a Special Area of Conservation. As a Beaconsfield resident, I believe counsel's proposal misses the following points: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan I believe that is an attempt to once again disregard the environment and local residents. Do not allow Beaconsfield Council continue destroying our environment for sake of profits without consideration of facilities in the area.
Angharad Lescott		129			My objections are as follows: There is no reference to Suitable Alternative Natural Greenspace. This crucial line of defence to development is absent. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation.
Clive Chapman		182			I would like to object to the Burnham Beeches Supplementary Planning Document, for the following reasons:- As I understand it, Burnham Beeches has an extremely high European level of nature conservation site status. As such, there are restrictions on

					development within a 5.6km buffer zone, which includes Beaconsfield and Wilton Park. According to current regulations there is a requirement that any new housing development must include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area. This is likely to come into play with the proposed Wilton Park development, and I can see no reference to Suitable Alternative Natural Greenspace. This is essential if the proposed Wilton Park development goes ahead. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space Buckinghamshire Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, which will come into play with the development at Wilton Park, and the Council's draft plan
Sholto Mee		113			Having read the proposed plans for Burham Beeches I would like to object based on the following: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Dr Nigel Molden		125			I am writing to strongly object to the Burnham Beeches Supplementary Planning Policy document. The proposal removes the protection of the statutory 5.6km buffer zone for the surrounding areas including Beaconsfield. The impact of the proposed significant commercial development in Beaconsfield is not taken into account as neither is the management of air quality.
John Wheeler		133			I'm writing to object strongly against any dilution of the protection for burham beeches. It would be quite wrong to reduce the 5. 6 kilometre buffer zone of protection which surrounds it. Burnham Beeches is a very fine and special place. It must remain a special area of conservation with no change at all in the protection.
Mrs Barbara Firman		100	I am surprised that the excuse of a large tract of land historically earmarked for recreation of Londoners experiencing fresh open space and ancient forests is being used as an example of protection against development. The area already designated in your capture outline has a number of other protected woodland, pasture and agricultural land where diverse and ancient wild habitats exist with only the protection of the landholders (not necessarily owners) who judiciously manage and nurture the intrinsic value		

			<p>of the natural resources we hold here in abundance. Further developments of housing, highways (especially unused ones for show) and factory/warehousing would only destroy the local ecology and certainly not improve it. After the present health pandemic it seems highly likely that communities and indeed the structure of our towns with an increased take-up of home working, leisure and social welfare. It therefore seems an ideal opportunity to see how those new needs can be met efficiently and not pressurise further operation of a previous planning development which would either not be fully utilised or viable at point of sale. Plenty of small scale, sensitive developments have been made to fit in with our diverse rural and suburban planning without causing major upset in the environment, and the clamour for largescale expansion is not evident from local society groups I have come into socially distanced contact with. The world in general has to rethink and study the world now and going into the future with fresh eyes and a new approach. I therefore, suggest a reflective pause to all further deliberations until further studies/observations have been made.</p>		
Tim Mayell		84			<p>Whilst it is positive that the council have acknowledged that housing development within the 500m-5.6km boundary is likely to have a significant adverse impact on conservation and there is a presumption against net new development within 500m, I have the following concerns: 1) The mitigation measures proposed in my view would not be particularly effective. Access controls would be unfair to existing residents and I'm not sure how Visitor numbers/impact on the environment can be managed simply by public awareness campaigns of alternative recreational sites or the recruitment of a ranger. The starting point should surely be a capacity study based on current visitor numbers and what capacity is tolerable both for the environment and to protect the quiet enjoyment of the park. If that capacity has already been reached then this must be taken into account in any new housing development within the 5.6km zone. If this means significant restrictions on the volume of new housing development within the zone to protect the environment then this should happen. 2) One other potential mitigation measure is suitable alternative Green natural space or new recreational space as an integral part of any new developments to mitigate increased visitor pressure to Burnham Beeches. I understand that this is a requirement for any housing developments close to special areas of conservation yet there is no mention of this important point in the</p>

					supplementary plan. 3) commercial development in the area can also have an impact on air pollution and visitor numbers (with company staff visiting the park during lunch breaks or after work). There is no reference to the impact of commercial development on Burnham Beeches or of an air pollution strategy to mitigate the impact of any such development plans.
Raj Banga		131			As a resident of Beaconsfield, I would like to object strongly to the above plan on the following grounds among others: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. There is no need for this development particularly post COVID 19- there is likely to be an over supply of commercial space. There is no clear guidance and mitigating solutions on the impact of enhanced local traffic
Tony Ward		147			I am very concerned about your plans for Burnham Beeches. This seems very dystopian, without a concern for what we need to value for future lives. What is the Suitable Alternative Natural Greenspace? Can there be a meaningful substitution for Burnham Beeches, or is this desktop theory? Is Beaconsfield either the location for, or the beneficiary of, a further 20,000 sq ft of commercial space, particularly, given the commercial voids in the town, and the existing ease of access to local supermarkets. The Council is 'moving the deck chairs on the Titanic' and working on an outdated model of consumer needs. Will the environment be self-correcting? What is the strategy for the environmental negative impact of this plan. COVID has rendered a step change in the way society will work in the future. However, this plan seems totally ignorant of that shift. I am opposed to this plan
John Corran		123	I understand that you issued the above document on July 29th for comment by August 3rd. I object: The timing is too tight, given the holiday period.		
Ms Dawn Platts		187			I list below three points that are not considered within the above Document: 1. There is no reference whatsoever to 'Suitable Alternative Natural Greenspace'. This crucial line of defence is no longer there. 2. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. 3. There is no reference to Air Quality Management Strategy that should be a key element of environmental

					mitigation and which is theoretically already part of the Council's draft plan.
Christina Moore		149	And as for your response that we, the residents, would have little to comment on, I find appalling. The residents are the ones whose lives will be blighted if your unchecked proposals go ahead. Little to comment on- you should be ashamed to treat your electorate in such a way. I demand that all environmental protections are added to this planning proposal so that these areas of special interest are preserved for the future.		
Ms Elizabeth Foster		119			The grounds of my objection are as follows:- 1. There is no reference in the document to Suitable Alternative Natural Greenspace, which is a crucial line of defence against excessive development. 2. There is no reference to the environmental impact or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for nearby Beaconsfield. 3. There should be proper reference to an Air Quality Management Strategy. This should be an important element of environmental mitigation.
Paul Magee		167			There is no reference to suitable alternative green space, impacts of commercial development or air quality impacts all of which are to my understanding supposed to be addressed.
Mike Batt		111	I wish to register my objection to your evil plan to strip Burnham Beeches of its ANOB. You might like to think you are more akin to the Democratic Republic of Slough but we will fight you tooth and nail to stop your warped approach. Go back to planning school.		
Daniela Gill-Carey		145	I am surprised to find that an important planning document relating to the local area was issued over the summer period (29th July) and with such a short time on offer for comments from the local public. Consultation ending today? Given the serious nature of the matter and how much over building could effect this part of the country, this seems a ridiculously short amount of time. I have quickly reviewed the document today. I find it unsatisfactory. There would probably be further objections, should we have longer to consider this document.		
Gerry Halls		143			Whilst the Habitats Regulations Assessment concluded that new homes within 5.6 km would have an adverse impact on the integrity of BB SAC, no evidence has been cited that any of the proposed elements of the Mitigation Strategy is likely to be successful in achieving public awareness of impacts, much less accomplishing a change in behaviour. This is clear from public behaviour during lockdown, ignoring regulations, much less guidance. Other examples of public education such as

					<p>don't litter, eat sensibly, don't drink to excess, lose weight also have yet to have a noticeable effect. Additional rangers would no doubt contribute to mitigation, but one additional full-time ranger is not going to ensure 7days a week coverage of the whole SAC. Electronic interpretation is likely to be a prime target for vandalism. Maps throughout the area already provide information about where eg cycling is and is not permitted: this is completely ignored. The 10-year surveys will only provide retrospective evidence of visitor numbers and visitor impacts. By then the damage will have been done. How will informing revisions to the mitigation strategy undo that damage? How will the visitor access strategy and assessment of visitor carrying capacity be translated into limiting visitor access? That is the only way of controlling visitor numbers and limiting damage. Limiting the numbers visiting BB SAC is not a reasonable option if it means turning members of the public away because too many people now live within easy visiting distance. Similarly, Policy SP BP9 Building Beaconsfield requires alternative natural greenspace for recreation to mitigate the potential recreational disturbance impacts on Burnham Beeches SAC. There is no identification of where this alternative natural greenspace is located in fact that requirement specified in Table 1.1 is the only mention of it. It is disputed that this SPD is not likely to have a significant environmental effect: No mention has been made of Air Quality Management Strategy as a result of the proposed expansion of Beaconsfield. This should be an integral part of environmental mitigation. The environmental and visitor impact of the proposed 20,000sqft commercial space Neither has there been any quantification of the numbers of extra visits the proposed 1600 additional homes will generate nor a quantification of the effect the Mitigation Strategy will deliver. All of this leads to the conclusion that this will result in a significant diminution of the highest level of protection for this site is supposed to have.</p>
Professor Eddie Obeng		137			<p>There is no reference to Suitable Alternative Natural Greenspace, a regulation which is put in place as a legal requirement for Special Areas of Conservation, such as Burnham Beeches. It is an essential means of protecting this crucial conservation area from visitor pressure. Damaging increases in environmental and visitor pressures are potential threats posed by the Council's current draft plan. In addition, the document does not mention anything on Air Quality Management. This must be part of the strategy for planning, so cannot be omitted. The document does not include any reference to an environmental/visitor impact assessment, ref. The Council's draft plan. It is the Council's duty and role to</p>

				ensure the common good on the environs - the preservation of wildlife habitat, maintaining clean air, providing green space for health and enjoyment. I point out the above omissions from the document, trusting that the Council are planning to maintain our land as 'green and pleasant' rather than ugly, polluted and over-developed to swell pockets of the few.
Peter Bains		174		I am a resident of Beaconsfield and write to object in the strongest possible terms to the above proposal. I have read the proposed document and believe that it is deliberately excludes/understates crucial and highly relevant planning concerns and as such is not only irresponsible but also negligent. For example; Why is there no reference whatsoever to Suitable Alternative Natural Greenspace. This is a huge, obvious and crucial principle in the context of the proposal and is not referenced at all! Why is there no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. Why is there is no reference to an Air Quality Management Strategy; this should be a key element of environmental mitigation. How can the Planning department not include these matters in their SPD?
Anthony and Christina Meaden		90		The draft Burnham Beeches SPD would seem to strip away the key protection of Burnham Beeches as Special Area of Conservation and allow excessive development in Burnham Beeches and Beaconsfield. We know that the key points of a SAC are that there are restrictions on development within a 5.6km buffer zone (which in this case would include Beaconsfield). There is also a requirement for new housing development to include "Suitable Alternative Natural Greenspace" (or new recreational space). There would appear to be no reference to this in the Draft Plan and indeed where this land would come from. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000sqft of commercial space the Council are proposing for Beaconsfield. Finally there is also no reference to an Air Quality Management Strategy, which should be a key element in the Council's draft plan.
Mrs Alison Clifford-King		176		There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Mr William Barrett	Chairman North East Burnham	73		We recognise that the current proposed policy document represents an improvement in respect of

	Residents Association				<p>Burnham Beeches' current position. Whilst the document makes the reasonable assumption that the occupants of properties in closest proximity to Burnham Beeches are more likely to visit and seeks to address, quantify and mitigate the resultant impact of such visitors on the fabric of Burnham Beeches, it does not, in our opinion, include sufficient mitigants for visitors who reside between the 1.5 km to 5.6 km from the Beeches. Such visitors surely will travel by car to the Beeches, and therefore it would be pleasing to see addition measures to deal with the added impact of higher car usage to and from the Beeches. Please find below suggestions for further key improvements that we would like to see weaved into the draft policy to ensure that Burnham Beeches is afforded the additional safeguards it deserves and needs: No Net New Properties (residential and commercial) on the fringes of Burnham Beeches Protections should be extended to include key arterial and approach roads leading to Burnham Beeches, such as Green Lane, (Burnham), Grove Road, (Burnham) and Crown Lane (Farnham Royal) to name but a few, in order to protect and preserve the character and feel surrounding Burnham Beeches. More prominence should be given to the arterial routes into Burnham Beeches which lie in the green belt, such as the roads named above. We propose that such roads should be included in the no net new properties protective measures, not just the final destination roads terminating in Burnham Beeches. This would serve to ensure the visitor has a green journey into Burnham Beeches and would facilitate the transition from suburban landscape to the natural environment. Such measures would discourage unsympathetic development encroaching the periphery and approach roads into Burnham Beeches where the stark contrast would be most marked. 1.5 km to 2.5km Visitor Band Visitors to Burnham Beeches starting their journeys from 1.5km to 2.5km from the Beeches will generate a high footfall and the majority will arrive and leave by private car. We encourage the Council to plan for additional, specific mitigation to address this demographic group. For example, what measures could be included to encourage such visitors to arrive on foot and by cycle. For example, the inclusion of safe pedestrian and cycle routes plus traffic calming measures would be a further enhancement to the plan and benefit the surrounding villages with long-lasting, positive health and environment effects, a lasting legacy of an enhanced and more protectionist SDP for Burnham Beeches. Parking Issues The plan appears to place the burden of parking on The City of London. This is disappointing and perhaps an oversight. For example, the Council could consider improved signposting of nearby municipal</p>
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				<p>parking sites and also suitable pricing to promote the use of such peripheral parking provision to relieve the burden on the Beeches' scarce parking provision. Additionally, alternative transport may be provisioned to take visitors to and from the area and raising of awareness regarding existing public transport arrangements to and from Burnham Beeches/the surrounding area. Rat running & Speeding As local residents we can attest that Burnham Beeches currently suffers from rat-running. The Council could consider what mitigants may be introduced to actively discourage rat-running through Burnham Beeches such as the introduction of traffic calming measures and improved signage to discourage HGVs transiting through the Beeches. We do hope that you are able to incorporate some of these important suggestions into the final plan. We are encouraged by the fact that the SPD is a promising start and will result in the emergence of a more robust plan for the ongoing conservation and protection of Burnham Beeches. We are supportive of any measures to ensure that the SAC status of Burnham Beeches endures.</p>
Mr James Alexander Boyle		77		<p>I am a local resident and write on our entire household to advise that we believe the document is unbalanced and lacking in completeness. Principally, we feel the following areas are notably absent (and should be included by Buckinghamshire Council within its review so as to be balanced): 1. Reference to Suitable Alternative Natural Greenspace seems to be absent. 2. References to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield also seems absent. 3. Reference to an Air Quality Management Strategy also appears absent.</p>
Mr Colin Lawson		79		<p>Burnham Beeches currently enjoys an extremely high European level of nature conservation site status. As I read the planning document, such status, including the restrictions on development within a 5.6km buffer zone, is not continued and this is most objectionable. The document appears to be a back-door way to sidestep current regulations including a requirement that any new housing development must include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area. This is likely to come into play with the proposed Wilton Park development, and I can see no reference to Suitable Alternative Natural Greenspace. This is essential if the proposed Wilton Park development goes ahead. It is also essential if other development plans are to introduced within the Beaconsfield area. The impact on Burnham Beeches from the 20,000 sq ft of commercial space within Beaconsfield</p>

					as currently proposed by Buckinghamshire Council are not covered by the planning document. There is no reference to an Air Quality Management Strategy, particularly in relation to the development at Wilton Park, within the Council's draft plan.
Mr Roger Worthington	Secretary Hitcham & Taplow Society	185			The consultation document is acceptable as far as its current content is concerned but there are significant omissions compared with the current regulatory regime. Specifically Burnham Beeches currently has the highest European level of protection for a nature conservation site. To our understanding this requires that any housing development within the 5.6km zone (which includes most of Taplow) must be accompanied by a Suitable Alternate Natural Greenspace provision. This is a crucial omission from the draft and the SPD should not be accepted without such inclusion. Additionally the SPD should include reference to an Air Quality Management Strategy, without which the longer term survival of the Beeches will be seriously threatened.
Mr Andy Barnard	City of London	95			Further, The City Corporation also supports the statement in paragraph 3.3.3 that should additional development come forward, over and above that set out in the Local Plan, projects within the SAMMS will need to be reviewed to ensure that they are fit for purpose. The City Corporation also welcomes paragraph 4.2.3 which provides for regular review and paragraph 4.1.2 stating that the costs of individual projects can be modified should that outlined in the strategy be found to be over, or under, estimates
Mrs Eva Lipman	President Hitcham and Taplow Society	108			Because Burham Beeches has the highest level of protection at the European Level which a nature conservation site can have and Taplow lies within 5.6Km the SPD must include a 'Suitable Alternate Natural Greenspace' provision and the SPD must state this. It should not be accepted without. It is vitally important that there should be an Air Quality Management Strategy in the SPD without which Burnham Beeches would not remain healthy.
Mrs Deirdre Smaje		158	While the strategic proposals no doubt ticks the boxes of 'due process', It seems to me extraordinarily optimistic to claim for example that one can mitigate the likely ecological damage of additional footfall through signage and educational programmes. Surely the current crisis has given us the clearest of lessons on how people will behave, when their personal need/desire to visit outdoor spaces overrides any cautionary messages they may be given. It is naive to think otherwise		
Mr Joseph Marais		89		I am incensed by the temerity of the Council in adopting such an attitude to our valuable heritage. I am severely dismayed by the wanton lack of respect that the Council has repeatedly displayed	

				regarding the opinion of the public in trying to rush through these proposals. The people of Buckinghamshire and specifically the Council have a duty of care to preserve the Burnham Beeches and indeed, the entire natural environment of the County. In my opinion, the Council is failing in doing so.	
Mrs Kate Morris		87	With reference to the possible amendments of the protected zone around Burnham Beeches - the arrangements detailed in the SPD are based on the Draft Local Plan for the area previously designated as Chiltern and South Bucks zones. This Plan hasn't yet been passed (and indeed, post Covid I would suggest needs a total overhaul to reflect the changes in the way that we live) so spending money on this consultation is premature. If you put Burnham Beeches into a search engine you get entries for the quality of its biodiversity, references to the quality of Ancient woodland within the boundaries, The Chilterns AONB - Map categories declares it a site of international importance - get this wrong, and the damage will be irretrievable.		
Mrs Rachel Ferguson		170			2.2 There is no reference to the environmental or visitor impact from the 20,000 sq ft of commercial space which is proposed for Beaconsfield in the Draft Local Plan. The evidence base has not sufficiently taken into account the potential adverse environmental impacts of the Local Plan development. 3 There is no reference to Suitable Alternative Natural Greenspace as a mitigation. Why has this requirement been removed? This is critical, as the only way to keep visitor numbers at a level which does not damage the habitat is to provide sufficient local alternative capacity for people to enjoy the outdoors - human behaviour is such that people will act in their own interests (wanting to go for a walk) and not in the interests of the protected area if it is the easiest or only available option. This has become even more essential as more people have been drawn to the countryside during the pandemic when other inside alternatives have been unavailable. 3 There is no reference to an Air Quality Management Strategy as a mitigation. Why is this not included? This is critical to ensure that the habitat is not damaged by visitor numbers. 3.1.4 Financial contributions as mitigation merely provide developers with a way of buying themselves out of their obligations or, worse, an opportunity to evade their obligations altogether by exploiting loopholes in legislation as demonstrated by their approach to s106 obligations. This is insufficient protection and must have legal weight behind it. 3.3.3 If these projects are considered essential, there must be some legal guarantee that the costs will be less than or equal to the amount of funding which would be provided through contributions. There is no

					indication on how they would be prioritised or if some are dependent on others. This must be clarified and made legally binding on developers BEFORE applications are approved. Table 3.1 Whilst these initiatives are worthwhile, it is evident from studying public behaviour during the coronavirus crisis (e.g. asking people not to go to beaches) that education is insufficient to stop people exercising what they see as their individual right to do what they want to. There must be legal constraints to prevent both individuals and developers from simply acting in their own interests.
Mr Robert Hanbury		134	I endorse the submission from the Hitcham & Taplow Soc.		
Mr Roger Bruce		110			I write with regards to the supplementary planning document relating to Burnham Beeches and must object to the proposals on the following grounds: 1. There is no mention of the impact on air quality through an air quality management strategy which is required to mitigate any development proposals 2. There is no reference to any alternative natural greenspace following any development 3. There is no reference in the document to any impact of the environmental or visitor impact on Burnham Beeches from the large 20,000 sq ft of commercial space proposed by the Council for Beaconsfield. I trust these considerations will be fully assessed.
Mr Jon Pender		124			I write with concern that there may be some unintended consequences arising from omissions in this report which could have a detrimental impact on the Beeches as well as the surrounding areas, including Beaconsfield. I am concerned that: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. I understand that the Beaconsfield Society will also be submitting a more detailed series of concerns which I also support.
Angharad Lescott		130	I am writing with reference to this recent consultation. Burnham Beeches is enormously important natural space and houses a wide variety of wildlife. My family uses it a lot and preservation/access to this ancient woodland is hugely important. Please don't erode environmental protections in the pursuit of yet more unwanted development.		
Mr Neil Salisbury	Trustee CPRE Bucks	103			We support the proposed Strategic Access Management and Monitoring Strategy (SAMMS). However we do have

				some reservations about the presumption against residential development with 500m and the financial proposals. The proposed presumption against new development within 500m is totally understandable, but it suggests Burnham Beeches is at capacity for visitors? We spend much effort campaigning for people to have open spaces and countryside close to where they live and then this SPD proposes to stop them doing so through this assumption! This is symptomatic of our ever more crowded South East area which we believe is at the heart of this dichotomy.
Mr Andrew Findlay		107		I OBJECT to the SPD in its current form. The mitigation measures seem to be largely centred around monetary payments for monitoring the damage caused by development, rather than broader actions to avoid it. There is no mention of Suitable Alternative Natural Greenspace as a requirement for new development. This must be included. It simultaneously improves quality of life for those living in any new development and reduces the impact those people will have on the sensitive sites that this document is supposed to protect.
David Gilbert		115		There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Roger Cousins		117		I would like to raise an objection to your draft planning document which appears to miss out a number of important points e.g: 1. Environmental Impact - No reference is made to this although clearly a 20000 sq ft of commercial space suggested for Beaconsfield, would be damaging. 2. There doesn't appear to be any reference to an Air Quality Management Strategy which I thought was a key item in environmental considerations. 3. I would have expected some reference to a Suitable Alternative Natural Greenspace to have been made. This seems to be missing.
Paul Kent		127		I strongly object to the proposals in the above document, principally for the reasons below. In addition, the current government's proposals to remove many planning controls give me no confidence that reasonable local interests will be given any consideration in future. There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to

					an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Graham Smith	Mycroft Group, Mycroft	135			I note, with distaste, your truncated consultation with regard to the local plan. I must object to your plans because they fail in three respects: What arrangements have been made for SANG -Suitable Alternative Natural Greenspace. What, and there will be, is the environmental and/or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. Why is there no reference to an Air Quality Management Strategy?
Mr Tony Milnes		139			I understand they the Supplementary Planning Document for Burnham Beeches omits two important elements, a Suitable Alternate Natural Greenspace for any development within a 5.6 km zone around Burnham Beeches, and a Air Quality Management Strategy.
Dr Rhiannon Rowsell		141			The SPD is deficient as it makes no reference to the following very important matters: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This must be addressed. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Rashpal Hullait		151			I would like to register my objection to proposed changes with respect to Burnham Beeches as a special area of conservation. I would like to object on the following grounds: There is no provision for Suitable Alternative Natural Greenspace. The impact of visitor or environmental pressures on Burnham Beeches is not considered as part of the 20,000 sq ft of commercial space that is being proposed for Beaconsfield. Air Quality Management Strategy is a key element of environmental mitigation and which is not mentioned. Key habitats will be affected once again no proper independent assessment. Impact of rain and flood waters and impact on habitat of chemicals once again not independently assessed. Carbon emissions will increase according to Councils own numbers by at least 20 % and no independent assessment of damage caused by these increased emissions
Ged Ashcroft		153			I would like to object to this proposal on the following grounds: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy, that

					should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Mrs Heather Brown		155			I would like to offer my objections to the above document. My chief concern is that it contains no requirements to provide suitable alternative green space to replace that lost by development. Green space is essential to maintain the mental health of residents. In addition the knock on effects on Burnham Beeches due to the commercial space has not been considered. It seems rather foolish to not be taking account of current changes in working practise to be planning commercial space that will no doubt be left empty in the near future.
Suzanne Metcalf		159			I am a resident of Beaconsfield and am very concerned about the planned major development. No thought or plan seems to have been put in place for this major change in relation to green space that is required and the environmental impact of this development. I am 100% against the development as it is which will impact so much on our town. There are needs for housing but why do many in the one space?
Mr & Mrs Clive & Janet Hann		161			It is of great concern that the Burnham Beeches Supplementary Planning Document of the 29th July has chosen to make no reference to the following points: 1): There is no reference to suitable alternative natural green space 2) No reference to the environment or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space proposed for Beaconsfield. 3) No reference at all to an air quality management strategy. This should be a key element of environmental mitigation and which is theoretically already part of the Council's Draft Plan.
Mr Anthony Wright		163			This is a special area of conservation and should be protected accordingly. These areas are increasingly rare and should not be damaged in any way. There is no reference to Suitable Alternative Natural Greenspace. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. And there is no reference to an Air Quality Management Strategy. We need to stop this for all of us and more critically for our children and generations to come. Once gone it is gone. We are but guardians of our beautiful wooded and green landscape. Please reconsider.
Mr Iain G F Lee		165	I write to lodge my strong objection to the above referenced planning document. This document has all the hallmarks of a Trojan Horse: Superficially it appears quite innocuous but concealed from view, by virtue of its many highly relevant omissions, is the potential it has to inflict serious and permanent damage to the Burnham Beeches		

			Special Area of Conservation. It is clear that this would be the inevitable consequence of pursuing the direction of travel foreshadowed by this seemingly innocuous SPD.		
Kate Iley		169			This proposal is deficient on at least the following points: - it makes no reference to the provision of Suitable Alternative Natural Greenspace - what is the proposed to satisfy this requirement? - BCC's Green Belt proposals include release of land within the scope of this proposal - there is no coverage of the visitor and environmental impact on Burnham Beeches of the Green Belt proposals. - what happened to the Air Quality Management Strategy, that should be a key element of environmental mitigation.
Hilary Coales		180	The document was issued on the 29th July, with a consultation period running until the 3rd September. This means it will have been hidden in the period of people trying (in the present difficult circumstances) to sort out holidays, jobs, schooling, many many problems that are new for people to contend with. Which rather suggests, the Council wanted to hide it and rush it through without giving people enough time to hear about it, find out the details and if they wish, to let their views be known. Why was a longer consultation period not given?		
Peter Fitzpatrick		184	I am writing to comment on and object to this SPD. I live in Bourne End and regularly walk in and enjoy the unique amenity at Burnham Beeches. The starting point must be that nothing must be done and no development must be permitted which in any way impacts upon or might impact upon the public's enjoyment of and the special natural environment at Burnham Beeches. The SPD is deliberately obtuse. It does not set out its purpose, but contains a number of bald assertions which members of the public are expected to accept without question. This is unacceptable, the more so given that Burnham Beeches is such an important site to the wider community as a Special Area of Conservation (SAC). Specifically, it is not acceptable or sufficient that the document baldly states that the SPD expands on policies and principles in the National Planning Policy Framework; and that the existing Chiltern District Core Strategy, South Bucks District Council Core Strategy and draft Chiltern and South Bucks Local Plan are already subject to a full Sustainability Appraisal and assessed as having no significant environmental effect. A full and proper explanation of these assertions, supported by evidence, is the least that is required. In the		

			absence of these, any purported consultation exercise is fundamentally flawed.		
Linda Vick		132			I am concerned that the above document leaves out the requirement for Suitable Alternative Natural Greenspace to be provided to compensate for new developments. This requirement is essential to protect the area for the future. Please ensure that it is reinstated.
Patrick Johnson		118			I am writing to express my very grave concerns about the above plan. I am most concerned that; There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space which the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation.
Mrs Gillian Walley		150			I am very concerned to note that the above planning document does not refer to the following: 1. The Suitable Alternative Natural Greenspace 2. The environmental and visitor impact on Burnham Beeches from the 20,000 square feet of commercial space proposed for Beaconsfield 3. An air quality management strategy Please be kind enough to explain to me why there is no reference to these extremely important points
Robin Firman		99		Having read the draft Supplementary Planning Document, I note that the Burnham Beeches Conservation Area needs protection from the possible detrimental effects of the controversial Chiltern and South Bucks Local Plan. We all need protection from this disastrous local plan which, if allowed, would use "green belt" land, with the consequential loss of trees and natural habitat, to build unneeded houses around Beaconsfield. The proposed office developments, with further loss of trees, do not square with the council's aspirations for the environment as expressed in the draft document. There is a lack of "joined-up thinking", if Burnham Beeches needs protection from over-development, so do we in Beaconsfield.	
Tim Mayell		85		As a Beaconsfield resident living in a flat I visit Burnham Beeches regularly. Over the past few months I have observed a huge increase in visitor numbers with many visitors coming from Slough as well as from the South Buckinghamshire area. At times, even during weekdays, it is now very crowded. This is partly due to the impact of the furlough scheme but also due to more people within the area working from home or unemployed. This trend is likely to continue in the long term and needs to be taken into account in any housing development plans for the area. I would be surprised if the visitor numbers this year are not significantly higher than those quoted in the last official study a few years ago.	
Carl Hanratty		128			This is to register my opposition to this plan. There is no reference to Suitable Alternative Natural Greenspace. This MUST be included and taken notice of in your considerations. There is no reference to an Air Quality

					Management Strategy. This is part of the Council's draft plan. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. One has to question why the Council is adopting underhand methods when they are an elected body who are supposed to be acting on our behalf and in the interests of local residents. It appears the Council is working to their own agenda and not acting legally- a serious matter for a supposedly representative body.
John Corran		122			The hidden objective seems to be to remove Burnham Beeches' status as a Special Area of Conservation - presumably to facilitate the excessive development contemplated between Burnham Beeches and Beaconsfield. Burnham Beeches' status requires: Suitable Alternative Natural Greenspace. Consideration of the environmental impact on Burnham Beeches of the proposed development. An Air Quality Management Strategy. In light of the above, the Supplementary Planning Document should be withdrawn
Christina Moore		148			Regarding the proposals for Burnham Beeches Special Area of Development. I am disappointed that once again the council is riding over protections for green belt in South Bucks. Especially after such a time as this pandemic, in which we have learned that green spaces and the environment are so incredibly important to people's welfare. The attempt, to rewrite the planning rules that protect Burnham Beeches, is underhand and hopefully illegal. Within the planning document there is no mention of the Suitable Alternative Natural Greenspace which is a part of the current regulations for new housing developments. Nor is there any reference to the damage that would be done to Burnham Beeches should the 20.000square feet of commercial space go ahead in Beaconsfield. The potential damage by extra visitors has not been taken into account. And finally there is no reference to air quality management within the planning document. We have recently discovered how important air quality is to our health and how pollution increases the risk of covid19 and yet you do not mention how you will manage air quality in your planning proposals.
Kate Dicker		156			I write to object to this document, I have tried to object on the portal but it appears not to be working for comments even though I have registered. This wordy document does not answer some very key questions including: Where is the alternative area of natural green space that is required to be provided? Where is the air quality management strategy explanation? There is also no reference to the proposed additional buildings, homes and commercial space proposed within Beaconsfield which will have an environmental and

					visitor impact and does not appear to be included in this document. Please refuse this application until the satisfactory solutions are provided
Joan Martin		181			I wish to make the strongest possible objection to the recent document that you have released concerning the above. You have neglected to mention in your document Suitable Alternative Natural Greenspace which protect the area. There is no mention to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy that is a key part of environmental mitigation of which is supposed to be part of the Councils draft plan. WHY HAVE THESE VITAL POINTS BEEN LEFT OUT OF THE DOCUMENT. No doubt this is an underhand way of getting what you want by omission. This is not acceptable. We need to look after and protect our surroundings from ever encroaching developers and Councils who want to destroy our area.
Ms Elizabeth Foster		120	I am writing to object to your draft planning document regarding the protection of Burnham Beeches, which strips it of key protections as a special area of conservation. I believe the document opens the floodgates to excessive development in an area of natural beauty. Indeed Burnham Beeches currently has the highest European level of nature conservation sites, so its importance cannot be overstated. Leaving important elements out of the document will give the Council free reign to pursue their reckless development policy in key green belt areas of South Bucks.		
Paul Magee		166	I have read the above document and as you would expect to a layman it is hard to comprehend, but what I do believe the document to be is an attempt to reduce the protection on the increasing rare green and less crowded space in a very crowded part of the country. It is worded in a way that makes you think it is doing something good for the environment while actually I believe it to be a way of allowing yet more development in what are supposed to be protected areas. I do not understand why a council which is paid for by us and is supposed to represent us always seems to be acting against the interests of the people it is supposed to represent. I think it would be far better if the council were to state its true objective when publishing these sort of documents so that we could make an objective judgment on what is trying to be achieved without having to try to read between the lines. Also it seems to be an awful lot of money to achieve what is stated in the		

			document. Money which could probably be far better spent providing other council services.		
Roger Edwards		126			I OBJECT STRONGLY to these proposals on the following grounds: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence for Beaconsfield and is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq. ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy. This should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. It seems that our own elected council has let us down again. Please record my objection and forward it to the relevant planning parties.
Gerry Halls		142	I wish to object strongly to the proposed reduction of environmental protections which are so important both for Burnham Beeches Special Area of Conservation and for Beaconsfield. Further I cannot believe you would not really expect any local resident, town or parish council, or local amenity group concerned about the impact of new residential development in the South Bucks (and a small part of Chiltern) area, to have too much to comment on. Your refusal to extend the consultation period beyond 3rd September so that residents currently on holiday might have a chance to respond is disgraceful, and encourages the view that you are trying to pass through these proposals unnoticed. Although the policy document (1.1.4) stresses that SACs are within the top tier of nature conservation sites and [should] have the highest level of protection in the United Kingdom hierarchy of sites designated to protect important features of the natural environment, the plan signally fails to achieve this. It is not clear how the June 2019 S Bucks Local Plan that requires development not to adversely affect the integrity of Burnham Beeches SAC will meet this requirement.		
Peter Bains		175	I also note a paragraph of the Council's response to a (very reasonable) request from the Beaconsfield Society to extend the time frame to respond to the SPD 'We would not really expect any local resident, town or parish council, or local amenity group concerned about the impact of new residential development in the South Bucks (and a small part of Chiltern) area, to have too much to comment on' Why I wonder would a Council respond in this extraordinarily patronising manner- could it be that by NOT including critical		

			matters relevant to the SPD they want it to fly under the radar?		
Mrs Susan Obeng		138			There is no reference to Suitable Alternative Natural Greenspace, a regulation which is put in place as a legal requirement for Special Areas of Conservation, such as Burnham Beeches. It is an essential means of protecting this crucial conservation area from visitor pressure. Damaging increases in environmental and visitor pressures are potential threats posed by the Council's current draft plan. In addition, the document does not mention anything on Air Quality Management. This must be part of the strategy for planning, so cannot be omitted. The document does not include any reference to an environmental/visitor impact assessment, ref. The Council's draft plan. It is the Council's duty and role to ensure the common good on the environs - the preservation of wildlife habitat, maintaining clean air, providing green space for health and enjoyment. I point out the above omissions from the document, trusting that the Council are planning to maintain our land as 'green and pleasant' rather than ugly, polluted and over-developed to swell pockets of the few.
Dr Michael Gill-Carey		144			Firstly the document makes no mention at all of "Suitable Alternative Natural Greenspace" that would be necessary as a result of the proposed building in the area. Secondly there is no consideration of the impact (environmental and visitor) on Burnham Beeches from the creation of 20000 square feet of Commercial space being proposed for Beaconsfield. Thirdly there seems to be no reference to an Air Quality Management strategy.
Mr Martin Maund	Chairman Ellington & District Residents Association	199	It is noted that on your Buckinghamshire Council website for commenting on the consultation is headed Burnham Beeches SAC Strategic Access Management and Monitoring Strategy SPD. The SAC acronym stands for Special Area of Conservation, however this aspect of Burnham Beeches has been completely ignored in the SPD, leading to the SPD being fundamentally flawed. A Special Area of Conservation is the highest European level of protection for a nature conservation site which are strictly protected sites designated under the EC Habitats Directive, however specified protection criteria have been omitted from the Burnham Beeches SPD and the SPD thereby fails in its duty to uphold protection of Burnham Beeches as a Special Area of Conservation.		
Mrs Sue Moffat	Town Clerk Gerrards Cross Town Council	311		We agree this is an important space within our local environment; helps with air quality and healthy exercise & a Nature Reserve. It is important to minimize the impacts of the modern world encroaching; housing growth, visitor impact, fires etc.	

Mrs Kari Dorme		364			I think that there has not been any safeguards put in place for the line in the document which specifies that a Suitable Alternative Natural Green Space should be found if this plan goes ahead. Nothing has been put forward for this. This is most important if there are plans for 20.000 square feet of office space near Beaconsfield.
Mr Stephen Rowsell		326			I strongly oppose your plan to re-write the rules protecting Burnham Beeches, stripping away its key protections as a Special Area of Conservation. The following points are the issues I'm most concerned about: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. Burnham Beeches is a magnificent natural resource and must be protected at all costs.
Dr Les Davies		270	The timing of this SPD is premature as it relates to policies contained within the emerging Chiltern and South Bucks (C&SB) Local Plan which is not yet approved and may need amendment to make it approvable. As such this SPD would be impacted. It should be delayed until the C&SB plan is closer to being adopted.		
Mr Simon Woolf		285			The proposed changes will do away with the requirements for to Suitable Alternative Natural Greenspace within the 5.6KM buffer zone and increase the urbanisation of the area. Surely this will increase the number to visitors to Burnham Beeches, but the document makes no reference to the impact, why? In trying to measure any impact from urbanisation, surely there is a need to have systems in place that monitor the pollution levels and possible effects on Burnham Beeches. Why is this not mentioned in the document?
Ms Shae Withers		203			Please note my objection to the Burnham Beeches supplementary planning document and my comments below: Unfortunately there are omissions when compared with the current regulatory regime: 1. requires that any housing development within the 5.6km zone must be accompanied by a Suitable Alternate Natural Greenspace provision. This is omitted from the draft and the SPD should not be accepted without such inclusion. 2. Where is the Air Quality Management Strategy, omission would seriously impact the survival of the Beeches? 3. Where is the reference to the environmental or visitor impact on Burnham Beeches arising due to Additional commercial space proposed for Beaconsfield?

Mr Paul Stimpson	Planning Policy Lead Officer Slough Borough Council	201		<p>Slough welcomes Buckinghamshire's efforts to meet its requirements to protect Burnham Beeches SAC, and notes the SPD does not need to be subject to an SEA. The Council notes it has historically worked together with South Bucks District Council to understand and address impacts on the Beeches, but that the Borough's planning team were not formally consulted on the Footprints updated methodology or the evolution of proposals to an SPD. While there is no duty to cooperate with the SPD or Habitat Regulations, Slough consider it would have been good working practice to engage Slough prior to the consultation. Slough therefore request the SPD, SEA and Footprints Report are amended to include that they cannot and do not set a precedent for either net new housing in Slough, including within the 5.6km buffer; or the emerging Slough Local Plan. This is necessary as: i) The assessment and mitigation of impacts on the SAC are covered by Slough's own Habitat Regulations Assessment process so it is outside of the scope of the Buckinghamshire Council SPD to make assumptions for Slough and its Local Plan (see South Bucks DC and Slough BC's jointly commissioned consultant Lepus's SA HRA Scoping report for SBC); ii) The Council's officers and Members have not been consulted on or agreed the content referring to Slough (for example assumptions on the housing requirement, distribution, trip generation and origin, and associated recreation space provided with housing development); iii) It is important to ensure that the SPD (with its SAMMs, Footprints Report and SEA Screening opinion) do not prevent Slough from bespoke discussions, including with Natural England and applicants, to provide CIL compliant mitigation for potential impacts on the SAC from net residential units within Slough, including to provide informal natural green space as close to those as possible. Slough would also like Buckinghamshire Council to note that if the SPD is not amended as requested it upholds the grounds of Objection against the SPD raised in the Legal Opinion by Clyde and Co on behalf of Slough Borough Council accompanying this letter. Legal Opinion by Clyde and Co: The Draft SPD, which relates solely to the south and east planning areas of BC's jurisdiction, sets out a proposed mitigation strategy that is designed to avoid adverse public access and disturbance on the integrity of the SAC arising from residential development. This strategy comprises: (a) a presumption against residential development within 500m of the SAC; and (b) requiring a standard financial contribution to be paid for each new net dwelling that is permitted in a zone of influence, of which (a) is of particular relevance to SBC. This proposed zone of influence is drawn as an area of between 500m and 5.6 kilometres from the SAC, which extends well into SBC's administrative area. This zone is based upon the 75th percentile from data obtained from visitor surveys carried out in 2013, 2016 and 2017 from around 900 interviewees i.e. the distance within which 75% of interviewees live. Although the Draft SPD has no direct bearing upon the determination of any planning application by SBC, once adopted: (a) it will be relied upon by BC and Natural England in responding to applications that fall to be determined by SBC and</p>	
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			<p>are considered to have an impact on the SAC; (b) it will assume some credence as establishing the cost of mitigation that is required to address likely harm to the SAC arising from residential development that is permitted within the zone of influence; and (c) generally, risks the establishment of an unhelpful precedent particularly in the context of SBC bringing forward its own local plan in due course. . Accordingly, and for the reasons set out below, it is recommended that objection be raised in response to the Draft SPD. Potential Grounds of Objection Subject to further consideration by officers, it is considered that the Draft SPD is objectionable on the following grounds. The Draft SPD is, in fact, a development plan document within the meaning of the Town and Country Planning (Local Planning) (England) Regulations 2012. These Regulations provide that a document that includes 'development management and site allocation policies, which are intended to guide the determination of applications for planning permission' must be development plan documents as opposed to SPDs. In this context, it would appear that the Draft SPD satisfies this definition by, for example, mandating that planning permission shall be refused if an applicant declines to pay the requisite contribution etc. On the face of it, it is intended to guide the determination of future applications for residential development in the relevant zone of influence. If so, it should be promoted as a development plan document. This is an important distinction because it would mean that the policy would be subject to: (a) public examination by an independent inspector (in the same way as the Draft Plan); and (b) the duty to co-operate. By promoting this policy in the Draft SPD, BC is circumventing these requirements. There is no explicit policy basis for the Draft SPD. It refers to the following local policies: (a) policy CS24 (Biodiversity) of the Chiltern District Core Strategy (as adopted in November 2011). This is a generic policy relating to the conservation and enhancement of biodiversity within the Chiltern district. It provides that Chiltern District Council ("CDC") will seek to protect and enhance all sites of international, national, regional or local importance (that would include the SAC). The reasoned justification for this policy adds that, having undertaken a Habitats Regulations Assessment, CDC is satisfied that adequate mitigation solutions have been put forward in the Core Strategy (and related plans and strategies) to ensure major impacts will be avoided at important European designations. It adds that CDC will assess whether additional mitigation measures are required at the SAC and whether they can feasibly be put in place to help South Bucks District Council mitigate potential impact from additional traffic; (b) policy CS32 (Green Infrastructure) of the Chiltern District Core Strategy (as adopted in November 2011). This policy simply provides that CDC will identify, protect and enhance strategic green infrastructure assets; (c) core policy 9 (Natural Environment) of the South Bucks District Core Strategy (as adopted in February 2011). This policy states that the highest priority would be given to the conservation and enhancement of the SAC, which will be achieved by restricting the amount of development in close</p>	
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			<p>proximity to it and ensuring that development causes no adverse effect on the integrity of the SAC. It goes on to state that further details and mechanisms for achieving this would be given in a Development Management DPD. The reasoned justification for this policy adds that where a specific development could result in significant effects in the SAC, it will need to be supported by a HRA to determine whether mitigation measures are required. No DPD has since been pursued by BC; and (d) draft policy DM NP3 (Natural- Burnham Beeches Special Area of Conservation) of the emerging Chiltern and South Bucks Local Plan 2036 ("the Draft Plan"). For the purposes of the Draft SPD, this is the key policy and states that an access management and mitigation scheme has been agreed with Natural England, the highway authority and the City of London. It is understood that this agreed scheme is, in effect, the Draft SPD. This policy states that, in order to provide on-site mitigation for additional visits to the SAC arising out of additional development within 5.6km of the site and beyond 400m, a precautionary approach would be taken for the protection and conservation of the SAC such that planning permission will only be granted if it would not give rise to significant adverse effects upon the integrity of the SAC. It adds that: Major residential developments that would result in a net increase in homes located between 400 metres and 5.6 kilometres from the Burnham Beeches SAC will be required to: 1. make financial contributions towards the Burnham Beeches Access Management Scheme, or any subsequent scheme which replaces this; and 2. demonstrate that no adverse impacts on the SAC will arise as a result of additional visitors to the SAC from the development. This might require the provision of bespoke mitigation, such as Suitable Alternative Natural Greenspace, as part of the development in order to offset visitor pressure to the SAC. Such mitigation will need to be determined in agreement with Natural England [emphasis added] (e) draft policy SP BP9 (Building - Beaconsfield) of the Draft Plan, which allocates land to the south and east of Beaconsfield for approximately 1,600 homes. It can be seen, therefore, that the specific mitigation required in the Draft SPD is inextricably linked to the above draft policies. It has no such direct link with the adopted policies. This is consistent with BC's response to the Inspector's initial questions in relation to the proposed examination into the Draft Plan, pursuant to which it indicated that a mitigation strategy for the SAC is proposed to be in place before adoption of the Draft Plan. However, there is a concern here that this is the wrong approach and that the Draft SPD should only follow once the policies upon which it is expressly predicated have been found to be sound i.e. upon adoption of the Draft Plan (including policies DM NP3 and SP BP9, as above), following an independent examination. Until this time, the detailed policy justification for the Draft SPD is not clear. On this, it is also important to note that draft policies SP BP9 and DM NP3 are subject to objection and, accordingly, only limited weight can be attached to them at this time. Related to the above, it is inappropriate and premature to progress the Draft SPD in advance</p>	
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				<p>of adoption of the Draft Plan. Whilst the Draft Plan has been submitted for examination by the Secretary of State, the Inspectors who have been charged with conduct of this examination have expressed concerns about whether BC has discharged its duty to co-operate. BC has requested that this issue be addressed at a hearing session in person, which has yet to be arranged. There is, therefore, real doubt about the extent to which the Draft Plan will be able to progress to adoption. Accordingly, it is inappropriate for the Draft SPD to be predicated upon a draft policy that attracts only limited weight and in respect of which there is a real prospect that it might not even be adopted (either in its current form or as modified).</p>	
<p>Mr Ben Knight (Agent: Mr Ed Rehill, Savills)</p>	<p>Land Steward Society of Merchant Venturers</p>	<p>237</p>			<p>Standard sum payable The SMV is concerned that the per dwelling contribution sought in the draft SPD is inadequately evidenced. The standard sum payable for each net new dwelling will not be capable of relating to the scale and kind of relevant developments. The proposed standard sum payable for each net new dwelling is not directly related to the relevant development and does not have regard to the different characteristics of different occupiers (for example, a family living in a 4-bedroom house compared with a sole occupancy 1-bedroom apartment or house). The SMV therefore propose that if a sum is required for each net new dwelling then the sum payable should be on a sliding scale whereby dwellings with more bedrooms are required to contribute more than those dwellings with fewer bedrooms. This approach is being used for other mitigation strategies elsewhere in England such as for the Solent Recreation Mitigation Strategy (December 2017). Additional monitoring fee and legal costs The SMV consider there is no justification for payment of a £541.02 monitoring fee to Buckinghamshire Council in addition to the standard sum per dwelling contribution. The proposed mitigation strategy includes several projects that should address or integrate monitoring so the monitoring element should not be an additional cost. It is also not clear whether this monitoring fee is per development proposal or applicable for each net additional dwelling. The draft SPD also states that 'legal costs' will be determined on a case by case basis. Further information on these fees should be included in the SPD. Viability testing The draft SPD sets out a calculation for a contribution of £2,023.87 plus a monitoring fee (and legal fee) for each net new home that is granted planning permission from 1 March 2020. This is a significant cost to each new home being built compared with, for example the Solent Recreation Mitigation Strategy (December 2017) which requires an average developer contribution of £564 per dwelling. The calculation is based on an unevidenced formula that is the total cost of the strategy over 80 years being payable by the untested</p>

					<p>assumption of a total 2,364 anticipated new homes to be built from within the Buckinghamshire portion of the buffer (from 500m to 5.6km) within an ungiven timescale. The SMV consider that the period (i.e. 80 years) over which the 3 mitigation scheme (and related contributions) has been calculated is unreasonable and far in excess of the life of the emerging Chiltern and South Bucks Local Plan. The SMV is also concerned that the total number of new homes to be built within the Buckinghamshire portion of the buffer may also change as a result of potential amendments to the emerging Chiltern and South Bucks Local Plan and that this could impact on the likely sum payable. The proposed sums payable for each net new home have not been factored into the viability testing of the emerging Chiltern and South Bucks Local Plan. It is therefore unclear whether the proposed sums payable when considered with other requirements of the emerging Local Plan, such as CIL and affordable housing, are viable for new housing developments. Suitable alternative mitigation The draft SPD provides no specific guidance on suitable alternative solutions to mitigate impacts of new development on the Burnham Beeches SAC. The SPD should therefore include guidance for sites which can 'consume their own smoke' and are capable of providing on-site suitable bespoke mitigation, such as Suitable Alternative Natural Greenspace (SANG). Where an on-site SANG is provided, the SPD must also make clear that the standard sum for each net new dwelling will not be required to be paid. It is noted that the Footprint Ecology Report (2019) ('Impacts of urban development at Burnham Beeches SAC and options for mitigation: update of evidence and potential housing growth, 2019') does not take into account any mitigation measures, such as additional greenspace that might accompany future specific developments. The SPD should therefore recognise that additional greenspace provided in association with development sites might provide sufficient capacity to enable development proposals to come forward.</p>
Mr Andrew McMullan		261			<p>I would like to note that the above document has several omissions which I believe should be taken into account; a change to the status of Burnham Beeches is not justified; namely: There is no reference whatsoever to Suitable Alternative Natural Greenspace. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.</p>
Mr Alan Burnett		255			<p>I am writing to state my objection to the Burnham Beeches Supplementary Planning Document. Despite the</p>

					pretence to address environmental requirements and monitoring of developers: - There is no reference to Suitable Alternative Natural Greenspace - There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield - There is no reference to an Air Quality Management Strategy. I am very concerned about the Council's agenda to degrade the green space in the area which seems to run contrary to the interests of the community with no clear justification given.
Mr Tom Aspinall		228	I object to Bucks County's apparent intention to downgrade the status of Burnham Beeches. In addition to the obvious threat that this would cause to this delightful natural area, the impact on people living for miles around would be significant. I visit the site several times a year for exercise and the pleasure of walking in such an unspoilt place. I am always impressed by the large number of people there. My estimate would be that hundreds of people use this site every day. The County should be protecting their citizens from voracious developers.		
Mr Gordon Austin		193			I refer to the above draft planning document to which I wish to raise the following objections:- 1) The proposed SAC Mitigation Strategy pays lip service to the requirement to avoid adverse impacts on Burnham Beeches from the Chiltern and South Bucks Local Plan but does not include any requirement for the provision of Suitable Alternative Natural Greenspace which is recommended as an effective means of limiting extra numbers of visitors from new developments with the 5.6Km buffer zone. Instead the so-called mitigation strategy is confined to a presumption against development with a narrow 500m band around Burnham Beeches SAC plus a requirement for financial contributions for developments within the zone from 500m - 5.6km. There is no evidence that these financial contributions will have any impact at all on growing visitor numbers. On the other hand local SANGs are shown to be effective in diverting visitors away to less sensitive sites. 2) The contention that the SPD should be eliminated from screening under the HRA process on the grounds that it could not have any conceivable effect on a European site is simply an assertion which is not backed up by any review or analysis of the factors which might lead to an adverse effect occurring. There is no evidence or basis for the conclusion reached. 3) In a similar vein it is repeatedly asserted in the document that the SPD does not present any policies, and serves only to provide greater clarity in relation to policies - and thus falls outside the need to carry out a Strategic

					Environmental Assessment. Given the impact of setting such a low bar on the Mitigation Strategy policy (see 1) above) there are clear grounds for conducting an SEA. 4) There are a number of aspects on which the SPD is silent. Whilst possible residential developments are considered, the SPD makes no reference to the possible environmental or visitor impact of the significant commercial development proposed for the Beaconsfield area. Similarly there is no evaluation of the air quality impact on the SAC of the proposed developments in the area.
Mr John Bartlett		189			Reference the Planning Document there is no reference at all to 'Suitable Alternative Natural Greenspace'. Why is this no longer part of the protections surrounding Burnham Beeches? Why have you not included details for an Air Quality Management Strategy - a key part of any environmental mitigation. The 20000 sq ft of commercial space the Council are proposing for Beaconsfield has not been dealt with in the Planning Document. This will impact both environmental and visitor considerations and needs to be factored in.
Mr John Kirtland		378	The points I raise below strongly indicate that this consultation and SPD is pre-mature, unready and ill prepared. There is only route that can be taken by the Council, that the consultation should be halted immediately and then re-run, but only once the following have been put in place: 1. the required mitigations have been included. 2. once the required evidence and SEA and HRA have been prepared as mentioned in detail below. 3. the outcome of the emerging Local Plan has been decided by the Planning Inspectorate and the Plan adopted. 13. The emerging Local Plan will most likely be withdrawn according to the Inspectors' initial findings, which you have full knowledge of. For example, Slough Northern Extension does not feature modelling for its impact on the Beeches. the impact on the Beeches is therefore worse than is reflected in the documents forming part of this consultation. The Council failure to include such information is misleading at best. 14. This consultation references policies from the Local Plan which have not been passed eg SP BP9. They simply do not exist and have been heavily criticised in the Reg 19 consultation. Their inclusion clearly shows that an outcome of consultation has already been determined. The consultation must be halted until such time as the Local Plan is withdrawn or modified. 15. SP BP9 would place the largest development in Chiltern and South Bucks within 2.6km of the Beeches SAC, on Green Belt and within the setting of the AONB.		24. The SPD requires a SEA because it will have a significant environmental effect and has not been subject to a Sustainability Appraisal. Whilst the emerging Local Plan underwent a Sustainability Appraisal this has been heavily discredited by the Inspector and therefore cannot and must not be used for this consultation.

			Your actions in this misleading consultation demonstrate that this is your aim. This consultation is clearly flawed and biased and must be halted. 16. The SAC benefits from the highest level of legislative protection that can be offered. SPD clearly fails it. It is not credible that this is anything but a deliberate act. 23. The SPD is premature and in itself is useless and a costly burden to the tax payer. It is setting out to provide clarity on something which may never exist as policy. Taxpayer money must not be wasted in continuing this consultation.		
Vivian Nicholas		222	Thank you for bringing this document to my attention. I have no specific comments to make and am broadly in line with the thrust of the proposals.		
Mr Richard Jenkins		303			I strongly object to the Burnham Beeches Supplementary Planning Document, because it utterly fails to make any serious attempt to protect the future of Burnham Beeches. I downloaded a pdf version of this document and made a pdf search to see how many times the word greenspace occurred, and it was only twice. Once was in the description of Burnham Beeches itself. The other mention was at the foot of page 3, in a table 1,1 - Policy Context. The last item in this table referred to Policy SP BP9 Building - Beaconsfield, in the Draft Chiltern and South Bucks Local Plan (June 2019), saying 'The policy requires development to provide suitable alternative natural greenspace for recreation to mitigate the potential recreational disturbance impacts on Burnham Beeches SAC'. Apart from the brief mention of a policy in a draft local plan, yet to be adopted, nothing more is said about Suitable Alternative Natural Greenspaces (SANGS) in the Supplementary Planning Document. This is strange, and a serious defect in the planning document. The NPPF imposed a requirement to "protect and enhance valued landscapes, sites of biodiversity or geological value and soils. Burnham Beeches SPA is certainly the kind of site referenced by the NPPF, and a SANG, provided or financed by a developer is a widely used method of such protection. If one googles SANG, one finds that counties all over England specifying the requirements of SANGs to meet local needs, but not, apparently, in Buckinghamshire. A proper and effective Burnham Beeches Supplementary Planning Document should specify the size, criteria and potential locations for a SANG to protect Burnham Beeches. The present utterly inadequate document considers as mitigation, for example, doing a visitor survey every decade. There is Green Belt near Beaconsfield, not presently accessible to the public, which might be suitable as a SANG. Of course, the Draft Chiltern and South Bucks Local Plan, which

					<p>makes the passing reference to Burnham Beeches in policy SP BP9, proposes building on this green belt. Buckinghamshire County Council should withdraw Burnham Beeches Supplementary Planning Document, and present a revised version, with a fully thought-out plan to protect Burnham Beeches.</p>
Mrs Sharon Cooke		206	<p>The underhand move to strip protections from the vitally important conservation area of Burham Beeches is simply scandalous. The wildlife declines in England are utterly stark with 50% of wildlife gone within 40 years and the remainder in serious decline.</p>		
Gill Poulton		366			<p>I understand that this is all being reviewed in Buckinghamshire Council's Burnham Beeches Supplementary Planning Document and I am very concerned that certain important issues are being ignored and omitted completely. As a resident of Beaconsfield I am very concerned about this. Any new planning document should include details about a Suitable Alternative Natural Greenspace to compensate for any development, and to protect the surrounding area. However this document does not seem to address this at all. Neither is there a mention of any Air Quality Management Strategy. Burnham Beeches can be seen as the lungs of the local area and the green space must be protected to ensure that there is enough fresh air for everyone's health and wellbeing. These points seem to be neglected completely. Please can you ensure that these points are addressed and that Burnham Beeches is protected for us all to enjoy and for it to be there for future generations.</p>
Mr Martin Danaher		234			<p>I would like to emphatically object to this underhand initiative. The Buckinghamshire Council Burnham Beeches Supplementary Planning Document is a developer's charter and must be stopped. The planning document make no mention of three key areas, see below: 1. There is no reference whatsoever to Suitable Alternative Natural Greenspace. 2. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space that Buckinghamshire Council are proposing for Beaconsfield. 3. There is no reference to an Air Quality Management Strategy. The Burnham Beeches Supplementary Planning Document is unsound, not fit for purpose and is disgraceful in its attempt to remove environmental protection for key areas.</p>
Nicholas Payne		342			<p>I would like to raise some concerns relating to your Burnham Beeches Supplementary Planning Document. Specifically, I note that there is no provision at all for Suitable Alternative Natural Greenspace. Secondly, there is no reference to the environmental or visitor effect on Burnham Beeches from the 20,000 square feet of</p>

				commercial space the Council are proposing for Beaconsfield. This is an altogether exceptional amenity for people, and especially families, living in and around the area and should not be harmed or prejudiced in any way. Finally, there is no reference to an Air Quality Management Strategy. Surely such a strategy should be a key element of environmental mitigation and which should already be reflected in the Council's draft plan. As an asthma sufferer, this is a particular concern to me. It is very dispiriting, particularly in this time of lockdown, to see such damaging and inappropriate proposals.
Mr Krane Jeffery		217		I write to object to your omissions of key policies and assessments that should have informed the Burnham Beeches supplementary planning document. Either this is a lack of attention to detail, or something more sinister given implications of these points, specifically: 1. You do not reference whatsoever to Suitable Alternative Natural Greenspace in this document, it has to be factored in 2. You don't mention environmental or visitor impact on Burnham Beeches of the 20,000 sq ft of commercial space unwisely being planned for my home town of Beaconsfield 3. Air Quality Management Strategy is also not mentioned, which is a topic addressed in the Council's draft plan, yet strangely absent here. Please take the appropriate action to rectify these oversights in this document to ensure the assessment in this document is fair and balanced.
Dr Said Ziai		272		I am writing to express my concerns regarding the Council's proposed plans outlined in the Burnham Beeches Supplementary Planning Document. In particular; The proposed plans fail to consider the Suitable Alternative Natural Greenspace. The document also ignores the environmental or visitors impact on Burnham Beeches from the over 20,000 square feet of commercial space which the Council is currently proposing for Beaconsfield. Furthermore, the document clearly fails to consider the Air Quality Management Strategy, which is considered to be a key element of the Council's own draft plans on environmental mitigation issues. Based on such fundamental factors, I object to your proposed plans and request the withdrawal of the proposed plans until the Council is able to properly address such critical issues. The consultation period should also be materially extended in order to allow all local residents to be properly informed and have the opportunity to respond to the proposed plans in an open manner.
David Ratcliffe		370		I am concerned that it fails to cover the following :- Air quality in the area. As a Beaconsfield resident for 11 years, I have witnessed the huge build-up of traffic (often static) in the area. The Government emphasises its efforts to improve air quality in the face of medical

					evidence of the damage it is causing to children in particular. Where is this fundamental topic being dealt with in the draft planning proposal? Surely planning should now do more than pay lip service to this somewhere down the line. Should it not be a fundamental principle to be addressed at the outset in all such planning proposals. Beaconsfield green belt development proposals. Beaconsfield lies within the 5.6km Burnham Beeches buffer zone. The proposal makes no mention of the impact of the extensive commercial and residential developments in Beaconsfield including the release of green belt currently under consideration. Why not ?
Peter Knee		266	We write in connection with your recent e-mail concerning the above. On the face of it your document appears to be attempting to safeguard the remarkable local asset that is the Burnham Beeches, a praiseworthy initiative. However, we are concerned that it does not go anything like far enough in seeking to ensure that the area surrounding the forest is not subject to the risk of harmful development. For instance, you cover the matter of 500 metre Government ruling but make little mention of the 5.6 kms one.		
Peter Knee		268			As residents of Beaconsfield, already concerned by the late SBDC's proposals for large scale housing and commercial development around the town, we believe that you have paid insufficient heed to the impact such a scheme would have on Burnham Beeches. Nor have you addressed the requirement for Suitable Alternative Natural Greenspace, a legal necessity. Frankly, this raise concerns about the comprehension and objectivity of the protection endeavour. There are other points to note, such as the lack of any reference to air quality strategy and vehicle movements. What you should be concentrating on is ensuring the integrity of Burnham Beeches and its surrounding area. Please therefore revisit your document before considering adoption. Thank you.
Felicity Coombs		330			My objections are to the things that are missing from the proposal: There is no reference to "Air Quality Management Strategy". There is no reference to the impact on Beaconsfield in terms of the environment or visitors from the new commercial space the Council are proposing. (This should also surely be reconsidered in the light of Covid-19) and the reduced need for office space?). There is no reference to Suitable Alternative Natural Greenspace which is a crucial line of defence.
Chris Cuthbert		293	Buckinghamshire Council are removing the protections of Burnham Beeches as a Special Area of Conservation. This will allow development in the Burnham Beeches and Beaconsfield area to an		

			excessive and unreasonable level. I believe that the Council's proposals in the Planning Document are unsound and should be rejected.		
Dr Michael Gill-Carey		146	I am surprised to find that an important planning document relating to the local area was issued over the summer period (29th July) and with such a short time on offer for comments from the local public. Consultation ending today? Given the serious nature of the matter and how much over building could effect this part of the country, this seems a ridiculously short amount of time. I have quickly reviewed the document today. I find it unsatisfactory. There would probably be further objections, should we have longer to consider this document.		
Mr Matthew Napier		105	I'm glad to hear that this proposal will not extensions of existing buildings, although I have to say that the 5.6k radius seems quite excessive and is likely to limit the prosperity of the area to a certain extent. Particularly in the current climate the small local businesses would welcome some more local trade and this proposal will limit growth of a local customer base.		
Mr Jonathan Harbottle		177			Existing mitigation is effective: As dogs have been evidenced to harm the SAC a Dog Control Order was put into place in 2014 that covers over half of the publicly accessible area. In most areas this covers it means dogs must be kept on leads, which prevents damage to more fragile parts of the woodland off the main paths. Research carried out by the Natural England, Hampshire County Council and the Kennel Club found that off lead access is the single most important influence for dog walkers when deciding where to walk their dogs A survey of dog owners who use Burnham Beeches to walk their dogs found that almost 83 per cent would walk their dog elsewhere if they were unable to let their dogs off lead. (https://www.thekennelclub.org.uk/press-releases/2014/july/dog-walkers-set-to-desert-burnham-beeches-if-off-lead-restrictions-are-enforced/). In their responses to planning applications in recent years resulting in net additional dwellings in Farnham Common within 500m of the SAC, Natural England are quoted as having no objections, for example: The current proposal to build additional dwellings in the developed area accords with the Core Strategy and the related screening statement. Natural England has consistently confirmed that this size of proposal will not adversely affect the SAC, in isolation or in combination with other developments. This is because there is no evidence that such developments adversely impact on the special features that have resulted in the SAC being designated, those being the acid beech forest, its shrub layer and the

				<p>habitat for invertebrates and epiphytes that it provides. In these circumstances the Council does not consider there will be any likely significant effect on the SAC. As there is no likely effect on the SAC, no further Appropriate Assessment under the Habitat Regulations needs to be undertaken and Natural England do not currently consider an analysis under the Habitats Regulations necessary with respect to this size of development. Therefore, despite the objection from the City of London it is not considered that an objection could be sustained on the basis of the proposal's impact on this important natural asset. The above was in response to an application for 3 new dwellings 17/02081/FUL. It is not clear why Natural England's approach has changed when recent evidence points to the fact that all the various existing mitigation methods are effective. Natural England's SSSI Condition Summary shows that 62.63% of the SSSI is in favourable condition, and the minority remainder that is unfavourable is all recovering. None of the SSSI is declining, destroyed or even unchanging - it is all either favourable or recovering. According to Wycombe District's Jan 2019 Habitats Regulations Assessment Report the current management regime is working well to maintain the conservation features of the site.</p>
Carol Linton		101		<p>Whilst I understand the necessity of protecting the Beeches SAC and accept the need to impose a levy on developments, I feel that Buckinghamshire has taken an unnecessarily simplified solution which will only benefit the wealthy. a. By imposing a fixed levy of £2023.87p on all new dwellings, buyers of new flats and smaller houses are disadvantaged. Major rebuilds and extensions will pay nothing but could have a greater impact on the number of visitors to the SAC. Perhaps a per bedroom charge would be fairer including for extensions. c. If the levy is to pay for the impact of visitors, should the council consider exemptions for care /dementia homes where the residents do not go out? There are a lot of Victorian houses on huge plots in Farnham where the only alternatives are large multigenerational homes or a care facility.</p>
Mrs Evans		83	<p>As the Council is aware, the majority of Taplow is within the 5.6km zone that requires protection. On reading the Planning document, it seems the SPD as it stands has been stripped of the protection it should in fact have. I am not sure if this is intentional or an oversight, but it is a concern. The Council is placed in a difficult situation where the need to include housing development in the area is undoubtedly important. I can only say, that having been subjected to the most incredible level of public usage of the riverbank during COVID19,</p>	

			(sometimes not always good!) I would struggle as to how any sensible development would seek to limit, rather than grow, the very limited public space which our community can enjoy in the area.		
Peter Marshall		112			I strongly object to the proposed planning submission named above. There is no reference to protecting the environment or air quality of this and the Beaconsfield area and this needs to be addressed completely.
Dr and Mrs John Leane		114			We wish to lodge a complaint against the above plan on the basis that there is no provision for the following: There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
David Gilbert		116	I agree with the Beaconsfield society objection to your proposals, as per the following communication from them on this subject which I agree with. Buckinghamshire Council's proposals: a charter for development Buckinghamshire Council issued the Burnham Beeches Supplementary Planning Document on 29th July, with a 'consultation' to run over the summer holiday season until 3rd August. It is a short document in planning terms, a mere 29 pages. Its proposals seem innocuous, mainly focusing on a requirement for developers to contribute towards environmental awareness and monitoring programmes. But look closely, and you will see what is NOT included:		
Geoffrey Brand		136	My attention has been drawn to your Burnham Beeches Supplementary Planning document which you issued, somewhat unhelpfully over the holiday season. Burnham Beeches and its surrounding area is unique in its historical preservation as an open space for the recreation not only of the local population but further afield, particularly Londoners on a day out. Your consultation should therefore extend much more widely than the minimal statutory requirements and more time should be allowed for this. Meanwhile I would personally stress that in view of growing pressures on the local environment there is little or no possibility of any development being offset elsewhere in the locality.		
Dr Rhiannon Rowsell		140	Burnham Beeches has the highest European level of nature conservation sites and is a highly valued natural resource in our community. I have read the		

			<p>Burnham Beeches Supplementary Planning Document issued on 29th July and wish to make strong objections. I am very concerned about the proposal to build 1,600 new homes to the east of Beaconsfield in the draft local plan. It is a requirement of current regulations that proposals for new housing development include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area as Burnham Beeches. There is simply not the land to create 1,600 homes and the roughly 30 hectares of new alternative greenspace that proximity of these homes to Burnham Beeches would require.</p>	
Christopher Neumuller		152		<p>Burnham Beeches is a special area of conservation which must be preserved. I object to any further or new residential development in this area or surrounding areas (especially Hedsor, Bourne end and Beaconsfield) There is no mention of suitable alternative natural green space. Which is a crucial line of defence for wildlife and for the environment, which will no longer be there. There is no reference to the environmental impact to Burnham Beeches from the 20.000sq ft of commercial space the council are proposing for Beaconsfield and the increase in traffic and pollution! Which brings me on to the direct issue and impact on the Air quality. Which should be a key element of environmental mitigation and which is theoretically already a part of the councils draft plan.</p>
Mrs R Cornall		154		<p>I have read the above document and have a number of objections to the proposals. Mitigation is spoken about at length in the document but details are few and a number of key elements appear to be missing 1) Lack of an Air Quality Management strategy. A key element of any environment mitigation process is Air Quality Management and this is not mentioned in the document. 2) Impact of Commercial property. The document makes no mention of the environmental impact of the proposed 20,000sq ft of commercial space. Nor is there as assessment of the impact of increased visitor numbers arising from this development. An increase might reasonably be expected given the close proximity of Burnham Beeches for workers at and visitors to this development. 3) Suitable Alternative Natural Greenspace. There is no mention in the document of Suitable Alternative Natural Greenspace which is a current provision for new developments. It is well documented that green spaces and green 'corridors' assist mammals, reptiles and insects and the retention of these spaces and corridors is important around Burnham Beeches. Therefore I believe the specific requirement to</p>

					provide alternative natural greenspace should be retained not replaced, as seems to be the case, with financial contributions by the developers towards surveys and visitor information at Burnham Beeches.
Suzanne Metcalf		160	Our councillors and elected representatives do not seem to be acting in the best interest of the local people. Anyone I know completely objects to the plans too. We already have HS2 impacting us from one side and this plan is totally unreasonable and unacceptable. Please consider these aspects and do the right thing and not allow the development to go ahead as it is. Please please look at the impact on the environment, the people, the traffic, the pollution, the facilities like schools and health, the roads - all simply cannot cope with the planned number of housing and people.		
Cllr George Sandy		162	Am aware that you will have received numerous objections to stripping away existing key protections of the Burnham Beeches and surrounding areas from the Draft SPD. Emasculation of these protections appear a wily move to neuter future objection to development which would weaken parishes and resident's ability to resist encroachment by developers seeking to reap maximum advantage from areas adjacent to Slough, Maidenhead, the Elizabeth Line and Beaconsfield. This should not be allowed especially because twenty-eight South Bucks Councillors (the full council) were elected on manifestos that promised to defend the Green Belt. It must therefore be the duty of all elected members to demand retention of the established protections of BB and for officers to cooperate accordingly. I shan't repeat all the sound reasons already lodged by other objectors but will emphasise that the entire infrastructure of SB is already over capacity and under unacceptable strain. Our GB is sacrosanct. Our air quality in places is already at dangerous levels and Lockdown has demonstrated it to be highly unlikely there will be much demand for commercial space in Beaconsfield or elsewhere. The draft SPD should be discarded in its present form and Burnham Beeches and its environs preserved as an SAC with current protections remaining intact.		
Mr Iain G F Lee		164			Among the most glaring omissions of the document are:- i) the lack of any reference to "Suitable Alternative Natural Greenspace", ii) the lack of any reference to the environmental or visitor impact on Burnham Beeches from the substantial amount of commercial space the Council are proposing for Beaconsfield, iii) the absence

					of any reference to an Air Quality Management Strategy dealing with environmental mitigation. . The above are by no means the only deficiencies of this document but they alone are more than sufficient to require the document in its current form to be withdrawn and replaced by one which fully addresses and makes explicit all the implications and consequences of the Council's plans. I strongly advocate that the council takes this course of action. Anything less would imply a failure of the Council to properly discharge its statutory obligations as a Planning Authority.
Rosalind Gibson		168	I wish to register an objection to the content of this document. Burnham Beeches is a site of National, Historical and Scientific Importance. Bequeathed and maintained as a whole in perpetuity for the recreational and educational use of the people of this country. No part of its acreage should be considered for future urban development by stripping away its key protections as a 'Special Area of Conservation'.		
Hilary Coales		179			I object to this document for several reasons, as follows:- No mention is made in the above document, of Suitable Alternative Natural Greenspace. Burnham Beeches has the highest European level of nature conservation sites, which means that there are restrictions on development within a 5.6km buffer zone, which includes Beaconsfield. One of the current important regulations because of this, is the requirement for new housing development to include suitable alternative natural greenspace or recreational space, to mitigate the increased visitor pressure on such a vital conservation area, but nothing is said about this, although Bucks Council is pressing for massive development in and around Beaconsfield. The 20,000 square feet of commercial space the Council is proposing for Beaconsfield is not mentioned at all, yet that will have an enormous environmental and visitor impact on Burnham Beeches. Neither is there, in this planning document, any mention of an Air Quality Management Strategy which should surely already be part of the Council's aims for the area?
Alexander Cuthbert		249			The plan fails to mention protecting the Burnham Beeches Special Area of Conservation, as Suitable Alternative Green Space is not mentioned in the document. I believe this means these issues have not been properly considered, making the proposal unsound. The plan does not mention the environmental and visitor impact of 20,000sqft of commercial space in Beaconsfield on Burnham Beeches and the area surrounding it. This is not mentioned in the sustainability appraisal. Increased traffic in Burnham Beeches and the surrounding protected area could seriously degrade the environment due to air pollution. The plan does not

					include an Air Quality Management Strategy. Theoretically this is already part of the councils draft plan. However increased traffic in Beaconsfield, Burnham, Burnham Beeches and the approaches to Slough due to increased population and development could increase air pollution. The M40 is an air quality management zone, where air pollution already breaches legal limits. Increased traffic, both from increases in population due to 1600 new homes, and from construction traffic, could illegally breach these limits further
Dr W Pierozynski		340			I was astonished to read the "Burnham Beeches Supplementary Planning Document : a charter for development" and see that the following requirements were missing from this document. Namely : . 1. There is no mention or reference to SANG (Suitable Alternative Natural Greenspace) which is a requirement for any new housing development to mitigate the increased visitor pressure on conservation areas. 2. There is also no mention or reference to the environmental and/or visitor impact on Burnham Beeches from the 20,000 square foot of commercial space that the council are proposing for Beaconsfield. 3. A key element of environmental mitigation should include an Air Quality Management Strategy. There is no mention or reference to this in the planning document. These requirements must be included in the planning document especially in any consideration of the impact of new residential developments in the South Bucks area.
Mr Peter Rogers		232	Having lived in Beaconsfield prior to the M40 being built, I express my deepest concerns how the Council can allow this area to be destroyed as it has been. Over the last 50 years our town has been destroyed by ludicrous planning with the most appalling so called Designed Houses built. When is the council going to protect our wonderful area of Buckinghamshire and prevent more houses being built in a town that is struggling to provide Doctor's Surgeries and Schools. Surely that is why you were elected to preserve our countryside.		
Mr Norman Dossett		322			The document fails to mention the damage to the SAC that will ensue from other effects of the additional homes in the area such as deterioration in air quality and water use. Two extracts from the Council's own Sustainability Appraisal by Lepus Consulting June 2019: Burnham Beeches Special Area of Conservation (SAC) is an internationally important habitat which has a critical load for atmospheric Nitrogen deposition of 10 - 20kg N/ha/year. The SAC is currently receiving an average of 25.7kg N/ha/year and is therefore receiving levels of atmospheric Nitrogen deposition which exceed its critical

					<p>load. In addition, surveys undertaken since the early 1990s have shown that lichen species composition and diversity is changing as a direct result of increased Nitrogen in this sensitive ecosystem. A reduction in local air quality, due to increased traffic volumes as a result of development proposed in the Local Plan would result in adverse impacts on sensitive ecosystems. Increased traffic related emissions would result in increased emissions of Nitrogen into the environment which could have adverse impacts such as eutrophication, acidification and toxicity. A particularly vulnerable habitat in the Plan area is Burnham Beeches SAC. One can only speculate that as there is no easy solution to the problem of reduced air quality for their citizens living in or near new housing developments or the SAC then the Council left this vital topic out from the document. 4 The document fails to mention, define or address the impact of an additional 20,000sq ft of commercial space that would be sited between A40and M40 inside the 5.6km boundary with the SAC. A failure to assess the possible threats that may be generated by as of yet unknown commercial premises within the 5.6km boundary does not imply there are no threats to the SAC. This document is a bureaucratic exercise to show a process required by the government has been followed. It will not stop Burnham Beeches from the effects of increased levels of Nitrogen pollution or human activity caused in part by increasing the number of people living or working in close proximity to the SAC.</p>
Val McFarlane		324			<p>In the document prepared by Bucks CC no account has been made of a Suitable Alternative Natural green-space. In the light of my comments above I am surprised that there is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq feet of commercial space the Council is proposing for Beaconsfield. Even more crucial there is no reference to an air quality management strategy which should be a key element of environmental management. In the light of all the above I urge Bucks CC to seek alternative provision and be imaginative and considerate in their planning for the residents of Bucks and those who come and visit us. With all the changes in the High Streets there will be land available that will not be detrimental to our ever reducing green spaces. I welcome hearing a positive response to these concerns</p>
Mr Rob Wood		251			<p>Your current document does not contain any reference to provision for protecting spaces of great natural beauty and famous and long standing use as a public outdoor resource. Significant space for people to use is continually being removed from the public and no alternative spaces found, such as with the site for the new doctors surgeries off the A40 in Beaconsfield and</p>

					<p>the idea of building on fields off the Amersham road in Beaconsfield, which would be of more benefit to locals as a park area, which it is currently enjoyed as Green and wooded spaces are of extreme importance to people, particularly those who have small homes and garden and enjoy the company of their pet. How big is your home and garden? Imagine what your life would be like living in a tiny space. It also does not contain any consideration to the air quality of the area, it has for a long time been of considerable concern to me, sometime if the wind is in the direction I can smell it in Fernhurst Close or on my allotment off the Amersham Road. There are huge landfill sites along a great distance on the M40, do you ever drive down the M40 and A40 and go through the evil smelling air. Then there is the pollution from traffic on the M40 and any other local source. Can you really say that you would want to build homes and work spaces in an area of such pollution and likely to cause serious health problems (I really would like to hear your response to this one). There is also no reference test evidence or local views on the effect of building 20.000sq ft of commercial space, this will only add to the problems I previously highlighted. The added traffic congestion from people living outside of Beaconsfield to work their, Again a burden for the poor unconsidered residents of Beaconsfield. Why should stands of relatively young trees in Beaconsfield have to be ripped out? Why would an old people's home next to a busy motorway be a good idea? Who do the planners represent. I know progress is needed but choose the right areas, when children of residents cannot afford to buy or find houses to rent in town, splitting up families, making childcare by family members very difficult, it worries me greatly about our values.</p>
Mr Frank Muzika		214			<p>I wish to object to the Burnham Beeches Supplementary Planning Document. As a resident of Beaconsfield I am very concerned that this may impact upon the environment local to Beaconsfield, as follows:- The omission of the overall impact on Burnham Beeches from the substantial commercial area the Council are putting forward for Beaconsfield. The omission of any mention of Suitable Alternative Natural Greenspace - an aspect fundamental to any responsible review of this topic. The omission of an Air Quality Management Strategy, which I understand to be in the Council's draft thoughts, but should be shown here part of environmental mitigation</p>
Marlen Lihou		328	With regards to the Consultation on the Burnham Beeches Supplementary Planning Document-- I strongly object.		
Hilary Milne		219			<p>There is no reference to the business park which is proposed by the M40. There is already an air quality</p>

				<p>issue in this area. At present there are many lorries pulling off the M40 and parking and overflowing from the rest stop which is the last before London on this motorway. The proposed business park is going to bring in many more cars and lorries to this area because of its proximity to London which is obviously the intention and because of the lack of public transport infrastructure workers will be driving to work. This development is designed to be a hub related to the M40 and London access and therefore traffic will impairing further the poor air quality in this area which will also certainly impact the Burnham Beeches SAC. I also note with interest the levy which will be added to new build houses. I thought the aim of the new housing was to try and reduce prices within the Beaconsfield area but immediately there is to be a new cost for these houses which seems to go against the original thinking. Finally the Environmental Impact Assessment established that there would be loss of habitat and environmental impact through the proposed developments in Beaconsfield and so it should be of prime importance that the Burnham Beeches are not impacted by this development plan. Therefore I would ask that the air quality issue be considered more deeply both for residents and the BB SAC. I do not think there is sufficient mitigation for public recreation due to the planned developments and population increase (both permanent and transient) within Beaconsfield. This should be accorded a great deal more weight as it will impact all the green spaces in the region but particularly somewhere as attractive and important as the Burnham Beeches SAC. The Planning Document concludes: "that any net new homes within 500 metres of the boundary BB SAC should be avoided. It also concluded that any net new homes between 500 metres and 5.6 kilometres of the BB SAC need to be mitigated.". This decision is to be welcomed with regard to further building on the edge of Burnham Beeches. However, it fails to explain how the proposed new building and subsequent population increase in Beaconsfield with its need for recreation will be mitigated as Green Belt land is also being taken for these new homes thus reducing the recreational area available for the population. The proposed new building in Beaconsfield is already going to put pressure on the surrounding countryside which is used extensively by residents and there will be further loss of Green Field sites due to this building. There is also proposed new shopping areas and a business park which will bring in more people to the area which is already congested. Any proposed mitigation must take into account these population increases which I do not believe this plan</p>
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					does and must therefore assume a subsequent greater pressure on the Burnham Beeches.
Mr Alan Lowe		195			It's upsetting that the Council has no interest in preserving conservation areas. The planning document does not contain any reference to the environmental impact on Burnham Beeches as a result of the commercial development that is being proposed for Beaconsfield. Also, the document takes no account of air quality management strategy in the environmental assessment. In addition, the document doesn't reference any suitable alternative natural greenspace. I would be grateful if you will take my objections into account.
Clare Windsor		297	I am also concerned by the lack of transparency with this consultation. It would have been much more helpful if you had publicised it more, and provided links to the existing provisions. By these means, members of the public could have clearer sight of the proposals and their implications.		
Adrian Windsor		348			The planning proposals exclude the following key current protections: - requirements for developers to provide Suitable Alternative Natural Greenspace; - requirements to assess the environmental and visitor impact of proposed developments on Burnham Beeches, including residential and commercial development; - an Air Quality Management Strategy.
Adrian Windsor		350	I write to register my strong objection to the above planning proposal. - Burnham Beeches is, for obvious reasons, a Special Area of Conservation. - It is an extremely valuable and highly-used amenity green space for not only Burnham but, importantly, also surrounding areas including Beaconsfield. I note also that - The proposal has been issued without any publicity. - The proposed consultation period runs over the holiday period and no longer. It is difficult to see how this is consistent with an acceptable level of local accountability and democracy.		
Trevor Carvey		208	I am writing to object most strongly to this Buckinghamshire Council's proposals: a charter for development Buckinghamshire Council issued the Burnham Beeches Supplementary Planning Document on 29th July, with a 'consultation' to run over the summer holiday season until 3rd August. It is a short document in planning terms, a mere 29 pages. Its proposals seem innocuous, mainly focusing on a requirement for developers to contribute towards environmental awareness and monitoring programmes.		
Mrs Raina C Carvey		212			There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches

					from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Jon Savage		191			In particular I am highlighting the following area of concern. There is no reference to Suitable Alternative Natural Greenspace. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation. There are clearly alternatives to this direction of travel that are not being considered in order to increase housing at the expense of a considered and environmentally thoughtful approach as seen in other areas.
Lindsay Bosma		374	I am writing to raise concerns about the Burnham Beeches Supplementary Planning Document. Recent events have reinforced the importance of the green spaces on not only the long-term future of our planet but on a local level the mental and physical health of those who live in our area. With this in mind I was very disappointed to see there are huge threats to the well-being of one of the most important and protected green areas in our area. Your supplementary document referenced above appears to remove some of the vital protections for Burnham Beeches, by allowing the development of surrounding areas without regard for the environmental damage that the increased visitor numbers and their resultant pollution will bring. Finally, I am concerned that there is a pattern with timing of consultation periods of council planning documents. This is not the first consultation that has taken place over the summer holiday period when traditionally local residents are away from home or busy looking after their children.		
Sandy Saunders		368	PRESERVATION OF BURNHAM BEECHES It appears that you may be attempting to remove the core elements of the rights of residents to protect Burnham Beeches from any and all encroachment or its uses for leisure and recreation for residents of, and visitors to, South Bucks. Burnham Beeches is a Special Area of Conservation and its boundaries must remain un-breached by any new development. This small area of forest is an undiluted jewel in the growing air and noise pollution of this part of the County, and its preservation should be a priority consideration for all Town and Parish Councils in the surrounding		

			area, for the sake of its wildlife today, as well as the freedom from road traffic it should continue to offer to successive generations and the barrier to further unwanted development it provides to any hamlet, village or town within 3.5 miles of its boundaries.		
Miss Dawn Franklin		289	My first impressions were that most of the wording seems unobjectionable, apart from it being unnecessary lengthy and full of jargon, which may be intended to obscure, rather than clarify. However, more in-depth analysis raises concerns that this seems to be an attempt to reduce the protection afforded to Burnham Beeches and the surrounding areas.		
Michael Lischer		279			I feel there are important omissions from the Supplementary Planning Document. These are: 1. There is no reference within the SPD of SANGs (suitable alternative natural green space). The proposed 117 hectare Beaconsfield site would require c. 30 hectares of SANG to mitigate against the town increasing in population by c 4,800 people (the town would grow in size by one third as you can see from the map above). As the Bucks evidence shows, this would have an adverse impact on the Beeches. This is a fatal omission from the Burnham Beeches SPD; SANGs should be included. 2. There is no reference to environmental or visitor impact from the proposed 20,000sm business park and associated car parking. One developer scheme shows a new car park for 850 cars. The impact on the Beeches from this has not been modelled nor mitigation included in the SPD. 3. There is no reference in the SPD to the required Air Quality Management Strategy which needs to be included in the SPD as a key element of environmental mitigation. The Urban Development Report does not include impact from the 20,000sm Beaconsfield commercial development planned in the emerging Local plan. The data informing this consultation is deficient. No information has been given as to how new mitigating SANG will be provided and managed in perpetuity. This is questioned in the Urban Development Report, but the SPD provides no answers to this deficiency. The closer the development to the 500m exclusion zone, the higher the financial contribution to SAMMS should be. Contributions to SAMMS should be excluded from inclusion in viability reports for development schemes. How will inflation be dealt with in relation to cost of SAMMS projects in the SPD? No mention is made in the SPD to the Air Quality Management Strategy referred to in draft policy DM NP3 which should also form part of the Beeches mitigation strategy. The mitigation measures outlined in SAMMS are not comprehensive and do not represent the full

					range of measures required to avoid adverse impacts on the Beeches. In particular it should be clarified that the full amount of SANG would be required on site at site SP BP9 in addition to financial mitigation.
Michael Lischer		281		The HRA in the draft Local Plan evidence base has been heavily criticised in the Reg 19 consultation. Why is this SPD predicated on an emerging Plan with an evidence base which has not been found sound? In many cases the evidence base of the emergin	
Mrs Catherine McLeod		358			There does not appear to be any mention of plans to satisfy the obligation to provide "suitable alternative natural greenspace" as mitigation and this should be included in the SPD. The environmental and visitor impact of commercial development should be assessed and mitigation for this should be included. Further work needs to be done before a new version of this SPD is consulted upon. An Air Quality Management Strategy should be included as mitigation. This needs to be worked on before a new version of the SPD is circulated for consultation.
Jeanette Gorst		360			I could not find any reference to current regulations regarding the requirement for new housing development to include Suitable Alternative Natural Greenspace (SANG), in order to mitigate what would be the inevitable increase of visitor numbers on the Burnham Beeches conservation area. There is insufficient land available to erect 1,600 homes plus an additional 30 hectares of new alternative green space that the proximity of Beaconsfield to Burnham Beeches would require. Similarly no reference is made to visitor impact or environmental issues on Burnham Beeches resulting from 20,000 sq ft of Commercial space which the Council are proposing for Beaconsfield. As regards Air Quality Management Strategy, which should be a prime element of environmental mitigation, no reference is made.
Mr T P Hugh Griffith		253	I am surprised that you have chosen to issue this document at this time when we residents in Bucks are dealing with a very serious pandemic and therefore not able to give the attention as under normal circumstances. Also such a short consultation period compounds the problem - what a very insensitive decision. I am also very surprised that the timing of this BBSPD coincides with the proposal to build 1600 new homes to the east of Beaconsfield in the Draft Local Plan. The BBSPD seeks to rewrite the rules protecting Burnham Beeches stripping away its key protections as a Special Area of Conservation a crucial barrier to stop excessive development. This dilution of environmental protections in this BBSPD has serious consequences, impacting on the character of both Burnham Beeches and Beaconsfield.		

Hugo Simpson		259			Burnham Beeches has the highest European level of nature conservation sites. Why any organisation would wish to encroach on it boggles the mind. There are clear restrictions on development within a 5.6km buffer zone. In the planning document there is absolutely no reference to: a). Suitable alternative Natural Green Space b). the environmental or visitor impact on Burnham Beeches from the proposed development of 20,000 sq.ft. of commercial space. c). the key element of air quality management strategy.
Michelle Devine		287	Burnham Beeches is unique, and a wonderful place to visit that we are fortunate enough to have on our doorstep. Currently there are plans for a hugely significant number of houses to be built in Beaconsfield, within the draft local plan which would impact on our local area and its amenities. I understand that the proposed Beaconsfield development falls within the restrictions of the Burnham Beeches conservation buffer zone. This regulation requires that new housing developments include Suitable Alternative Natural Greenspace or recreational space to mitigate increased visitor pressures on such conservation amenities like Burnham Beeches. I fail to see how there is sufficient land available for the proposed housing numbers and the alternative greenspace that would be required given the distance to Burnham Beeches.		
Inland Homes (Agent: Mr Ian Gillespie, Igloo Planning)		389		A site level Shadow HRA (including AA) was undertaken to inform the outline application. This Shadow HRA was informed by visitor surveys undertaken in 2014 by Footprint Ecology, which collated information regarding visitor behaviour at Burnham Beeches SAC, and concluded that the likely number of visits to the SAC can be determined based on distance to the designation. With this evidence alongside other studies the site-level Shadow HRA assessed the potential recreational effects on Burnham Beeches SAC arising from the proposed development at Wilton Park. . In particular, the site level Shadow HRA (including AA) included an assessment of the degree of natural green space being delivered under the proposals at Wilton Park, and applying well established principles in use for other European designations (such as Thames Basin Heaths SPA, or Ashdown Forest SPA/SAC), concluded that more than sufficient open space would be delivered under the proposals such that new and existing residents would be attracted to use this very local recreational space, rather than Burnham Beeches SAC. The site level Shadow HRA (including an AA) was therefore able to conclude that there will be no effect on the integrity of Burnham Beeches SAC as a result of the permitted development. Throughout the AA process, Natural England was consulted. Natural England confirmed in correspondence (dated 15 March 2019) that they 'agree with the conclusions of the Appropriate Assessment that there will be no adverse effect on the	

				<p>integrity of Burnham Beeches SAC as a result of either air pollution or recreational disturbance from the proposed development at Wilton Park'. Following Natural England's approval, South Bucks District Council adopted the Shadow HRA (including an AA) for the purposes of helping to fulfil its duties under the Habitats Regulations. This adopted HRA (including an AA) forms Appendix 2 of the Officer's Report to Planning Committee 5 June 2019, published on the 28 May 2019. As such, the Shadow Appropriate Assessment that informed the outline application was not only approved by Natural England, but was then adopted by South Bucks District Council as the competent authority. Accordingly, all relevant statutory consultees and the competent authority agreed (as recently as May 2019) that the proposed development at Wilton Park would have no adverse effect on the integrity of Burnham Beeches SAC.</p>	
Mrs Hilda Holder	Clerk Taplow Parish Council	263	<p>The content of the current version is generally acceptable but we consider that the scope is insufficient. Planning matters in general have been placed under great stress recently by successive changes in government policy leading to difficulties in keeping Local Plans current, exacerbated by the stresses on local authorities arising from Covid-19. We think this is in danger of inadvertently leaving the protection of Burnham Beeches seriously deficient in areas that would affect Taplow and that this deficiency could be rectified by amendment to the SPD. Specifically the draft Local Plan contains provisions for Suitable Alternate Natural Greenspace (SANG) provision in the 5.6km area around Burnham Beeches should any development be proposed, which is excellent and is referred to in the SPD. However the draft Local Plan is currently in Inspection and the Inspectors have indicated that they are minded to reject it. A Bucks County appeal may well be successful and the Local Plan may be approved. A responsible council must consider the effectiveness of the SPD should the Local Plan be rejected. The current Local Plan for this area (revised at 2011) contains no SANG support, so if the SPD is approved in current form the 5.6km area would have no SANG provision which would be unacceptable. We strongly suggest that this situation is considered with a view to ensuring that if the Local Plan is rejected that appropriate SANG provision is included in the SPD, either by immediate inclusion or by inclusion of the need for a future amendment should the Local Plan subsequently fail.</p>		
Brown Not Green Chesham Ltd		385	<p>INTRODUCTION: Brown Not Green (BNG) is a not for profit private company limited by guarantee established by the Chesham community with the</p>		

		<p>main aim of protecting the Green Belt around Chesham in Bucks. The company is registered in England (Company Number 10810899) and the BNG organisation is itself a member of both the Open Spaces Society and London Green Belt Council. Buckinghamshire Council has prepared a Supplementary Planning Document to guide housing development within 5.6 kilometres of the boundary of the Burnham Beeches Special Area of Conservation. The Supplementary Planning Document seeks to establish an avoidance and mitigation strategy to protect the ancient trees in Burnham Beeches from any increase in disturbance to the trees from the recreational activities of the residents of new homes within the 5.6-kilometre boundary. The consultation ran from 29 July 2020 to 3 September 2020.</p> <p>CONSULTATION RESPONSE 1. These representations are submitted by Brown Not Green Chesham Ltd (BNG) in response to the consultation published by Buckinghamshire Council ('the Council') on the Draft Burnham Beeches Special Area of Conservation (SAC) Strategic Access and Mitigation Strategy Supplementary Planning Document (SPD). 2. These representations are made in the context of our concerns regarding the potential impact of proposed future development, upon the Burnham Beeches SAC as part of the emerging South Bucks and Chiltern Local Plan. BNG note that several sites currently within the Green Belt are allocated for development that we contend will have an impact upon the Burnham Beeches SAC. 3. We have previously made submissions in respect of the emerging Chiltern & South Bucks Local Plan under the Regulation 19 consultation (June - August 2019) as well as under earlier consultations and to the Inspectors' MIQs in advance of the Stage 1 Examination hearings, which have since been delayed. These representations on the Draft SPD are set within the context of our objections to the emerging Local Plan and in particular the potentially significant negative impact that future development within the Burnham Beeches 'Zone of Influence' (namely, the proposed allocation of various Green Belt sites) could have upon this area of significant and valued habitat. 4. Whilst BNG is broadly supportive of this SPD and the Council's ambitions to ensure that any significant effects on the SAC, which may arise through the implementation of the South Bucks and Chiltern Local Plan (or other subsequent Buckinghamshire</p>		
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		<p>Local Plan), are appropriately managed and mitigated, we do wish to raise a number of concerns regarding the legal compliance and status of the SPD. 5. Our representations presented herein refer to both the legal compliance and conformity of the SPD with the wider development plan, and the content of the SPD itself. 6. In respect of the legal compliance and conformity of the SPD our concerns may be summarised as follows: 6. i The Burnham Beeches SPD is not identified in the South Bucks and Chiltern Joint Local Plan Local Development Scheme (April 2019). A Local Development Scheme is a requirement under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended), which states that 'The scheme must specify the documents which are to be local development documents' and 'which documents are to be development plan documents'. As the SPD is not mentioned in the LDS its status in relation to the wider development plan is therefore unclear. 6. ii The timing of this SPD is premature as it relates directly to policies contained within the emerging South Bucks and Chiltern Local Plan, which has not yet progressed through Examination and as such may be subject to change, which would in turn have implications for this SPD. 6. iii There is a lack of consistency between the mitigation measures contained in the Draft SPD and those referenced in (for example) Policy DM NP3 and Policy SP BP9 of the emerging South Bucks and Chiltern Local Plan (notably the lack of reference to SANG provision and air quality mitigation measures). The Draft SPD is therefore currently in conflict with regulations 8(3) to 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and as such is not legally compliant. CONCLUSION: We believe that the contents of the SPD should be amended in response to the above-noted concerns to ensure there is no conflict between the SPD and the emerging South Bucks and Chiltern Local Plan policies. The adoption of the Burnham Beeches SPD should also be delayed until the South Bucks and Chiltern Local Plan has progressed sufficiently through the Examination process so as to ensure that the policies contained within the SPD will be in full conformity with the Local Plan once it is adopted.</p>		
Wendy Wagner		276		We wish to object to your plans to build 1600 new homes to the east of Beaconsfield. We do not agree with your Supplementary Planning Document, specifically as it fails to refer to suitable alternative natural greenspace,

					and also it fails to refer to the environmental or visitor impact on Burnham Beeches from the 20,000 square feet of commercial space proposed for Beaconsfield. Furthermore there is no reference to an air quality management strategy, which should be a key element of environmental mitigation.
Ms Barbara Richards		352	Whilst in overall support of this plan, I would object to the inclusion of Farnham Common village centre, i.e. The Broadway, in the 500m zone. This would result an inability to repurpose any of the vacant properties into other useful outlets for the benefit of the local community. For example if many of the retail outlets became vacant and were unable to be used for anything else this could create subsequent blight on the local amenities.		
Mr Jacques Vaillancourt		239			We object to the attempt to redefine the current prohibition of development within 500M OF Burnham Beeches to a Presumption against residential development within 500m of Burnham Beeches is not an acceptable definition. - There is no reference whatsoever to 'Suitable Alternative Natural Greenspace'. This crucial line of defence is simply no longer there. - There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. - There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Peter Fitzpatrick		183			Further, there are a number of key matters which are simply not addressed or mentioned in the SPD, including the following- 1 There is no reference to Suitable Alternative Natural Greenspace; 2 There is no reference to Air Quality Management Strategy which is a fundamental element of environmental mitigation; 3 There is no reference at all to (let alone any explanation of) the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space which has been proposed for Beaconsfield. In summary, the SPD is woefully defective and inadequate, and must be withdrawn. It is fundamentally flawed.
Mr Martin Maund	Chairman Ellington & District Residents Association	198			We are the Ellington & District Residents Association representing Taplow Riverside, Buckinghamshire. We advise our comments in regards to the Burnham Beeches Supplementary Planning Document as follows. Omitted from the SPD is the requirement that housing development within the 5.6km zone around Burnham Beeches must have a Suitable Alternate Natural Greenspace included. This is a vitally important regulation that has been totally ignored and the SPD cannot be allowed to be approved without it being

					included. From the SPD's mitigation strategy an Air Quality Management Strategy has been omitted which is an important part of environmental mitigation and by its exclusion will threaten the future of Burnham Beeches and its survival and this omission again fails Buckinghamshire Council's duty to protect Burnham Beeches as a Special Area of Conservation. The protection of Burnham Beeches is paramount as a Special Area of Conservation and there is no reference to the environmental or visitor impact on Burnham Beeches caused by development within the 5.6km zone and any increased pressure on such a vitally important conservation area this will have. We trust that you appreciate the seriousness of the omissions relayed and their effect on removing the protection that Burnham Beeches should have and that the SPD is flawed without them and cannot therefore be progressed until the items above have been included within it.
Mr Philip Markham	Senior Archaeology Officer Buckinghamshire Council	331			Thank you for consulting the Buckinghamshire Council Archaeological Service on the above proposal. We maintain the local Historic Environment Record and provide expert advice on archaeology and related matters. We welcome this document and have very few comments to make. Mitigation Strategy Project 1. We expect that this will be undertaken by mobile phone, however, if signal coverage is an issue the burying of cables for the electronic information at interpretive panels may be an issue. The siting of panels, if proposed may also be an issue. Burnham Beeches has two Scheduled Monuments within its boundaries, 7 Ways Plain Iron Age Hillfort and Hartley Court moated site and Enclosure. This would be an ideal time for conservation management plans to be produce for the long term preservation and interpretation of these sites.
Mrs Sue Moffat	Town Clerk Gerrards Cross Town Council	312			The area should be managed to help avoid impact. We also wish to add:- (i) There is no reference to an Air Quality Strategy which we believe is important for environmental mitigation. (ii) The mitigation refers to new net homes contributing, but will this also apply to commercial properties?
Mrs Kari Dorme		365	Burnham Beeches should be protected from this change in the planning rules which I think is just brought about to accommodate developers planning new housing and office space. Please lodge my objection.		
Dr Les Davies		271			The mitigation measures proposed do not mention a suitable alternative natural greenspace (SANG) provision whereas the emerging C&SB local plan does. The SPD should provide details on size, where it will be and how it will be delivered in perpetuity There is no mention of an Air Quality Mitigation Scheme, a key part pf mitigation of the integrity of Burnham Beeches SAC that is referred to

					in the C&SB local plan. The SPD should include mitigation of the impact of visitors from other sources than new housing, e.g. employment sites and UK tourism. (Burnham Beeches is already experiencing significant increased usage as a result of COVID19).
Mr Simon Woolf		284	I gather Buckinghamshire Council is seeking to make changes to the 5.6km buffer zone, which protects Burnham Beeches from over development within 5.6km. I fail to understand why there is a need to dilute this protection, when we have one of the most fabulous woods in the area. Even the cars was stopped from driving along Halse Drive and other roads in Burnham Beeches to protect it from pollution emitted by vehicles. Therefore in conclusion I am against any changes and suspect these are a crude attempt by developers to influence the change to increase the urbanisation of the surrounding area that will in turn destroy this wonderful habitat. It is so important that we protect Burnham Beeches because of its status having the highest European level of nature conservation site. The proposed changes would affect this status and I think it is vital that we keep and protect this oasis of woodland and we continue to keep Burnham Beeches as a Special Area of Conservation.		
Mr David Banks		240	I whole heartedly agree with the proposals to protect the SAC. I have reservations that the levy should be scalable so that the incentive to build affordable homes is not lost. I also feel, given the numbers of people from Slough that use the site, that Slough Borough Council should have been involved in this and that they should also be imposing the levy within their area of control. There is insufficient co-operation between the planning departments of the two authorities.		
Mr Paul Stimpson	Planning Policy Lead Officer Slough Borough Council	200	The introduction to the SPD makes it clear it only applies within the Chiltern and South Bucks Local Plan area. This point does not carry through where references are made to the 500m-5.6km zone of influence, for example, at para. 2.2.5, 3.2.3, 3.2.4 and 3.2.5 (typo as 3.2.1). Slough object to this as the omission risks interpretation the SPD's 'zone of influence' applies to or sets a precedent for properties within Slough.		
Mr Paul Stimpson	Planning Policy Lead Officer Slough Borough Council	202			The Draft SPD identifies a list of projects that would benefit from the proposed financial contribution. They can be summarised as follows: (a) provision of electronic interpretation; (b) events and promotion of activities aimed at raising public awareness of recreation pressure and alternative places to visit; (c) the appointment of a ranger/ambassador (a new member of staff); (d) visitor

					<p>surveys; (e) monitoring of visitor impacts on the ecology of the SAC; and (f) the production of an access plan/carrying capacity study. The Draft SPD estimates that the cost of these projects for a total period of 80 years would equate to £4,784,440. This aggregate cost is then divided by the total number of dwellings estimated to come forward within the zone of influence (referred to as Allocation BP9 + HELAA + existing applications + windfall) i.e. a total of 2,364. Accordingly, the Draft SPD requires a contribution of £2,023.87 (being £4,784,440 divided by 2,364) to be paid by each net new home that is granted planning permission from 1 March 2020. This is a significant per dwelling cost (compared with, for example: (i) the Essex Coast Recreational Disturbance Avoidance & Mitigation Strategy Draft SPD (January 2020) - £122.30 per dwelling; (ii) the Solent Recreation Mitigation Strategy (December 2017) - £564 per dwelling; and (iii) the Suffolk Coast European Site Recreational Disturbance Avoidance and Mitigation Strategy SPD (2019) - £121.89 or £321.22 per dwelling (subject to zoning). There is a concern that a planning obligation entered into pursuant to the Draft SPD would be contrary to the CIL Regulations 2010 (as amended) and/or national policy because: (a) there is no satisfactory evidence to demonstrate that the proposed mitigation would actually have the desired effect i.e. avoid or mitigate harm to the SAC; and/or (b) the period (i.e. 80 years) over which the mitigation scheme (and related contributions) has been calculated is excessive, unreasonable and far in excess of the life of the related plan; and/or (c) a standard sum payable for each net new dwelling is not necessarily directly related (or fairly related in scale and kind) to the relevant development and fails to have any proper regard to the different characteristics of different occupiers (compare, for example, a family living in a 5-bedroom house with a sole occupancy 1-bedroom apartment or house); and/or (d) there is no justification for payment of a monitoring fee to BC in addition to the standard per dwelling contribution; and/or (e) the per dwelling contribution sought in the Draft SPD is inadequately evidenced and is, in any event, disproportionate (as (b) above); and/or (f) the per dwelling contribution is unreasonably prescriptive and lacks sufficient flexibility.</p>
Mr Ben Knight (Agent: Mr Ed Rehill, Savills)	Land Steward Society of Merchant Venturers	233	The SMV have no objection to the principle of ensuring the integrity of the Burnham Beeches SAC, however we do object to the draft SPD for the following reasons: 1. There is no explicit local planning policy basis for the draft SPD; 2. Lack of joint mitigation approach with other Buckinghamshire plan areas/ neighbouring authorities which also fall within the 5.6km zone		

of influence; 3. Sum payable for each net new dwelling will not be capable of relating to the scale and kind of relevant developments; 4. No justification for the additional monitoring fee and lack of information on legal costs; 5. The proposed sums payable have not been considered in the viability testing of the emerging Chiltern and South Bucks Local Plan; 6. The draft SPD does not include specific guidance on suitable alternative mitigation; 7. The draft SPD has not considered the likely impacts of the Covid-19 pandemic. . No explicit local planning policy basis for the draft SPD

The specific mitigation required in the draft SPD is linked to policy DM NP3 (Natural - Burnham Beeches Special Area of Conservation) of the emerging Chiltern and South Bucks Local Plan. It has no such direct link with the policies in the adopted Development Plan (Chiltern District Core Strategy and the South Bucks District Core Strategy). The SMV consider that the SPD should only be drafted and adopted after the Chiltern and South Bucks Local Plan is adopted, if indeed it is found to be sound. It is noted that draft policy DM NP3 is currently subject to objections and, accordingly, only limited weight can be attached to it at this time. It is inappropriate and premature to progress the draft SPD in advance of adoption of the emerging Chiltern and South Bucks Local Plan. Lack of joint mitigation approach with other Buckinghamshire Plan areas/ neighbouring authorities. The SMV is concerned about the lack of a joint approach to the overall mitigation strategy for the Burnham Beeches SAC between other Buckinghamshire Plan areas and/or neighbouring authorities, which also fall within the 5.6km zone of influence. For example, the adopted Wycombe Local Plan has its own mitigation strategy for growth in the western planning area of Buckinghamshire. It is not clear why further effort hasn't been made for a SPD to be developed on a joint plan area/ authority basis such, as for example, the joint working approach for the Thames Basin Heaths Special Protection Area between the affected 11 authorities in Berkshire, Hampshire and Surrey. Impact of Covid-19 The impact of the Covid-19 pandemic has meant that local people have realised the opportunities for recreation in their local area. There may now be less demand from potential visitors to places such as the Burnham Beeches SAC, particularly from those people that would have to drive to the SAC. This should be considered in the SPD.

Mr Nigel Morgan	Seer Green and Jordans Society	260			<p>Burnham Beeches has a magnificent history, has the highest European level of nature conservation sites, and is a wonderfully natural playground and lungs for its many visitors from both near and far. I have used it for seventy years! I have seen an outline of your draft planning document relating to Burnham Beeches Special Area of Conservation Supplementary Planning Document; having done so, I sense that this strips away its key protections as a Special Area of Conservation. I would include these grounds: There is no reference whatsoever to Suitable Alternative Natural Green space. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. On this basis and given the historic and existing importance of Burnham Beeches, this document should not become policy.</p>
Mr James Patterson		197			<p>I am astonished and appalled at the proposals contained in the above planning Document. The failure to include suitable alternative green space is a gross disregard for the promise to uphold and improve the green credentials for our County. Your failure to uphold the promises made is simply unacceptable. I am also concerned at the absence of an Air Quality Strategy, given the numbers of deaths attributed to poor air quality. As someone who has voted Conservative all my life, I am ashamed that you are failing to uphold conservative values and will take every action possible to change this plan</p>
Cllr Jacquetta Lowen-Cooper		224	<p>Endorses Cllr Sandy's representation, as below. Am aware that you will have received numerous objections to stripping away existing key protections of the Burnham Beeches and surrounding areas from the Draft SPD. Emasculation of these protections appear a wily move to neuter future objection to development which would weaken parishes and resident's ability to resist encroachment by developers seeking to reap maximum advantage from areas adjacent to Slough, Maidenhead, the Elizabeth Line and Beaconsfield. This should not be allowed especially because twenty-eight South Bucks Councillors (the full council) were elected on manifestos that promised to defend the Green Belt. It must therefore be the duty of all elected members to demand retention of the established protections of BB and for officers to cooperate accordingly. I shan't repeat all the sound reasons already lodged by other objectors but will</p>		

			<p>emphasise that the entire infrastructure of SB is already over capacity and under unacceptable strain. Our GB is sacrosanct. Our air quality in places is already at dangerous levels and Lockdown has demonstrated it to be highly unlikely there will be much demand for commercial space in Beaconsfield or elsewhere. The draft SPD should be discarded in its present form and Burnham Beeches and its environs preserved as an SAC with current protections remaining intact.</p>		
Richard Baker		226			<p>Please note our objection to your draft planning document because it seeks to strip Burnham Beeches of its status as a Special Area of Conservation thereby opening the way for excessive and unsustainable development in Beaconsfield and the surrounding area. Whatever happened to the suitable alternative natural greenspace? It must be reinstated. Where is the impact statement related to the effect on Burnham Beeches of the additional commercial development proposed for Beaconsfield? This cannot simply be ignored? Where is the statement on environmental mitigation in relation to air quality which the Council has apparently signed up to? Again, this must be included. Although it is your duty as our Council to facilitate suitable, sympathetic and sustainable development, that must not be at any cost, and certainly not at the expense of adverse and irreversible impact on local amenities, green space and the environment.</p>
Don Lunn		230	<p>It is with deep regret and sadness that I am obliged to write this email. This process has been undertaken with indecent haste and without giving the residents sufficient time to see how they will be affected but this course of action that you have chosen to enact. Your refusal to extend the consultation period beyond the 3rd September with the following written comment "We would not really expect any local resident, town or parish council, or local amenity group concerned about the impact of new residential development in the South Bucks (and a small part of Chiltern) area to have too much to comment on". I find this impertinent in the extreme and totally unacceptable. I would remind you, that we as residents and you as our elected body, are the temporary custodians of the area in which we live and our responsibility to pass it on to those who follow us in as good or better state than that in which it was handed down to us. From the above you will understand that I oppose this action you are trying to undertake in the strongest possible terms.</p>		

Mr & Mrs Ian & Janet Ridley		241	The above-mentioned document in the subject line of this email falls far short of the protection currently in place for the Burnham Beeches Beaconsfield area. This re- writing of the rules appears to be stripping away the key protections given to Burnham Beeches as a Special Area of Conservation. It must be borne in mind that this area has the highest possible European level of Nature Conservation devoted to it. These rules have an important effect on the Beaconsfield area as well due to the development restrictions imposed by a buffer zone of 5.6km stretching from Burnham Beeches into the Beaconsfield area. This appears to me to be an underhand tactic to dilute protection of the east end of Beaconsfield from devastating development in that area.		
Mr David Spruzen		243			In relation to the SPD, whilst there is mention of the 'no net new' dwellings for the 500m-5.6km zone, there is not for the within 500m presumption against development zone. I think for clarity within the 500m zone, the words 'no net new' should be included within section 3.2.1. There is no reference anywhere to Suitable Alternative Natural Greenspace. This needs to be included. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. This needs to be considered and mitigation included. There is no reference to an Air Quality Management Strategy. This should be a key element of environmental mitigation and part of the Council's draft plan.
Ms Samantha Lowi		245			The SPD really needs to set out a full suitable Alternative Natural Green Space policy. The SPD should include the requirement for an Air Quality Mitigation Scheme. The SPD should take account of increased visitor pressure from sources other than the proposed new residential development.
Ms Sheila Stabler		247	I am writing with major concerns to your proposals. We live on the outskirts of Burnham Beeches and have major concerns about you plans and the lack of clarity about the environmental impact this will have On Burnham Beeches. Also the impact this will have in the air quality. It's so sad that councils try to benefit themselves but with little consideration to the surrounding areas of conservation. Burnham Beeches is a wonderful area for people to 'get away from it all' and a great area of conservation. Please leave the areas around it alone.		
Vivienne Ely		257			Burnham Beeches has the highest European level of nature conservation sites. This means that there are restrictions on development within a 5.6 km buffer zone, which includes Beaconsfield. One of the most important

					current regulations is the requirement for a new housing development to include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area. This protection is a key argument against the 1,600 new homes currently proposed to the east of Beaconsfield in the draft local plan. There is simply not the land to create 1,600 homes AND the roughly 30 hectares of new alternative greenspace that our proximity to Burnham Beeches would require. The draft plan should fail on this point alone. There is no reference whatsoever to Suitable Alternative Natural Greenspace. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy. This beautiful woodland Burnham Beeches that is so loved and enjoyed must be preferred for future generations.
Mr & Mrs Philip & Brenda Cox		274	On a broader front, we are also extremely worried about the impact on, and lack of planning for, local infrastructure within Beaconsfield - specifically traffic congestion (already a major issue around the M40 Junction2 and through Farnham Common on the A355). Intolerable pressure on local schools, doctors and wider health services, with no apparent additional investment planned. We were appalled by the statement from Buckinghamshire Council about extending the Consultation Period, that 'we would not really expect any local resident, Town or Parish Council, or local amenity group concerned about the impact of new residential development in the South Bucks (and a small part of Chiltern) area, to have too much to comment on'. Given the scale and impact of this development on Beaconsfield, its surrounding area and the nationally important nature and conservation area of Burnham Beeches this statement in itself is outrageous, ill-informed, arrogant and unacceptable. It smacks of the Council having already made the decision regardless of the views of local residents or local amenity groups. We strongly urge the Council to REJECT this overdevelopment of our local area.		
Clare Kirk		283			I would like to object to the Burnham Beeches supplementary Planning document. A suitable alternative natural green space must be a requirement and provided by any developer planning development in the area to protect Burnham Beeches from an increase in visitors. Provision should be made to protect the environmental impact on Burnham Beeches of any development in Beaconsfield, both residential and

					commercial. Provision should be made to protect Burnham Beeches from the effect of additional visitors on Burnham Beeches from any development in Beaconsfield, both residential and commercial. To protect the environment there should be a comprehensive and suitable air quality management strategy in any supplementary planning document for Burnham Beeches.
Jenny Claridge		291	For all local residents, Burnham Beeches is a valuable local amenity, where they can exercise and enjoy the outside space and fresh air in a safe and healthy environment. Burnham Beeches is designated as a Special Area of Conservation however specified protection criteria have been omitted from the Burnham Beeches SPD. It seems clear that the SPD therefore does not uphold protection of Burnham Beeches as a Special Area of Conservation. I hope you will understand my concerns and those of other residents of the seriousness of these omissions and agree that the SPD is flawed without them and cannot therefore be progressed until these are addressed satisfactorily.		
Mr & Mrs Ian & Barbara Fairgrieve		295	My husband and I strongly object to the intention to alter the status of Burnham Beeches. This is a National Nature Reserve, a Special Area of Conservation and a biological Site of Special Scientific Interest. Why are you considering bringing in any changes without due and careful consideration to such an important site? Why has this document been issued during the summer holidays when local residents would most probably be unaware of it? We need much more time to consider the implications of this plan and the effect it could have on such an important conservation area I sincerely hope you will extend the period of time to allow objections to be fully considered Too many proposed developments which have a profound effect on the area we live in are not being given enough time and consideration to realise their full impact on the town, the residents and the surrounding environment		
Mr & Mrs John & Jan Donlon		299			I refer to the above document and would wish to make comment. It appears that there are 2 significant omissions from the document, and I believe it is a statutory requirement for them to be included: Suitable Alternate Natural Greenspace for any housing development within the 5.6km zone around Burnham Beeches. Air Quality Management Strategy. The protection of this area (Burnham Beeches) as a Special

					Area of Conservation is of vital importance to the surrounding communities.
Charlotte Coales		301			I am writing in reference to the Burnham Beeches Supplementary Planning Document (issued by Buckinghamshire Council) on 29th July. I am concerned that nowhere in this document do you refer to... A 'suitable alternative natural greenspace. This crucial line of defence is simply no longer there. The environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. An Air Quality Management Strategy - this should be a key element of environmental mitigation (something which is theoretically already part of the Council's draft plan?)
Mr and Mrs Fred Russell		306	I understand from our residents association that Burnham Beeches is under s threat of Possible serious development in the area within the zone in which it lies. I must protest at such a threat since Burnham Beeches (BB) is worthy of all the protection It's possible to provide for the area. In particular the underlying failure to accord BB the maximum level of protection it needs and deserves according the general EU rules of Strategic access Management (SAC) As I understand it the SPD carefully avoids mentioning the SAC level of protection. The implications for heavy development In the immediate BB area are manifold And obvious and respectfully request that this shortcoming in the draft SPD be remedied before it is too late.		
Mr Christopher Patrick Langley		309			I wish to lodge my objection to this initiative. You are surely aware of the special conservation status of Burnham Beeches and the regional provision for "Suitable Alternative Natural Greenspace", neither of which are covered in your document. Nor do you appear to have thought through the issues relating to environmental impact; people pressure, air quality are two that spring immediately to mind. You are in the position on a temporary custodian, sir, of our natural environment and you have a duty of care towards it and towards the heritage of our children and their heirs and successors. This document should be withdrawn.
Mr David Knowles		277			I am writing to object to the omissions in the Burnham Beeches Supplementary Planning Document, and to urge you to correct these. The most important point is that it has no reference to the fact that Burnham Beeches is a Special Area of Conservation. This has implications for the surrounding area, because it includes a buffer zone of 5.6km around the site, and this protection zone extends into Beaconsfield, particularly the area around the A335, which is designated for commercial space. It also includes a requirement for Suitable Alternative

					<p>Natural Greenspace. Secondly, there is no mention of an Air Quality Management Strategy, and again the developments around the A335 will have an impact. Thirdly, the overall impact of 20,000 sq ft of commercial space around Beaconsfield needs to be considered in the context of the effect it will have on Burnham Beeches, particularly on traffic along the A355 in the Farnham Common area, which is already very narrow and congested. For all of these reasons, the plan should be withdrawn and reissued.</p>
Mr John Bartlett		190	<p>I am concerned about your underhand attempts to dilute certain environmental protections important to both Burnham Beeches and Beaconsfield. The Planning Document was only issued on the 29th July and yet you are expecting full responses by the 3rd September during which time a lot of people are away or occupied with family.</p>		
Mr John Kirtland		379			<p>Without these in place it is apparent that this consultation is being directed towards an outcome that supports the development of green belt that falls within the perimeter, through the removal of controls and measures which otherwise help to protect it. 1. The avoidance and mitigation strategy set out in the SPD is very weak and requires strengthening. 2. The avoidance and mitigation strategy set out is missing fundamental mitigations which are not mentioned in the SPD. It therefore does not protect the Beeches from increase in disturbance. This must be amended. 3. The Hydrology Report is out of date. A new report is needed before further consultation goes ahead. 4. The 10-year Management Plan referred to in the out of date Hydrology Report is expired and is not set out among the consultation documents. 5. The SPD does not address the reduction in water levels mentioned in the out of date Hydrology Report 6. This SPD assumes acceptance of an emerging Local Plan which has not yet passed through public examination and is likely to be found unsound. Yet the out of date Hydrology Report refers to NPPF where proposed development which has a noted adverse impact on a SSSI like the Beeches should not normally be permitted. Why is this consultation going ahead when the Local Plan has not been passed as fit? 7. This SPD predicated on an emerging Plan with an evidence base which has not been found sound? The HRA used in the evidence base of the draft Local Plan has already been heavily criticised in the Reg 19 consultation and without any acceptable response from the Council. 8. It is apparent that much of the evidence base of the emerging Plan is not sound yet the Council has clearly made the assumption that the Local Plan will be accepted. This consultation must stop until the Plan is</p>

				<p>either accepted or withdrawn. 9. The emerging Local Plan on which the SPD is based clearly conflicts with the Core Policy referenced in the Hydrology Report. This consultation is therefore flawed and should be stopped. 11. This consultation must be accompanied by a fresh air pollution monitoring report. The latest air quality monitoring in Beaconsfield, showed many instances air quality standards being failed. 17. The data informing this consultation is deficient. For example, the Urban Development Report does not include the massive impact from the unneeded 20,000 sq m Beaconsfield commercial development planned in the emerging Local plan. Again, note that this Plan is not yet approved and has received heavy criticism from the Inspector. 18. The UDR questions how new mitigating SANG will be provided and managed in perpetuity. The SPD provides NO answers to this and is therefore lacking. 19. You do not address how small sites will contribute to SANG. This must be addressed. 20. The SPD 'sets out a mitigation strategy required to avoid adverse public access and disturbance impacts' but fails to include SANG. SANG must be addressed in terms of provision and perpetuity. 21. The SPD fails completely in its requirement to include all required mitigation strategies. For example, Policy SP BP9 (emerging Plan) and the emerging Plan in general is not an adopted policy and may never be. This consultation must be halted until such time as the Plan is withdrawn or accepted. 22. The SPD completely fails in its duty to provide any clarity at all on SANGs, their location, their maintenance in perpetuity. 26. Viability reports are already calculated in favour of the developer. Contributions to SAMMS should therefore be excluded from inclusion in viability reports. 27. The government's adoption of environmental net gain principles seek to improve the environment. It is not clear how SAMMS would ensure improvement in each and every case? 28. The SPD establishes the mitigation level provided for developments (ie the range of schemes and costs). For this reason alone, it must not be eliminated from further assessment in the HRA process. Misjudging the level of mitigation or putting in place ineffective measures will have a direct and massively negative impact on the SAC. The SPD must not be eliminated. 29. The mitigation measures in SAMMS are woefully inadequate. They do not represent the full range of measures that will be required to avoid adverse impacts on the Beeches. This opens the door to developer loopholes and their exploitation. 30. It must be stated that the FULL SANG amount would be required on the site in SP BP9. This must be in addition to full financial mitigation.</p>
Mrs Sharon Cooke		205		<p>Where is the Suitable Alternative Natural Greenspace in your plan? It is simply not there. In your anxiety to pave</p>

					the way for developers coupled with your contempt for the environment, you have not even bothered to make any reference to the environmental impact of your plan upon Burnham Beeches or upon the air quality. People have had quite enough. I look forward to the local elections with interest
Mr John David Dowson		215			Little time to respond however I am not sure you have the best interests of Beaconsfield residents at heart. Specifically on your published proposals:- There is no reference to suitable alternative green space. Where is it? What is the impact of your stated plan on Burnham Beeches of 20,000 sq ft increase of commercial development that you are proposing for Beaconsfield? There is no reference to air quality management. Will it be enhanced or made worse? I would appreciate your reply.
Gill Poulton		367	I am rather concerned that the rules which protect Burnham Beeches are being reviewed and that we risk losing this wonderful local area of woodland and open space. Burnham Beeches has been designated as a Special Area of Conservation as it is a very important area for nature preservation, and has the highest European level of nature conservation sites. It must be protected from any developments and in order for this to happen there must be rules which are applied to prevent these developments.		
Mr Martin Danaher		236	I am most concerned that Buckinghamshire Council is yet again trying to allow developers to build across greenbelt and protected areas in south Buckinghamshire. On this occasion, why is the council trying to re-write the rules protecting Burnham Beeches, stripping away its key protections as a Special Area of Conservation?		
Yvette de Lusignan Austin		343			2. How is air quality to be managed? As can be seen from the Burnham Beeches Recreation Report, impacts on Burnham Beeches include air pollution from local traffic increases, which would inevitably follow from the massively enlarged resident and commercial population that the council is proposing. The SPD, however, ignores these impacts altogether, and only references increased visitor numbers as the source of negative impact. Whilst increased visitor numbers may be relatively simple to mitigate for, the only way to mitigate against impacts from increased population is to limit that increase. I list the quotes below which support my comments: 1. the Burnham Beeches Recreation Report[ii] explicitly states that visitor numbers are not the only source of all urban impacts: Para 2.6: Many of the impacts set out above are linked to recreation use. Recreation use is therefore important to consider in depth and is a focus of subsequent sections of the report. It is however

				<p>important to note that some of the urban impacts are not related to recreation, and management of recreation pressure/visitor numbers will not necessarily address all the issues identified. We have also included air quality in the list above, however it should be noted that air quality issues are likely to be linked to a range of factors, not least traffic use on the motorways and nearby Heathrow airport. This is a critical issue for Burnham Beeches and is being considered by the Chiltern and South Bucks Councils through other studies/modelling work. As such air quality is outside the scope of this report. 2. The SPD alters the emphasis of the list of impacts to the SAC compared with its stated source, The Burnham Beeches Recreation Report. This latter report states that the impacts are from increasing levels of urban development; the SPD changes this to be from Growing visitor numbers instead: Quote from the SPD 2.1.4 Growing numbers of visitors can result in conflict for space among users and demand for more facilities, [my emphasis] such as parking, refreshments, and toilets. There are also several potential ways in which public access and disturbance can have an impact on the nature conservation interest of the site. These include the following 10: Contamination (e.g. dog fouling, litter, spread of plant pathogens); Increased fire risk; Trampling/wear (e.g. loss of vegetation, soil compaction, erosion, damage to trees from climbing); Harvesting (e.g. fungi, wood); Difficulties in managing the site (e.g. maintaining the grazing regime); Disturbance (e.g. birds and affecting the behaviour of livestock); Fragmentation; Hydrological impacts (water availability and flow); Vandalism; and Air quality. Quote from the Burnham Beeches Recreation Report Impacts (to the SAC interest) from increasing levels of urban development, [my emphasis] are varied and have long been a concern. These impacts include: Contamination (e.g. dog fouling, litter, spread of plant pathogens); Increased fire risk; Trampling/wear (e.g. loss of vegetation, soil compaction, erosion, damage to trees from climbing); Harvesting (e.g. fungi, wood); Difficulties in managing the site (e.g. maintaining the grazing regime); Disturbance (e.g. affecting the distribution of livestock and deer); Fragmentation; Hydrological impacts (water availability and flow); Air quality 3. The SPD makes only one reference to air pollution, and only one reference to traffic (vehicles), in paragraph 2.1.5: 2.1.5 work to reduce the impact of visitors include the following: Closing internal roads to vehicles (to improve visitor safety and focus recreation on more robust areas whilst reducing air pollution) [SPD] 4. The Burnham Beeches Recreation Report references the impact of poor air quality caused by urban growth and traffic increases, in Table 1, in Para</p>
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					<p>2.4 and Table 6. The SPD does not consider it: Table 1: Summary of potential nature conservation impacts (to the SAC interest) linked to increased levels of surrounding development at Burnham Beeches Air quality Changes in air quality (e.g. from local traffic increases) [Burnham Beeches Recreation Report, my emphasis] Para 2.4: For Burnham Beeches specifically, the site improvement plan produced by Natural England for the SAC2 lists air quality as [linked to] urban growth [Burnham Beeches Recreation Report] Table 6: Potential nature conservation impacts from nearby development Air quality Changes in air quality (e.g. from local traffic increases) Will relate to roads around periphery and through SAC, use of which will be linked to local housing.</p> <p>3. What is the impact of 20,000 ft of commercial space planned in Beaconsfield? Unfortunately, presumably because the emphasis of the Burnham Beeches Recreation Report is on recreation, it completely overlooks the severely aggravating factor of the enormous planned commercial development in the area on Burnham Beeches. This is not, however, justification for it to be completely overlooked by the SPD.</p> <p>4. Suitable Alternative Natural Greenspace (SANGs). The SPD only discusses the SANGM (Strategic Access Management and Monitoring) side of harm mitigations; the local population deserves to be told how SANGs could be provided. What are the plans for these?</p>
Yvette de Lusignan Austin		345	<p>I wish to make the following comments on the BB SPD[i]: 1. The consultation period permitted is too short, given that it: a) falls over the school summer holidays, when many people are away, or having to juggle child care and work; and b) during a period of pandemic when gatherings of people are prohibited. Thus, members of the community are unable to come together to discuss the implications of the document, which, with the background documents, requires significant time and effort to read and interpret. Perhaps this is a deliberate choice on the part of the council to make it difficult for local people to respond.</p>		
Paul Austin		347			<p>I have read the Supplementary Planning Document, and have some comments to make. I do not believe that the document does enough to preserve the Burnham Beeches Special Area of Conservation. There is no explanation in it of how air quality is to be managed to protect the area the vast increase in traffic in the area and along the M40 corridor which would accompany the proposed commercial and residential development will bring an associated decrease in air quality. There is no reference to the 20,000 sq ft of commercial development planned for Beaconsfield. And there is no explanation of how Suitable Alternative Natural Greenspaces might be</p>

				accommodated. These questions must be answered if Burnham Beeches is to be properly protected.
Genevieve Austin		327		I cannot see from the SPD that there is any policy in place to manage air quality. How does the council propose to ensure that air quality will not be affected and Burnham Beeches damaged by the inevitable reduction in air quality caused by the huge population growth they intend for the Beaconsfield area, and for the similarly huge growth in commercial property? And what provision will be made for SANGS?
John Macfarlane		194		I would like to register my concern, following publication of the above document issued 29th July, which seems to omit some significant specific actions and requirements that seek to preserve and protect the important green and publicly accessible spaces in this part of Buckinghamshire. There seems to be no mention of the environmental or visitor impact on Burnham Beeches that surely would be significant were the addition of 20,000 sq ft of commercial space, which the council propose is developed close to the M40 junction just north of the Beeches, and this surely should be examined and a detailed plan produced to explain how this would be mitigated? There is surely a requirement for the vitally important Burnham Beeches habitat to continue to enjoy the protection it deserves and any proposed development of new housing for example should require the developer to include suitable natural green space or recreational space to mitigate the impact on the conservation area? Clearly any development of commercial or residential construction in the area will inevitably have a damaging impact on the environment too and there should be a clear strategy to study the impact on Air quality and details this and any form of mitigation which I believe is a current requirement. I object to the proposal certainly without the above issues being reinforced and established as a basic ongoing requirement in any developmental proposal for this vitally important conservation area of European significance.
Nina Randall		305		I read with concern the Burnham Beeches Supplementary Planning Document issued by Buckinghamshire County Council on 29th July 2020. There seem to be some omissions in the document: 1) There is no reference to an Air Quality Management Strategy this is key as the potential development area under discussion in the vicinity of Junction 2 of the M40 and would result in greater traffic on the A355, which is close to, or adjacent to the Burnham Beeches, Special Area of Conservation. The air quality implications need to be examined in detail. 2) There is no reference to a suitable alternative natural greenspace. The proposed commercial and residential development would increase

					the pressure on existing green spaces in the area, including Burnham Beeches. This needs to be considered in the planning document. 3) Whilst taking into account the environmental impact and increased visitor numbers caused by proposed residential development, the planning document does not refer to the environmental impact and visitors arising from the commercial premises planned for the outskirts of Beaconsfield. Given that this space could be up to 20,000 sq ft, the numbers of workers at this site and therefore travel to and from this site, could be significant and needs to be included in any calculations. These omissions, I believe, need to be corrected before proceeding any further with the planning process.
Kevin Thomas		308			I read with interest the Burnham Beeches Supplementary Planning Document issued by BCC on 29th July 2020. However, there appear to be several omissions, as follows: Whilst taking into account the environmental impact and increased visitor numbers caused by proposed residential development, it does not refer to the environmental impact and visitors arising from the commercial premises planned for the outskirts of Beaconsfield. Given that this space could be up to 20,000 sq ft, the numbers of workers at this site could be significant and should be included in any calculations. There is no reference to an Air Quality Management Strategy this is key as any residential or commercial development in the vicinity of J2 on the M40 would result in greater traffic on the A355, which is close to or adjacent to the Burnham Beeches SAC. The air quality implications should be examined in detail. There is no reference to a suitable alternative natural greenspace. The proposed commercial and residential development would increase the pressure on existing green spaces, including Burnham Beeches. This should be considered in the document. I believe these omissions should be corrected before proceeding further with the planning process.
Felicity Coombs		329	Before I list my objections, I want to point out that this document is almost impossible for the lay person to understand. There is no simple summary and the language used is dense and technical. This is surely against the spirit of public consultation and mitigates against genuine concern and understanding from the people you represent? It should be a basic requirement of the planning process that short plain English documents complement the more detailed technical papers.		
Chris Cuthbert		294			If there are 1600 new homes built to the east of Beaconsfield, then there will not be enough space for the 30 hectares of new alternative greenspace that Beaconsfield's proximity to Burnham Beeches would

					require. I did not see any reference to alternative green space in the Supplementary Planning Document at all. Regarding the proposed 20,000 sq ft of commercial space which the Council are proposing for Beaconsfield, there is no comment in the Document regarding the environmental impact of this on Burnham Beeches or of the likely visitor impact. There is no reference in the Document to the environmental mitigation of housing or commercial development such as an Air Quality Management Strategy.
Alexander Cuthbert		248	This creates risk of development in areas such as Burnham Beeches, Littleworth Common and Beaconsfield. As a local resident in Beaconsfield I have enjoyed country walks in the Littleworth Common area, and feel that the single track roads around this village are unsuitable for heavy lorries that development around this village could bring. Such development could be inappropriate for the area. The council has not considered the impact of development around Burnham Beeches in co-operation with neighbouring Slough council. Development around Burnham Beeches, Farnham Common and Farnham Royal could increase traffic congestion in Slough. Slough council has not been consulted on this matter. The Buckinghamshire council has never been elected as a unitary authority, with the first elections not due until May 2021. The councillors representing what was the former South Bucks District Council, who now serve on this council were last elected in May 2015. It is therefore undemocratic for them to take far reaching decisions for the future of Buckinghamshire without a further election taking place first. In the UK there are no offices which are normally elected for a term of more than 5 years.		
Dr Adrienne Regan		318	My husband and I feel outrage! We have been living in Gerrards Cross since 1982 and know Beaconsfield and Burnham Beeches very well. We hear that Bucks Council plans to rewrite rules protecting Burnham Beeches. Burnham Beeches is a special area of conservation. We object strongly to the draft plan for 1600 new homes to the east of Beaconsfield and 20,000sqft of commercial space. There should be a 5.6km buffer zone from Burnham Beeches and this includes Beaconsfield.		
Dr Adrienne Regan		320			We need to know: - where is the recreation space (SANG)? There needs to be 30 hectares of natural greenspace if 1600 new homes are planned. - Air quality management strategy (AQMS) - what are your plans? We are shocked and distressed about the way these plans have been pushed forward in such difficult times.

William Gambley		332	I am a resident and Council Tax payer living very close to the outstanding Burnham Beeches. I am in total opposition to any change in the current planning for this area and the Beaconsfield surrounds. The Covid 19 pandemic has shown how important clean, green and accessible spaces are for the health and wellbeing of our communities. We need the Burnham Beeches and the surrounding green areas protected and preserved for ourselves and our children. The stupidity of Brexit should not be allowed to destroy the highest levels of environmental protection that we currently enjoy or that are there for our children and their future.		
Sarah Smith		334			I would like to register my objections. The document threatens green land in Bucks and the protected area of Burnham Beeches. I note in particular, there is no reference to suitable alternative natural green space; there is no reference to the environmental or visitor impact on Burnham Beeches of the proposed 20,000 square foot of commercial space proposed for Beaconsfield; there is no reference to an air quality management strategy which is essential to manage environmental impact.
KY Embleton		336			I wish to object to the above. I understand there are 1,600 new homes currently proposed to the east of Beaconsfield in the draft local plan. There is simply not the land to create 1,600 homes AND the roughly 30 hectares of new alternative greenspace that our proximity to Burnham Beeches would require. In the document, there are some crucial omissions, chiefly :- . NO REFERENCE WHATSOEVER TO :- Suitable Alternative Natural Greenspace. the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan. This underhand, below-the-radar dilution of environmental protections is simply not acceptable and to try to sneak in the consultation period during the summer holiday period is also not acceptable, to say the least. I would be obliged if you would extend the period of the consultation so that people are given a fair chance to consider these plans and the likely impact to them as residents.
Mr & Mrs Anthony & Kathryn Protopapadakis		338		The document in 2.1.2 states that most visitors to Burnham Beeches SAC live locally and arrive by car. Given the impact of Covid-19 in raising visitor numbers and the need for us all to be more environmentally friendly it is hard to see how Burnham Beeches SAC could possibly sustain a larger local population	

				generated by additional development with the 500m-5.6km distance.	
Mr Benjamin Hasted		344	I have been reading the Burnham Beeches Supplementary Planning Document and am very concerned that Burnham Beeches - this incredibly valuable area of protected woodland - may be at risk of losing some of its existing protections. I am resident within 500m of Burnham Beeches so believe my views should be of particular interest to the council. I am very anxious to protect the integrity of Burnham Beeches - this is an immensely valuable and rare piece of historic woodland. As such, any reduction in the current protections afforded this precious space must absolutely be avoided.		
Mr Benjamin Hasted		346			I specifically mention this with regard to the very large planned development on the outskirts of Beaconsfield. Your latest document appears to make no reference to the requirement for 'Suitable Alternative Natural Greenspace' that is currently a requirement for the new proposed development. I also note that there is no mention of the environmental impact on Burnham Beeches from the 20,000sq ft of commercial space that is being proposed just outside Beaconsfield - your document references 'net new homes' a lot but doesn't mention commercial property at all when these could have a massive impact on the environment. Finally I also note a distinct lack of reference to an Air Quality Management Strategy which I believe should be an intrinsic part of any environmental mitigation strategy - I thought this was part of the council's draft plan so it strikes me as very odd that it is not mentioned at all.
Mr & Mrs Iain & Rebecca Miller		354			We have recently become aware of some of the specifics of the above plan, and wish to object on several points: 1. We see no reference to SANG provisions, which we believe are required, and are particularly important for the precious Burnham Beeches resource area 2. We are concerned about increased pressure on the surrounding area associated with the new commercial space provisions 3. We'd like to understand more about air quality management strategy and provisions
Mr Nigel Smales		356	Finally, while I have no objection to the principle of a 'per net new house' levy to keep the Beeches in good order, it is unreasonable for Buckinghamshire Council (BC) to charge legal fees of £541.02 'per net new house'. I see the logic of there being a charge for assessment of each application, but why should such costs escalate incrementally per house? There should be a ceiling on this charge beyond which BC will be obliged to justify its legal costs to the public in detail.		

Helen Fowler		362			<p>I would like to object to the Burnham Beeches Supplementary Planning Document, for the following reasons:- There is no reference to "Suitable Alternative Natural Greenspace" (SANG). Burnham Beeches has an extremely high European level of nature conservation site status. This means restrictions on development within a 5.6km buffer zone, which includes Beaconsfield and Wilton Park. According to current regulations there is a requirement that any new housing development must include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area. This is likely to come into play with the proposed Wilton Park development, and is essential if the proposed Wilton Park development goes ahead. Are the developers and landowners hoping to ignore the present SANG requirements? There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space Buckinghamshire Council are proposing for Beaconsfield. It is also very worrying that there is no reference to an Air Quality Management Strategy, which will come into play with the development at Wilton Park, and the Council's draft plan.</p>
Mr Bob Urie		372	<p>This consultation has been run over the summer holidays and should be extended to give people a proper chance to respond. Bucks Council aren't replying to Freedom of Information requests or other applications within statutory time limits, and so the public should be given more time to respond to this consultation.</p>		
Barbara Meadows		376	<p>I have lived in the local area for 52 years and have visited Burnham Beeches regularly since that time as a child I walked into the area to play on a daily basis. Now I drive about twice a month to visit this very diverse and beautiful area to rest, relax and walk in nature. The Council has a duty to co-operate with the public, taking into account their opinion on planning. I am writing to express my concern about the areas around Burnham Beeches and the impact it will have on nature and the surrounding infrastructure, should there be further housing development within 5.6km of this valuable site. I understand that a sizeable commercial property is also considered which would bring an even larger number of vehicles of different sizes along the already congested roads. I travel to this area from the north and south along the A355. As you get towards the village of Farnham Common and Farnham Royal the traffic is already heavy, requiring two crossing areas within the village for pedestrians. Roads leading off the</p>		

		<p>A355 are restricted, either by parked cars or narrow, curved roads. All traffic to the most popular area (the common with toilet and refreshment facilities) has to come along these roads to gain access the parking area which is already extremely busy. If there is further housing built around this area, towards Beaconsfield and the Chalfonts (again already very busy with traffic) I do not believe the infrastructure would cope. As well as building there has to be 30 hectares of suitable alternative natural greenspace (SANG). I am interested to know how this could be achieved. I would be grateful if you would consider my comments as part of your legal obligation to the public to create a healthy environment with suitable space to breathe and restore our sanity within our fragile world.</p>		
<p>Mr Dennis Elsey</p>		<p>395 This document is erroneous and should be withdrawn for the following reasons: The whole Local Plan and related documents basis of this document is in contention and therefore all public consultation comments upon the Local Plan, the Sustainability Appraisal and the Habitats Regulation Assessment (HRA) apply to this document. It is obvious that these comments have not been applied to this document and therefor it should be withdrawn entirely and only represented with amendments when the Local Plan, Sustainability Appraisal and Habitats Regulation Assessment have passed Planning Inspection. It refers to the HRA and portrays it as accurate and reliable thereby misleading the public because the HRA document is wrong for the reasons stated in response to the Local Plan Public Consultation and the Planning Inspectors therefor this document is wrong and not a fit basis for public consultation. This SPD will not reverse the huge decline in B.B. SAC and is not sustainable. Bucks Council is clearly misleading the public, residents and Statutory Consultees, the latter are either negligent in not commenting or unaware of this background to this document. Therefor this document should be withdrawn and probably is in default of Public Consultation Guidelines and the Council's own constitution. Note: Currently this SPD is in default of Buckinghamshire Councils responsibility specified in 1.3.1; 1.5.1; 1.5.2 and 1.5.3 and to ensure no adverse effect in Policy DM NP3 Natural - Burnham Beeches Special Area of Conservation: The policy sets out requirements that will ensure development within the Plan area will not adversely affect the integrity of Burnham</p>		

Beeches SAC. This document's description in the introduction which says: Description: The Supplementary Planning Document sets out a mitigation strategy required to avoid adverse public access and disturbance impacts from development on the integrity of the Burnham Beeches SAC. You can comment on the following sections of the document: Section 2 Background, Section 3.3 Strategic Access Management and Monitoring Strategy, Section 8 Appendix 1 (a), Section 9 Appendix 1 (b) and Section 10 Appendix 1 (c). This description is wrong and misleads the public and residents and Statutory Consultees because it says: The policy sets out requirements that will ensure development within the Plan area will not adversely affect the integrity of Burnham Beeches SAC. However, it misses out the major points above and also air pollution. Therefore the following points should be added to new Section 2.0 Background\;\; The Sustainability Appraisal 6.1.4 says NOx Air Pollution is 15% from road transport and 16% from air travel (with Heathrow over-flights). The remaining 69% is from commercial and domestic premises which are the largest factor with heavily polluting Slough 1.25 km to the south, and with Farnham and the A355 trunk road all along the eastern perimeter. The M4 motorway is 4.5 km, much less than 5.6 km, downwind to the south. The towns within 5.6 kilometres of Burnham Beeches include: Stoke Poges; Farnham Royal & Common; western Slough; Burham; Taplow; Cookham Rise; Bourne End; Hedsor; Little Marlow; eastern Flackwell Heath; Loudwater; Wycombe Marsh; south Tylers Green; Penn; Knotty Green; Beaconsfield; Seer Green; Jordans; Chalfont St Giles; western Chalfont St Peter; Gerrards Cross; Hedgeray; Fulmer. . Burnham Beeches is dying from air pollution now as explained in the HRA Update February 2020 specifically NOx where Total nitrogen deposit rates. Concentrations were predicted to exceed the critical load of 10kg N/ha/yr THROUGHOUT the SAC. This is caused by airborne NOx pollution from all sources both being deposited on foliage and dissolving to form acid rain which falls on Burnham Beeches and surrounding areas. Therefore ANY increase for ANY reason will hasten the demise of this National and International Special Area of Conservation and a Natura 2000 site which would be a major default by Buckinghamshire Council in its conservation responsibilities. It is critical to the survival of this

			<p>site that air pollution is reduced and Buckinghamshire Council as Competent Authority ought to have negotiated with Slough, Slough Estates (industrial parks); Heathrow, CAA, Maidenhead and High Wycombe to do so, and put it in an Air Quality Action plan and this SPD at 3.0. Furthermore Air Quality is a key matter for public health, especially the aged, children, pregnant women and the vulnerable. Note: with these comments added to the SPD in a new 2.0 then a more urgent case is made and the actions can be more severe whilst appearing reasonable in this context. For example charging of developers can be a requirement without alternative, if this is stated policy then they cannot claim to be surprised subsequently. As you can see the above self-financing method of tackling the environmental damage is much more likely to achieve its objective of saving Burnham Beeches SAC from its current path of destruction than that contained in this SPD. It will also have local public health benefits and be sustainable in the long term whereas the current SPD will not produce a sustainable future at all. Arranging the deck chairs on the Titanic springs to mind. Anyone who has seen the B.B. SAC 20 years ago and 10 years ago can testify it has declined in variety and density of flora and fauna enormously to its current very poor condition and the locals have photographs that show this. This failure of stewardship needs to be reversed.</p>	
Mr Dennis Elsey		397		<p>Similarly for the HELLA housing need which is in contention and made obsolete by recent official housing growth projections which are considerably lower than the Local Plan basis. High Wycombe for example shows a decline. Therefore 3.3.3 SAMMS Project economics are wrong and it should be withdrawn. Critically, the removal of the most important existing protection for the 5.6 km Zone of Influence namely the requirement for all new development to have: Suitable Alternative Natural Greenspace is not mentioned at all thereby making this document a complete mis-representation. ADD to 3.1.1: Because the SAC is currently in a badly weakened state from air pollution then stringent action is required now to save this irreplaceable SAC and which will also have a public health benefit from lower air pollution in the surrounding area. Hopefully as Air Pollution is reduced by reduction in domestic, commercial and transport sources over the next 10 years then the SAC and public health will have improved. Add to: - 3.1.2 and construction, building extension, and air pollution. - 3.1.4 line 1 comprises delete two, insert five components: -</p>

					<p>3.1.4 bullet point 1 continue: and controls on amendment to existing properties; and - 3.1.4 ADD a 3rd bullet point: The current policy of requiring Suitable Alternative Greenspace for all new development is retained. - 3.1.4 ADD a 4th bullet point : - Buckinghamshire Council will negotiate with other authorities including Slough, Slough Estates, Berkshire, High Wycombe, Dept. of Transport, Heathrow Airport and the Civil Aviation Authority to agree an action plan to reduce air pollution especially NOx in the whole area. - 3.1.4 ADD 5th bullet point : Access to the SAC will be controlled by: i. Limiting entrance to only bicycles and electric vehicles including hybrids ii. Limiting maximum visitor numbers employing Car Park style entrances with CCTV and a £2 charge which entitles the ticket holder to a free B.B.SAC leaflet including a map [Note the £2 may need to be more in order to finance the entrance gates/ CCTV but 100,000 vehicles at £2 is £200,000 p.a.]. Announce high fines for non-compliance. iii. Dogs limited to the Common to avoid pollution and damage to fauna and flora. iv. Keeping pedestrians to specified walkways. v. Advising the real time current visitor number on the B.B.SAC website homepage showing spare capacity and the limit, the rules and the fines for non-compliance. - 3.2.2 ADD net new homes and limit size increases to existing buildings to minimise ground disturbance, air pollution , noise pollution and hydrology disturbance and pollution. - 3.2.4 ADD end line 1, and extension / replacement of existing properties. - 3.2.5 DELETE - 3.3 SAMMS replace with the points above in 3.1 and 3.2. Keep the warden as a manager of volunteer wardens with mobile phones to record offenders to trace and fine them. A stringent application at the start will set the standard which is then more likely to be adhered to by the public. put it in an Air Quality Action plan and this SPD at 3.0.</p>
Mr Alex Dalton	Land and Partners	403	<p>Contradictory evidence needs to be clarified: Part of the evidence base is the Visitor Survey 2015/16 by C. Philip Wheeler and Penny A. Cook and the data collected as part of the survey confirms the estimate of 69% of respondents to the Public Consultation in 2009 stating that they travelled by car (Wheater 2009). It is clear from this evidence that visitors living at driving distance - likely more than 500m -make up most of the recreational activity at the SAC. The blanket ban on the development of new homes within a 500m radius would therefore not be likely to have a significant impact upon visitor levels. With nearly 70% of the 551400 visitors each year arriving by car, any impact from the proposed SPD upon the numbers walking in from within 500m would be</p>		

			<p>inconsequential. Dog walking is purported to contribute to impacts upon the SAC and according to the same survey document just over 60% of dogs arrived in cars with their owners. Residents walking into the site from within 500m of the SAC could therefore not be significant contributors to recreational pressure because, according to the 2015/16 visitor survey, there are far less visits of this type; the visits do not contribute to air pollution from car travel and; they are less likely to bring dogs to the SAC. However, the data on frequency of visits is in direct conflict with the Footprint Ecology work which says that more visits arise from within 500m of the site. This conflict between the evidence bases casts doubt upon the reliability of the evidence as a whole. Before the SPD is adopted this apparent inconsistency should be clarified.</p>		
Mr Alex Dalton	Land and Partners	405			<p>Existing mitigation is effective As dogs have been evidenced to harm the SAC a Dog Control Order was put into place in 2014 that covers over half of the publicly accessible area. In most areas this covers it means dogs must be kept on leads, which prevents damage to more fragile parts of the woodland off the main paths. Research carried out by the Natural England, Hampshire County Council and the Kennel Club found that off lead access is the single most important influence for dog walkers when deciding where to walk their dogs A survey of dog owners who use Burnham Beeches to walk their dogs found that almost 83 per cent would walk their dog elsewhere if they were unable to let their dogs off lead. (https://www.thekennelclub.org.uk/pressreleases/2014/july/dog-walkers-set-to-desert-burnham-beeches-if-offlead-restrictions-are-enforced/) In their responses to planning applications in recent years resulting in net additional dwellings in Farnham Common within 500m of the SAC, Natural England are quoted as having no objections, for example: The current proposal to build additional dwellings in the developed area accords with the Core Strategy and the related screening statement. Natural England has consistently confirmed that this size of proposal will not adversely affect the SAC, in isolation or in combination with other developments. This is because there is no evidence that such developments adversely impact on the special features that have resulted in the SAC being designated, those being the acid beech forest, its shrub layer and the habitat for invertebrates and epiphytes that it provides. In these circumstances the Council does not consider there will be any likely significant effect on the SAC. As there is no likely effect on the SAC, no further Appropriate Assessment under the Habitat Regulations needs to be</p>

				<p>undertaken and Natural England do not currently consider an analysis under the Habitats Regulations necessary with respect to this size of development. Therefore, despite the objection from the City of London it is not considered that an objection could be sustained on the basis of the proposal's impact on this important natural asset. The above was in response to an application for 3 new dwellings 17/02081/FUL. It is not clear why Natural England's approach has changed when recent evidence points to the fact that all the various existing mitigation methods are effective. Natural England's SSSI Condition Summary shows that 62.63% of the SSSI is in favourable condition, and the minority remainder that is unfavourable is all recovering. None of the SSSI is declining, destroyed or even unchanging it is all either favourable or recovering. According to Wycombe District's Jan 2019 Habitats Regulations Assessment Report the current management regime is working well to maintain the conservation features of the site. Some development will not have any impact upon the SAC by virtue of its use. The SPD is not clear what use classes of development are precluded by the SPD whereas SPDs for a similar purpose in other areas are usually explicit in terms of what type of development is affected. The evidence and the SPD seems to read as if it applies to C3 Dwellings. The restrictions should not apply to other use classes that will not generate additional visits to Burnham Beeches. It should also not apply to C2 Residential Institutions because it would be unlikely that residents of these developments would place any significant pressure upon the SAC. Care homes and similar institutions are not likely to accommodate people who regularly walk dogs or visit the SAC at a frequency comparable to residents of a C3 family house. Summary: The need for the level and type of mitigation the SPD sets out is questionable. This is because all of the minority part of the SAC that is in unfavourable condition is recovering with the current policies in place. Natural England were not objecting to net new dwellings within 500m until recently. It is not clear what has changed. The proposal for a 500m zone is too broad and too inflexible. It is not in line with the NPPF which allows for a case by case assessment. There is insufficient justification for a 500m zone when other LPAs find a 400m zone appropriate around habitat sites of comparable value. Within this zone there is no consideration of actual accessibility to Burnham Beeches and how this differs across the proposed exclusion zone. Similarly there is little consideration of access to other alternative recreation areas (like Brockhurst Wood) which may be equally or more accessible. The adoption of this SPD would go ahead of the similar proposed</p>
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					policy in the emerging joint Local Plan. It may prejudice the outcome of the examination of that policy in the Local Plan as it would have the same effect without being appropriately scrutinised. With the fundamental questions raised above, the SPD should therefore not be adopted in its current form.
Beaconsfield Society (Agent: Mr Alex Roberts, DLP Planning)		407		Public access and disturbance impacts: We have no comments to make on this section. Evidence base: In reviewing the evidence base that supports the Draft SPD, we note that the Footprint Ecology Recreation Report only takes account of increased visitor numbers that are associated with proposed new housing developments. In order to provide a more accurate assessment of potential impacts of future visitors upon the SAC, this assessment should also take into account the additional population increases that are expected to arise from natural population change and migration patterns that will place pressure on the SAC in addition to the impact of population increases that result from new development. The SPD should therefore take into account the impact of the total population change expected over the period of the relevant Local Plans to which this SPD has relevance. This will ensure that the mitigation measures proposed are sufficient to preserve the integrity of the SAC. Furthermore, no justification has been provided as to why the impacts of other types of development, such as employment growth (e.g. workers visiting on their lunch hour / after work) have not been taken account of in assessing the cumulative impact of visitors. We therefore suggest that the SPD should be amended so that applications for employment development should also be liable for a financial contribution towards the SAMMS. Or as a minimum, further justification should be provided as to why the potential impact of these other land uses upon the SAC has not been accounted for within the SPD. The Recreation Report has also not taken account of the potential impact of increased rates of tourism, which may further affect the integrity of the SAC, and how these impacts should be managed.	
A F Blake-Pauley		411	This SPD has many faults in a planning context as discussed in paragraphs below. It also reveals that there is within the Directorate for Planning Growth and Sustainability a lack of planning competence and breadth of knowledge of the national beauty areas scene and the problems of influencing people behaviour. The National Planning Policy Framework (NPPF), which should be the Directorate's Bible. reinforces what the Town and Country Planning Act 1990 sets out. Paragraph 54-56 read 54 Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. 55. Planning		

conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification. 56. Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. The Planning Policy and Guidance set out in paragraphs 4,5and 6 above clearly holes the Directorates SPD below the water line and it is now to hoped that it will sink without trace. The Management of the Directorate appear to owe the local County Council taxpayers an apology for wasting money and staff time on a flawed and unimplementable exercise. While on the subject of the Directorate's misjudgement it is worthwhile looking at other issues the text of the SPD raises. Paragraph 1.2 of the SPD sets out its so-called Purpose and scope. There is, however, no mention here of exactly why the Directorate for Planning Growth and Sustainability has chosen the summer months of 2020 to spend a very substantial period of staff time and financial resource on the research needed for the SPD and then to launch a public Consultation on it. The Council's Lead Local Plan Consultant asserts in his 27 July letter to Chiltern and South Bucks Council Tax Payers that the Directorate is unable to cope with postal comments on the SPD. It is puzzling therefore how it has managed to put together a 34 page document when its resources are declared to be so stretched. It is also unclear why the Lead Local Plan Consultant, in the letter referred to above, asks recipients of it that if they have queries on it, they should note that they may not receive an immediate response to them. Yet he had the very considerable amount of time needed to prepare, submit and act on his Report to Leader (Planning & Enforcement portfolio) Decision Date: 13 July 2020. The Directorate and its Lead Local Plan Consultant cannot have it both ways; either they have the time and resources to properly run a democratic, non-discriminatory Consultation or they have an undeclared motive for avoiding

explaining the timing of this currently unnecessary and now demonstrably unimplementable Consultation. Needless to say, either of these makes the SPD objectionable as does the lack of any reason why at such an inappropriate time the Directorate took it upon itself to act in the matter. The draft Chiltern and South Bucks Local Plan 2036 (dCSBLP) is in Limbo and has been found by the Inspectors appointed to examine it as lacking in a particular important matter (Matter 1) constructive and active engagement. This lack was sufficient to cause the Inspectors concerns, sufficiently strong enough to put further examination action of the rest of the draft Local Plan on ice. The furious response by the Directorate to the Inspectors' conclusion which they had fully justified in well set out argument, was vituperative or at the very least not exactly diplomatic, which local taxpayers on whose behalf the Directorate is supposed to act find unacceptable. Importantly, the response was completely lacking in any sort of detailed argument as to why in a planning context the Directorate considered the Inspectors' conclusion was without merit. Instead it demanded the holding of a hearing and wrote that 'We anticipate being in a position to submit our full response, once the arrangements for that hearing have been fixed'. That now raises the question of why has the Directorate not had the time to set out its full response in writing (for all to see), and so remove the blockage to the examination of the dCSBLP, but it has had time to draft and consider the currently unnecessary and illegitimate SPD in question and to proceed to a discriminatory and undemocratic public Consultation on it. Given that in the continued absence of a new planning-required Local Plan for the area, the threat of an infrastructure devastating increase in housing and commercial development on the Green Belt land east of Beaconsfield and nearby is removed and will, while the Directorate doggedly refuses to put its full response in writing and as long as the Covid 19 pandemic situation endures, remain removed. So, the need for a mitigation strategy to avoid adverse public access and disturbance impacts from draft Local Plan development in Chiltern and South Bucks areas on the integrity of the Burnham Beeches SAC is not remotely needed at present. It follows that the Directorate is seeing a problem that of a possible greatly increased threat to the integrity of the Burnham Beeches SAC - where

none currently exists or is likely to for the foreseeable future. Moreover, given (a) the lack of convincing explanation in the Directorate's response to the Inspectors' concerns and (b) the strong NPPF and PPG based arguments put forward by the massive opposition to many of the contents the dCSBLP proposing housing and commercial developments, there seems very little prospect that that draft will eventually see light of day in anything like its present form. In launching consideration of the SPD and then going all the way with it to public Consultation - using Council Tax payers money for the purpose - the Directorate appears to be acting without a cause. If correct, that raises the question of why. It seems unlikely that it is sincere care for the integrity of the Burnham Beeches SAC. In paragraph 1.2.2 of the SPD it is claimed that it sits alongside other standing guidance. Not only is there a great deal of standing guidance, but that guidance makes the SPD totally unnecessary. NPPF and PPG already afford the Planning officers of the Directorate all the tools they need to see off planning proposals which could be said to be a threat to the integrity of the Burnham Beeches SAC. For the Directorate to purport to argue that that is not the case again raises the question of its motivation for tabling its SPD proposal at this juncture. In Table 1.1 of the SPD, Chapter 15 of the NPPF is quoted. It reads Chapter 15 (Conserving and enhancing the natural environment) Para. 177 The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. The Directorate's aim here appears to be that if it can show that mitigation measures as proposed in the SPD are in place it can argue that large housing development and the associated huge increase in the local population (as proposed in the dCSBLP) can go ahead within 5.6 kilometres of the Burnham Beeches SAC. Table 1.1 omits to quote Paragraph 175c of NPPF Chapter 15 which reads [When determining planning applications, local planning authorities should apply the following principles:] development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, Which underlines yet again how

unnecessary the Directorate's SPD really is. The intention of the Directorate to create a situation in regard to the integrity of the Burnham Beeches SAC and to provide for huge development to the east and south of Beaconsfield as foreseen in the dCSBLP becomes clear from the next policy details quoted in Table 1.1. These details read Chiltern District Council Core Strategy (Adopted November 2011) CS24 Biodiversity These policies set out the principle of the protection of Burnham Beeches SAC in Chiltern. CS32 Green Infrastructure These policies set out the principle of the protection of Burnham Beeches SAC in Chiltern. Any successive local policies will carry forward the principles set out in Policies CS24 and CS32. South Bucks District Core Strategy (Adopted February 2011) Core Policy 9 Natural Environment This policy sets out the principle of the protection of Burnham Beeches SAC in South Bucks. Any successive local policies will carry forward the principles set out in Core Policy 9. The details of these policy strategies take some finding and the text in which they are set is not for the inexpert in planning matters. Since the Consultation is meant to be a public one, it is objectionable that the Directorate has not provided a fuller explanation of why these policy strategies are said to support the purpose of the SPD. It also needs to be explained how they are justified in a NPPF paragraph 175c context. Core Policy 9 of the South Bucks Core Strategy (adopted February 2011) for example reads in part The Council has produced a Habitats Regulation Assessment (HRA) Screening Statement, which has concluded that the Core Strategy will not generate any significant effects in relation to Burnham Beeches SAC, or any other European Site, either alone or in combination with other plans and projects. However, where a specific development could result in significant effects on the SAC, a Project Level (Regulation 48) HRA will need to be carried out by the developer when the planning application is submitted to determine whether mitigation measures are required. It seems unlikely that a developer produced HRA which says it is OK to build a huge housing complex within 5.6 kilometres of the Burnham Beeches SAC could be used to overrule NPPF paragraph 175c. The SPD is silent on such planning intricacies and that makes it objectionable. Paragraph 1.4 of the SPD discusses the question of a Sustainability Appraisal of this SPD and refers to The European Union (EU) Directive 2001/42/EC7 (SEA Directive).

The Directorate seeks to diminish the importance of the Burnham Beeches SAC by quoting Article 3(3) and 3(4) of the SEA Directive, SEA which says that it is not required for plans and programmes which determine the use of small areas at a local level or which only propose minor modifications to plans and programmes, except where the plan or programme is determined to be likely to have a significant environmental effect. It seems unlikely that even the elements in the Directorate intent on inflicting huge environmental, health and other damaging impacts on the population of Beaconsfield, could argue that a massive housing and commercial development on Beaconsfield's East and South Green Belt areas would be a minor modification. Additionally, if they think an SPD is necessary to mitigate the potential impact on the Burnham Beeches SAC, it is not easy to see how they could claim that a major development is unlikely to have a significant environmental effect. As part of the Sustainability Appraisal the Directorate consulted three statutory consultees whose very brief comments add little to the debate over the rights and wrongs of the dCSBLP issue which is clearly at the heart of the Directorate's SPD initiative. One notes that there was no consultation with numerous bodies involved in the dCSBLP issue. In paragraph 1.4.4 the Council is said to state that its SPD is not likely to have a significant environmental effect and accordingly will not require an SEA. It (or more likely Management elements in the Directorate) puts forward such an uncorroborated claim while at the same time making it obvious that it remains wedded to massive development in the Beaconsfield area. Note the use of the phrase is not likely which still means that a significant environmental effect could happen as a result of the implementation of the SPD. The main reasons for the BCC's conclusion is a) the SPD expands on policies and principles set out in the National Planning Policy Framework (NPPF), Comment: it is not for the Council to expand on the principles of the NPPF. It cannot do that. Any expansion on the NPPF is the prerogative of the Secretary of State for Environment, Food and Rural Affairs. (Another example of lack of thinking and concentration in the Directorate.); b) the SPD expands on policies and principles set out in the Chiltern District Council Core Strategy (Policy CS24 and CS32) and the South Bucks District Core Strategy (Core Policy 9). The Directorate can assert that all it likes, but

			<p>these quoted policies cannot supersede NPPF and PPG. The Directorate also claims that the SPD reflects emerging policy in the Publication Version of the Chiltern and South Bucks Local Plan (Policy DM NP3 and Policy SP BP9). There is nothing emerging about these proposed policies: as pointed out elsewhere in this paper the dCSBLP is stuck fast in limbo and could remain there for a very long time (the World Health Organisation forecasts that Covid-19 will last another two years at least). The Directorate's claim is the real giveaway of what lies behind the Directorate's intention in proposing the SPD. It wants to act as though the Inspectors' block on further consideration of the dCSBLP towards which it is itself obstinately contributing does not exist. The dCSBLP has no status in planning law; none of its draft provisions or policies can be implemented and that situation will apply, as discussed above, for the foreseeable future. To conclude the SPD and its SAMMS is an unworkable sham and its Council internal and public promotion seriously detracts from the reputation of the Council's Directorate for planning competence and confirms the Local Plan Inspectors judgement quoted above. I object to the SPD and ask that no further action on it should be taken, and other than wind down costs, no further Council tax payer money should be spent on it. Given the dCSBLP overtones of the SPD document, and with reference to paragraphs 22-24 of the Local Plan Inspectors' letter of 12 November 2019 to Mr Mark Jaggard, I am copying this paper to Mr Ian Kemp, the Inspectors' Programme Officer for on-passing to the Inspectors if he considers that appropriate. I am also copying it to Councillor Warren Whyte, Cabinet Member for Planning and Enforcement and to other Councillors who may have an interest in the subject matter. Annex attached re: the consultation letter sent 27 July 2020.</p>	
A F Blake-Pauley		413		<p>The lack of planning competence issue is evidenced by the Strategic Access Management and Monitoring Strategy (SAMMS) set out in Section 3 of the SPD. This strategy proposes to raise considerable sums of money through Section 106 agreements from development in the SPD relevant areas (largely Green Belt land to the East and South of the Beaconsfield built-up area) and then to use that money to influence public behaviour in the hope that that will mitigate the potential damaging effects of increased population pressure on the Burnham Beeches Special Area of Conservation (SAC). What this so-called strategy overlooks is the planning guidance on</p>

					<p>when planning obligations can be sought by the local planning authority. Planning obligations derive their existence from section 106 of the Town and Country Planning Act 1990. They are intended to mitigate the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. The Directorate's SAMMS proposals clearly cannot meet b) or c). Nor, if a development proposal is set out in a Local Plan can it be argued by the Planning Authority that it is unacceptable which means therefore that it cannot meet a). The illegitimate proposals in the SPD for using monies to be raised by Developer contributions included Events and promotion of activities aimed specifically at raising public awareness of recreation pressure and alternative places to visit and the creation of a Ranger post to raise awareness of visitor impacts, including help with enforcement of PSPOs, promotion of sustainable transport, responsible dog ownership, impact of recreation activities on wildlife. These are so obviously non-starters in the context of the relevant planning law that it raises questions about the thinking that has taken place within the relevant parts of the Directorate. The proposal for a Ranger on the equivalent of £10 a day for 280 days of the year (plus NI contributions by the employer which appears to have been overlooked) with the qualities and experience needed for the task in question can only have come from someone, and approved by others, who have no experience in the employment and natural habitat field. The Directorate make a further strange and obviously contradictory claim. It states that 'The SPD does not present any policies'. What then, one is entitled to ask, is the Burnham Beeches SAC Mitigation Strategy in Paragraph 3 of the SPD other than a full-blooded policy including a Strategic Access Management and Monitoring Strategy, quaintly abbreviated to SAMMS. An SPD stated intention of SAMMS is to educate visitor behaviour when visiting the SAC by securing sizeable contributions from developers and presumably ordinary citizens who wish to develop land in the designated SPD area through a Section 106 agreement. As set out in paragraphs 3 -7 above the intention is unachievable because it conflicts with planning guidance. The Directorate appears to be onto yet another loser here with the vision that it can influence public behaviour with some organised Events</p>
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					<p>and promotion of activities aimed specifically at raising public awareness of recreation pressure and alternative places to visit and the creation of a Ranger post to raise awareness of visitor impacts, including help with enforcement of PSPOs, promotion of sustainable transport, responsible dog ownership, impact of recreation activities on wildlife there would not be much Ranger enforcement or other of the claimed SAMMS benefits for the miserly £2800 a year proposed by the strategy. . The Directorate seems unaware of the fact that if Covid 19 has taught us one thing it is that educating people about the need to observe guidance on how to behave in public places is always very difficult and often nigh on impossible to achieve. The evidence of this has been manifest from the Bournemouth Beaches and similar on many UK coastal spots on a summer's day, the many raves up and down the UK and the street demonstrations against lock down measures. Burnham Beeches is a delightful habitat-rich and beauty spot as the SPD well describes. Burnham Beeches is one of hundreds of beauty spots and precious habitat places throughout the country, very many of which face the problem of disturbance and harm as a result of public access. In short it is a national problem and one which probably requires a national mitigation policy. For the Directorate to suggest it should be dealt with by a local planning authority in a complicated and half-baked way that will put up housing costs, including social housing costs, does not seem like a good idea.</p>
Neil Richardson		401	<p>The recommendation of the SPD therefore to reduce such risks and prevent further urbanisation around the edges of the SAC there should be a presumption against residential development within 500m of the SAC boundary. Through analysis of visitor survey postcode data it was found that 75% of visitors to BB lived within 5.6 km of it. Accordingly the SPD recommends that for new housing between 500m from the SAC and 5.6km as part of the process of obtaining planning permission the proposal should undergo a Habitat Regulations Assessment which can lead to mitigation measures being put in place to counter the adverse impacts on the SAC's integrity from cumulative impacts of development. The following is a series of criticisms of the above SPD. The Corp of the City of London has long standing obligations to provide open access land available to the public for informal recreation. Those members of the public wishing to live close to BB would to some extent be frustrated in this respect by the presumption against development within 500m of the SAC. Arguably such a restriction goes against</p>		

the spirit of allowing access to this important natural recreational resource. There is an assumption in the SPD that new home owners living close to the SAC would indulge in activities likely to create public access and disturbance issues that would adversely impact on the SAC. In this respect by way of example some such residents would be dog owners who would wish to exercise their dogs in BB. The SPD seems to assume that the owners concerned would not deal with their dog droppings by listing this as an example of a contamination with adverse impacts. However, most dog owners are responsible and deal with this by at home disposal or use the increasingly no. of dog waste bins that are to be seen in the public realm. Furthermore, in some Council areas there are bylaws in place controlling this and scope exists for the relevant authorities at BB to adopt similar measures if considered necessary. Similarly trampling is seen as further possible adverse impact on the SAC of public access and disturbance that would accompany the arrival of residents of new homes if such properties were built close to the SAC. However, research (Pescott & Stewart (01/2014)) shows that there is significant heterogeneity in the impact of trampling on vegetation recovery. Counteract initiatives to such trampling are not referred to by the SPD but temporary cordoning off of heavily walked routes through the SAC to allow vegetation recovery and establishing alternative paths is good practice that BB rangers no doubt implement. Likewise, vandalism is another public and disturbance issue relevant to SAC but also society in general. It is one of the prices to be paid for free and unrestricted access to open space such as BB. Whether it can be confidently asserted that by building new homes near the SAC this will inevitably lead to (more) vandalism is questionable. It could be said that by living close to such an attractive area most residents would wish to maintain and enhance their environment. From the above it can hopefully be seen that there are ways of dealing with public and disturbance issues that are less extreme than imposing an embargo on new housing close to the SAC which in any event would not address behaviour of visitors from further afield. Table 7 of BB SAC and urban development study sets out the number of incidents relating to PSPO/Dog Control Orders for the years 2015/16, 2016/17 & 2017/18. This shows 517, 386 & 334 incidents respectively for

			<p>the 3 years in question which is encouraging in that it demonstrates a downward trend. Whilst a relatively minor set of data. It nevertheless possibly puts in context the scale of some public access and disturbance issues which for 2015/2016 the number of incidents (517) represented less than 1% of those visiting. Conclusions. In the light of the above it would seem that whilst there are issues surrounding public access and disturbance relevant to BB it cannot be said categorically that more new housing adjacent to or close by BB will automatically lead to conflicts which will compromise its integrity as a SAC but also as a substantial area available for informal recreation. Clearly there are mitigation measures that can be put in place to increase the public's understanding and appreciation of this unique place and these should be encouraged. At the same time, some new housing close to the SAC should not be entirely prohibited. From time to time the occasional opportunity for judicious infilling may arise and with appropriate safeguards should be allowed to proceed.</p>		
Dr Bob Newell		391	<p>Is it a legitimate use of Council resources, in the current circumstances? This entire exercise is being carried out by the new Council's Policy Department, which is self-evidently short on manpower resources. The most important issue for 2020/21 for the council is undeniably to successfully progress its Local Plans. This not only means in the process, but in delivering the product. The current Local Plan situation can be summarised as: - Chiltern & South Bucks Draft: Most likely to be withdrawn, due to fundamental preparation errors; - Aylesbury Vale: Further long delay due to myriad Inspector queries. Many years in the preparation, and in dire need of Adoption; and - Wycombe: Adopted, but with the main Housing Allocations mostly not making significant progress, and also in need of a vast amount of Policy input in terms of Policies which are simply not working. Given the above situation, the question then arises as to whether such a vast, controversial, and (I would argue) unnecessary / excessive exercise such as this is the right use of the new Council's resources. I would further argue that, in professional terms, the Council's resources must be placed where they can best benefit not only the best interests of Planning, but those of the County's Ratepayers. In such a context as the above, the Burnham Beeches SAC represents an</p>		

unnecessary waste of resources. Is the Burnham Beeches SAC a rational or proportionate response? The proposals present as being modelled on the Thames Basin Heaths scenario. However, in terms of the actuality of the circumstances, I would argue that there is no real correlation between them. Any proposal such as the Burnham Beeches SAC must result from a fundamental Risk Assessment. Whilst there have been numerous assumptions made, there is no significant evidence that the proposals are the result of a comprehensive Risk Assessment. Further, I would argue that whatever does exist, in practical terms, the Council's proposals represent a fundamental over-reaction to it. The guiding principles for such proposals must surely be the NPPF. Here, in Habitats and Biodiversity (Paras 174-177) it is left open to the decision maker to consider the significant harm or adverse effect of any development on case by case basis. At Para 175 it states: When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. In the light of such protections, the question then arises as to whether such an exercise as the Council is pursuing can be fully justified. It already possesses the powers to control any risks. There is

			<p>no evidence to suggest that applying such measures as proposed by the Council is rational or proportionate in the circumstances. Do the proposals represent an abuse of process? Finally, I would point the Council towards the Judgement in William Davis Ltd & Ors v Charnwood Borough Council [2017] EWFC 3006 (Admin) (23rd November 2017). The judgement and its implications formed a learned article by Roy Pinnock of Dentons (http://www.planninglawblog.com/common-sense-needed-to-flush-out-spd-abuse/) As discussed by Pinnock, the judgement emphasises several points to which Authorities and affected parties should pay attention: where an SPD is promoted as a stop gap in the absence of saved policies, by definition it cannot be supplementary (and is itself a primary policy assuming DPD status as in the Skipton case); a housing mix policy which could lead to refusal on the grounds that the proposed mix is unacceptable (or an outline application condition imposing a particular mix) is a statement regarding the development of land and development management policy; uncertainty arising from the very poor drafting of the Regulations should be dealt with in light of the realities of development control and the fundamental importance of robust and independent examination of the development plan; viability impacts were material and had adopting the policies without consideration of those impacts was unlawful; SPD should not be used for making an alteration to plan policy to address new evidence. As Pinnock states: Authorities will need to be far more careful about the statements they include in what purport to be SPDs on issues such as housing mix and affordability but also density, height and other matters. There is still a tendency to sneak swathes of untested, unjustified and ineffective policy in through the back door via dodgy SPDs. The Burnham Beeches SAC represents the wrong Policy, at the wrong time, and prematurely implemented, contrary to Law. These proposals should be Withdrawn at the earliest opportunity.</p>		
Dr Bob Newell		393			<p>Is the Council in order to demand Section 106 Agreements at this stage? The Council is already Refusing Planning Applications on the basis that no S106 payments have been offered by the Applicants. Since; - the matter of the SAC is merely out to consultation, and not Adopted as Policy, - there has been no mention to Applicants of S106 Agreements being required, and -</p>

					there is no legal justification for Refusing Planning Applications on this basis, then to demand S106 Agreements and Refuse Planning Applications is simply legally unjustified. It is my contention that the Council's current stance is entirely and immediately unlawful and capable of legal challenge. The question arises as to what the council is going to do about the arc of influence within Berkshire. Does it expect, for example, Slough Borough Council, Wycombe district Council, and the Royal Borough of Windsor and Maidenhead to impose S106 Agreements on all new Housing development in its area. Even if these LPAs were to agree to the provisions for S106, it will very significantly delay the issuing of Planning Permissions for much-needed Housing, through the time, effort, delay and cost involved in the exercise, over an extremely wide area, and further will cost the Councils involved vast sums in administration. In simple terms, there is no evidence to suggest that the Council has thought-through the full range of implications for its proposals here. It is simply not relevant for the Council to consider the proposals in such a completely isolated manner. It could, alternatively, advance far more modest and relevant proposals. The impact of these proposals on the Planning process, both in and beyond the County, should be considered.
Mrs Mary Knee		265	We write in connection with your recent e-mail concerning the above. On the face of it your document appears to be attempting to safeguard the remarkable local asset that is the Burnham Beeches, a praiseworthy initiative. However, we are concerned that it does not go anything like far enough in seeking to ensure that the area surrounding the forest is not subject to the risk of harmful development. For instance, you cover the matter of 500 metre Government ruling but make little mention of the 5.6 kms one.		
Mrs Mary Knee		267			As residents of Beaconsfield, already concerned by the late SBDC's proposals for large scale housing and commercial development around the town, we believe that you have paid insufficient heed to the impact such a scheme would have on Burnham Beeches. Nor have you addressed the requirement for Suitable Alternative Natural Greenspace, a legal necessity. Frankly, this raise concerns about the comprehension and objectivity of the protection endeavour. There are other points to note, such as the lack of any reference to air quality strategy and vehicle movements. What you should be concentrating on is ensuring the integrity of Burnham Beeches and its surrounding area. Please therefore revisit your document before considering adoption. Thank you.

Ms Dawn Platts		188	Burnham Beeches is surrounded by densely populated towns including Slough Maidenhead and Uxbridge etc as well as close proximity to busy roads such as A.355, A4, M40 and M4. The increased level of road traffic generated by the Supplementary Planning Document will cause traffic jams and gridlock in key areas resulting in toxic levels of pollution. This does not appear to have been envisaged or addressed at any stage.		
Eric Wagner		275			We wish to object to your plans to build 1600 new homes to the east of Beaconsfield. We do not agree with your Supplementary Planning Document, specifically as it fails to refer to suitable alternative natural greenspace, and also it fails to refer to the environmental or visitor impact on Burnham Beeches from the 20,000 square feet of commercial space proposed for Beaconsfield. Furthermore there is no reference to an air quality management strategy, which should be a key element of environmental mitigation.
Val McFarlane		323	I live in Beaconsfield and have done so for 52 years and am dismayed at the proposal to violate the environmental area surrounding Burnham Beeches. This area of outstanding scientific interest and value was purchased by London City for the benefit of those who did not have access to green spaces. This concept has been very apparent during the current pandemic when this beautiful location has been valued by so many local families and their children and the elderly. I am sure there were others from London too. This space is an ideal environment for children to learn about their environment something being encouraged by the government through Forest schools so the current proposals are very disturbing for the quality of everyone's experience.		
Mr Rob Wood		250	Firstly the lack of consideration in not informing all local residents affected by the scheme, this is a shameful act and the response when challenged that it would be of no interest to them. Have you ever had your life and daily routine disrupted for years by works you don't want, need and are unsuitable for the real needs of the area and its resident people, who will gain nothing from it but bear the burden of ill conceived ideas. Which I'm afraid that the planners and area/ county councils seem to be blatantly unaware of, who and what information pulls their strings?		
Mr Robert French		325			I use Burnham Beeches a lot as do a great many other people. It is essential that its integrity as a Special Area of Conservation is not compromised. I object strenuously to this planning document on the grounds that: There is no reference whatsoever to Suitable Alternative Natural

					Greenspace. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Mr Simon Bradfield		252	It's very disturbing to hear that there's proposed development in the Burnham Beeches area. Burnham Beeches is an invaluable natural habitat and recreation area, loved by locals and visitors alike, and the proposal of developers nibbling away at the edges just makes the Beeches future more precarious. Places like this are vital, and every year more and more are lost, built over for houses and (unnecessary) railways. And once they are gone, they're gone. If developers had their way the countryside would be decimated. I'm not anti-building or developers, but more creative ideas have to be considered, mainly through looking at brownfield sites (or possibly like Tesco in Gerrards Cross and build over the railway line). As I said, when these natural habitats have gone it's not coming back, and that would be an horrific legacy for future generations. And they will look back our generation with contempt.		
Mrs Pauline Keyne		262			I am writing as a local resident who regularly makes use of Burnham Beeches for recreation and exercise. I wish to oppose the Bucks Council proposals outlined in the Burnham Beeches Supplementary Planning Document (29th July 2020). Firstly, it fails to identify Suitable Alternative Natural Greenspace, which is a legal requirement for Special Areas of Conservation, (which include Burnham Beeches) to protecting conservation areas from visitor pressure. The proposal therefore threatens this area without any mitigation, so is unacceptable. Secondly, it is a requirement that a proposal address Air Quality Management which it fails to do. This omission makes the proposed strategy unsafe and unsustainable as well as being counter to other Council plans. It is my understanding that Bucks Council has a duty to protect the environment for the common good, and that this includes preserving wildlife habitat, maintaining clean air and providing green space for health and enjoyment. The proposal is counter to this duty, and is not justified by any environmental/visitor impact assessment. Given the likelihood of substantial increases in both residential and commercial development in nearby areas, this impact assessment cannot safely be neglected.
Andreas Preuss		269			I write to you with respect to the above mentioned Supplementary Planning Document (SPD) published -

					<p>according to the introduction to the document - in the evening of 28 July 2020, and in the following provide you with my objections to this SPD: 1. The SPD is not making any reference to the instrument of "Suitable Alternative Natural Greenspace" or "SANG". This SPD needs for SANGs to be provided, and it does not. This is a serious omission, which has to be corrected by explicitly including the SANGs into this SPD. 2. The SPD does not make a reference to an Air Quality Management Strategy, which should be a key element of environmental mitigation. This is another serious omission, which has to be corrected by including the Air Quality Management Strategy into this SPD. 3. The SPD does not make a reference to the environmental and / or visitor impacts on Burnham Beeches resulting from the additional traffic (pollution / number of additional visitors) to and from the 20,000 sq ft of commercial space the Council is proposing for Beaconsfield. This is an omission that needs to be rectified.</p>
Tony and Pat Edwards		357	<p>We wish to object to these proposals which might be better named Burnham Beeches Removal of Protection Strategy. There are presently restrictions on development within a 5.6km buffer zone, which includes Beaconsfield. One of the most important current regulations is the requirement for new housing development to include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area. It appears that the Council is clandestinely attempting to remove these current protections presumably in an effort to correct its error in not taking them into account in preparing the proposals to develop a large area of green belt so as to massively increase the size of Beaconsfield. For these reasons we strongly object to what the Council is trying to do. We object also to the lack of transparency in not drawing attention to the changes which seems quite Machiavellian.</p>		
Tony and Pat Edwards		359			<p>The Council's Burnham proposals have no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial protection of the Beeches is simply no longer there. despite admitting the pressure visitors are already placing on the Beeches there no reference to the environmental or visitor impact arising from the 20,000 sq m of commercial space and 1600 homes the Council is proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.</p>

Jeannette Buckle		369			<p>With regards to the Consultation on the Burnham Beeches Supplementary Planning Document - I write to strongly object. Any watering down or omissions of the various clauses in this planning document, puts at risk an irreplaceable ecosystem, that no amount of extra funding or benefit in kind for whatever worthwhile idea, will come anywhere close to making amends. Once it is gone it is gone. So I strongly object to your charter for development in particular. With regards to development, this part of the country is already far more crowded and congested than the rest of the County (Bucks & Berks) and Country. It is also far more polluted and any addition to that pollution will have significant negative impacts to the more vulnerable and sensitive species. This could potentially destroy a whole finely balanced ecosystem with many more unforeseen loss of habitat and species. There needs to be air quality monitoring and an air quality monitoring strategy that works with the Environment Agency and other key respected stakeholders like English Nature, to ensure this area is fully protected and development is restricted to ensure that key pollution levels ie NOX is not breached and limits further development if close to safe limits. With the expansion of Heathrow quite clearly this part of the country needs a moratorium on large housing developments and none on green field/space and definitely not on green belt. As the term suggests Ancient woodland can not be replaced hence its designation and need for protection. I notice there is no reference to suitable alternative natural green space. This is fundamental in protecting Burnham Beeches. One reason being that people will travel to burnham beeches less often if they have access to green space by them without getting in the car. It is also more essential than ever that housing and new housing has its own local parks and green spaces on their doorstep where they live. This improves their mental wellbeing and their general physical health. The lack of are a huge burden on the state. As we know in terms of the adult social care bill and NHS care costs are rising out of control because people are living longer but less well needing care for very long periods of time. Simple things like enabling people stay fit mentally and physically significantly delays personal decline. Green spaces simply put are good for the mind, the body and general happiness. Therefore Burnham Beeches protection should be strengthened not weakened and in fact development should provide mandatory green space that has suitable access for all. Finally with regards to 20,000 sq ft of commercial space proposed for Beaconsfield, quite clearly this would have a huge negative environmental impact in terms of traffic alone, but also the extra</p>
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					burden of lunch time break spent at Burnham Beeches by the workers frequently, if not daily ,that would otherwise not be visiting Burham Beeches will be huge.
Hilary Milne		218		I am writing with comments in relation to the 29 page Burnham Beeches Supplementary Planning Document you released for consultation. I would like to point out that the document is concerned with net new housing within 500 m of the edge of the SAC to 5.6 km. This area is of the highest level of protection for its natural value but is also of historical value. It is used regularly by individuals and groups for walking, running and playing as well as for the "green bath" experience that it can offer. It is a site of the highest importance for protection in all respects.	
Mr Alan Lowe		196	I want to object to the above planning document. I'm concerned that the Council is attempting to remove Burnham Beeches special area of conservation. The conservation area means that there should be restriction on development within the buffer zone, which includes Beaconsfield (my home).		
Clare Windsor		298			- In particular I am concerned at the absence of any reference to developers building within the 5.6km buffer zone being required to provide Suitable Alternative Natural Green Space. This is an ideal way to keep visitor numbers down at Burnham Beeches and
Trevor Carvey		207			There is no reference whatsoever to Suitable Alternative Natural Greenspace. This crucial line of defence is simply no longer there. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. There is no reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation and which is theoretically already part of the Council's draft plan.
Mrs Raina C Carvey		213	I am writing to object most strongly to this Buckinghamshire Council's proposals: a charter for development Buckinghamshire Council issued the Burnham Beeches Supplementary Planning Document on 29th July, with a 'consultation' to run over the summer holiday season until 3rd August. It is a short document in planning terms, a mere 29 pages. Its proposals seem innocuous, mainly focusing on a requirement for developers to contribute towards environmental awareness and monitoring programmes.		
Jon Savage		192	I would like to object to this document on the premise that it's intention is to remove restrictions on development and accelerate the loss of green space that defines the local area. I also feel the council is dismissive of the opinions of the community it serves. Burn ham Beeches in an outstanding example of green habitat and open space and should remain fully protected.		

Lindsay Bosma		375			<p>I therefore object to the Burnham Beeches Supplementary Planning Document currently under consultation on the following grounds :- 1. The document allows for the increase in Commercial Space without any reference to how the environmental impact of this development will be offset or the need for provision of suitable alternative Green Space. 2. Air quality will reduce as a result of the proposal but this again has been ignored. There has not been any assessment as to the scale of the impact or into the course of action required to mitigate the increase in air pollution. Based on the above I call for the document to be rejected/withdrawn until the environmental/air quality omissions have been addressed. Only then should it be resubmitted and with a consultation period that will allow the local population to have the time to carefully consult it.</p>
John Milne		256			<p>I wish to register several objections to the Burnham Beeches Supplementary Planning Document for your consideration: 1. I understand that Burnham Beeches is a Special Area of Conservation, meaning that there are restrictions on development within a 5.6 km buffer zone which includes parts of Beaconsfield where the Council is proposing to build 1600 new homes. Where are your proposals for Suitable Alternative Natural Greenspace related to such housing? 2. I understand the Council is proposing to build 20,000 sq ft of commercial space in Beaconsfield and in close proximity to Burnham Beeches. Where is the environmental or visitor impact study on the effect on Burnham Beeches? 3. Has there been an Air Quality Management Strategy prepared for this area or are you simply ignoring the environmental implications of your proposals? Please take my objections described above into consideration in your planning.</p>
Miss Dawn Franklin		290			<p>I could find no reference to the impact on Burnham Beeches of the massive development of Beaconsfield being proposed by the Council. A development of such a size must be a critical factor with the potential to damage the conservation area of Burnham Beeches with an increase in all the harms set out in section 2.1. I could find no mention of "Suitable Alternative Natural Greenspace" (SANG), an area that is aimed at protecting the Special Protection Area of Burnham Beeches. The SANG, into which Beaconsfield itself falls, is a buffer zone in which development is constrained to prevent damage to the SPA itself. This is a critical line of defence to protect Burnham Beeches and should be reinforced, not ignored. If the development of Beaconsfield were to proceed, where would the required new recreational space of approx. 30 hectares come from? Managing Air Quality is a key feature of environment protection but I could find no mention of the Air Quality Management</p>

					Strategy. The Burnham Beeches Supplementary Planning Document should not be accepted until these omissions have been addressed.
Michael Lischer		280	- The avoidance and mitigation strategy set out does not protect the Beeches from increase in disturbance because it is missing fundamental mitigations which are not mentioned in the SPD. - The Hydrology Report 2014 in paras. 1.7 and 1.8 state reduction		
Mrs Catherine McLeod		361	I am writing to object to the above planning document on the following counts: The document is based on the draft Chiltern & South Bucks Local plan which has not yet gone through appropriate examination. It is premature to be consulting on the impact on Burnham Beeches without clarity on the adoption of the C&SB plan. The evidence used in the SPD has been strongly challenged as part of the C&SB Local plan process. Until the outcome of the public examination of the C&SB local plan is known, the SPD consultation should be put on hold.		
Louise Burnett		333			I am a concerned member of the community who has noted a number of omissions in your planning document for Burnham Beeches. The new proposal has omitted reference to the suitable alternative natural green space. The proposal also fails to mention the impact on the environment and the visitor impact. Finally this proposal has omitted the air quality management strategy and with air pollution in the south being very poor a strategy needs to be in place. With Burnham Beeches having the status of the highest European level of nature conservation I feel it's very important that the supplementary planning document protects Burnham Beeches rather than diluting it's environmental protection.
Mr T P Hugh Griffith		254			No reference to Suitable Alternative Natural Greenspace - a key item. - No reference to the environmental or visitor impact of the 20,000 sq ft of commercial space being proposed for Beaconsfield. - No reference to an Air Quality Management Strategy.
Sarah Jouhar		246			I'm writing to object to the proposals set out in the above named document. Firstly the document does not refer to the impact of visitors on the site from the commercial space which has been proposed for Beaconsfield. There is no mention of a Suitable Alternative Natural Greenspace, and this is vital. Furthermore there is no mention of an Air Quality Management Strategy.
Michelle Devine		288			The new Burnham Beeches supplementary planning document fails to include this key point. I have seen NO mention or reference to the Suitable Alternative Natural Greenspace. I am quite perplexed and puzzled as to why

					that could be. We are all aware of how important the environment and environmental protection is. The BB supplementary planning document does not refer to the environmental or visitor pressure of the draft local plan which affects Beaconsfield. This seems quite peculiar as the proposed development is within a short distance of Burnham Beeches. The final key omission, in my opinion, is any reference to Air Quality. Where is the Air quality Management strategy? This should most definitely be included as It's a important part of environmental mitigation. The supplementary planning document is a very long document and it's hard to understand and make reference to all the points contained but the above 3 factors most definitely need attention urgently. I trust that this will be dealt with so that we can all work together and help preserve and protect our local area.
Inland Homes (Agent: Mr Ian Gillespie, Igloo Planning)		388	<p>The site, which comprises a former Ministry of Defence base, is in receipt of outline planning permission (Ref: 17/01763/OUT) for the development of 304 new homes, renovation of 46 existing dwellings, alongside new community and recreational facilities and extensive areas of open greenspace. This planning permission was granted on the basis of extensive ecological survey and assessment work, specifically including a site level Shadow Habitats Regulations Assessment (HRA), including a Shadow Appropriate Assessment (AA), to ensure that the proposals would have no adverse effects on the integrity of Burnham Beeches Special Area of Conservation (SAC), either alone or in-combination with other plans and projects. This Shadow Appropriate Assessment was agreed with Natural England and adopted by South Bucks District Council in May 2019. Subsequently, South Bucks District Council has produced a consultation draft of the Burnham Beeches SAC Strategic Access and Mitigation Strategy Supplementary Planning Document (SPD) (dated July 2020) that sets out a draft Mitigation Strategy for the SAC. This report highlights the 'challenges of coping with increased levels of visitors and the potential for threats to the qualifying features' of Burnham Beeches SAC, and suggests that mitigation measures in the form of a Strategic Access Management and Monitoring (SAMM) Strategy are necessary in order to avoid adverse effects on the integrity of the SAC arising. This note specifically addresses the position with the Wilton Park site. The permitted development at Wilton Park pre-dates the SPD, and instead includes bespoke mitigation within the permitted development to ensure that there will be no</p>		

			<p>adverse effects on the integrity of Burnham Beeches SAC, a conclusion tested and agreed via the stringent HRA process. The purpose of this technical briefing note is to summarise the specific mitigation that the Wilton Park development will deliver in order to fully safeguard Burnham Beeches SAC, and explain why it is desirable for any adopted Strategic Access and Mitigation Strategy SPD to ensure flexibility is provided to enable bespoke mitigation solutions to be provided as an alternative to SAMM where these are agreed with Natural England. With respect to the appropriateness of the SAMM strategy, the current strategy seeks to protect Burnham Beeches SAC by funding mitigation purely from new development within South Bucks and Chiltern planning areas and does not form a co-ordinated approach to include other local authorities. This is despite the draft Mitigation Strategy (March 2020) recognising that neighbouring local authorities include Slough Borough Council, Wycombe District Council and the Royal Borough of Windsor and Maidenhead. All these local authorities have a duty, as a Competent Authority under the Conservation of Habitats and Species Regulations 2017 (as amended), to ensure that planning application decisions comply with the Habitats Regulations. As such, without the cooperation of these neighbouring local authorities (which generate visits to Burnham Beeches SAC), there is an unnecessary burden upon new development within South Bucks District, which should ultimately be shared by neighbouring local authorities. Accordingly, it is recommended that the SPD costings are adjusted to account for contributions to also be collected from adjacent LPAs. Conclusion: The site at Wilton Park is in receipt of outline planning permission (Ref: 17/01763/OUT) for the development of 304 new homes, renovation of 46 existing dwellings, alongside new community and recreational facilities and extensive areas of open greenspace. This planning permission was informed by a specific site level Habitats Regulations Assessment, including an Appropriate Assessment, which sets out a suitable bespoke mitigation strategy for safeguarding Burnham Beeches SAC.</p>		
Brown Not Green Chesham Ltd		386			7. Our other main concerns regarding the content of the Draft SPD may be summarised as follows: 7. i. The SPD should include reference to the requirement for SANG provision (Suitable Alternative Natural Green Space) as this forms a key part of the mitigation strategy necessary

				<p>to ensure the integrity of Burnham Beeches SAC is retained. As a minimum, the SPD should include details of where the SANG will be provided, what size of SANG provision is required and how it will be delivered. 7. ii. The SPD should include reference to the requirement for an Air Quality Mitigation Scheme as this forms a key part of the mitigation strategy necessary to ensure the integrity of Burnham Beeches SAC is retained. 7. iii. The SPD should make clear reference to the mitigation measures previously introduced by other former authorities that now form part of Buckinghamshire Council (including Wycombe District Council) and explain how these have informed the development of the measures contained within this SPD. 7. iv. The SPD should take account of the impact of increased visitors from sources other than new residential development (including employment use, natural population growth and increased domestic tourism). 7. v. There is inconsistency between the 400m zone of presumption against development contained in emerging Local Plan Policy DM NP3 and the 500m zone identified in the Draft SPD. The Council should consider how and whether it is possible to amend the emerging Local Plan to ensure the two documents are not in conflict.</p>
Alison Wheelhouse		381		<p>1. The avoidance and mitigation strategy set out in the SPD is too weak. 2. The avoidance and mitigation strategy set out does not protect the Beeches from increase in disturbance because it is missing fundamental mitigations which are not mentioned in the SPD. 3. The Hydrology Report is dated February 2014 and so is over 6 years old. It is out of date. A new report should be provided for a fresh consultation. 4. The 10 year Management Plan referred to in para. 1.6 of the 2014 Hydrology Report may have expired or have little time left to run. This Plan is not set out among the consultation documents. 5. The Hydrology Report 2014 in paras. 1.7 and 1.8 state reduction in water levels and air quality are concerns. These are not addressed in the SPD. 6. Para 2.1 of the Hydrology Report refers to Para 118 NPPF as stating that proposed development which has a noted adverse impact on a SSSI like the Beeches should not normally be permitted. So why is this SPD predicated on an emerging Local Plan which has not yet passed through public examination and is likely to be found unsound? 7. The HRA in the draft Local Plan evidence base has been heavily criticised in the Reg 19 consultation. Why is this SPD predicated on an emerging Plan with an evidence base which has not been found sound? 8. In many cases the evidence base of the emerging Plan on which this SPD is based is out of date. 9. The Hydrology Report 2014 does not reference the emerging Local Plan because it pre-dates it by many</p>

					<p>years. It is out of date. 10. The emerging Local Plan on which the SPD is based conflicts with the Core Policy referenced in the Hydrology Report 2014. 12. The latest air quality monitoring in Beaconsfield, as part of the planning application for the council part of the A355 relief road showed many instances of exceedences and failure of air quality standards. This consultation should be accompanied by an up to date air pollution monitoring report. 22. Para. 2.6 of the 2019 Urban Development Report states air quality is a critical issue for Burnham Beeches. And air quality is outside the scope of this report. Air quality studies and modelling work should accompany a re-run of this consultation. 24. The Urban Development Report does not include impact from the 20,000 sq m Beaconsfield commercial development planned in the emerging Local plan. The data informing this consultation is deficient. 25. No information has been given as to how new mitigating SANG will be provided and managed in perpetuity. This is questioned in the Urban Development Report but the SPD provides no answers to this deficiency. 26. How will small sites contribute to SANG? 27. The SPD should be subject to a HRA because the SPD would have a conceivable effect on a European site. 29. The SPD para. 1.2.1 states that the SPD sets out a mitigation strategy required to avoid adverse public access and disturbance impacts but fails to include SANG; further it fails to explain how SANG would be provided and maintained in perpetuity. 30. The SPD fails completely to include all required mitigation strategies. Policy SP BP9 in the emerging Plan and the emerging Plan in general is not an adopted policy and may never be. 31. The SPD fails to provide any clarity at all on: SANGs; where SANGs will be located; and how they will be maintained in perpetuity. 43. The SPD determining of the level of appropriate mitigation relative to each development IS policy and a SEA is needed for the SPD. 44. The SPD should not have been eliminated from further assessment in the HRA process because it establishes the mitigation level provided for developments (the range of schemes and costs). If the level of mitigation has been misjudged or if the measures are ineffective, they will have a direct impact on the SAC. 4 45. No mention is made in the SPD to the Air Quality Management Strategy referred to in draft policy DM NP3 which should also form part of the Beeches mitigation strategy. 46. The mitigation measures outlined in SAMMS are not comprehensive and do not represent the full range of measures required to avoid adverse impacts on the Beeches. 47. In particular it should be clarified that the full amount of SANG would be required on site at site SP BP9 in addition to financial mitigation. 48. The potential impacts of</p>
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					employment sites have not been taken into account when assessing the impact on the Beeches.
Alison Wheelhouse		384	<p>15. Slough Northern Extension has not been modelled for impact on the Beeches. The emerging Local Plan must 'likely' be withdrawn according to the Inspectors' initial findings which have been published. The impact on the Beeches is worse than is reflected in the documents forming part of this consultation 16. The policies in the emerging Local Plan such as SP BP9 have not been found sound and have not passed through public examination. These policies are mentioned in the documents forming part of this consultation but they simply do not exist and have been heavily criticised in the Reg 19 consultation . 17. The insanity of an emerging policy (SP BP9) which would place the largest development in Chiltern and South Bucks within 2.6km of the Beeches SAC, on Green Belt and within the setting of the AONB simply beggars belief. 18. The SAC has the benefit of the highest level of legislative protection and this SPD fails it. 19. Para 1.4 of the Urban Development Report states that SACs have the utmost conservation importance and this SPD fails to protect the Beeches. 20. The avoidance and mitigation measures in the SPD are inadequate. 21. The consultation is premature because the emerging Local Plan has not been found sound. 28. The Lepus SEA Screening Document March 2020 states the SPD serves only to provide greater clarity about the Council's expectations in relation to existing policies within existing and emerging development plan documents. However, as the policies in the emerging Local Plan are not adopted policies at all, the SPD is policy-making. It should be either supported by both a HRA and SEA - or the consultation should be re-run once the outcome of the emerging Local Plan is known. The strategic policies of the emerging Local Plan have simply not been found sound and may never be. 32. The SPD sets out to provide clarity on something which may never exist as policy. It is premature and in itself is useless. 33. The SPD will have a significant environmental effect and does require a SEA because it has not been subject to a Sustainability Appraisal. The emerging Local Plan was subject to a Sustainability Appraisal but that has been widely discredited in the Reg 19 consultation on both the Sustainability Appraisal and draft Plan. Neither has been p49. This consultation has been run over the summer holidays when people have been away on holidays</p>		

			<p>or working from home and caring for children during Covid. A request for an extension to the consultation deadline has been declined even though the Council themselves have failed to respond to FOI requests within statutory timeframes- it is taking the Council over 3 months to respond. One rule for us, another rule for the Council. This is undemocratic. The Council have accused the Beaconsfield Society of misleading people both in relation to this consultation and the draft Local plan consultation. This is not correct and is another example of the Council meddling in the democratic process. The Beaconsfield Society is advised by eminent planning consultants and a planning QC. This consultation should be re-run once: the required mitigations have been included and once the required evidence and SEA and HRA have been prepared as mentioned above and once the outcome of the emerging Local Plan has been decided by the Planning Inspectorate and the Plan adopted. This consultation and SPD is completely pre-mature, unready and ill prepared assed by the Inspectorate.</p>	
Gerry O'Riordan		286		<p>Whilst the document seems to encourage developers to contribute towards environmental awareness and monitoring programmes, I am concerned that there is no specific mention in the document about the provision of SANGS by any prospective developer. Whilst this condition is potentially covered within the draft Local Plan, if this draft Local Plan is rejected (as would seem quite likely at the moment) then there is absolutely no inclusion of SANGS within the SPD. On this basis alone the document should be rejected. There also doesn't appear to be any mention of an Air Quality Monitoring Strategy, something which should most definitely be put in place in an area of such botanical sensitivity. In my opinion this SPD does not include sufficient protection for the Burnham Beeches SAC and should be rejected.</p>
Pam Dornin		220		<p>I write in respect of the above document and wish to register my objection to the proposals therein. Nowhere within this document is reference made to: SANG (Suitable Alternative Natural Greenspace), a crucial line of defence and vital to Burnham Beeches, a Special Area of Conservation. The impact on Burnham Beeches from the 20,000 sq.ft of commercial space proposed for Beaconsfield by Buckinghamshire County Council. The Air Quality Management Strategy which should be a key element of environmental mitigation and which is, theoretically, part of the Council's draft plan.</p>
Margaret Jolly		223		<p>Please note our objection to your draft planning document because it seeks to strip Burnham Beeches of</p>

					its status as a Special Area of Conservation thereby opening the way for excessive and unsustainable development in Beaconsfield and the surrounding area. Whatever happened to the suitable alternative natural greenspace? It must be reinstated. Where is the impact statement related to the effect on Burnham Beeches of the additional commercial development proposed for Beaconsfield? This cannot simply be ignored? Where is the statement on environmental mitigation in relation to air quality which the Council has apparently signed up to? Again, this must be included. Although it is your duty as our Council to facilitate suitable, sympathetic and sustainable development, that must not be at any cost, and certainly not at the expense of adverse and irreversible impact on local amenities, green space and the environment.
Cllr Barry Harding		225	<p>Endorses Cllr Sandy's representation, as below.</p> <p>Am aware that you will have received numerous objections to stripping away existing key protections of the Burnham Beeches and surrounding areas from the Draft SPD. .</p> <p>Emasculation of these protections appear a wily move to neuter future objection to development which would weaken parishes and resident's ability to resist encroachment by developers seeking to reap maximum advantage from areas adjacent to Slough, Maidenhead, the Elizabeth Line and Beaconsfield. This should not be allowed especially because twenty-eight South Bucks Councillors (the full council) were elected on manifestos that promised to defend the Green Belt. It must therefore be the duty of all elected members to demand retention of the established protections of BB and for officers to cooperate accordingly. I shan't repeat all the sound reasons already lodged by other objectors but will emphasise that the entire infrastructure of SB is already over capacity and under unacceptable strain. Our GB is sacrosanct. Our air quality in places is already at dangerous levels and Lockdown has demonstrated it to be highly unlikely there will be much demand for commercial space in Beaconsfield or elsewhere. The draft SPD should be discarded in its present form and Burnham Beeches and its environs preserved as an SAC with current protections remaining intact.</p>		
Cllr Roger Reed		227	<p>Endorses Cllr Sandy's representation, as below.</p> <p>Am aware that you will have received numerous objections to stripping away existing key protections of the Burnham Beeches and surrounding areas from the Draft SPD.</p>		

			Emasculation of these protections appear a wily move to neuter future objection to development which would weaken parishes and resident's ability to resist encroachment by developers seeking to reap maximum advantage from areas adjacent to Slough, Maidenhead, the Elizabeth Line and Beaconsfield. This should not be allowed especially because twenty-eight South Bucks Councillors (the full council) were elected on manifestos that promised to defend the Green Belt. It must therefore be the duty of all elected members to demand retention of the established protections of BB and for officers to cooperate accordingly. I shan't repeat all the sound reasons already lodged by other objectors but will emphasise that the entire infrastructure of SB is already over capacity and under unacceptable strain. Our GB is sacrosanct. Our air quality in places is already at dangerous levels and Lockdown has demonstrated it to be highly unlikely there will be much demand for commercial space in Beaconsfield or elsewhere. The draft SPD should be discarded in its present form and Burnham Beeches and its environs preserved as an SAC with current protections remaining intact.		
Don Lunn		229			I draw your attention to the following points which you seem to have totally overlooked:- 1. There is no reference to "Suitable Alternative Natural Greenspace". 2. No reference to the environmental or visitor impact on Burnham Beeches. 3. No reference to an Air Quality Management Strategy.
Cllr Jackson Ng		231			I am writing in to register my views re the consultation on Burnham Beeches. Although a Town Councillor with Beaconsfield Town Council, this is my personal view on the matter. I am disappointed to learn that it appears that there are no references to Suitable Alternative Natural Greenspace which is crucial for the safeguarding of our local communities and future generations. It appears that there are no references to the proposed commercial space in / around Beaconsfield and its impact on Burnham Beeches which is a special conservation area. Furthermore, there should be an Air Quality Management Survey so that we can understand the environmental impacts of any such developments. I would urge that consideration be taken into consideration of any proposed developments that might impact local residents (and their pets), not just in Burnham but also its surrounding communities.
Ms Caroline McCullagh		238			Beeches Road Farnham Common, right next to the Beeches, already serves huge numbers of people from a wide area (seen from weekend car park!). I am worried

					that there seems to be no suitable alternative planning space in the above document. In weekends, particularly, there are huge amounts of people (and in lockdown many more, seeking release) This area was bought in 1880 for recreation in the countryside - the impact of 20,000 sq ft of new employment and the huge number more people, and the lack of Air Quality management will go against the ethos of the purchase agreements and invade our local freedom of countryside recreation. More areas need to be sourced before your development is agreed.
Mr & Mrs Ian & Janet Ridley		242			Suitable Alternative Natural Greenspace. known as (SANG). This is a crucial line of defence and has not been mentioned anywhere! You do not mention the visitor impact or environmental damage to Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing to develop in the east end of Beaconsfield. You do not refer to the 'Air Quality Management Strategy'. This should be a key element of environmental mitigation and which is supposed to already be part of the Council's draft plan. The above are only three of the below-the-radar tactics you seem to be employing to circumvent already in place development restrictions. We object most strongly to this new document which due to the omission of many factors dilutes massively the protection already in place for the whole area and should be withdrawn immediately and modified to retain current protection..
Ms Samantha Lowi		244	Please can you explain why the SPD is based on a plan that has not been passed yet?		
Mr & Mrs Paul & Rosemary Badman		258	We are extremely disappointed that apparently the recent draft Buckinghamshire Plan does not preserve the environmental protection which has been in place regarding Burnham Beeches and its surrounding area. In the 40 years we have lived in South Bucks we and our family have enjoyed leisure time in and around Burnham Beeches and are very keen that this continues. Also we greatly appreciate the nature of the local area and do not wish to see overdevelopment of new housing which may be a consequence of removing the environmental protections currently in place.		
Mr & Mrs Philip & Brenda Cox		273			We are extremely worried about the impact on Burnham Beeches which is in the top flight of European Nature Conservation Sites and very close to Beaconsfield. It is a unique facility and protection of its environment is critically important. Specifically, the proposed development has NO Suitable Alternative Natural Green Space, or new recreational space to mitigate the increased visitor pressure on Burnham Beeches. With 1600 new homes there is simply not the land to create the roughly 30 hectares of NEW alternative green space

					that the proximity to Burnham Beeches would require in compliance to stated Planning Policy. To us this is a fundamental issue. Furthermore, there is NO reference to the environmental or visitor impact on Burnham Beeches from the 20,000. Sq ft of commercial space the Council are proposing for Beaconsfield. Importantly, there is also NO reference to an Air Quality Management Strategy, that should be a key element of environmental mitigation.
Mrs Toni Fox		282			my family is deeply upset to learn that changes to Commercial buildings may have a very detrimental effect on Burnham Beeches and surrounding nature areas. There is no mention of an Air Quality Management Strategy or suitable alternative natural Greenspace. Also the elevated number of visitors from the proposed developments would be detrimental to such a delicately balanced nature reserve. We therefore oppose these plans.
Jenny Claridge		292			Burnham Beeches is designated as a Special Area of Conservation however specified protection criteria have been omitted from the Burnham Beeches SPD. It seems clear that the SPD therefore does not uphold protection of Burnham Beeches as a Special Area of Conservation. The main thing missing from the SPD is the requirement that housing development within the 5.6km zone around Burnham Beeches must have a Suitable Alternate Natural Greenspace included. This is a critically important regulation for this special area that has been totally ignored. The SPD cannot be allowed to be approved without it being included. Further, from the SPD's mitigation strategy, an Air Quality Management Strategy has been omitted. This is an important part of environmental mitigation and its exclusion will threaten the future of Burnham Beeches. This omission again fails Buckinghamshire Council's duty to protect Burnham Beeches as a Special Area of Conservation. The protection of Burnham Beeches as a Special Area of Conservation is key to the local environment and there appears to be little thought given to the environmental or visitor impact on Burnham Beeches caused by development within the 5.6km zone.
Mr & Mrs Ian & Barbara Fairgrieve		296			Why is there no reference to ' Suitable Alternative Natural Greenspace'? Also, why is there no mention in this document of the environmental impact on Burnham Beeches of the proposed commercial development in Beaconsfield? There is no reference in this document to an Air Quality Management Strategy which is such a key element in environmental strategy for this area
Charlotte Coales		300	I object to this document and the seemingly underhand way it has been rushed through with little opportunity for public consultation or objection. I am also alarmed to hear of attempts		

			by the council to strip away the key protections of Burnham Beeches as a Special Area of Conservation. It has such value in terms of biodiversity and human well-being - please don't put this at risk.		
Mrs Ann King		302			I am concerned that there have been serious omissions in the Burnham Beeches Supplementary Planning Document with regard to Burnham Beeches. Burnham Beeches is a "Special Area of Conservation" and as such should have been included in the Burnham Beeches Special Area of Conservation Strategic Access Management and Monitoring Strategy SPD. This means that the protection criteria that should have been included in the Supplementary Planning Document have been omitted, namely that housing development within the 5.6 km zone must have a "Suitable Alternate Natural Greenspace". An Air Quality Management Strategy has also been omitted from the Supplementary Planning Document and this is an important part of environmental mitigation that Buckinghamshire Council should have included in order to protect Burnham Beeches as a Special Area of Conservation. As a resident of Taplow this matter is of grave concern to me and my family.
Katie Buchanan		310			Please note I wish to object to the Burnham Beeches Supplementary Planning Document, for the following reasons:- . 1. There is no reference to the environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space Buckinghamshire Council are proposing for Beaconsfield. Not understanding or communicating this impact means a decision cannot be accurately made. 2. There is no proposed suitable alternative natural greenspace in the proposal. Burnham Beeches is a nature conserve and as such, there are restrictions on development within a 5.6km buffer zone, which includes Beaconsfield and Wilton Park. According to current regulations there is a requirement that any new housing development must include Suitable Alternative Natural Greenspace (SANG), or new recreational space, to mitigate the increased visitor pressure on such a crucial conservation area. This is likely to come into play with the proposed Wilton Park development, and I can see no reference to Suitable Alternative Natural Greenspace. This is essential if the proposed Wilton Park development goes ahead. 3. There is no reference to an Air Quality Management Strategy, which will come into play with the development at Wilton Park, and the Council's draft plan. Please advise on the plan here.
Mr Martin Bennett		316	I am writing to object to the proposed changes to protection of the environment in and around Burnham Beeches. I would prefer that protection is increased as development pressures on the		

			<p>green areas increase. This would be the natural response for a planning committee. My last public action was to protest against the proposed incinerator plant along the A40. In this case the changing nature of refuse collection was not being considered, and the protestors saved the council from an enormous and predictable mistake. There is pattern here where the protestors against local development are again trying to save the council from another predictable and enormous mistake. As with the refuse, there are big changes taking place in the country that are not being considered. The train into London is currently empty, and nobody is expecting it to fill up again. Nobody I know is expecting to resume a 5 day commute into London when the virus goes away. Brexit will have unknowable effects on the economy and population levels, but both will shrink to some greater or lesser degree. To plan as if the local economy was based on commuting into London at this point will look as daft as planning for an incinerator did a few years ago. America usually leads us, and its major cities are emptying of professional classes fast. They will probably become ghettos. What will happen to London? There will also be an exodus of talent and capital from the UK, as has happened before when the taxation inevitably rises. A property tax will come as the only way to pay back 2 trillion (and counting) in debt. The only way to protect our capital in this area is to keep its value as a green and pleasant place to live, and even to enhance it. That will be appreciated by everyone in the longer term. Please do not reduce the protection on Burnham Beeches.</p>	
William Gambley		335		<p>In the rush to pad the pockets of developers where is the requirement and provision of suitable alternative green space? Where is the protection and acknowledgment of the needs of the thousands who use the Burnham Beeches on a regular basis. How can we enjoy clean air when the very spaces we need to keep the air clean and our minds and bodies healthy are covered in tarmac, bricks and glass. As this pandemic has shown we are lions led by donkeys. The Buckinghamshire Council should choose to roar against this planning proposal.</p>
Mr & Mrs Anthony & Kathryn Protopapadakis		337	<p>Firstly we find it quite misleading in that on the first read through it appears as if it is simply suggesting some financial contribution from developers of new housing, permitted in accordance with the protected area of 5.6km surrounding Burnham Beeches safeguarded by its SAC status, to help run and protect the site.</p>	

			<p>However, on closer reading, it seems to imply that development over 500m and within 5.6km is ok as long as it pays some contribution. Does this mean that this document is purporting to make it easier for development within this SAC 5.6km buffer zone? We are very impressed with how Burnham Beeches SAC is managed both for conservation and for the visitors who gain so much pleasure from the experience. We would like to raise our serious objection to any intent in, or result from, this document, in allowing development within the 5.6km buffer zone safeguarded by Burnham Beeches status as a SAC.</p>		
Mr & Mrs Anthony & Kathryn Protopapadakis		339			<p>Furthermore there is no way that the increased usage and pressure on conservation at Burnham Beeches SAC, generated by the massive development at Wilton Park and any other future potential developments in the 500m - 5.6km range, could possibly be mitigated. Nor would such developments be able to create suitable alternative natural greenspace or new recreational space as there simply would not be room in the area to do so. It is not clear to us that the need to mitigate the likely effects of the development would necessarily be effectively addressed by the projects shown. In addition there is no apparent cap on how many development projects this approach could allow over time. Lastly, it is not made explicitly clear in the document that there is NO net new homes permitted within 500m the term 'to be avoided' allows interpretation and potential development.</p>
Ashley Stevens		341			<p>The document lacks suitable provision of alternative natural greenspace, any study of the impact on Burnham Beeches (already heavily used) and any comment on air quality.</p>
Ian Fowler		349			<p>I would like to express my concern regarding your plans for development affecting Burnham Beeches and the surrounding area. In particular, I would seek your written confirmation that the Air Quality Management Strategy has been fully considered and the required standards will be met,</p>
Corinne Foster		351			<p>Contrary to what was in your communication to the Beaconsfield Society, I believe many local residents will have a comment, specifically an objection, to your proposal. I have been informed that there are a number of areas that have not been included, and they certainly should be. These areas that SHOULD be included are: Reference to Suitable Alternative Natural Greenspace. Environmental or visitor impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield. The Air Quality Management Strategy, that should be a key element of environmental mitigation. I live in Beaconsfield and want</p>

					to know more about what is planned as it has an impact on me and my family.
Candace Dovey		353	<p>I am a resident and Council Tax payer living very close to Burnham Beeches. I use the woods every day. I am in total opposition to any change in the current planning for this area and the Beaconsfield surrounds. The Covid 19 pandemic has shown how important clean, green and accessible spaces are for the health and wellbeing of our communities. Burnham Beeches and the surrounding green areas need to be protected and preserved for ourselves and our children. The world is already losing so much of its natural beauty and losing wildlife in the process. The stupidity of Brexit has already shown itself to be detrimental to the generations to come and this move to take protection away from Burnham Beeches is nothing short of deplorable in adding to the situation: we need these green areas for all sorts of reasons, a main one being to help with the mental health of everybody. The pandemic has proved this - there are so many reports about the benefits of nature and the natural world in keeping us mentally well. In the rush to pad the pockets of developers, we lose sight of what the majority of people are losing. Across the world the focus is very much on greed and losing sight of the things that are invaluable. Burnham Beeches is one of these invaluable and precious things. Where is the protection and acknowledgment of the needs of the thousands who use the Burnham Beeches on a regular basis? Burnham Beeches is frequented by so many people and their families. People travel long distances to enjoy what the woods offer and what they cannot find nearer to them. Green space is at a premium. This move by Bucks County Council needs to be stopped now.</p>		
Mr Nigel Smales		355			I wish to register my objection to this SPD, not so much for its content as for its omissions. The SPD should not discard the current regulation which requires any new housing development within 5.6km of Burnham Beeches to include provision for 'Suitable Alternative Natural Greenspace'. Further, to reduce the risk of the Beeches being poisoned, the SPD should include an Air Quality Management Strategy.
Mr & Mrs Herrick & Pam Worth		363	<p>An area of outstanding beauty for all to enjoy should remain as such. Any development to take this away would be taking away the free areas of enjoyment & learning to us & future generations. Please stop this.</p>		
Mr Bob Urie		371			There is no mention of the obligation to provide "suitable alternative natural greenspace" as mitigation

					and this should be included in the SPD. The environmental and visitor impact of commercial development should be assessed and mitigation for this should be included. Further work needs to be done before a new version of this SPD is consulted upon. An Air Quality Management Strategy should be included as mitigation. What is this strategy to be? This needs to be worked on before a new version of the SPD is circulated for consultation.
Mr Bob Urie		373		This SPD is based on the emerging Local Plan which has not even gone through public examination yet. This SPD consultation is premature. The evidence on which this SPD is based has been strongly and widely challenged in the emerging Local Plan process and the SPD consultation should await the outcome of the Local Plan public examination.	
Barbara Meadows		377			I see no reference to the management of air quality, which has to be a major factor for everyone's health as well as that of nature.
Mr Dennis Elsey		396		The following points should be added to a new 2.0 - Background : By specifying 'NEW' homes this has excluded the following which must be added to a new 2.0 - Background a. Replacement, refurbishment and extension to existing homes. This could be extensive eg conversion of a 3 bed cottage into a 12 bed mansion with swimming pool, 3 car garage, and with uprated utilities provided. The pollution and disturbance from such a change in both construction and ongoing usage would be immense. b. Development other than homes including development of example Offices, Industrial Workshops, Warehouses all of which occur in the Local Plan particularly in policy : SP BP9 Building - Beaconsfield which is well within the 5.6 km protected 'Zone of Influence'. c. The installation of : utilities, services , roads for new homes and increased demand . eg sewers, water, gas, electricity, telecoms. All of these have a major air pollution, noise, hydrology and traffic pollution impacts both on initial installation and ongoing operation as mentioned in the Sustainability Appraisal. These effects disturb the fauna and flora of B.B.SAC. Furthermore with the recent accelerated trend to more outdoor exercise and other pursuits then there will be a major increase from the existing population as has been witnessed with other tourist sites now limiting visitor numbers. There is also a major impact from the current step up in internet shopping and home delivery with a rapid escalation in delivery vans to domestic and business premises. These major impacts crucial to this SAC in its current weak state have not been considered by Bucks Council which is currently in default of its responsibilities and also it appears it has not been considered at all by the Statutory Consultees: Natural England, Dep. Env., or City of London because this document does NOT identify them. These major omissions invalidate this SPD and the HRA upon which it is based and they should be added to new Section 2.0	
Mr Trevor Brawn		307	Thank you for the opportunity to comment on the plans for Burnham Beeches SAC Strategic Access Management and Monitoring Strategy SPD. I do		

			not intend to comment formally, but I do support in principle the proposed restrictions to new development and redevelopment within the two development control zones. I am satisfied that Burnham Beeches is such a special environmental and historic area that it merits very special protection measures.		
Inland Homes (Agent: Mr Ian Gillespie, Igloo Planning)		390			In its current form, the draft Burnham Beeches SAC Strategic Access and Mitigation Strategy SPD states that the requirement to provide financial contributions (as part of the SAMM Strategy) applies to all net new residential development within the defined zone of influence. The words net new residential development need further clarification because the requirement to make financial contributions cannot be applied to developments that already have planning permission (but are not yet built). As set out above, the permitted development at Wilton Park was subject to rigorous scrutiny prior to permission being granted, including a detailed Appropriate Assessment with respect to Burnham Beeches SAC. Consequently, there are two principal reasons as to why SAMM contributions as proposed in the draft Strategic Access and Mitigation Strategy SPD should not apply to development at Wilton Park. The Appropriate Assessment that informed the outline application was agreed to be robust by both Natural England and South Bucks District Council, with the proposed Wilton Park development demonstrated to have no adverse effect on the integrity of Burnham Beeches SAC. The only reason as to why any additional mitigation may be deemed appropriate, is if it is necessary to undertake a revised Appropriate Assessment. There is only a need to revisit an Appropriate Assessment at the Reserved Matters stage where new relevant material evidence has come to light since the grant of the outline permission. In regard to Wilton Park, since the grant of the outline an additional report has been published in the form of a Mitigation Strategy which the draft SPD has now taken forward. However, this contains no new survey data, being based upon the same evidence base and the same body of visitor survey data i.e. visitor surveys undertaken by Footprint Ecology in 2014, which was used to inform the Wilton Park Appropriate Assessment in 2019. Reason 1: Where outline permission has been already granted, and proposals tested via HRA, there should be no requirement for additional mitigation at the RM stage. As such, all information used to inform the Strategic Access and Mitigation Strategy SPD was available at the time the site-level Appropriate Assessment was produced for the Wilton Park development and adopted by South Bucks District Council. Given the absence of

					<p>additional material survey data since the 2019 Appropriate Assessment, it is considered that the current site-level Appropriate Assessment for Wilton Park remains relevant and valid and accordingly does not need to be revisited for a reserved matters application. This conclusion is in line with principles set out by DEFRA (which, although not directly applicable to this situation, provide good practice guidance for the adoption of the conclusions of another competent authority as to whether a plan or project is likely to have a significant effect on a European site). These set out that no further assessment is required when no additional material information has emerged, such as new environmental evidence or changes or developments to the plan or project, that means the reasoning, conclusion or assessment they are adopting has become out of date. In addition, revisiting an Appropriate Assessment at a later stage is only typically required where the proposals have significantly altered in terms of their potential effects on the SAC. In terms of Wilton Park, the detailed design for the site (produced at the Reserved Matters stage) will not give rise to increased unit numbers, with this fixed by the outline permission. As such, the current site-level Appropriate Assessment that has been adopted for the permitted development at Wilton Park is considered to remain valid and would not need to be updated for the Reserved Matters stage. As such, as outline permission has been already granted, and proposals tested via HRA, there should be no requirement for additional mitigation at the RM stage. It should also be recognised that the entire process of Appropriate Assessment is inherently precautionary and requires a high bar to be cleared. This is set out in the 2014 Briels decision, in which the inspector stated the assessment carried out under Article 6(3) of the Habitats Directive cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned (see, to that effect, Sweetman and Others EU:C:2013:220, paragraph 44 and the case law cited). As such, the existing 2019 Appropriate Assessment (which has been agreed with Natural England and adopted by South Bucks District Council) for the permitted Wilton Park development should be recognised to be robust in its own terms and its mitigation proposals as fit for purpose. As such, there is no need at the reserved matters stage to require contributions to SAMM as this would serve only to add further precaution (by way of more mitigation) onto an already precautionary assessment. Reason 2: In the event additional mitigation is required, flexibility should be incorporated into the SPD to allow bespoke mitigation</p>
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					<p>to be put forward e.g. SANGs, where this is agreed with Natural England. The proposed development at Wilton Park has already been tested by HRA (including AA) at the outline stage, and through the delivery of areas of natural greenspace (absorbing existing and future recreational pressures), it has been demonstrated that the development will have no adverse effect on the integrity of Burnham Beeches SAC. Notwithstanding whether a strategic mitigation solution is adopted in the district (in this case based on SAMM), it should remain open to any project as an alternative to using the strategic mitigation solution, to bring forward its own bespoke mitigation where this can satisfy the requirements of the Habitats Regulations and is agreed by Natural England. This principle is already established for other designations. For example, where an established strategic mitigation regime is already in place (such as SAMM and SANG at Thames Basin Heaths SPA), it is still open to the developer to deliver a proposal which provides bespoke mitigation outside of this mitigation regime as long as it is assessed via HRA. The site at Wilton Park is no different, with the already accepted bespoke mitigation of delivering open green space providing the necessary safeguards for the SAC, such that the provision of SAMM measures are unnecessary. As Wilton Park has demonstrated, where alternative bespoke mitigation can be delivered and is fully tested by HRA/AA, and agreed with Natural England, this should be allowable in lieu of SAMM contributions. Accordingly, it is recommended that the draft Strategic Access and Mitigation Strategy SPD is updated to include flexibility for developments to deliver their own bespoke mitigation as an alternative to providing SAMM contributions. Conclusion: South Bucks District Council (now Buckinghamshire Council) has produced a consultation draft of the Burnham Beeches SAC Strategic Access and Mitigation Strategy SPD (dated July 2020) that sets out a draft Mitigation Strategy for the SAC. This proposes that mitigation and avoidance measures in the form of SAMM are brought forward in order to avoid adverse effects on the integrity of Burnham Beeches SAC arising from new residential development. In terms of the Wilton Park permitted development, this is already subject to an agreed bespoke mitigation strategy, which has been tested under HRA(AA) and agreed in May 2019 to have no adverse effect on the integrity of Burnham Beeches SAC. Consequently, there are two principal reasons as to why the SAMM requirement within the draft Strategic Access and Mitigation Strategy SPD should not apply to development at Wilton Park and it is recommended that the SPD is updated to reflect these points: a) Where</p>
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				outline permission has been already granted which includes a comprehensive mitigation solution and the proposals have been tested via HRA, and there have been no material changes in circumstance in the intervening period, there should be no requirement for additional mitigation at the Reserved Matters stage. It is recommended that the SPD is updated to reflect this position; and b) In the event additional mitigation is required (due to material changes in circumstance in the intervening period), flexibility should be incorporated into the SPD to allow bespoke mitigation to be put forward e.g. SANGs, where this is agreed with Natural England.
Beaconsfield Society (Agent: Mr Alex Roberts, DLP Planning)		408		SECTION 3 BURNHAM BEECHES SAC MITIGATION STRATEGY Introduction: Paragraph 3.1.2 states that 'This mitigation strategy is intended to address both the requirement to avoid, or mitigate, adverse impacts on the integrity of Burnham Beeches SAC from local plan led development as set out in the Chiltern and South Bucks Local Plan and the requirement to prevent further deterioration of the SAC features as a result of public access and disturbance.' However, the mitigation strategy fails to include all measures necessary to mitigate the adverse impacts of local plan led development as set out in the HRA. Notably, the Draft SPD fails to make reference to the requirement for SANG provision (as required by Policy SP BP9 in the emerging Chiltern and South Bucks Local Plan) and the requirement for an Air Quality Mitigation Scheme (as set out in Policy DM NP3). As noted above in paragraph 1.7 this is in conflict with regulations 8(3) to 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012. If this conflict is not addressed, then the SPD will not be legally compliant and should not be adopted. However, as also stated in paragraph 1.6 above, because the Local Plan policies to which this SPD relates are still emerging the SPD should not be adopted before the Local Plan Examination has concluded. We therefore recommend that the mitigation strategy is amended to include reference to these additional mitigation requirements. The wording of paragraph 3.1.4, for example, should be amended as follows: The Burnham Beeches SAC Mitigation Strategy for the Chiltern and South Bucks Local Plan comprises four components: Presumption against residential development with 500m of Burnham Beeches SAC; Financial contributions (set out in Table 3.1) from all net new residential development within a defined zone of influence (500m - 5.6km) towards a Strategic Access Management and Monitoring Strategy (SAMMS) at Burnham Beeches SAC; Provision of SANG within strategic development sites (including Site SP BP9); and

					<p>Implementation of the Air Quality Mitigation Scheme. Details of the Air Quality Mitigation Scheme and requirements for SANG provision should then be clearly set out within Section 3 of the SPD alongside the SAMMS. Presumption against development: We support the presumption against development within 500 metres of the boundary of the SAC. However, the SPD is inconsistent with Policy DM NP3 in the emerging Local Plan, which states that planning permission will not be granted for development which results in net additional homes within 400 metres from the Burnham Beeches Special Area of Conservation (SAC) and is therefore in conflict with regulations 8(3) to 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012. In order for the Local Plan and the SPD to align, the wording of Policy DM NP3 would need to be amended to reflect the 500 metre references contained within the SPD and the evidence presented in the Footprint Ecology Recreation Report. At this stage, this can only be done through the Local Plan Examination through main modifications recommended by the Inspector. In Paragraph 3.2.4 there is a need to clarify that the provision of SANG at Site SP BP9 is required in addition to the financial contribution to the mitigation strategy (as outlined in paragraphs 8.5.3 and 8.5.4 of the Report to Inform HRA, June 2019 and Policy DM NP3). We therefore suggest that the wording of this paragraph is amended as follows: Taking this forward for the determination of planning applications the Council's standard Appropriate Assessment for net new homes within the 500m to 5.6km zone requires a financial contribution to the mitigation strategy set out in table 3.1 of this SPD. See Appendix 1 (b) for this Appropriate Assessment. Provision of Suitable Alternative Natural Greenspace (SANG) is also required in addition to the financial contribution to the mitigation strategy at strategic allocation sites identified within the Local Plan. Contributions to the Air Quality Mitigation Scheme may also be required. Details of the requirements for SANG and Air Quality mitigation are set out in [insert cross-reference to where details are provided in SPD]. Strategic Access Management and Monitoring Strategy (SAMMS): Suitable Alternative Natural Greenspace (SANG) Provision Proposed Policy DM NP3 of the South Bucks and Chiltern Local Plan 2036 (Publication Version) requires applications for development beyond 400 metres from the SAC to undertake a full Habitats Regulations Assessment of the potential impacts of development and, if appropriate, proposed mitigation measures must be submitted prior to the determination of the planning application(s). We would therefore expect the SPD to detail the requirements of bespoke</p>
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					<p>mitigation measures that may be required, including Suitable Alternative Natural Greenspace (SANG) provision. The lack of reference to these alternative mitigation measures within the SPD would appear to be a significant gap in ensuring the integrity of the SAC is retained. Policy SP BP9 in the South Bucks and Chiltern Local Plan 2036 (Publication Version) explicitly requires the provision of SANG within the allocation site in order to mitigate its potential recreational disturbance on the Burnham Beeches Special Area of Conservation (paragraph 11.10.6). The requirement for SANG provision within the allocation site is also identified in the policy wording for Policy SP BP9. The lack of reference to SANG provision within the Burnham Beeches SAC Mitigation Strategy therefore appears to be a significant omission. As noted in paragraph 1.4.4 of the SPD, its purpose is to provide greater clarity about the Council's expectations in relation to existing policies within existing and emerging development plan documents. The requirement for SANG provision is set out within Policy SP BP9 of the emerging South Bucks and Chiltern Local Plan, however no detail on the requirements for this provision are included in the Plan. Whilst this SPD therefore represents a key opportunity to provide essential guidance on the requirements for SANG provision as part of the proposed development of Site SP BP9, we note that it is not identified in the South Bucks and Chiltern Joint Local Plan Local Development Scheme (see paragraph 1.5 above) and therefore its status in respect of the wider development plan is unclear. Paragraph 6.16 of the Footprint Ecology Recreation Report states: For large developments, SANGs can be delivered by the developer at the development location, providing dedicated recreation space of suitable quality on the new residents doorstep. In such cases the challenge is ensuring sites are of suitable quality (given the proximity to urban development) and size. There also has to be confidence that the sites can be secured and appropriately managed in perpetuity. Large greenbelt sites are likely to be best able to provide substantial areas of greenspace as part of a development. This report also notes that SANG should be provided 'up-front', and that 'any suitable land should be secured in advance and established as SANG prior to occupation of the development being mitigated for'. It is therefore essential that reference to SANG provision at Site SP BP9 is included in the SPD to provide the applicant with appropriate guidance as to how the SANG is expected to be delivered within the development site. We therefore suggest that the SPD is amended to include explicit reference to the requirement for SANG provision as part of the delivery of Site SP BP9 (in addition to the</p>
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				<p>required financial contributions towards the SAMMS). This should include guidance on the size of SANG provision required and how it is expected to be delivered within the site. Paragraph 6.18 of the Footprint Ecology Recreation Report states that 'In the Thames Basin Heaths and other areas, new [SANG] sites are provided at a rate of 8ha per 1000 new residents, equivalent to 0.0192ha per dwelling (assuming 2.4 occupancy). There is no reason to suggest any alternative rate of delivery would be more appropriate for Burnham Beeches. A key component of new greenspace will be the overall size, as interview data from Burnham Beeches suggests an average walk of 3.6km (Panter & Liley 2016); 30-40ha are likely to be the minimum overall size necessary to provide enough space for such a route. We would therefore expect that SANG provision in the order of 30-40ha should be provided within the proposed allocation Site SP BP9 (in accordance with the policy outlined in the Draft South Bucks and Chiltern Local Plan that requires on-site SANG provision). Air Quality Paragraph 9.3.3. of the South Bucks and Chiltern Local Plan 2036 (Publication Version) states that: 'The Habitats Regulations Assessment shows that without mitigation there are likely to be significant effects on the SAC from increased visitor pressure and a deterioration in air quality due to increased vehicle movements in the locality. Development within the hydrological catchment areas of the SAC, as shown in Image NP1, could particularly impact on the health of the trees by causing changes to the surface and ground water flows as well as changes to water quality. Development proposals within the hydrological catchment areas will therefore need to demonstrate that avoidance measures are incorporated into schemes. It is currently unclear how the mitigation measures identified in the SAMMS (and the SPD as a whole) will effectively mitigate against reductions in air quality due to increased vehicle movements and changes in water quality resulting from development in the hydrological catchment area. These issues will not be mitigated through the measures identified in the SAMMS. Whilst the Local Plan references an Air Quality Mitigation Scheme (paragraph 9.3.6) it is unclear how this is linked to the contributions requested as part of the SPD. This should be clarified within the SPD. Mitigating the impacts on air quality are particularly important in light of the recognition in paragraph 2.1.2 of the SPD that access to Burnham Beeches has changed in recent years and now most visitors live much more locally and arrive by car. Policy DM NP3 also states that in addition to contributions towards the Burnham Beeches Access Management Scheme and provision of bespoke mitigation measures (such as SANG),</p>
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					<p>developments must contribute towards the Burnham Beeches Air Quality Mitigation Scheme, or any subsequently agreed scheme, unless it can be demonstrated that the development would not result in any adverse impact on air quality at Burnham Beeches either alone or in combination with other development. It would therefore be expected that details of the Air Quality Mitigation Scheme be included in the SPD, as these form part of the key measures for ensuring that the integrity of the SAC is retained. Financial Contribution Calculation Table 3.1 (page 20) identifies that the total cost to each home is calculated by dividing the total mitigation cost by 2,364 dwelling units that are expected to be delivered within the Plan period. Whilst the breakdown of the 2,364 dwelling units is not provided in the Draft SPD, it is provided in the Burnham Beeches Mitigation Strategy (version 1, March 2020). This identifies that the figure of 2,364 is comprised of: 1,600 dwellings to be delivered at Site SP BP9 (Land to the east of Beaconsfield) 58 dwellings at smaller HELAA sites located within 5.6km of the SAC 165 units relating to a current planning application at Taplow 541 units formed of an approximate windfall allowance. In reviewing these figures, it is unclear how the windfall allowance figure of 541 units has been calculated. The HELAA (January 2020) makes allowance for 1,204 windfall units across the whole South Bucks and Chiltern plan area. The assumption that 541 windfall units will be delivered within a 500m to 5.6km radius of the SAC would therefore appear to be proportionately too high. We suggest that this figure is reduced (or at the very least explained) and the total cost per dwelling contained in Table 3.1 recalculated accordingly. In respect of the 165 units relating to a current planning application at Taplow. It is unclear whether permission on this site has already been granted. If permission has already been granted it is unclear how the financial contribution would be acquired from this development through a Section 106 agreement. If this is the case and planning permission has already been granted, these 165 units should be removed from the total figure of 2,364 dwellings and the total cost per dwelling contained in Table 3.1 recalculated accordingly. Similarly, the 58 dwelling units identified at smaller HELAA sites should also be reviewed and those which have already been granted planning permission should be removed from the total dwelling figure and the total cost per dwelling contained in Table 3.1 recalculated accordingly. It is important to ensure that the total required contributions can be obtained in order that the Mitigation Strategy can be properly implemented. This is the only way to ensure</p>
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					that the adverse impact of future proposed development upon the integrity of the SAC can be avoided.
Beaconsfield Society (Agent: Mr Alex Roberts, DLP Planning)		404	<p>Firstly, we note that the SPD is not identified in the South Bucks and Chiltern Joint Local Plan Local Development Scheme (April 2019). A Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended), which states that The scheme must specify the documents which are to be local development documents and which documents are to be development plan documents. As the SPD is not mentioned in the LDS its status in relation to the wider development plan is not clear. Secondly, we question the timing of this SPD and the fact that many of the matters it deals with (such as the calculation of financial contributions) relate directly to policies contained within the emerging South Bucks and Chiltern Local Plan, which has not yet progressed through Examination and as such may be subject to change, which would in turn have implications for this SPD. Furthermore, the Sustainability Appraisal for the Local Plan has also not yet been finalised (as the plan is still progressing through Examination) and as such, because the Local Plan has not yet been found sound this SPD cannot rely on the justification that the Publication Chiltern and South Bucks Local Plan have already been subject to full Sustainability Appraisal (including SEA) and assessed as having no significant environmental effect (paragraph 1.4.4, Draft Burnham Beeches SPD) as justification for why the SPD does not require a SEA. We would therefore expect this SPD to be prepared alongside the emerging Local Plan, and not adopted before the emerging Local Plan has been. Thirdly, we note a lack of consistency between the mitigation measures contained in the SPD and those referenced in Policy DM NP3 and Policy SP BP9 of the emerging South Bucks and Chiltern Local Plan. The Draft SPD is therefore currently in conflict with regulations 8(3) to 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 which state that: (3) Any policies contained in a supplementary planning documents must not conflict with the adopted development plan (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.</p>		

Notwithstanding these initial concerns, the remainder of this report comments on certain aspects of the Draft SPD with the intention of ensuring that when it is adopted the SPD is a robust planning document that can be effectively implemented in the determination of future planning applications and agreement of future planning obligations (or infrastructure levy contributions). For ease of reference, these representations are broadly structured to relate to the relevant sections of the Draft SPD. In this regard, the representations will identify which part of the SPD we would like to comment upon, and where possible and appropriate we identify what changes to the Draft SPD we believe are required. These representations also comment on the Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) screenings of the SPD that have been undertaken by the Council, as well as other supporting documents where relevant, including the Hydrology Report (2014) and Recreation Report (2019). SECTION 1 INTRODUCTION 1.1 Burnham Beeches Special Area of Conservation in paragraph 1.1.2 it would be useful to include a map identifying the extent of Burnham Beeches SAC that is public open space. This is the area of the SAC that is most under threat from increased visitor numbers and is also the area identified as containing the main features of importance for nature conservation (paragraph 1.1.3). It would therefore be useful to identify how large this area of the SAC is in hectares so that the potential impact upon this area of the SAC from increased visitor numbers can be better represented and understood as forming the context for the SPD. Paragraph 1.1.7 states that the HRA1 that was prepared to support the emerging Chiltern and South Bucks Local Plan sets out the requirement for a mitigation strategy to avoid adverse impacts on site integrity at Burnham Beeches SAC. This paragraph goes on to state that Subject to the implementation of this strategy, the HRA concluded that there would be no adverse impact on the integrity of Burnham Beeches SAC because of public access and disturbance. However, the HRA identifies a number of other mitigation measures in addition to those identified in the Draft SPD, such as the requirement for SANG provision (paragraph 8.5.5, Report to Inform HRA, June 2019) and Air Quality Mitigation Scheme (paragraph 5.12.7, Report to Inform HRA, June

2019). These are notably missing from the Draft SPD. Indeed, paragraph 8.5.5 of the Report to Inform HRA states that the 2019 Footprint Ecology Report sets out a number of mitigation measures that should inform the Access Management Scheme. This list includes: Measures relating to increased footfall, erosion, general wear and tear. These include repair and maintenance of paths and car parks and management of entrances. Dealing with litter and waste through the provision of dog waste bins and staff time to deal with litter collection and fly-tipping. Interpretation and events to raise awareness about the site and influence behaviours. Other aspects relating to increased visitor number impacts such as specialist veteran tree management and livestock management. Monitoring to update and inform future mitigation intervention. Provision of SANGs to provide alternative recreational and green space to relieve public access pressures on the SAC. All of these above measures are included in the SAMMS within the Draft SPD with the notable exception of the SANG provision (which is a requirement of Policy DM NP3 and Policy SP BP9 in the emerging South Bucks and Chiltern Local Plan). Therefore, the mitigation measures outlined in the Draft SPD are insufficient to avoid an adverse impact on the integrity of the Burnham Beeches SAC. The Draft SPD should be amended to include reference to the requirement for SANG provision (further commentary on this point is provided in section 4(c) below).

1.2 Purpose and scope of the SPD

Paragraph 1.2.1 states that 'This Supplementary Planning Document (SPD) sets out a mitigation strategy required to avoid adverse public access and disturbance impacts from development on the integrity of the Burnham Beeches SAC'. However, as noted above, the mitigation measures outlined in the SAMMS are not comprehensive and do not represent the full range of mitigation measures necessary to avoid adverse impacts from development on the integrity of the Burnham Beeches SAC, including those referenced in Policy DM NP3 and Policy SP BP9 of the emerging South Bucks and Chiltern Local Plan. The Draft SPD is therefore currently in conflict with regulations 8(3) to 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (outlined in paragraph 1.7 above). The SPD should therefore be amended to include reference to SANG provision and air quality mitigation, as outlined in the Draft Local Plan policies and supporting HRA

(further commentary provided in section 4(c) below). Paragraph 1.2.1 states that the Wycombe Local Plan has its own mitigation strategy for growth in the western planning area. It is unclear how Wycombe's mitigation strategy has been taken into account or informed the development of this Draft SPD. The Wycombe District Local Plan Revised HRA (January 2019) states in paragraph 5.21: In a letter to Wycombe District Council dated 1 February 2013, Natural England advised that Chilterns Beechwoods SAC and Burnham Beeches SAC should be considered under the Duty to Cooperate, in particular as both SACs may be subject to recreational impacts from new developments within Wycombe District. At the time, Natural England suggested that if this turned out to be the case mitigation of this effect would likely to be most effectively dealt with in cooperation with other local planning authorities similarly affecting these SACs. The Burnham Beeches SPD that has been prepared by Buckinghamshire Council should be revised to explain in greater detail how the mitigation measures previously introduced by other former authorities that now form part of Buckinghamshire Council, including Wycombe District Council, have been taken into account and informed the development of this SPD.

1.3 Spatial policy framework We have no comments to make on this section.

1.4 Sustainability Appraisal of this SPD In reviewing the SEA Screening Report that has been prepared in support of the Draft SPD, we are content that SEA Screening procedures have been followed correctly, including taking account of comments from statutory consultees. One minor comment is that Section 1.4 of the SPD should be retitled Strategic Environmental Assessment of this SPD as it relates to the SEA rather than the Sustainability Appraisal.

1.5 Habitats Regulations Assessment of this SPD We have no comments to make on this section.

1.6 Consultation We note that the submission of comments via the Consultation Portal are limited to Section 2 Background, Section 3.3 Strategic Access Management and Monitoring Strategy, Section 8 Appendix 1 (a), Section 9 Appendix 1 (b) and Section 10 Appendix 1 (c) of the Draft SPD only. It should be possible for comments to be made on all sections of the SPD.

SECTION 4 IMPLEMENTATION AND REVIEW Implementation We note that the intention is for the financial contributions to be acquired through a S106 legal

agreement. Such planning obligations will need to be in accordance with regulation 122 of the Community Infrastructure Levy Regulations 2010 which states that: A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development. We question how the SPD will ensure that the Council can consistently meet these regulatory requirements in its request for financial contributions towards SAMMS, particularly if the requirement for mitigation is not always known until a planning application is submitted. The cost of delivering mitigation would also need to be calculated at the time the S106 request is made, which does not appear to have been considered in the Draft SPD. In Paragraph 4.1.2 we support that the contribution sums are subject to an inflation related clause. Review and Monitoring We support the proposed approach to monitoring and review of the Mitigation Strategy within the Draft SPD. CONCLUSIONS Our representations presented in this report refer to both the legal compliance and conformity of the SPD with the wider development plan, and the content of the SPD itself. In respect of the legal compliance and conformity of the SPD our concerns may be summarised as follows: The Burnham Beeches SPD is not identified in the South Bucks and Chiltern Joint Local Plan Local Development Scheme (April 2019). A Local Development Scheme is a requirement under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended), which states that The scheme must specify the documents which are to be local development documents and which documents are to be development plan documents. As the SPD is not mentioned in the LDS its status in relation to the wider development plan is therefore unclear. The timing of this SPD is premature as it relates directly to policies (notably Policies DM NP3 and SP BP9) contained within the emerging South Bucks and Chiltern Local Plan, which has not yet progressed through Examination and as such may be subject to change, which would in turn have implications for this SPD. The Draft SPD also relies on the Local Plan having been subject to full Sustainability Appraisal (including SEA) as a justification for why the SPD does not require a SEA. However, the Local Plan has not yet

been found sound and therefore this justification is not valid. There is a lack of consistency between the mitigation measures contained in the Draft SPD and those referenced in Policy DM NP3 and Policy SP BP9 of the emerging South Bucks and Chiltern Local Plan (notably the lack of reference to SANG provision and air quality mitigation measures). The Draft SPD is therefore currently in conflict with regulations 8(3) to 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and as such is not legally compliant. Our other main concerns regarding the content of the Draft SPD may be summarised as follows: The SPD should include reference to the requirement for SANG provision (as detailed in Policy DM NP3 and SP BP9 of the emerging South Bucks and Chiltern Local Plan), as this forms a key part of the mitigation strategy necessary to ensure the integrity of Burnham Beeches SAC is retained. As a minimum, the SPD should include details of where the SANG will be provided, what size of SANG provision is required and how it will be delivered. The SPD should include reference to the requirement for an Air Quality Mitigation Scheme (as detailed in Policy DM NP3 of the emerging South Bucks and Chiltern Local Plan) as this forms a key part of the mitigation strategy necessary to ensure the integrity of Burnham Beeches SAC is retained. The SPD should make clear reference to the mitigation measures previously introduced by other former authorities that now form part of Buckinghamshire Council (including Wycombe District Council) and explain how these have informed the development of the measures contained within this SPD. The SPD should take account of the impact of increased visitors from sources other than new residential development (including employment use, natural population growth and increased domestic tourism).
There is inconsistency between the 400m zone of 'presumption against development' contained in emerging Local Plan Policy DM NP3 and the 500m zone identified in the Draft SPD. The Council should consider how and whether it is possible to amend the emerging Local Plan to ensure the two documents are not in conflict. The Council should review the total dwelling figures contained in Table 3.1 to remove any units for which planning permission has already been granted, as it will not be possible to retrospectively obtain financial contributions from these schemes. Section 4.1 of the SPD should be amended to provide detailed

			clarification on how the Council will ensure that the regulatory requirements regarding S106 legal agreements will be consistently met, particularly given that the cost of delivering mitigation would need to be calculated at the time each S106 request is made. In conclusion, we believe that the contents of the SPD should be amended in response to the above-noted concerns to ensure there is no conflict between the SPD and the emerging South Bucks and Chiltern Local Plan policies. The adoption of the Burnham Beeches SPD should also be delayed until the South Bucks and Chiltern Local Plan has progressed sufficiently through the Examination process so as to ensure that the policies contained within the SPD will be in full conformity with the Local Plan once it is adopted.		
A F Blake-Pauley		412		The concerns about the threats to the integrity of Burnham Beeches are well set out in Section 2 of the SPD. It is a pity that the Directorate has not undertaken the task of doing so out of any genuine concern for the habitat itself, but as it states without compunction the SPD aims to address both the requirement to avoid, or mitigate, adverse impacts on the integrity of Burnham Beeches SAC from local plan led development as set out in the Chiltern and South Bucks Local Plan. It is also a pity that the Directorate did not acknowledge at that point in the SPD that there is the possibility that the dCSBLP may never emerge from its present state of limbo.	
Neil Richardson		402			On the wider question of funding mitigation measures to which new housing in the 500m -5.6 km zone would be expected to contribute not all alleged public access and disturbance issues are to be laid at the door of new housing. It is reasonable therefore that the cost of some of this funding should be footed by visitors to BB not associated with new housing.
Miss Jessica Graham	Senior Planner Savills (UK) Limited	394			2. PROVISION OF SANG 2.1 Paragraph 3.1.4 of the consultation SPD states that the Mitigation Strategy for the Chiltern and South Bucks Local Plan (July 2019) now comprises two components: i, Presumption against residential development with(in) 500m of Burnham Beeches SAC; and i, Financial contributions (set out in Table 3.1) from all net new residential development within a defined zone of influence (500m - 5.6km) towards a Strategic Access Management and Monitoring Strategy (SAMMS) at Burnham Beeches SAC. 2.2 In the draft version of the Strategy (Paragraph 3.1.1) which was first shared in February 2020, a third component was stated: i, Provision of Suitable Alternative Natural Greenspace (SANG) at the strategic allocation at Beaconsfield (Local Plan Policy SP BP9). 2.3 All references to the requirement to provide SANG have thus been removed from this latest version of the Mitigation

					<p>Strategy, except in Table 1.1: Policy Context for SPD, where reference to Policy SP BP9 Building - Beaconsfield remains, with the comments stating: The policy requires development to provide suitable alternative natural greenspace for recreation to mitigate the potential recreational disturbance impacts on Burnham Beeches SAC. 2.4 Clarification is therefore sought whether the landowner/ developer group can offer a bespoke SANG on or adjacent to its site in lieu of financial contributions to SANG. If the allocation site provides a SANG, would it still be expected to make SANG payments as well, in accordance with Table 3.1 of the SPD, at a cost of £2,023.87 per dwelling, or at a reduced rate, if the SANG provided was deemed to mitigate the effects of the development on the SAC? Policy BP SP9 allows for approximately 1,600 homes, thus the SANG payment would be in the region of £3,238,192 (assuming that SANG payment would not be levied against other land uses). Whilst the landowner/ developer group is more likely to pursue SANG contributions rather than the provision of SANG, the SPD ought to be clear if SANG contributions and SANG provision would be mutually exclusive, so that SANG contributions would not be sought in the event that SANG was provided and vice versa. 2.5 It is noted Paragraph 3.2.1 of the SPD states the following: If the contribution is not agreed by the applicant and the applicant cannot satisfy the Council and Natural England that their alternative would have the same or better mitigation success than the Council's mitigation strategy, then the Council's standard Appropriate Assessment attached as Appendix 1 (c) applies. 2.6 Confirmation is subsequently requested that no SANG payment will be required if the land allocated at Policy SP BP9 provides a bespoke SANG designed and secured to Natural England's and/ or Buckinghamshire Council's satisfaction. 3. SANG CONTRIBUTION 3.1 Further clarity is sought over the interval between reviews of the Mitigation Strategy. Paragraph 4.1.2 suggests that S106 monies will be subject to an inflation related clause, but it is unclear if this is an annual review or five yearly (as stated at paragraph 3.1.3). Paragraph 4.1.2 goes to state that the costs of individual components may be reviewed as part of the annual update based on the outcomes of individual project evaluation, which again is contrary to the five-year review period stated in paragraph 3.1.3. It is also unclear at what interval the housing numbers (which determine the cost per dwelling of the SANG contribution) will be reviewed. 4. HOUSING NUMBERS 4.1 Housing numbers in the consultation Mitigation Strategy have increased to 2,364, from the draft version of the strategy of 1,658. The draft version suggests that 1,658 represents the</p>
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					<p>allocation at BP9 (policy provision for 1,600 houses), plus HELAA sites. It is our understanding that no viable HELAA site(s) is(are) currently being promoted within the 5.6km zone, therefore confirmation is sought on which HELAA site(s) is(are) being referred to in the SPD? Any upward revision in the housing numbers would be welcomed by the landowner/ developer group as this would lower the SAMM cost per dwelling in this area, therefore queries regarding housing numbers are raised to enable a better understanding of how they have been derived. 4.2 In addition to the allocation at BP9 and potential HELAA sites, the consultation Mitigation Strategy attributes the 706 increase in housing numbers to existing applications and windfalls. These existing applications are not identified. Therefore, it is unclear what proportion of the 706 units are accounted for by existing applications and how much is estimated to be attributable to windfalls. If existing applications are expected to pay SAMM contributions, this assumes that any Section 106 agreement/CIL payment has not been finalised. We assume that SAMM contributions cannot be sought retrospectively. 4.3 The SPD suggests that SAMM contributions will be payable on all housing applications within 5.6km of the SAC, even single dwellings (windfalls), with no minimum size of development being exempt. This should be more clearly stated. 4.4 The landowner/ developer groups previous response to the draft version of the Mitigation Strategy raised queries about the impact upon the level of the SAMM tariff with potential increases in development arising within Slough Borough Council area. We still query whether a realistic assessment has been made of the likely pipeline of development not only in Buckinghamshire, but also in Slough, over the life of the Mitigation Strategy, which has such an important bearing on the per dwelling contribution. The potential for reviewing the per dwelling contribution if further development is proposed should be stated and the proposed intervals between those reviews also defined. 5. CONCLUSIONS 4 Beaconsfield East and South Eco/Reps to BB SAC SPD/953.1/V3/CM/1 September 2020 5.1 The landowner/ developer group with interests in the land allocated at Policy SP BP9 Beaconsfield seek clarification of the following issues within the draft Burnham Beeches SAC Strategic Access and Mitigation Strategy SPD: i. In light of the removal of all references to SANG (except in Local Plan Policy SP BP9), confirmation is sought as to whether the provision of a bespoke SANG in lieu of the SAMM contributions is an option to mitigate site SP BP9s impact on the SAC. ii. If the SANG provided was deemed to mitigate the effects of development at south and east of Beaconsfield on the SAC, would SAMM contributions</p>
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				still be required and/or would SAMM contributions and SANG provision be mutually exclusive? i, Request that the review mechanisms for project costs and housing numbers are more clearly defined.
Dr Bob Newell		392	<p>Practical Consequences of the SAC: From Fig 2.1, the 5.6k so-called 'Zone of Influence' can be seen to cover areas stretching across Buckinghamshire and Berkshire. In a Northerly direction - it encompasses an area including and beyond Beaconsfield. In a Southerly direction, it effectively encompasses the whole of Slough. In an Easterly direction, it goes out to the M40/M25 interchange. And in a Westerly direction, it encompasses such areas as Bourne End and Flackwell Heath. Here, the Council is effectively saying Burnham Beeches is potentially adversely affected by all households in this area, and further that any new development in these areas must pay for mitigation. The Council's assumptions are simply untrue. Such a wide area could not conceivably pose such a risk. And the Council has no evidence to support any consideration to the contrary. The drawing of such a wide area into the considerations will result in Legal Agreements being required in most situations which simply do not, and could never, justify them. The time, effort, delay and cost involved in this is not only unjustified it is unjustifiable. The Council's proposals therefore present as an entirely unjustified money-making scheme, with no practical justification. In reality, households in the areas within the 5.6k have a very wide range of recreational opportunities, which would render Burnham Beeches well down the list of places to visit. Even locally to Burnham Beeches, such areas as Black Park are a much more logical dog exercise proposition than is Burnham Beeches. The document mentions dogs in many places within the text. However, the Council obviously hasn't carried out any real research to discover the actual potential number of dogs or whether, in point of fact, they actually cause an issue in terms of a threat to Burnham Beeches. It is my proposition that to liken Burnham Beeches to the Thames Basin Heaths scenario represents a death-defying leap of logic, totally devoid of any evidence, and completely unrelated to reality. Further, it has practical consequences which the Council, self-evidently, could never have considered. As with the Chiltern and South Bucks Local Plan, the proposals are devoid of a credible evidence base. Can the 500m 'Presumption Against Development' be justified? There is no practical evidence to suggest that this measure is in any way warranted. Again, it is a measure which has simply been 'lifted' from elsewhere, with little attempt to justify it. I don't believe that it can in any way be justified. Also, the document purports to have its roots in Core Policy 9. However, this Policy simply does not represent a reason for the Council's actions here. Further, the document mentions the Draft Chiltern and south Bucks Local Plan, which the PINS Inspectors have been very clear in stating is inadequate, and is expected to be withdrawn. Again, it is highly legally dangerous of the Council to assume that the Draft Plan will progress any further than its present state. It's self-evidently fatally flawed research and documentation process has</p>	

			<p>no business being the basis of any new Policy. I am advised that in its responses to planning applications in recent years resulting in net additional dwellings in Farnham Common within 500m of the SAC, Natural England are quoted as having no objections, for example: The current proposal to build additional dwellings in the developed area accords with the Core Strategy and the related screening statement. Natural England has consistently confirmed that this size of proposal will not adversely affect the SAC, in isolation or in combination with other developments. This is because there is no evidence that such developments adversely impact on the special features that have resulted in the SAC being designated, those being the acid beech forest, its shrub layer and the habitat for invertebrates and epiphytes that it provides. In these circumstances the Council does not consider there will be any likely significant effect on the SAC. As there is no likely effect on the SAC, no further Appropriate Assessment under the Habitat Regulations needs to be undertaken and Natural England do not currently consider an analysis under the Habitats Regulations necessary with respect to this size of development. Therefore, despite the objection from the City of London it is not considered that an objection could be sustained on the basis of the proposal's impact on this important natural asset. It is not clear why Natural England's approach would have changed here, when recent evidence points to the fact that all the various existing mitigation methods are effective. Natural England's SSSI Condition Summary apparently shows that 62.63% of the SSSI is in favourable condition, and the minority remainder that is unfavourable is all recovering. None of the SSSI is declining, destroyed or even unchanging it is all either favourable or recovering. According to the evidence as presented, the current management regime is working well, and maintaining the condition of the subject area. As previously discussed, the Council very greatly over-plays the effect of dog walking, and with no scientific support for its assertions. The Council's stance shows scant acquaintance with the facts, and with other factors affecting the condition of the area. According to the Council, dog walking contributes to impacts upon the SAC and its survey document states that just over 60% of dogs arrived in cars with their owners. Residents walking into the site from within 500m of the SAC could therefore not be significant contributors to recreational pressure because, according to the 2015/16 visitor survey, there are far less visits of this type, and these visits do not contribute to air pollution from car travel and; they are less likely to bring dogs to the SAC. The Council's rationale is therefore in error. Along with other contributors, I believe that the related to frequency of visits is in direct conflict with the Footprint Ecology work which says that more visits arise from within 500m of the site. This conflict between the evidence bases casts doubt upon the reliability of the evidence as a whole. The proposals cannot therefore be Adopted, given this obvious evidential inconsistency. As with other respondents, I also query the Council's decision not to take into account the convenience of access to other nearby green spaces for recreation. As just one example, in Farnham</p>	
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				<p>Common residents of many locations within the 500m zone would find it more convenient to access Brockhurst Wood to the East rather than Burnham Beeches to the West. As with other respondents, I note for example that in Guildford BC it is also possible to undertake an Appropriate Assessment (AA) to demonstrate that the proposals will not have an adverse effect on the SPA. It is therefore logical that proposals within the Burnham Beeches buffer zone should be able to carry out their own bespoke AA as an alternative to the one provided in the SPD which entirely precludes development of net new dwellings. A blanket ban on the development of new homes within a 500m radius would, on the evidence, not be likely to have a significant impact upon visitor levels. Like other respondents, we note that with nearly 70% of the 551400 visitors each year arriving by car, any impact from the proposed SPD upon the numbers walking in from within 500m would, in point of fact, be inconsequential. My consideration, on the evidence, is that the existing mitigation measures are entirely effective.</p>	
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Full Name	Organisation Details	ID	Appendix 1 (a) - Do you have any comments on Appendix 1 (a) - Appropriate Assessment Less than 500 metres?	Appendix 1 (b) - Do you have any comments on Appendix 1 (b) - Appropriate Assessment Developer Will Pay?	Appendix 1 (c) - Do you have any comments on Appendix 1 (c) - Appropriate Assessment Developer Will NOT Pay?
Mr John Bailie		12			Agree with Section 4 - Conclusion
Mr John Bailie		14	I agree with the comment from Natural England in Section 7, in which they state that, "the words 'no net new' should be included within section 3.2.1".		
Mr Colin Parker		67			I concur with Buckingham Council's reason for refusal as set out at 5. in the SPD
Mr Adrian Blackburne		2		<p>If I have interpreted correctly, the proposal is for a flat rate per 'home' but clearly the impact that each home could have will depend on the number and type of occupants. For example an over 55s retirement home clearly will have less potential impact than a 5 bed family home. I can understand wanting to keep the formula simple but I would argue a per home rate is too simplistic. A common approach (e.g. for rebuild cost estimation, insurance quotes) is to consider the bedroom count as this is a fundamental property of housing and is known in all cases. As an example, suppose the average number of bedrooms per home is 2.5, this would give a total bedroom count of $2,364 \times 2.5 = 5,910$. Hence the fee per bedroom would be £809.55. This way the cost to the developer of a 2 bed home would be £1619.10 but to a 5 bed home developer would be £4,047.75. This is a much fairer and proportional approach.</p>	
Mr John Bailie		13		<p>Agree with the concept of a Strategic Access Management and Monitoring Strategy Contribution However, I feel that it should not be charged per property but per (say) bedroom, as this is likely to be a better measure of the number of individuals living in the new property and therefore a better measure of the likely impact on Burnham Beeches</p>	

Mr Malcolm Butwick		23	The HRA is not realistic in terms of distance and vicinity especially if consideration is to be given to the proposed 20,000 sq. ft development to the East of Beaconsfield - with all the additional baggage. The SAMMS must consider the possibility of future proposed development under the NFPP SANG (Suitable Alternative Green Space) is a vital ingredient in today's world To use a popular acronym BLM ! Burnham (Beeches) Land Matters !!		
Mr Colin Parker		68	I concur with Buckingham Council's reason for refusal as set out at 5. in the SPD		
Mr William Smith	Senior Planning Manager Berkeley Strategic Land Ltd	45	We are concerned about the change from 400m originally proposed and 500m now proposed as this is not properly justified and could unduly restrict much needed housing development in the future. Please refer to earlier comments and accompanying report by Aspect Ecology.		
Mr Peter Baxter		32	Can I first say that as this whole document is so complex it would be better for individuals if you were to provide a short summary in layman's terms. As a volunteer litter picker in the Beeches I believe the 500 metre and the 5.6 kilometre rule should be extended to a kilometre and 10 kilometres respectively to fully encompass Stoke Common and the new country Park. The use of the Beeches should also be encouraged for local people only as after the Covid lock down we found a surge of new people using the Beeches and while their need to get out into country space can be appreciated unfortunately, they were in the main the type of people who left heaps of rubbish behind. The dog enforcement should be maintained with much higher fines for people dropping poo bags or allowing their dogs to foul without cleaning up. Minimum £3,000.00 increasing to £5,000.00 if not paid within 14 days. We have witnessed other dogs, children and livestock being attacked by dogs not under supervision and frankly once the owners come into view all becomes very clear. I believe it is important to include the A355 within the consultation as this road contributes substantial environmental damage on a continuous basis and should be redefined as a B road with a weight restriction for lorries and a 20mph speed limit through Farnham Common.		
Mr Hamish Broom		55		I do not think any amount of financial mitigation can save the precious environment of the Beeches. Simply put there must be now new development within the 5.6k radius of the Beeches. No amount of money can compensate for what would be lost. We want to enjoy the outdoors and be with	

				nature in harmony, no amount of money can offset the absence of this. Please do not allow the developers to proceed. As a local resident who walks regularly in the Beeches, I want the Council to continue to protect these areas and their surroundings from development for now and the future. I worry that the Council and its planners have more of a sympathetic ear to developers than the general public, the lack of any reference to Air Quality Management Strategy in this document, is evidence to me, that our needs as local people are not being considered properly.	
Mr William Smith	Senior Planning Manager Berkeley Strategic Land Ltd	46		In line with earlier comments whilst we consider the proposed 500m restriction on all residential development is not justified we support the use of SAMM contributions to provide mitigation. Further explanation is set out in the accompanying paper by Aspect Ecology which is submitted via email alongside this response.	
MR FRANK ABE		35	Totalling agree with the views of Historic England on the emerging Burnham Beeches Special Area of Conservation Area Mitigation Strategy Supplementary Planning Document 2020 and associated SEA Screening Document however although they conclude that there is no requirement for an SEA, it is important that future assessments should take into account impacts from wider activities beyond 500 meters i.e. negative externalities e.g. effect on air and water quality.		
Mr Hamish Broom		54	500m is far too close for housing development to be near to Burnham Beeches, it seems this is recognised by the Council. The Council and its planners are trusted by us the public and residents of this area to do the right thing and protect areas such as Burnham Beeches from developments that would harm these unique areas. Please do not relent or give way on your obligations or responsibilities, we are counting on you , for the benefit of the community and the wild life in the Beeches to prevent any changes in the regulations which would be to the detriment of the environment as we know it today.		
Mr Hamish Broom		56			Have you taken into account the impact on Burnham Beeches from the 20,000 sq ft of commercial space the Council are proposing for Beaconsfield? I am not sure that it has been fully discussed and considered. The amount of extra road usage and potential environmental and air pollution coming from this new complex of commercial units, will only bring more strain on the natural environment. Its not going to be possible for animals, wild life, vegetation, trees and woods of this area to be unaffected by a new development such as this. I have already mentioned the absence of a Air Quality Management strategy, I wonder if this is the only thing missing? I do not regard the point being will developers pay or will they not, this is missing

					the more important issue of lasting damage to the environment, which will happen over time and unfortunately can never be reversed!
Mr David Hart		62		This proposal would require a relatively small cost for any applicant for planning permission within this 500 meter to 5.6 Kilometre zone, the £2023.87 contribution to the SAMMS for each net house is insignificant compared to the high cost of any new developments within the Beaconsfield part of this zone. The fees to the Council plus legal expenses would also be insignificant for a large development. I understand that the current requirement is to provide suitable natural alternative green space to replace that lost due to housing and other development allowed in the 500 metre to 5.6 kilometre zone. The proposal therefore represent a very significant reduction due to this in the protection of the Burnham Beeches SAC. The loss of a green space in this zone due to development will inevitably result in increased pressure on the Burnham Beeches SAC if it is not mitigated by the provision of alternative natural green space. Based on this I must register my opposition to this proposal, unless this protection is maintained.	
Mr Stewart Carter-Roberts		64	We have lived in the Beaconsfield/Farnham Common Area for over three decades and have enjoyed raising our children with countryside surrounding our several homes. In that time we have seen a slow but relentless growth in housing stock and thus on families who have moved to these areas. This has led to considerable increases in pressure on schools, medical surgeries, transport links (Buses and Trains). Burnham Beeches now is so popular and visited by so many people and their vehicles that car parks are full, particularly at weekends. Frequently, dozens of cars are parked on the small outer beeches ring road. With additional housing and families this will further exacerbate an already deteriorating situation.		
Mrs Marie Elizabeth Hammon		65			I have been on Planning at Burnham Parish Council for the last fifteen years, and Chair for the second year. I believe that developers shall always pay. They shall upgrade their new builds to sell to higher purchasers and make them exclusive properties. We need to protect our area of Burnham Beeches and the surrounding area. We need to preserve the environment. Wildlife is at risk to the disruption and noise that shall be committed due to the work and the removal of natural areas. Owls are particularly sensitive to noise, small mammals shall be moved to less suitable areas, bats and insects that are all part of the natural cycle shall be impacted by this disruption. We need the balance of wildlife to sustain the introduced animals at Burnham Beeches. Peace and tranquillity has to radiate out from the centre of our ancient woodlands. The precarious balance has to be maintained. The air quality shall be significantly degraded by the production of more houses; and

					the people, walkers, visitors and dogs shall bring cars, pollution and degenerate the unique atmosphere of our natural spaces. Suitable Alternative Natural Green space (SANGS) should be provided to offset any development. These have not been consulted. Further development must be stopped, it is vital to preserve our inherited woodland for future generations as we are the keepers and custodians, and not the owners.
Mr Andy Barnard	City of London	96	The City Corporation supports the '500m presumption against development zone' and also the '500m to 5.6km zone' where a financial contribution by developers is required to mitigate the impacts of the new development. The City Corporation is content that the measures proposed are proportionate to the level of development proposed under the Local Plan		
Mr Neil Salisbury	Trustee CPRE Bucks	104		With regard to the funding, it is proposed to be provided largely through: All net new homes granted planning permission from 1 March 2020 will need to contribute towards the SAMMS Projects (Section 4.1.1). We feel a different funding model should be considered for protecting this SAC. Our reasons for this are: i, Requiring Section 106 (or CIL) funds from new houses within the 500m to 5.6km zone will tend to have the opposite effect to that which we believe should be the strategy. i, This effect of this proposal will be to push up the cost of homes that are near the SAC, making them less affordable and therefore making it harder for people to live near the SAC (adding to the dichotomy described above). The SAC should be there for all people, not just those that can afford to live close to it. We recognise local people are the most frequent users but we feel a different financial model should reflect the fact that the SAC is also there for people from London and from a much wider area generally.	
Mr Jonathan Harbottle		178	The 500m zone needs to be more flexible: The NPPF sets out at paragraph 177 that the presumption in favour of development does not apply where significant effects on a habitats site are likely, unless an appropriate assessment indicates there will be no significant impacts. This self-regulating aspect of the presumption in favour of sustainable development would be overridden by the blanket ban on net new dwellings within 500m of Burnham beeches. To be consistent with the NPPF the SPD should allow for appropriate assessments to be carried out on an individual basis to assess actual projects and whether they will affect the integrity of the SAC. The inclusion of land within the 500m buffer zone should have regard to the accessibility of the land to Burnham Beeches. Not all areas within the zone will generate the same trip level, due to the particular route from a dwelling, or potential dwelling, to the		

entrance of the SAC. The Footprint Ecology document refers to the Thames Basin Heaths among others as an example where an exclusion zone is in place and was found to be appropriate. It is notable that the distance in the case of all the other SAC/SPAs referenced is 400m and not 500m. In the case of the Thames Basin Heaths SAC, a more flexible approach is taken by some of the relevant LPAs, where it is possible for impacts on the SAC to be considered in relation to the actual accessibility to it and not simply a notional as-the-crow-flies distance. For example, in Guildford's SPD it is stated that 'In exceptional circumstances, it may be appropriate to modify the extent of this zone to take account of physical obstructions to access to the SPA. Barriers such as railway lines, waterways and major roads may restrict cat movement and human access to the SPA, allowing the exclusion zone boundary to be adjusted marginally. In these circumstances, each application will be considered individually on its merits and in consultation with NE. Whilst barriers such as railway lines may restrict human movements there is no evidence that they restrict cat movements. A similar approach is taken by Hart District Council in their Avoidance Strategy for the Thames Basin Heaths SPA. It would also be sensible to take account of the convenience of access to other nearby green spaces for recreation. For example in Farnham Common residents of many locations within the 500m zone would find it more convenient to access Brockhurst Wood to the east rather than Burnham Beeches to the west. In Guildford BC it is also possible to undertake an Appropriate Assessment (AA) to demonstrate that the proposals will not have an adverse effect on the SPA. Proposals within the Burnham Beeches buffer zone should be able to carry out their own bespoke AA as an alternative to the one provided in the SPD which entirely precludes development of net new dwellings. As set out in our comments on the Background section, it is too inflexible to automatically exclude all development in this zone. It should be possible to submit a bespoke Appropriate Assessment with a proposal in the zone and this may show that mitigation is possible or not necessary. As it stands this blanket ban would prevent local needs from being met through sustainable development even where it may be possible to avoid impacts upon the SAC. There are examples within other exclusion zones of appropriate development being allowed on appeal,

			one such example is appeal reference 3197635 at 122 Kings Ride, Camberley.		
Carol Linton		102			b. It is not clear when the developer will not pay (Appendix C). I would appreciate clarification, please
Mrs Rachel Ferguson		173			This is insufficiently legally binding to ensure that developers pay the amounts required. Developers evading their s106 obligations through inflating/reducing figures is commonplace, and there is no follow up to review whether estimated sale and purchase prices are actually achieved and hold them to account. This must happen in order for this approach to achieve its purpose.
Mrs Sue Moffat	Town Clerk Gerrards Cross Town Council	313	We do not think 500 metres is unreasonable, we ourselves want our Green Belt gaps around us to be protected.		
Mrs Sue Moffat	Town Clerk Gerrards Cross Town Council	315			We do not think 500 metres is unreasonable, we ourselves want our Green Belt gaps around us to be protected.
Mr Paul Stimpson	Planning Policy Lead Officer Slough Borough Council	210		Appendix 1(b) to the Draft SPD contains a pro-forma appropriate assessment where the applicant is prepared to pay the requisite contribution: it states that, provided the applicant has entered into a unilateral undertaking to secure the per dwelling contribution (as above) and BC's monitoring fee of £541.02, the related planning application will be deemed to be in accordance with the mitigation requirements for the SAC.	
Mr John Kirtland		380	10. The buffer zone of the Beeches is 5.6km. Development within 500m only is restricted but development from 501m is not. This position harms the Beeches. From the out of date Hydrology Report 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. The SPD is in complete conflict with this aim and creates dangerous potential for damage to the Beeches. 12. The Urban Development Report describes the Beeches as a small, isolated and vulnerable SAC. The SPD goes nowhere close to achieving any form of protection. 25. Development that is closer to the 500m exclusion zone should command a higher contribution.		
Brown Not Green Chesham Ltd		387		7. vi. The Council should review the total dwelling figures contained in Table 3.1 to remove any units for which planning permission has already been granted, as it will not be possible to retrospectively obtain financial contributions from these schemes. 7. vii. Section 4.1 of the SPD should be amended to provide detailed clarification on how the Council will ensure that the regulatory requirements regarding S106 legal agreements will be consistently met, particularly given	

				that the cost of delivering mitigation would need to be calculated at the time each S106 request is made.	
Alison Wheelhouse		383	<p>11. Para 3.6 of the Hydrology Report 2014 states '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'. The SPD does not aid this aim and creates dangerous potential for damage to the Beeches. The buffer zone of the Beeches is 5.6km. Development within 500m only is restricted but development from 501m is not. This all or nothing position harms the Beeches. 13. The 2019 Impacts of Urban Development Report references the emerging Local Plan which has not yet passed through public examination and has been heavily criticised. 14. The 2019 Urban Development Report on page ii describes the Beeches as a 'small, isolated and vulnerable SAC'. The SPD does not go nearly far enough in its protection. 23. Figure 3 in the Urban Development Report shows that the biggest amount of development on Green Belt land lies within 3 to 3.5km of the Beeches. This should be prohibited. 34. The closer the development to the 500m exclusion zone, the higher the financial contribution to SAMMS should be. 35. Contributions to SAMMS should be excluded from inclusion in viability reports for development schemes. 36. How will inflation be dealt with in relation to cost of SAMMS projects in the SPD? 37. How will SAMMS projects be reviewed to ensure they remain fit for purpose? 38. How will new SAMMS projects be introduced when necessary? 39. It is not clear how it has been determined that the range of mitigating measures and their costs is proportionate or adequate to the impacts of developments within certain radii of the Beeches. 40. The government's adoption of environmental net gain principles seek to improve the environment not simply mitigate adverse impacts. It is not clear how SAMMS would allow for net gains? 41. How is it that developments within 500m are completely unacceptable but those within 501m are acceptable provided developers pay into the scheme? There should be a gradation. 42. The cost seems to have been calculated based on local plan developments but what happens to the cost if further developments come forward making more of an adverse impact? What measures would this extra cost fund and who</p>		

			decides those measures and how would their effectiveness be measured?		
Mrs Sue Moffat	Town Clerk Gerrards Cross Town Council	314		We do not think 500 metres is unreasonable, we ourselves want our Green Belt gaps around us to be protected.	
Mr Paul Stimpson	Planning Policy Lead Officer Slough Borough Council	209	Appendix 1(a) to the Draft SPD contains a pro-forma appropriate assessment for planning applications for residential development within 500m of the SAC, including a proposed reason for refusal.		
Mr Paul Stimpson	Planning Policy Lead Officer Slough Borough Council	211			Appendix 1(c) to the Draft SPD contains a pro-forma appropriate assessment where the applicant will not pay the contribution and has not provided an alternative solution that is agreeable to BC and Natural England, in which case it advises that the application must be refused and a reason for refusal is set out in the appendix. This ties in with paragraph 3.2.1 of the Draft SPD, which states that if the contribution is not agreed by the applicant and the applicant cannot satisfy the Council and Natural England that their alternative would have the same or better mitigation success than BC's mitigation strategy, then the application must be refused.
Mr Dennis Elsey		399		Appendices 8, 9 & 10 delete and replace in accordance with other comments.	
Beaconsfield Society (Agent: Mr Alex Roberts, DLP Planning)		409		Appendices: Appropriate Assessments In Appendix 1(b), the final paragraph on page 27 should be amended to state that such applications and permitted development can only be permitted if the applicant enters into a legal agreement with Council, as Local Planning Authority, to pay towards Buckinghamshire Council's Strategic Access Management and Monitoring Strategy; to contribute towards the Air Quality Mitigation Strategy; and in the case of the development of Site SP BP9, to provide Suitable Alternative Natural Greenspace (SANG). References to SANG and Air Quality Mitigation Scheme should also be added to section (a) Fees and Mitigation of Appendix 1(b).	
Mr Norman Dossett		319	I wish to register my objections to the Draft July 2020 document from Buckinghamshire Council because the document is a distraction from the real issues impacting Burnham Beeches (SAC) from the proposal to build 1600 extra homes nearby. 1 The mitigation strategy dealing with developments within 500m of the boundary with Burnham Beeches lacks any credibility. The document states that net new homes should be avoided (reasons for refusal Appendix 1a). This statement does not prohibit development whatsoever. Additionally, by focusing on net new homes it allows a cottage to be replaced by a mansion. The impact on the SAC will obviously be greater from more people living in a larger house. This strategy has no teeth to prevent further damage to the SAC.		

Mr Norman Dossett		321			The mitigation strategy for the area between 0.5 and 5.6KM also lacks credibility. The simplest solution to restrict footfall in the SAC would be to increase the car parking fees. The City of London could do quickly. Instead of which the proposal is for a multi-layered series of projects designed to monitor and advise people to relocate their activities outside of the SAC. This will fail for the following reasons: It requires funding from the developer(s) of £2023 per house built. Appendix 1b states if paid. There is no obvious sanction or ability to enforce a developer in the document to contribute to this strategy. This proposal is put forward by the same group (now within Buckinghamshire Council) that has failed to get the current developer of the MOD site (Inland Homes) in Beaconsfield to agree to open their land to complete the Beaconsfield relief road from the A355 to Pyebush roundabout. Having failed to demonstrate any control over developers for the relief road; the document would have us believe that the council could do better next time but they don't say how! The SAMMS project 2 (Table 3.1) wants to raise awareness of alternative places to visit. This is laudable BUT the proposal to build 1600 extra houses on the greenbelt will take away existing footpaths and greenbelt already used for recreation and by dog owners. The document does not suggest where either the new or existing displaced recreational users may relocate to especially as the Buckinghamshire Council is proposing to build on the green belt and on existing recreational facilities.
Mr Dennis Elsey		398	Appendices 8, 9 & 10 delete and replace in accordance with other comments.		
Mr Dennis Elsey		400			Appendices 8, 9 & 10 delete and replace in accordance with other comments.
Mr Alex Dalton	Land and Partners	406	The 500m zone needs to be more flexible The NPPF sets out at paragraph 177 that the presumption in favour of development does not apply where significant effects on a habitats site are likely, unless an appropriate assessment indicates there will be no significant impacts. This self-regulating aspect of the presumption in favour of sustainable development would be overridden by the blanket ban on net new dwellings within 500m of Burnham beeches. To be consistent with the NPPF the SPD should allow for appropriate assessments to be carried out on an individual basis to assess actual projects and whether they will affect the integrity of the SAC. The inclusion of land within the 500m buffer zone should have regard to the accessibility of the land to Burnham Beeches. Not all areas within the zone will generate the same trip level, due to the particular route from a dwelling, or potential dwelling, to the entrance of the SAC. The Footprint Ecology document refers to the Thames Basin Heaths among others as an example where an exclusion zone is in place and was found to be		

			<p>appropriate. It is notable that the distance in the case of all the other SAC/SPAs referenced is 400m and not 500m. In the case of the Thames Basin Heaths SAC, a more flexible approach is taken by some of the relevant LPAs, where it is possible for impacts on the SAC to be considered in relation to the actual accessibility to it and not simply a notional as-the-crow-flies distance. For example, in Guildford's SPD it is stated that 'In exceptional circumstances, it may be appropriate to modify the extent of this zone to take account of physical obstructions to access to the SPA. Barriers such as railway lines, waterways and major roads may restrict cat movement and human access to the SPA, allowing the exclusion zone boundary to be adjusted marginally. In these circumstances, each application will be considered individually on its merits and in consultation with NE. Whilst barriers such as railway lines may restrict human movements there is no evidence that they restrict cat movements.' A similar approach is taken by Hart District Council in their Avoidance Strategy for the Thames Basin Heaths SPA. It would also be sensible to take account of the convenience of access to other nearby green spaces for recreation. For example in Farnham Common residents of many locations within the 500m zone would find it more convenient to access Brockhurst Wood to the east rather than Burnham Beeches to the west. As shown in the OS map below, the area is laced with footpaths suitable for recreational use which do not enter the SAC. In Guildford BC it is also possible to undertake an Appropriate Assessment (AA) to demonstrate that the proposals will not have an adverse effect on the SPA. Proposals within the Burnham Beeches buffer zone should be able to carry out their own bespoke AA as an alternative to the one provided in the SPD which entirely precludes development of net new dwellings. Hydrology: Potential hydrological impacts should have some influence upon the zone precluding development of additional net dwellings. Some areas are unconstrained in this respect whereas others within the zone would have hydrological implications, and clearly the former should be considered more favourably.</p>		
Beaconsfield Society (Agent: Mr Alex Roberts, DLP Planning)		410			<p>Appendices Appropriate Assessments In Appendix 1(c), the final paragraph on page 27 should be amended to state that such applications and permitted development can only be permitted if the applicant enters into a legal agreement with Council, as Local Planning Authority, to pay towards Buckinghamshire Council's Strategic Access Management and Monitoring</p>

						Strategy; to contribute towards the Air Quality Mitigation Strategy; and in the case of the development of Site SP BP9, to provide Suitable Alternative Natural Greenspace (SANG). References to SANG and Air Quality Mitigation Scheme should also be added to section (a) Fees and Mitigation of Appendix 1(c).
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Simon Meecham

October 2020