

Transport • Economy • Environment

Rob Smith
Director Growth, Strategy & Highway

Allan Bennett
Neighbourhood Planning Officer
Community Fulfilment
Aylesbury Vale District Council
The Gateway, Gatehouse House Road
Aylesbury, HP19 8FF

Submitted by email:
localplanconsult@aylesburyvaledc.gov.uk

Buckinghamshire County Council
County Hall, Walton Street
Aylesbury, Buckinghamshire HP20 1UA

Miss Arnoldis Nyamande
01296 674679
strat_planning@buckscc.gov.uk

Telephone 01296 385000
www.buckscc.gov.uk

9th August 2019

Dear Mr Bennett,

Wendover Neighbourhood Plan: Pre-submission Consultation

Thank you for consulting Buckinghamshire County Council (BCC). We welcome the opportunity to comment on the Wendover Neighbourhood Plan (NP) consultation. We hope these comments help to further develop your neighbourhood plan and look forward to continuing to work with you on this.

Please find our main comments below. More detailed comments on the plan can be found in Appendix 1.

Archaeology

- The Wendover Neighbourhood Plan states that the plan covers the entire parish, but the text focuses exclusively on the market town of Wendover; the whole parish has a rich archaeological presence which is not mentioned in this plan.

Ecology

- The policies within the Neighbourhood Plan relating to biodiversity have been mixed in with policies on other topics meaning the overall message is being lost in the process. We recommend a separation of topics for clarification to avoid key issues not being given the gravity they deserve.
- Furthermore, due to the number of features of ecological importance within the Parish, a detailed ecological assessment must be a requirement of all planning applications.

Transport

- Overall, we happy with the measures taken in the Wendover neighbourhood. We do have some suggestions to consider in increasing sustainable travel and on maximising on Wendover's positioning as the gateway for smaller settlements to larger urban areas.

Thank you again for the opportunity to comment on the Wendover Neighbourhood Plan consultation. We look forward to future engagement with you on the development of the Neighbourhood Plan. If you have any further queries on our comments, please contact the BCC Strategic Planning team via our email address: strat_planning@buckscc.gov.uk

Yours Sincerely,

Arnoldis Nyamande
Assistant Strategic Planning Officer



Appendix 1

Archaeology

Whilst we welcome the inclusion of a Conservation & Heritage section at 5.12, and of Policy H2 which addresses development within the Conservation Area, we are disappointed not to see further discussion about the archaeology of the parish within the document, particularly within the Issues, Objectives and Policies section. The future growth of the parish, including the forthcoming construction of HS2 and the associated works which will inevitably follow, means it is important to consider the implications of development on the archaeological resource.

Paragraph 1.3 of the Wendover Neighbourhood Plan states that the plan covers the entire parish, but the text focuses almost exclusively on the urban environment of the town of Wendover. The whole parish has a rich archaeological presence, most of which is not referred to or considered within the Draft Neighbourhood Plan, nor are the numerous monuments of all archaeological periods which cover the entire parish.

It is for the local community to decide on the scope and content of a neighbourhood plan; however, there could be benefits in setting out a specific historic environment section drawing on the evidence from Historic England and the Buckinghamshire County Historic Environment Record. In addition to the content on built heritage which has already been included within the Draft Neighbourhood Plan, further investigations could include:

- Policies to protect, conserve and/or mitigate impacts on the historic environment including archaeological remains, and particularly focusing on development within Archaeological Notification Areas
- Policies to manage the settings of heritage assets or important views such as those associated with the Scheduled Monuments within the Parish
- Particular historic environment considerations to be taken into account when seeking to develop specific sites
- Opportunities for investment into the historic environment alongside delivery of new development, such as interpretation panels which include archaeology (the example at 5.17 does not do this)
- Opportunities could be identified to protect spaces which contain in situ archaeological deposits of significance.

We would recommend that the Historic Environment Record for the Neighbourhood Plan area is consulted if not already done so to get a greater understanding of the history and archaeology contained within the area. The Buckinghamshire County Historic Environment Record is a public record and we would welcome the opportunity to share our information with the local community. For HER information please contact Julia Wise, HER Officer on 01926 382072 or juwise@buckscc.gov.uk

Guidance on taking the historic environment into consideration in neighbourhood plans has been published by Historic England and includes:

- Neighbourhood Planning and the Historic Environment August 2014
- The Historic Environment in Local Plans

There is also the NPPF especially Section 16. We trust this is helpful and if you have any queries please do not hesitate to contact us.

Ecology

Having reviewed the draft Wendover neighbourhood plan, have noted that there are a few omissions with respect to biodiversity, details of which are provided below:

1. It is suggested that Section 3 of the Plan (*Location*) includes an overview of the diverse habitats and biodiversity present within the Parish. In addition to being an historically important settlement, Wendover Parish is characterised by ancient and mature woodland and trees, species-rich hedgerows, calcareous grassland, traditional orchards, watercourses and ponds, and supports a variety of protected and notable species.

2. The policies within the Neighbourhood Plan relating to biodiversity have been mixed in with policies on other topics, and the overall message is being lost as a result. For example, biodiversity appears to have been covered in the *Conservation and Heritage* Section (which should deal with historical conservation areas and assets) as well as the *Green Spaces and Environment* Section. It is recommended that for clarity these topic areas are separated into the following Sections:

- a. *Green Space and People* - to cover green infrastructure, public open space and wellbeing
- b. *Natural Environment and Biodiversity* – to cover natural assets, habitats, protected and notable species
- c. *Heritage and Historic Landscapes* – to cover historical conservation areas and assets
- d. *Visual Landscape* – to include the policy on *Key Views and Vistas*

3. Wendover Parish encompasses several statutory and non-statutory sites of nature conservation importance, including (but not limited to) Bacombe and Coombe Hills Site of Special Scientific Interest (SSSI), Field South of World's End Local Wildlife Site (LWS; fen habitat), Coxgrove Wood LWS (ancient woodland), Hale Wood LWS (mixed woodland), and Bacombe Warren LWS (species-rich calcareous grassland). The Parish also encompasses a number of Biological Notification Sites and is immediately adjacent to Weston Turville Reservoir SSSI. It is recommended that a map of existing biodiversity assets within and adjacent to the Parish is incorporated into the Neighbourhood Plan in Map 3 and Map 5 using records from BMERC (Buckinghamshire and Milton Keynes Environmental Records Centre). Please note that it is not sufficient to provide a link to Magic Maps (Map 5) as this mapping website is difficult for the unfamiliar user to navigate, and the Magic database does not include information on non-statutory designated sites such as Local Wildlife Sites.

4. Development on or adjacent to statutory and non-statutory sites, such as SSSIs, LWSs and BNSs must be avoided. Text stating this should be incorporated into the policies in the proposed *Natural Environment and Biodiversity* Section. The current wording in Policy CH1 is not sufficient and must be strengthened.

5. There are areas of Priority Habitat within the Parish (NERC Act, 2016), including ancient woodland and fen, which are both considered 'irreplaceable'. The presence of veteran trees (also considered irreplaceable) within the Parish is likely given the age of the settlement. Priority Habitats are a material consideration in the planning process and development on or adjacent to them must be avoided. BMERC should be contacted for a detailed list of Priority Habitats within the Parish.

6. The Parish of Wendover is partly within the Chiltern Escarpment and Dunsmore Woods Biodiversity Opportunity Areas (BOAs). BOAs are the most important areas for biodiversity in the county and represent the regional priority areas of opportunity for restoration and creation of Priority Habitats. This information should be included within the proposed *Natural Environment and Biodiversity* Section of the Plan.

7. BMERC also holds a number of records of legally protected and notable species for the Parish, including great crested newt, bats, otter, water vole, reptiles, badger, protected and notable birds, notable invertebrates and plants. Again, protected and notable species are material considerations in planning applications and should be fully assessed and mitigated for as part of any development application.

8. It is recommended that text from the NPPF is incorporated into the policies in the proposed *Natural Environment and Biodiversity* Section, specifically (Paragraph 170) "*Planning policies and decisions should contribute to and enhance the natural and local environment by...d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...*" and that a mandatory requirement for demonstrating long-term and measurable biodiversity net gain as part of any development application is included in the policies. Currently the only mention of biodiversity net gain is in Policy G3, but the wording needs to be strengthened. The requirement for development proposals to be "*expected to provide net gains*" is not sufficient.

9. Due to the number of features of ecological importance within the Parish, a detailed ecological assessment^{2,3} must be a requirement of all planning applications – this requirement should be included in the policies in the proposed *Natural Environment and Biodiversity* Section. This should include an assessment of the need for a sensitive lighting strategy where impacts on existing biodiversity assets and green corridors are proposed.

10. The Parish encompasses a number of green spaces, green corridors, watercourses and species-rich hedgerows, which are all green infrastructure assets. The protection and enhancement of green infrastructure must be demonstrated as part of all development proposals within the Parish, and this requirement should be included in the policies in the proposed *Natural Environment and Biodiversity* Section.

11. Development adjacent to exiting watercourses must be avoided.

² CIEEM (2017) Guidelines for Preliminary Ecological Appraisal (GPEA)

² CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal (GPEA)*

³ CIEEM (2018) *Guidelines for Ecological Impact Assessment (EclA)*

12. The wording in Policy G3 must be strengthened and terms such as “*will be expected to*” and “*where appropriate*” should be avoided to prevent ambiguity.

13. It is recommended that the text in Policy G3 regarding landscaping is changed to “*landscaping must maximise opportunities for wildlife and pollinators, and comprise plant species that are native and of local provenance*”.

14. Despite it being listed as a key objective under the *Housing* Section to promote reuse of brownfield sites, the policies under that section do not reflect this. However, it should be noted that brownfield sites often support protected and notable species, and brownfield can be a priority habitat in its own right. Therefore development proposals on brownfield sites must be subject to a detailed ecological assessment, as is necessary for a green field site.

Additional comments:

- Please note that the NERC Act (2006) states that with regard to Section 40 “*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes restoring and enhancing species populations and habitats as well as protecting them.*” This responsibility extends to town and parish councils.
- The role that biodiversity and green space plays in improving human health and well-being should be promoted throughout the Plan.

Housing

There are no new major designated development sites - the draft VALP requires Wendover to take 128 new houses during the plan period although these are either already built or have been committed. All local planned redevelopment will take place at the RAF Halton site which is due to close in 2025. VALP suggests that at least 1,000 homes will come forward during the Plan period at RAF Halton Camp after its closure.

Schools

Development of 1000 homes at RAF site likely to require the provision of a new 1-2fe school or expansion of Halton School onto another site, which is in addition to the recent expansion of John Hampden/Wendover CE schools to meet existing permissions in Halton and Aston Clinton. The local secondary school is popular and oversubscribed; BCC will need to continue to monitor the impact of development on the school although there is a new secondary school planned on the Kingsbrook development which may relieve some of the pressure on the school.

Transport Strategy

Wendover Parish consists of more than just Wendover Town: it is the settlements of Dean, King's Ash, Little London, Small Dean, The Hale, Wendover Dean and World's

End. As such, we must emphasise the strategic importance of Wendover's relationships to its neighbouring settlements. It acts as a midpoint or gateway between these smaller settles to Aylesbury, Amersham and beyond. We would support an increase in connectivity between Wendover and these settlements through the development and/or facilitation of sustainable travel modes such as green links, cycle paths and public footpaths. Buckinghamshire County Council is happy to be of assistance, should you choose to go down this path. Please find more a more detailed response attached in the table below.

Paragraph Number	Comment
5.24	BCC are working with John Hampden Infant School and Wendover Junior Schools on their School Travel Plans. We would happily work with John Colet to help develop a School Travel plan for the school. School Travel Plans help promote safe and sustainable to school.
5.25	There is positive support for cycling in the Neighbourhood Plan. This aligns with BCC's aspirations for the promotion of sustainable travel.
5.26	We note the concerns around HGV traffic travelling through the town centre. Following the adoption of BCC's Freight Strategy in 2018 and the subsequent employment of a Freight Officer, we would gladly work with the parish to investigate freight challenges.
6.3	Public comments regarding transport and the redevelopment of the RAF Halton site are noted for future consideration.
8	Objectives for Housing and Sustainable Development could also consider promoting measures to increase the use of sustainable transport or make it more attractive e.g. place improvements. This would help with reducing the need for parking alongside broader benefits such as improving public health.
8	<p>We welcome the transport objectives. We suggest that these objectives consider further promotion of walking and cycling as the first choice for short journeys, in line with BCC's LTP4. Increased walking and cycling would help to address issues with traffic flow and parking provision.</p> <p>The Parking Vision for Buckinghamshire can be found here: https://www.buckscc.gov.uk/media/4514124/parking-delivery-plan-june-2018.pdf . It includes the current arrangements for management of off and on-street parking.</p>
8	We would encourage the promotion of sustainable travel to help mitigate potential traffic and safety issues in/near Wharf Road and Manor Road. To achieve this we would like to promote continued engagement in the school travel planning process for the schools in the Neighbourhood Area (see comment 5.24).
Policy SD2	<p>BCC and Aylesbury Vale District Council (AVDC) have both published guidance for parking schemes associated with new developments. We would advise the Parish to look at BCC's Countywide Parking Guidance when assessing provision for car parking associated with new developments.</p> <p>Parking considerations should not only be for vehicles but also take into account provision for sustainable travel (for example, cycle racks and EV charging points).</p>
Policy IC1	Supportive of proposals to increase the provision of high speed broadband and improved mobile signal. It is important that proposed development incorporates the provision of up-to-date electronic communications to facilitate home working as this can have positive effects on local transport e.g. reduced trip numbers.
Policy T2	<p>Buckinghamshire County Council has a Highways Development Management Guide to ensure new developments to help make new developments work. It includes principles for making developments work and mitigating the impacts of developments.</p> <p>https://www.buckscc.gov.uk/services/transport-and-roads/transport-plans-and-policies/highways-development-management-guidance/</p>

Policy T3	BCC are supportive of improvements to the sustainable transport infrastructure. This should also recognise opportunities to improve supporting infrastructure such as cycle parking and the sense of place which help to make sustainable transport an attractive alternative.
11.40	The link provided only accesses BCC's Local Transport Plan 4. The wording should be revised to reflect this or a link provided to all of BCC's transport plans - https://www.buckscc.gov.uk/services/transport-and-roads/transport-plans-and-policies/
Policy T4	The first bullet point in Policy T4 refers to the production of a ' <i>sustainable transport strategy</i> '. BCC do not have any guidance relating to the production of a ' <i>sustainable transport strategy</i> '. We ask that it is clarified what this is referring to.