

## Annex A – Consultation comments received on the Bledlow-cum-Saunderton SA/SEA Scoping Report

Consultee	Date of contact	Date of response	Comments received	How comments taken on board
Natural England Reference: 180189	29/2/16	18/3/16	<p>Many thanks for consulting Natural England and giving us the opportunity to make comment upon this scoping opinion for this neighbourhood plan.</p> <p>Having reviewed the documentation provided it is clear that the main areas which would be expected are included in the scoping for the main sustainability appraisal report and as such there wouldn't be any further suggestions to make around this. The main issues to take account of here are (as highlighted in the documents) the Chilterns Area of Outstanding Natural Beauty (AONB) and the impact of new development upon the designated sites in the area, with the Chilterns Beechwoods Special Area of Conservation (SAC) just outside the plan area to the south east.</p> <p>Along with Lodge Hill Site of Special Scientific Interest (SSSI) there is also Butler's Hangings SSSI in the very south of the plan area which should be identified in the main report even if impacts can subsequently be discounted. Given that the main allocations for development, which the plan anticipates will likely be away from the areas designated for their biodiversity interest, landscape impacts will likely still need consideration for infill development in the villages of Bledlow and Saunderton among the other smaller villages.</p>	<p>Noted and baseline updated</p> <p>Noted. Issues have taken account in drafting policies. Policy 10 'Environment' includes reference to both these environmental assets.</p>
Historic England Reference: HD/P5136	29/2/16	30/3/16	<p>Thank you for your e-mail of 29<sup>th</sup> February 2016 advising Historic England of the consultation on the Bledlow-cum-Saunderton Neighbourhood Plan SA Scoping Report. We are pleased to make the following general and detailed comments.</p>	

		<p>The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment.</p> <p>In addition, general advice on Sustainability Appraisal and the historic environment is set out in Historic England's publication "Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment": <a href="http://www.historicengland.org.uk/images-books/publications/strategic-envirn-assessment-sustainability-appraisal-historic-environment/">http://www.historicengland.org.uk/images-books/publications/strategic-envirn-assessment-sustainability-appraisal-historic-environment/</a>.</p> <p>Turning to our specific comments, as regards Other Plans and Programmes (Stage A1), the Parish Council is clearly aware that the Neighbourhood Plan must have regard to national policies and advice contained in guidance issued by the Secretary of State (e.g. the National Planning Policy Framework and National Planning Policy Guidance) and contribute to the achievement of sustainable development.</p> <p>We would highlight that the Framework makes it clear that the conservation and enhancement of the historic environment is an integral component of sustainable development (see paragraphs 7 and 9) and that "conserve heritage assets in a manner appropriate to their significance" is a core planning principle.</p> <p>As regards Baseline Information (Stage A2), we would like to see a description of the historical development of the parish. We would also prefer "Historic Constraints" in Appendix B to be retitled "Heritage" or "Historic Environment" in recognition of the fact that heritage assets are a benefit and can be an opportunity as well as a constraint.</p>	<p>Noted</p> <p>Issues to be taken into account in drafting site based and design management policies.</p> <p>Noted and updated.</p> <p>See App B to D Settlement Area Design Statements</p>
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		<p><i>quality of development that will be expected for the area.....based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics".</i></p> <p>Is there a character study of Bledlow-cum-Saunderton (we note the 1996 Character Study of the Conservation Area but this is dated and does not cover the whole of the Neighbourhood Plan area)? If not, then this too should be identified as a gap in the baseline.</p> <p>There are no grade I or II* listed buildings on the Historic England 2015 Heritage at Risk Register in the parish, but there may be grade II buildings at risk – has the Parish or District Council undertaken a survey of grade II buildings? If not, then this too should be identified as a gap in the baseline.</p> <p>The 2015 Heritage at Risk Register identifies two scheduled monuments at risk within the parish, both part of the Saunderton Lee barrow cemetery. It would seem reasonable, therefore, to identify the conservation and enhancement of heritage assets as a sustainability issue, particularly as so much of the Parish is within an AONB, in which paragraph 115 of the National Planning Policy Framework states that cultural heritage is an important consideration.</p> <p>The paragraph on Sustainability Issues (Stage A3) in fact starts with identifying aspirations rather than issues (new development on brownfield/previously-developed land, to be mixed use where possible, to make better use of sensitive infill, to protect views to and from the Chilterns AONB and not undermine the rural character and environment of the parish).</p> <p>We welcome Sustainability Objective 5 and the two associated sub-objectives. Other possible sub-objectives are</p> <ul style="list-style-type: none"> <li>• <i>“Does the BcSNP protect and enhance non-designated features of historical or cultural interest, including non-scheduled archaeological sites and features and historic landscapes?”</i></li> </ul>	<p>Noted. See App B to D Settlement Area Design Statements</p> <p>For action by WDC</p> <p>Noted. The requirements for an Archaeological Statement in respect of the Bronze Age Round Barrow included within Policy 3 – Molins, South Saunderton</p> <p>SO5 updated</p>
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Wycombe District Council  Ref: Email dated 7 <sup>th</sup> April 2016	29/2/16	7/04/16	<p>We welcome the inclusion of a full SA, incorporating SEA to demonstrate how the plan meets sustainable development in accordance with one of the Basic Conditions.</p> <p>A comprehensive analysis of the baseline conditions for the neighbourhood area have clearly been established. As demonstrated through the Scoping Report, Bledlow-cum-Saunderton is area of high landscape and environmental qualities with a number of protected areas for biodiversity and historic constraints. The six objectives within the appraisal framework are reflective of those issues identified within the baseline conditions for the scoping report. I have identified a few suggestions for how the appraisal</p>	Noted  Noted and revisions considered in updating the sustainability objectives

		<p>framework could be improved to give greater clarity and reflect those issues identified in the scoping report.</p> <p>Objective 1: Housing – is the purpose of this objective intended to be just for affordable housing? Or is the intent to provide for a range of size, types and tenures for all housing, including affordable housing? If the latter is the case then it is suggested the objective is clarified for all housing, which includes affordable housing. I would suggest that the objective should be for all housing as the Molins site is likely to include an element of general housing.</p> <p>Objective 2: Community facilities – for consistency for 2B I suggest community facilities is also included as this can be different from leisure. You may also find it useful to identify what is meant by community facilities and leisure facilities. This will make the assessment of the policies easier to interpret.</p> <p>Objective 3: Biodiversity. For point 3C you may wish to identify access to the countryside/ 'green infrastructure and biodiversity' so that there is consistent wording with the purpose of that objective.</p> <p>Objective 4: Landscape and Villagescape – for point 4A. All landscapes can be important, therefore rather than just referring to protected landscapes you may wish to widen the question to protected 'and important' landscapes.</p> <p>Objective 6: Rural Economy – for 6C it would be helpful to clarify whether reducing the need for travel is just for work, or whether it is referring to all aspects of daily life.</p> <p>It is recommended the scoping report is published alongside the SA appraisal as part of the draft plan consultation so that it can be considered wider by consultees.</p>	
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<p>Chilterns AONB</p> <p>Ref: email 14/4/16</p>	<p>29/2/16</p>	<p>14/04/16</p>	<p>The CAONB response directed the NP to the following reference publications, including:</p> <ul style="list-style-type: none"> <li>• the Chilterns AONB Management Plan 2014-2019 'A Framework for Action'</li> <li>• the Chilterns Buildings Design Guide</li> <li>• the Buildings Design Guide Supplementary Technical Notes dealing with Flint, Brick and Roofing Materials,</li> <li>• the Environmental Guidelines for the Management of Highways in the Chilterns</li> <li>• the Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the Chilterns AONB</li> <li>• the Chilterns Conservation Board's Position Statement on Renewable Energy</li> <li>• the Making of the Chilterns Landscape (Chilterns Historic Landscape Characterisation Project Summary)</li> <li>• the Chilterns Historic Landscape Characterisation Project report</li> <li>•</li> </ul>	<p>References welcomed and added to the BcS NP 'Schedule of Evidence' and considered in developing the Settlement Area design statements and Development Management Policies.</p>
<p>Environment Agency</p> <p>Ref: WA/2006/00 0248/OT-03/IS1-L01</p>	<p>29/2/16</p>	<p>14/4/16</p>	<p>Flood Risk Management</p> <p>The following plans identify a small area in the northern part of the Bledlow-cum- Saunderton Parish within Flood Zone 3. Flood Zone 3 is also identified on our Environment Agency flood risk mapping.</p> <ul style="list-style-type: none"> <li>• Plan B- Settlement Profile map</li> <li>• Plan C Policies and Constraints Plan</li> <li>• Plan F- Area at Risk of flooding</li> </ul> <p>Flood Zone 3 is defined as having a high risk of flooding in accordance with Table 1 'Flood Risk' in the Planning Practice Guidance.</p> <p>The Wycombe Strategic Flood Risk Assessment (SFRA) says that parts of Flood Zone 3 in this area are within Flood Zone 3b (functional floodplain). This is defined as land where water has to flow in times of flood. This flood zone is at greater risk of flooding than those areas within Flood Zone 3a. Please see the</p>	

			<p>flood zone definitions within Table 1 'Flood Risk' of the Planning Practice Guidance.</p> <p>Any development (apart from minor development see definition in paragraph 104 of the NPPF) or site allocations within Flood Zones 2 or 3 will need to be sequentially tested in accordance with the National Planning Policy Framework (NPPF) paragraphs 100 and 101. This would also apply to these sites within Flood Zone 1 that have known flooding issues from surface water or groundwater flood risk.</p> <p>Some types of development may not be appropriate within certain flood risk zones. Such as dwellinghouses within Flood Zone 3b. Please see Tables 1, 2 and 3 in the Planning Practice Guidance for further information. Please note that Table 3 does not include the application of the sequential test which must be carried out first.</p> <p>Appendix B of BcS Scoping Report In Appendix B BcS Scoping Report there is an unnamed table covering different constraints. One of these is 'Flooding' on page 5. In the 'Trends and Consequences' column it says <i>"the presence of flood risk does not require the BcSNP to avoid selecting development sites in these areas, but the sequential test should apply"</i></p> <p>This sentence will need rewording as the sequential test is applied to avoid building in areas of flood risk. So the avoidance of development within fluvial Flood Zones 3 and 2 will need to be considered first before you look at other sources of flooding in Flood Zone 1. This is in line with the National Planning Policy Framework (NPPF) Paragraphs 100 and 101. A suggestion for alternative wording for this paragraph is: <i>"The presence of flood risk requires the BcSNP to avoid selecting development sites in areas of flood risk by applying the sequential test"</i>.</p>	<p>The BcS NP does not allocate sites within or in proximity to Flood Zone 2 and 3.</p> <p>No sites have been selected in areas of flood risk.</p> <p>Buckinghamshire CC Flood Management Team confirmed that in respect of flood risk (1/05/15) they had no objections to the principle of residential development at Policy 3 – Molins. Surface water flood risk on Haw Lane noted.</p>
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		<p>risk, including ordinary watercourses, surface water and groundwater. Given this, we recommend that you consult Buckinghamshire County Council when producing your flood risk policy for their comments, particularly on surface water, sustainable drainage (SUDS) and other 'local' sources of flood risk.</p> <p>The accommodation of Sustainable Urban Drainage Systems (SUDS) into a development will need to be at the earliest stages of the design process in order to have sufficient land available. Please be aware that we do not want infiltration in contaminated land as this may form pathways for pollution to the groundwater aquifers.</p> <p>Biodiversity and river corridors  Within this parish there are watercourses. There are three named watercourses which are designated as main rivers. These are the Kingsey Cuttle Brook, Illmer Upper Ditch and The Lyde. These rivers and other ordinary watercourses should be acknowledged and included in your Sustainability Appraisal. Please be aware of Wycombe District Local Plan policies DM15 Protection and Enhancement of River and Stream Corridors and CS17 (Environmental Assets). DM15 says that a 10 metre ecological buffer zone is required along watercourses from the top of the river bank. Policy DM15 also promotes deculverting of watercourses and promotes avoidance of any new culverting of watercourse.</p> <p>In Appendix B in the unnamed table 'Biodiversity &amp; Environment' you have mentioned green infrastructure in the 'Trends and consequences' column. You should also include blue infrastructure such as river corridors within this section. The preservation, enhancement and creation of wildlife habitat along the river corridors should be promoted. The NPPF paragraph 117 says that planning policies should "promote the preservation, restoration and re-creation of priority habitats and ecological networks..." These ecological networks should include blue networks such as river corridors. This can link in with the delivery of the green infrastructure.</p>	<p>the NPPF and DMPO (2015)  <i>"A flood risk assessment and sustainable drainage strategy and Operation and Maintenance Plan to demonstrate no increase in local surface water flood risk nor infiltration into areas of contaminated land"</i></p> <p>Noted. The plan does not allocate sites near watercourses listed.</p> <p>Noted and ecology/green infrastructure enhancement principle included within Policy 3 - Molins</p>
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