



The Planning  
Inspectorate

---

# Report to South Bucks District Council

by **Stephanie Chivers BA DipTP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 31 January 2011

---

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE SOUTH BUCKS  
CORE STRATEGY DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 21 July 2010

Examination hearings held between 10 and 18 November 2010

File Ref: PINS/N0410/429/5

## ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
CIL	Community Infrastructure Levy
CS	Core Strategy
DPD	Development Plan Document
LDS	Local Development Scheme
LP	Local Plan
¶	Paragraph no.
PC	Proposed Change
PPS	Planning Policy Statement
PPG	Planning Policy Guidance
RS	Regional Strategy
S.106	Planning obligation under S.106 of the Town and Country Planning Act 1990 as amended
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

### **Non-Technical Summary**

This report concludes that the South Bucks Core Strategy Development Plan Document provides an appropriate basis for the planning of the District over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- To the housing tables and trajectory to reflect the use of net rather than gross SHLAA figures, together with a note of action to be taken if the upper housing target figure is significantly exceeded;
- To reflect an amended target for the proportion of housing development on previously-developed land;
- To the thresholds for the provision of a housing mix and affordable housing, and other amendments to policies CP10-CP12, to make them effective;
- To policy and supporting text in the section on Development Sites, to reflect PPG2, *Green Belts*.
- To CP14 and CP15 in regard to the timing of infrastructure provision, and finally
- To CP16 and related text to make it sufficiently flexible.

All of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

## Introduction

1. This report contains my assessment of the South Bucks Core Strategy (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (¶ 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the Consolidated Version of the Core Strategy (CD1/03), which is the Proposed Submission Core Strategy of March 2010 (CD1/01) together with the Schedule of Proposed Changes (CD1/02) introduced following public consultation. All were submitted in July 2010.
3. Further Proposed Changes proposed by the Council between Submission and the start of the hearings (CD1/35) were incorporated into Consolidated Version 2 of the Core Strategy (CD1/36). All the changes in CD1/36 were subject to 4 weeks of public consultation from 15 October to 12 November 2010, which closed before the end of the Examination hearings. I have taken the consultation responses into account in writing this report. I have also taken into account the Council's Schedule of Changes Arising During the Examination Process (CD1/37). The few proposed changes in that document which go to soundness were subject to focussed public discussion at the hearings with relevant stakeholders.
4. My report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report (**PC**). All of these changes have been proposed by the Council and are presented in Appendix A and related Appendix 1. None of these changes should materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken. I have recommended no Inspector-generated changes.
5. Some of the changes put forward by the Council are factual updates, consequential changes, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Council's view that they improve the plan. They are shown in Appendix B. I am content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.
6. For conciseness, I have referred to the policies throughout as CP6, for example, rather than give the full title of Core Policy 6. Paragraph numbers are indicated by ¶.

## Assessment of Soundness

### Introduction

7. The amendments to PPS3 of June 2010 and the revocation of the RS in July 2010 both occurred before the submission of the CS. Consequential changes

were incorporated into the Submitted documents, and were consulted upon in the post-submission exercise of October-November 2010. Since then the position concerning the RS has become more fluid. At the time of issue of this report the RS is reinstated as part of the development plan. The Secretary of State's statement that the government's intention to repeal the statutory basis of the Regional Strategies is a material consideration is subject to judicial review. Consequential changes in relation to the reinstatement of the RS have been included in Appendix B and for the avoidance of doubt, I endorse these changes. I examine the implications of the PPS3 amendments and the RS, where they affect the soundness of the plan, under the Issue headings which follow.

## **Main Issues**

8. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the plan depends.

### **Issue 1 – Does the Council's overall strategy have a firm basis?**

9. The cascade of relationships between the five themes identified in the South Bucks Sustainable Community Strategy (2009) (CD7/01) and the Council's overall vision for the District, its strategic objectives and how they inform policy, critical success factors, related performance indicators and targets, is particularly clearly set out in the plan. The vision is thus carried through to delivery in an exemplary manner.
10. The overall housing strategy of the plan is to accommodate growth within existing settlements, whilst avoiding harm to townscape character and without releasing Green Belt land. There is a clear audit trail which shows how alternative strategies were developed and tested, with a variety of spatial distributions of growth including those which would involve the release of some Green Belt land. Sustainability appraisal and effective engagement with stakeholders and the community took place at all main stages of the process.
11. There is uncertainty about when the three Opportunity Sites of Wilton Park (CP14), Mill Lane (CP15) and Court Lane, within the South of Iver Opportunity Area (CP16), will come forward. They are not central to the delivery of the strategy, because the RS and CS housing targets can be achieved without them. They are therefore, rightly, not strategic sites or allocations in the CS. The sites are important in the District however, and most provide significant opportunities for regeneration. The Council do not currently propose to produce a Site Allocations DPD and it is thus appropriate that the CS provides a policy framework for their development. The overall strategy is sound.

### **Issue 2 – Does the plan make justified and effective provision for housing in terms of the overall number of dwellings, their distribution and the provision of particular types of dwellings including affordable housing?**

#### *Evidence base and the RS*

12. The RS, the South East Plan, proposes housing growth for the District of 1,880 units over the period 2006-26. The Panel which examined the draft RS concluded that this level of growth could be accommodated without implications for the Green Belt [¶ 21.95 CD7/12]. South Bucks has a particularly strong housing market. In the years following the publication of

the Panel's Report it became evident, from the Council's Annual Monitoring Reports [CD1/27-29] and from the SHLAA [CD2/01] that, because of the high number of completions, and commitments in terms of land with residential planning permission, the RS target would be exceeded. It is likely that 2,200 dwellings would be delivered, and a range of 2,200-2,800 new dwellings in the period 2006-26 was set in CP1. At 1 April 2010, 84% of the 2,200 dwellings at the lower end of the dwelling range had been completed, were under construction or had outstanding planning permission [CD11/11 ¶18]. The upper figure of the range allows for flexibility and takes account of the fact that the Opportunity Sites may come forward during the plan period. The Council's approach in exceeding the RS target is justified, in that it is based on local circumstances and evidence which post-dates that of the RS.

13. The evidence is robust, in terms of ¶58 of PPS3, that at least the lower range of the housing target is likely to be delivered, for the following reasons:
14. *Non-implementation* - The District is seen as a desirable place to live and has a low lapse rate for residential planning permissions of from 0%-1.29% [Appendix 1 of CD9/10]. Whilst this may change in the future due to uncertain economic conditions, the SHLAA allows for a 5% non-implementation rate.
15. *Net vs gross housing figures* -The SHLAA figures were updated to April 2010 to reflect the latest housing monitoring data and were recalculated, in response to points made during the Examination, so that they are expressed as net rather than gross, allowing for demolitions. **PCs 1-12 and PC28** show those changes. Amendments to the figures to reflect the latest monitoring data do not affect soundness but the expression of the SHLAA figures as net does, and the two are inextricable. All the changes are therefore shown in Appendix A of this report and its associated Appendix 1. The amendments show that the target of 2,200 would be met.
16. *Densities* - It was suggested that the amendment to PPS3 in 2010 concerning the deletion of the national indicative minimum density figure might be reflected in lower yields from residential sites. The SHLAA figures were subject to a sensitivity test to see the effects of development at lower densities than those assumed, or than those delivered in permissions granted in 2005-2009 in the Principal Settlements [Appendix 2 of CD9/10, CD11/10, CD11/11]. The lower density assumptions, and the use of net SHLAA figures, yielded a total of 2,166 dwellings, 34 short of the lower strategic target of 2,200 units. However, the shortfall is not of significant size, and could be met through development on rural exception sites, and in later parts of the plan period through the Opportunity Sites and windfalls.
17. *Previously-developed land* – The amendment to PPS3 in 2010 which removed domestic gardens from the definition of previously-developed land (PDL) is important in the District because a large proportion of completions since 2006, outstanding permissions and many SHLAA sites involve development on private garden land. The Council carried out a review of the PDL status of sites with planning permission or in the SHLAA which would be likely to be completed on or after 1 April 2010, applying their new definition that only housing development on residential back garden land which incorporates all or part of the footprint of an existing property would represent PDL [CD1/34]. The assessment shows that the new PDL target in CP1 of 80% rather than

95% is justified and achievable. The amendment is reflected in **PC13**. The target is a statistical result of, rather than a contributory factor to, housing delivery, but the change affects soundness because it shows that PPS3 has been properly taken into account. The view was expressed at the Examination that the change in the definition of PDL might make Members less willing to grant permission on any garden land. However, the Council could find no firm evidence that this had occurred to date [CD11/02], and PDL status is only one of many matters to be taken into account in assessing applications for planning permission.

18. The evidence base is robust, subject to the recommendations above, and no contingency sites, within or outside the Green Belt, are required to make the strategy more deliverable or more flexible.

*Phasing and 5-10-15 year supply of housing land*

19. The high reliance on completions and commitments, the large proportion of smaller sites identified in the SHLAA, and the absence of strategic sites, means that phasing is not appropriate. The housing trajectory indicates that the RS target of 1,880 units is likely to be achieved by about half way through the plan period, and the lower strategy target of 2,200 dwellings is likely to be reached by about 2023/24. The rate of provision would therefore be slower in the latter half of the period, not only because of the structure of the identified housing supply but as a matter of policy in CP1, to limit the effect of infilling at higher densities on the townscape of the Principal and other settlements.
20. Windfalls would be likely to come forward as a source of growth in the second half of the plan period, in the light of the District's strong housing market and attraction as a place to live, in spite of fluctuations in the economy. Opportunity Sites CP14 and CP15 would provide a major opportunity for housing growth in the coming years. During the hearings a large degree of uncertainty regarding Wilton Park (CP14) was resolved by statement by the Ministry of Defence that they will release the site in 2014, and evidence was presented that in parts of Mill Lane (CP15) there are realistic moves towards implementation in the short to medium term. The plan therefore demonstrates a 5 and 10 year supply of land in terms of ¶154 and ¶155 of PPS3, and broad locations for future growth after that.
21. Proposed Change **PC27** would make the policy effective in that it proposes action should housing grow by significantly more than the upper figure of the target range, in accordance with PPS3 ¶164.

*CP2 - Housing type and size*

22. Policy CP2 aims to deliver mixed and sustainable communities by encouraging a range of housing types and sizes, including Lifetime Homes. The Council proposes to delete the policy threshold of 0.16 hectares or above in **PC15**. On lower density sites 0.16 hectares might yield fewer than 5 dwellings, the remaining policy threshold. The requirements of CP2 in addition to those of CP3, concerning affordable housing, could be unduly onerous in such situations. **PC15** also adds an aim that development should provide a range of types and sizes that takes account of the existing housing mix in the area. This would replace a more prescriptive requirement for the identification of local needs which could be disproportionately onerous for the developer or

Council at the planning application stage. I recommend **PC15** and consequential amendment **PC14** to related text in ¶3.2.14, in order to make CP2 justified, flexible and deliverable.

23. The District has a high and growing proportion of elderly people among its residents. The policy does not say that specialist accommodation for the elderly would be allowed only on sites currently or most recently used for community infrastructure or employment, just that on such sites accommodation for the elderly would be given favourable consideration. The wording would thus be effective.

### *CP3 - Affordable housing*

24. There is a large amount of affordable housing need in the District, which has one of the highest average house prices in the country. Only 45 net affordable dwellings were delivered in the period April 2006- March 2010 under Policy H5 of the South Bucks District Local Plan (LP) which seeks that a minimum of 20% of bedspaces are affordable, at sites of 15 or more dwellings. The Three Dragons Development Economics Studies of 2007 and 2010 [CD2/05-6] found that this threshold would fail to capture 50% of sites with permission granted in 2006-09, or 95% in the Principal Settlements [¶6.12-6.13 CD2/06].
25. Robust viability testing in the Three Dragons studies, at different site densities and yields, supported a site threshold of 5 dwellings and a yield of 40%, which was incorporated into CP3. There was no evidence that site size was a particular constraint on viability [¶6.14 CD2/06]. In the light of the changes to PPS3 in 2010, which removed the indicative national density of 30 dwellings per hectare (dph), the Three Dragons model was re-run at a density of 20 dph. Development at those densities was still found to generate substantial residual values, including at the lower end of the market [CD11/36]. In addition, the policy allows a flexible approach to provision where that can be soundly justified.
26. A Court of Appeal judgement in 2010 found in favour of Wakefield Metropolitan District Council<sup>1</sup>, in effect supporting their Core Strategy affordable housing target of 30%. The Inspector examining the Core Strategy noted that in spite of the recession there was no evidence that the housing market would not recover at some time during the plan period [¶25 CD11/08]. In addition, it is clear that the housing market in Wakefield differs considerably from that of South Bucks.
27. The Inspector's report on the soundness of the Royal Borough of Windsor and Maidenhead Core Strategy noted that the Borough's affordable housing viability study did not fully support a 40% affordable housing requirement, and he queried the robustness of one of the assumptions used [¶5.4 of Inspector's report, Appendix to CD9/08]. The situation in South Bucks, which is supported by up-to-date viability studies and has an average house price significantly higher than in the Royal Borough, is therefore different. Neither this, nor the Wakefield judgement, tells against the soundness of CP3.

---

<sup>1</sup> Barratt Developments PLC v The City of Wakefield Metropolitan District Council and Another [2010] EWCA Civ 897

28. ¶16.30 of CD2/06 identified that demolition costs and very small schemes can exert pressure on viability. Proposed Change **PC16** clarifies that no affordable housing would have to be provided in one-for-one schemes, or in developments where there is no net gain in dwellings. Without this change CP3 would be unduly restrictive, and I therefore recommend it.
29. Achievement of the affordable housing target of 350-500 units over the plan period under CP3 will be challenging, but the evidence base is robust, up to date and supports the view that the policy is realistic and justified. Subject to Proposed Change **PC16** which I recommend, the plan is sound in that regard.

**Issue 3 – Employment - does CP10 represent a flexible and effective approach to employment land provision, which complies with PPS4?**

30. South Bucks has a strong employment market with an approximate balance between the number of jobs and the resident workforce. The District has a high proportion of new business start-ups, and highly skilled employees with nearly half in the role of managers, senior officials or in the professions [CD3/01-02]. Policy CP10 seeks to encourage the area's current strengths in high value and knowledge-based industries, and small-scale and start-up businesses, whilst protecting existing Class B employment land. There is no evidence of a significant quantitative or qualitative shortage of employment land, and the policy goes as far as it reasonably can to match employment land supply with the skills and not just the crude numbers of the workforce. For the same reasons as are given in the section of this report concerning CP17, *Other Development Sites*, there is no strategic need to seek for further employment land in the Green Belt, or for local alterations to the Green Belt boundary, in order to make the CS sound. I have taken careful note of the points made in relation to Pinewood Studios and the Uxbridge Business Park among other sites, but none would outweigh that overall consideration.
31. The District is adjacent to major employment attractors including at Slough and in West London and there are large flows of commuters both into and out of the area, which are however roughly in balance. Whilst this is not entirely sustainable, CP10 aims to encourage more people to live and work locally by retaining employment land and encouraging home working and uses that will match the skills of the local workforce.
32. Class B employment land<sup>2</sup> in the District is under pressure from more lucrative uses, particularly residential, and once lost would be difficult to replace especially in the Green Belt. It is right that CP10 protects existing Class B land, and affording a greater level of protection for more important sites, which are to be identified in a later DPD, is a valid approach.
33. Proposed Change **PC17** amends wording in CP10 and its related footnote to add flexibility to the policy and to make it correspond more closely with the spirit of Policy EC2(h) of PPS4, although I note that the wording in (h) refers to site allocations in a plan rather than existing sites as in CP10. There was much discussion of the role of the marketing test at the hearings. However I consider that it is right that the PPS4 test of "no reasonable prospect", in other words the marketing exercise in terms of CP10, should be applied

---

<sup>2</sup> Class B of the Town and Country Planning (Use Classes) Order 1987, as amended.

before the consideration of an alternative economic use which does not fall within the B Use Class. Otherwise, other economic uses such as retail, hotel or care home accommodation could too readily supplant a B Class use on a site. Without **PC17** the effectiveness of the policy would be limited. **PC17** also introduces changes to the third paragraph of the policy, which relates to changes from B Class use to retail outside the District and Local Centres defined in CP11, in order to remove undue inflexibility and to make the policy accord with PPS4.

#### **Issue 4 – Town and village centres – is CP11 too inflexible?**

34. Policy CP11 includes a table to show the scale of additional floorspace likely to be required over the plan period in the main retail centres of Beaconsfield, Gerrards Cross, the Bishop Centre Taplow and elsewhere. The text of the policy and the proposed new heading emphasise that the figures are indicative and the Council confirmed that the figures would not be treated as maxima. The table is based on the December 2009 revision of the 2007 South Bucks District Council and Chiltern District Council Joint Retail/Town Centre Study [CD3/04 and CD3/03] and is therefore up to date. Proposed Change **PC18** adds that the indicative figures in the table may be updated by a future Retail Study. Subject to the proposed amendment, the policy is sufficiently flexible to take account of changing circumstances.
35. It was drawn to my attention that in ¶ 3.4.18 the Bishop Centre should be referred to as “out of centre” rather than “out of town” in order to comply with terminology in PPS4. However, I consider that this does not affect soundness significantly, and the Council make no proposed change in that regard.

#### **Issue 5 – Sustainable energy – will CP12 be effective in delivering the climate change vision of the Core Strategy?**

36. The District has one of the highest per capita carbon footprints in the UK, and tackling climate change is one of the four key elements of the Core Strategy's spatial vision. Policy CP12 follows guidance in ¶ 8 and 18 of PPS22, *Renewable Energy*, in encouraging the use of decentralised, renewable or low-carbon sources of energy in new development and includes, among other positive measures, a 10% target for the provision of energy from such sources in development which exceeds the policy thresholds. Housing supply over the plan period is heavily reliant on schemes granted planning permission, or under construction, under Local Plan policies which have no such provisions. Furthermore, the indicators and targets for CP12 in Appendix 7 of the CS are neither SMART nor particularly challenging. However, the policy goes as far as it reasonably can in the context of the local situation in the District, and Proposed Change **PC19** adds flexibility in amending “targets” to “requirements” of the policy, which will be kept under review and may be updated in a future DPD. Subject to that change, I consider that the policy is sound.

#### **Issue 6 – Opportunity Sites – do CPs 14-16 provide justified and effective guidance for directions of growth in later parts of the plan period?**

### *CP14 Wilton Park*

37. During the hearings Defence Estates announced that the Defence School of Languages would be likely to vacate Wilton Park in 2014, thus increasing the likelihood that the site would be developed within the plan period.
38. Illustrative diagram Map 4 shows possible routes for a future A355/A40 relief road for Beaconsfield, which pass between the town and Wilton Park. The road does not feature in any current programme or Local Transport Plan, nor is the need for, nor funding for it, in evidence. The development of Wilton Park does not depend on the provision of the relief road, and it does not form part of the strategy. However, it is right that the existing Highways Authority Retained Improvement Lines should be shown on Map 4, to simply reflect a matter of fact. It is also right that the design of a suggested new access to Wilton Park from the Pyebush roundabout should not prejudice the provision also of a spur to serve a relief road, if that scheme were found to be necessary in the future.
39. Proposed Change **PC20** amends the final sentence of ¶ 3.6.8 to reflect national policy in the approach to Green Belt openness in PPG2. Proposed Change **PC21** alters the wording of CP14 to remove an inflexible requirement that all necessary new infrastructure should be in place before development commences. It is replaced by a requirement to demonstrate that infrastructure can be put in place within agreed timescales. Subject to those changes, CP14 is sound.

### *CP15 Mill Lane*

40. Mill Lane is a sensitive and complex site in several ownerships, with a number of constraints. It is also adjacent to the Royal Borough of Windsor and Maidenhead, on the opposite bank of the Thames. Policy CP15, to be followed in due course by a Development Brief, would provide a suitable framework for the conservation-led regeneration of this site which would take into account the important issues including those which cross boundaries. It is not necessary for the land, in addition, to be subject to compulsory purchase by the Council to ensure delivery, even if funds were available. The policy is appropriately detailed for this complex site without being over-prescriptive, and more specific requirements for massing, height and other design and environmental considerations should properly be part of the later Development Brief. Subject to Proposed Change **PC22** concerning infrastructure, similar to **PC21** above, the policy is sound.

### *CP16 South of Iver*

41. There are a number of employment sites in the CP16 area which together generate a significant number of heavy goods vehicle (HGV) movements. Traffic associated with these sites, en route to or from the M25, M40 or M4, has little alternative but to pass through Iver Village High Street or the residential area of Richings Park. The policy seeks to improve environmental conditions for local people by first encouraging employment uses on those sites that would result in a reduction of HGV movements. Paragraph 3.6.33 adds that, for the Thorney Business Park, a reduction of such movements might also be achieved by the use of rail and canal access, or the provision of a new access road. The two-stage approach is not as clearly expressed as in

CP7, *Accessibility and Transport*, but the plan should be read as a whole and I see no threat to soundness in that.

42. Immediately to the west of the Thorney Business Park is a site safeguarded for a proposed Multimodal Waste Transfer Facility in the adopted Minerals and Waste Local Plan, and in the emerging Minerals and Waste Core Strategy (MWCS). The reference to the site in ¶3.6.26 does not imply that the South Bucks Core Strategy is attempting to re-run the arguments of the MWCS, merely that the MWCS is not yet adopted.
43. The proposed Multimodal Waste Transfer Facility might bring the possibility of the provision of a relief road to the west of Thorney Business Park as an alternative to Thorney Lane, thus helping to relieve the pressure of HGV movements in Richings Park and Iver Village. However, it is far from a concrete proposal and there is no firm evidence yet of need or feasibility, nor even a sketch indication of a route. I consider that inclusion in the CS at present of a firmer intention to pursue that option would be premature and unjustified. Nevertheless the CS sets the scene for the possibility of a relief road and could provide some policy support for CIL or S.106 contributions from development in area CP16 as a whole, not just the Thorney Business Park, provided that the other relevant tests were met.
44. I recommend Proposed Changes **PC23** and **PC24** to ¶3.6.33 and CP16, which would make the wording less onerous and add essential flexibility in regard to the Thorney Business Park by emphasising that it is not HGV movements as a whole, but those that would pass through Iver Village and Richings Park, that should be reduced significantly. **PC23** also changes the trigger for seeking a significant reduction in HGV movements from "comprehensive" to "significant" development or redevelopment in ¶3.6.33. This would not be unduly onerous: without it, piecemeal development would escape the need to reduce vehicular movements.

**Issue 7 - Other development sites – does CP17 accord with PPG2? Are sites put forward by representors essential to the delivery and flexibility of the CS as contingency or alternative locations for growth?**

45. I concluded under Issues 1 and 2 that the overall strategy of accommodating housing growth within existing settlements without removing land from the Green Belt is sound, and that there is robust evidence that at least the lower CS housing target can be delivered in the plan period. There is therefore no need for a comprehensive review of Green Belt boundaries at this time, nor any need to look further for other housing land in the Green Belt to ensure the flexibility or deliverability of the CS, or the protection of existing townscape. A number of sites in the Green Belt were put before the examination, the individual site-specific and other merits of which I have considered carefully. However, for the above reasons, contingency or alternative development sites are not required to make the plan sound, and none of the benefits put forward by promoters would override that consideration.
46. The CS proposes, under a number of policies, that the developer shall prepare a development brief jointly with the Council, or with significant Council input, for certain sites. Proposed Changes **PC25** and **PC26** to ¶ 3.6.37-3.6.39 and to CP17 clarify that in the Green Belt, with the exception of designated Major

Developed Sites in the Green Belt, applicants would not need to prepare a development brief prior to the submission of a planning application. I consider that this properly reflects the weight given to the protection of the Green Belt in PPG2, and thus would be necessary to make the plan conform to national policy.

## Legal Requirements

47. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS		
Local Development Scheme (LDS)		The Core Strategy is identified within the approved LDS March 2010 which sets out an expected adoption date of March 2011. The Core Strategy's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations		The SCI was adopted in 2007 and consultation has been compliant with the requirements therein, including the consultation on all post-submission Proposed Changes.
Sustainability Appraisal (SA)		SA has been carried out and is adequate.
Appropriate Assessment (AA)		AA was carried out. There were no significant direct or indirect effects on the SPA and SACs within or close to the District, alone or in combination with other plans or policies.
National Policy		The Core Strategy complies with national policy except where indicated and changes are recommended.
Regional Strategy (RS)		The Core Strategy is in general conformity with the RS
Sustainable Community Strategy (SCS)		Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)		The Core Strategy complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

48. **I conclude that with the changes proposed by the Council, set out in Appendix A, the South Bucks Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.**

*Stephanie Chivers*

Inspector

This report is accompanied by 3 separate documents:

Appendix A and related Appendix 1 - Council Changes that go to soundness

Appendix B - Council's Minor Changes

## Appendix A – Council Changes that go to Soundness

Table 1 PC1	Update the figures in Table 1 - see Table 1, <b>Appendix 1</b> .	To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.
Third Para of 'Community Needs' section  PC2	Amend the first sentence to read: "... (with approximately 1,000 <del>100</del> <sup>20</sup> dwellings completed over the ten year period)"  After "(with approximately 1,000 dwellings completed over the ten year period)" - add a footnote reference, with the footnote to read:  "Assuming the Opportunity Sites come forward in the period 2011-21, approximately 1,400 dwellings are likely to be completed over this ten year period".	To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.  To acknowledge the potential contribution of the Opportunity Sites to the number of dwellings completed in the period 2011-21. The dwelling estimate has also been updated to reflect the latest housing monitoring data (2010) and use of net SHLAA figures.
Para 2.1.10  Appendix 5  PC3	Replace "2022/23" with " <u>2023/24</u> " in the first sentence.  Also, update the introductory paragraph of Appendix 5 (as amended), to read:  "...the lower end of the 2,200-2,800 dwelling range in <del>2022/23</del> <u>2023/24</u> ...."	To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.
Para 2.2.8  PC4	Amend the first sentence to read:  "...plan period (approximately <del>230</del> 243 dwellings), than in any..."	To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.
Table 3 PC5	Update the figures in Table 3 - see Table 3, <b>Appendix 1</b> .	To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.

<p>“Beaconsfield Box” PC6</p>	<p>Replace the figure “430” with “<u>440</u>” in the first sentence.</p>	<p>To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.</p>
<p>Table 4 PC7</p>	<p>Update the figures in Table 4 - see Table 4, <b>Appendix 1</b>.</p>	<p>To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.</p>
<p>Table 5 PC8</p>	<p>Update the figures in Table 5 - see Table 5, <b>Appendix 1</b>.</p>	<p>To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.</p>
<p>Table 6 PC9</p>	<p>Update the figures in Table 6 - see Table 6, <b>Appendix 1</b>.</p>	<p>To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.</p>
<p>Para 2.2.30 (Rest of the District box)  PC10</p>	<p>Replace the figure “1,440” with “<u>1,380</u>” in the first sentence.  Replace the figure “1,140” with “<u>1,170</u>” in the second sentence.</p>	<p>To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.  To reflect the latest housing monitoring data (2010).</p>
<p>Para 3.2.2 - Table 7  PC11</p>	<p>Update Table 7 to provide housing land supply data as of 1<sup>st</sup> April 2010 and net SHLAA figures. See <b>Appendix 1</b>.</p>	<p>The updated housing land supply position (as at 1st April 2010) shows a sharp fall in completions (when compared with previous years). Just 109 additional units were completed in 2009/10 - although over 1,000 units have now been completed or are under construction. There has been an increase in the stock of commitments (from 759 to 853 units) and a reduction in the identified SHLAA potential.  The new planning permissions granted in 2009/10 are for development in the Principal and Secondary settlements.</p>
<p>Para 3.2.4 PC12</p>	<p>Replace the figure “611” with “<u>443</u>” and “2,731” with “<u>2,698</u>” in the first sentence.</p>	<p>To reflect the latest housing monitoring data and housing trajectory figures 2010 (and use of the net SHLAA figures).</p>
<p>Core Policy 1 PC13</p>	<p>Amend the second sentence to read: “At least <u>80%</u> of this development will be accommodated on</p>	<p>To reflect amendments made to PPS3: Housing (June 2010), which now reclassifies back garden land as greenfield.</p>

	Previously Developed Land.”	
Para 3.2.14 PC14	Delete the last two sentences of para 3.2.14. Replace with: <u>“In order to encourage mixed communities, in accordance with PPS3, a mix of dwelling types and sizes will be required on larger developments.”</u>	To more accurately reflect the intended implementation of Core Policy 2 (also see related change to Core Policy 2).
Core Policy 2 PC15	In the first sentence of the second paragraph, delete “or 0.16 hectares and above, ”.  In the first sentence of the third paragraph, delete “or 0.16 hectares and above, ”.  Delete the second sentence of the second paragraph, and replace it with: -  <u>“The mix of housing provided will vary from site to site but the aim should be to provide a range of types and sizes that take account of the existing housing mix in the area.”</u>	The Council considers there is no benefit to be gained from including these additional site size thresholds in Core Policy 2. In lower density schemes, only one or two dwellings may be built on sites of 0.16 ha, and it would not be practical to provide a mix of dwelling types and sizes, or a proportion of lifetime homes, in such circumstances.  This change is proposed in the Council’s Written Statement No. 3 (CD9/11). Its purpose is to ensure consistency with the final sentence of paragraph 3.2.14 (as shown on page 45 of CD1/36).
Core Policy 3 PC16	Amend the first sentence of the second paragraph to read: -  <u>“...of 0.16 hectares and above (<del>irrespective of where there is a net gain in</del> the number of dwellings) should be affordable...”</u>	This change is proposed in the Council’s Written Statement No. 4 (see CD9/12). Its purpose is to clarify that one for one schemes (and other schemes where there is no net gain in dwellings) would be exempt from the requirement to provide affordable housing.
Page 71, Core Policy 10 PC17	Amend the second sentence of the second paragraph to read: -  <u>“In limited circumstances, including where there is no reasonable prospect of a site being used for the permitted purpose<sup>70</sup> ...”</u>  Also amend the footnote attached to these words as follows:	To add to the flexibility of Core Policy 10, the Council has proposed a further minor change (see CD11/35).  This change arises out of the discussions at the hearing session on Core Policy 10. Savills (representing Land

	<p>“In seeking to demonstrate that <u>there is no reasonable prospect of a site being used for the permitted purpose</u>, the applicant will need to have undertaken a prolonged period of unsuccessful marketing, using details approved by the District Council.”</p> <p>Amend the third paragraph to read:</p> <p>“The change of use of employment land and floorspace (B Use Class) to retail use <del>will not be permitted</del> (outside of the District and Local Centres defined in Core Policy 11) <u>will only be permitted in limited circumstances - where there is evidence that the proposal would not have a significant adverse impact upon nearby District and Local Centres, and there are no sequentially preferable alternative sites available.</u>”</p>	<p>Securities) have agreed that this wording is preferable to that in CD1/36 (see CD11/35).</p> <p>This change is proposed in the Council’s Written Statement No. 10 (see CD10/4). Its purpose is to address the most recent representation on the Proposed Changes received from Savills (on behalf of Land Securities), and to comply with national guidance in PPS4. Savills have confirmed that in their view, this wording is appropriate and sound (see CD11/35).</p>
<p>Core Policy 11 PC18</p>	<p>In the first sentence of the third paragraph, after the words “set out below”, insert “<u>(or as updated in a future Retail and Town Centre Study)</u>”.</p>	<p>This change is proposed in the Council’s Written Statement No. 11 (see CD10/8). Its purpose is to provide some further flexibility in Core Policy 11 to respond to updated information during the Plan period.</p>
<p>Core Policy 12 PC19</p>	<p>In the final sentence, replace the word “targets” with “<u>requirements</u>”.</p>	<p>This change is proposed in the Council’s Written Statement No. 12 (see CD10/10). Its purpose is to clarify and provide greater flexibility to amend other aspects of the policy in the light of new evidence and technological advances.</p>
<p>Para 3.6.8 PC20</p>	<p>Amend the final sentence to read: “The Council accepts the general principle of retaining the same overall quantum of floorspace through any redevelopment scheme, but will need to be satisfied that the height, massing and distribution of the proposed development <u>has no greater impact (and preferably a lesser impact) than existing development on the openness of the Green Belt reduces the impact on the openness of the Green Belt, and the purposes of including land within it.</u>”</p>	<p>To ensure consistency with national guidance (PPG2: Green Belts) and the wording in Core Policy 14.</p>

<p>Core Policy 14 PC21</p>	<p>Amend the penultimate bullet to read: “<u>Demonstrate, prior to the granting of planning permission, that the necessary infrastructure can be put in place within agreed timescales, prior to development commencing including...</u>”</p>	<p>To clarify expectations on infrastructure delivery on the Wilton Park Opportunity Site. The previous wording could have been interpreted as requiring all necessary new infrastructure to be in place on the ground, prior to development commencing. This may not always be necessary or desirable.</p>
<p>Core Policy 15 PC22</p>	<p>Amend the last bullet to read: “<u>Demonstrate, prior to the granting of planning permission, that the necessary infrastructure can be put in place within agreed timescales prior to development commencing.</u>”</p>	<p>To clarify expectations on infrastructure delivery on the Mill Lane Opportunity Site. The previous wording could have been interpreted as requiring all necessary new infrastructure to be in place on the ground, prior to development commencing. This may not always be necessary or desirable.</p>
<p>Para 3.6.33 PC23</p>	<p>Amend the penultimate sentence to read: -  “In the longer term, should proposals come forward for <u>comprehensive significant development or redevelopment of on the Thorney Business Park, the Council would look for a significant reduction in the HGV movements (generated by the site) through Iver Village and Richings Park, either through land use, use of the rail and canal access or provision of a new access road.</u>”</p>	<p>This change is proposed partly in the Schedule of Further Proposed Changes (CD1/35), and partly in the Council’s Written Statement No. 16 (CD10/22). Its purpose is to clarify that the policy aims to reduce the number of HGVs travelling from the Thorney Business Park through Iver Village and Richings Park, rather than necessarily restrict the number of HGV movements generated by the site generally.</p>
<p>Core Policy 16 PC24</p>	<p>Amend the last paragraph to read:  Any proposals for significant development or redevelopment on the Thorney Business Park should deliver a significant reduction in <u>the number of HGV movements (generated by the site) through Iver Village and Richings Park, either through land use, use of the rail and canal access or provision of a new access road.</u>”</p>	<p>The purpose of this change is to clarify that the policy aims to reduce the number of HGVs travelling from the Thorney Business Park through Iver Village and Richings Park, rather than necessarily restrict the number of HGV movements generated by the site generally.</p>

<p>Paras 3.6.37-3.6.39 PC25</p>	<p>Replace paragraphs 3.6.37-3.6.39 with:</p> <p><u>“3.6.37 The redevelopment of sites in the Green Belt will normally be inappropriate development, unless for a limited range of uses<sup>88</sup>. Inappropriate development will not be supported unless the applicant can demonstrate that there are very special circumstances justifying development in the Green Belt. The applicant will also need to comply with the relevant community consultation requirements, as set out in the Council’s Statement of Community Involvement – although it will not normally be appropriate to prepare a development brief for such sites, as national and local Green Belt policy severely limits the range of development options available.</u></p> <p>3.6.38 <del>Alternatively, and if necessary, the Council may need to</del> If necessary, the Council may give consideration to identifying additional Major Developed Sites in the Green Belt, through preparation of a subsequent DPD.</p> <p>3.6.39 For the avoidance of doubt, development briefs will normally be required on sites of 1 hectare or more (<u>on land excluded from the Green Belt</u>), although in certain circumstances (for example, where a site is in a particularly sensitive setting) a development brief may need to be prepared for smaller sites”.</p>	<p>To reflect the Council’s latest view that it would be inappropriate to require Development Briefs on Green Belt sites (unless designated as Major Developed Sites).</p>
<p>Core Policy 17 PC26</p>	<p>Amend the first sentence of Core Policy 17 to read: “Should other significant sites come forward for development on land excluded from the Green Belt, a Development Brief will normally need to be prepared, prior to submission of a planning application.</p>	<p>This change limits the requirement for the preparation of a Development Brief to significant sites, on land excluded from the Green Belt.</p> <p>The Council considers it would be inappropriate to require applicants to prepare a Development Brief for sites, when the principle of redevelopment still needed to be formally considered by the Council. Furthermore, the Council could put itself in a very difficult position, working with an</p>

		applicant on a Development Brief, with the implied position that it endorsed the principle of redevelopment.
Para 4.1.10 PC27	<p>Insert new sentence at the end of paragraph 4.1.10 to read:</p> <p><u>“If, on the other hand, there is a significant over supply of housing (<i>insert footnote</i>) as assessed against the housing targets in the Spatial Strategy and Core Policy 1, the Council will seek to put in place actions to manage this oversupply”.</u></p> <p>New footnote:</p> <p><u>“PPS3: Housing, indicates at paragraph 64 that more than a 10-20% over supply could be considered ‘significant’.”</u></p>	To clarify that management action will also be needed if there is a significant oversupply of housing, as well as an undersupply, consistent with the Spatial Strategy and Core Policy 1.
Appendix 5 PC28	Update the Housing Trajectory figures and table to provide housing land supply data as of 1 <sup>st</sup> April 2010. Also to incorporate the net SHLAA figures (see Appendix 1).	To reflect the latest housing monitoring data (2010) and the use of net SHLAA figures.

**Appendix 1**

Table 1 - Housing Distribution Overview (updated to 1<sup>st</sup> April 2010)

Settlement Hierarchy		Completions and under Construction 2006-2010	Commitments at 1 <sup>st</sup> April 2010	Identified SHLAA Potential 2010-2026	Indicative Scale of Housing Development in the period 2006-2026
Principal Settlements	Beaconsfield	218	101	124	443 (+300)*
	Gerrards Cross	162	55	70	287
	Burnham	39	109	35	183
Secondary Settlements		358	339	153	850
Tertiary Settlements		70	157	28	255
Rural Settlements		10	3	33	46
Other		145	89	0	234 (+100)*
Totals		1,002	853	443	2,298 (400)*

Table 3 - Housing Development at Beaconsfield (updated to 1<sup>st</sup> April 2010)

Completions and under Construction 2006-2009	Commitments at 1 <sup>st</sup> April 2010	Identified SHLAA Potential 2010-2026
<del>208</del> <u>218</u>	<del>65</del> <u>101</u>	<del>157</del> <u>124</u> (+300)*

Table 4 - Housing Development at Gerrards Cross (updated to 1<sup>st</sup> April 2010)

Completions and under Construction 2006-2009	Commitments at 1 <sup>st</sup> April 2010	Identified SHLAA Potential 2010-2026
<del>147</del> <u>162</u>	<del>31</del> <u>55</u>	<del>104</del> <u>70</u>

Table 5 - Housing Development at Burnham (updated to 1<sup>st</sup> April 2010)

Completions and under Construction 2006-2009	Commitments at 1 <sup>st</sup> April 2010	Identified SHLAA Potential 2010-2026
<del>36</del> <u>39</u>	<del>89</del> <u>109</u>	<del>54</del> <u>35</u>

Table 6 - Housing Development in the Rest of the District (updated to 1<sup>st</sup> April 2010)

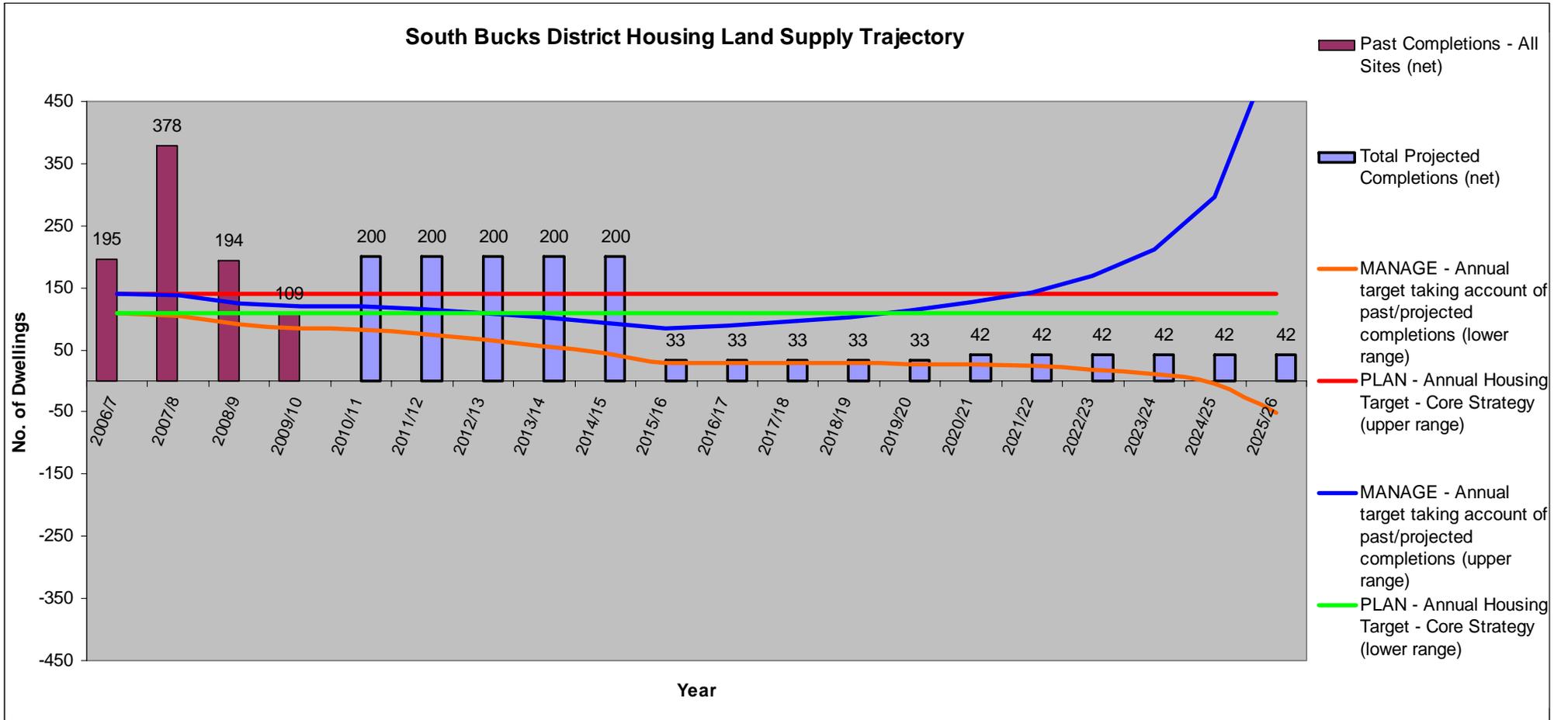
Settlement Hierarchy	Completions and under Construction 2006-2010	Commitments at 1 <sup>st</sup> April 2010	Identified SHLAA Potential 2010-2026
Secondary Settlements	<del>341</del> <u>358</u>	<del>304</del> <u>339</u>	<del>208</del> <u>153</u>
Tertiary Settlements	<del>74</del> <u>70</u>	<del>152</del> <u>157</u>	<del>40</del> <u>28</u>
Rural Settlements	<del>9</del> <u>10</u>	<del>7</del> <u>3</u>	<u>33</u>
Other Locations	<del>146</del> <u>145</u>	<del>111</del> <u>89</u>	0 (+100)*

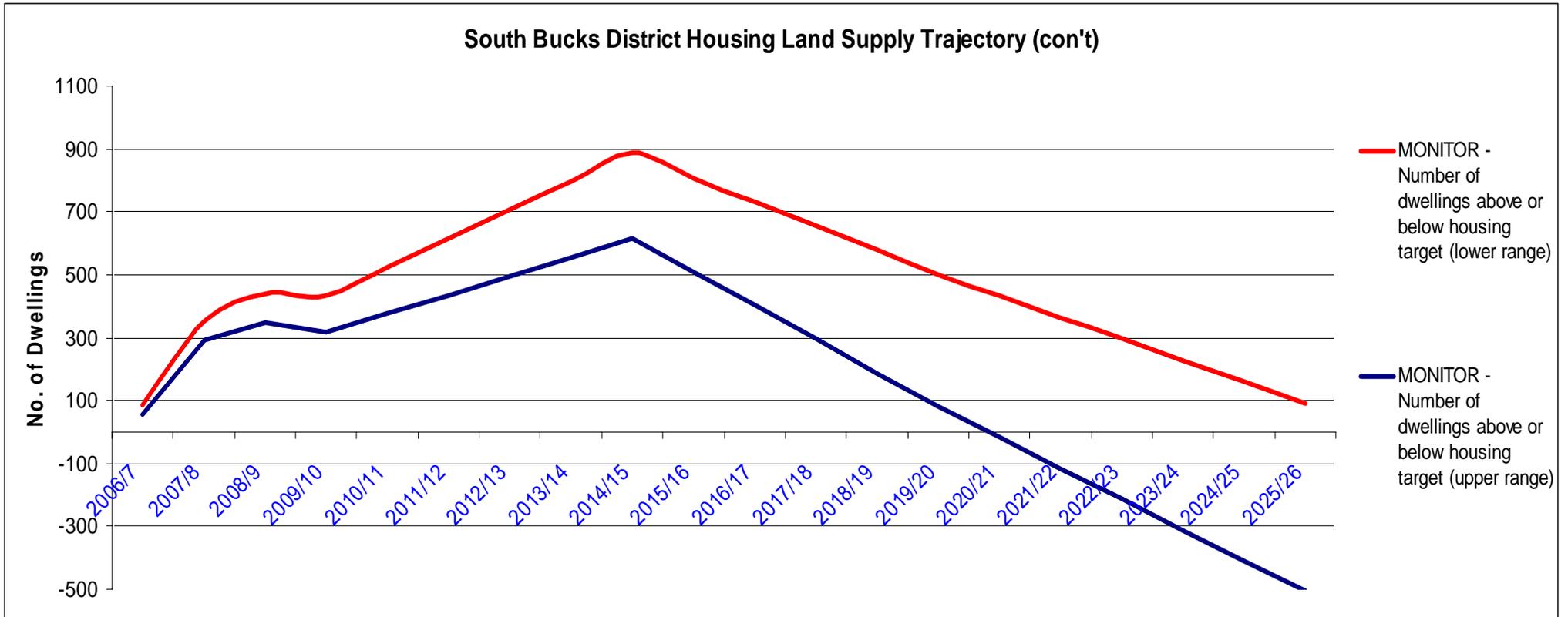
Table 7 - Housing Land Supply (as at 1<sup>st</sup> April 2010)

Source of Supply	Total
Completions 2006-2010	<u>876</u>
Commitments - under construction at 1 <sup>st</sup> April 2010	<u>126</u>
Commitments - outstanding planning permissions at 1 <sup>st</sup> April 2010 <sup>1</sup>	<u>853</u>
<b>Total completions and commitments 1st April 2010</b>	<b><u>1,853</u></b>
Potential from sites identified in SHLAA	<u>443</u>
Opportunity Sites	400
<b>Estimated total supply (2006-2026)</b>	<b><u>2,698</u></b>

<sup>1</sup> This figure includes a 5% non-implementation allowance. An analysis of past trends demonstrates that very few planning permissions are allowed to lapse in South Bucks.

Appendix 5





South Bucks District Housing Land Supply Trajectory																					
	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	TOTAL
<b>Past Completions - All Sites (net)</b>	195	378	194	109																	876
<b>Projected Supply - Extant Planning Permissions</b>					176	176	176	176	176	13	13	13	13	13	5	5	5	5	5	5	975
<b>Projected Supply - sites in the SHLAA</b>					24	24	24	24	24	20	20	20	20	20	37	37	37	37	37	37	442
<b>Total Projected Completions (net)</b>					200	200	200	200	200	33	33	33	33	33	42	42	42	42	42	42	1417
<b>Cumulative Completions</b>	195	573	767	876	1076	1276	1476	1676	1876	1909	1942	1975	2008	2041	2083	2125	2167	2209	2251	2293	2293
<b>PLAN - Annual Housing Target - Core Strategy (lower range)</b>	110	110	110	110	110	110	110	110	110	110	110	110	110	110	110	110	110	110	110	110	2200
<b>PLAN - Annual Housing Target - Core Strategy (upper range)</b>	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	2800
<b>PLAN - Cumulative Housing Supply (lower range)</b>	110	220	330	440	550	660	770	880	990	1100	1210	1320	1430	1540	1650	1760	1870	1980	2090	2200	2200
<b>PLAN - Cumulative Housing Supply (upper range)</b>	140	280	420	560	700	840	980	1120	1260	1400	1540	1680	1820	1960	2100	2240	2380	2520	2660	2800	2800
<b>MONITOR - Number of dwellings above or below housing target (lower range)</b>	85	353	437	436	526	616	706	796	886	809	732	655	578	501	433	365	297	229	161	93	
<b>MONITOR - Number of dwellings above or below housing target (upper range)</b>	55	293	347	316	376	436	496	556	616	509	402	295	188	81	-17	-115	-213	-311	-409	-507	
<b>MANAGE - Annual target taking account of past/projected completions (lower range)</b>	110	106	90	84	83	75	66	56	44	29	29	29	28	27	27	23	19	11	-5	-51	
<b>MANAGE - Annual target taking account of past/projected completions (upper range)</b>	140	137	124	120	120	115	109	102	94	84	89	95	103	113	127	143	169	211	296	549	

## Appendix B – Council's Minor Changes

Paragraph / Policy	Proposed Change	Commentary
Contents Page	Amend reference to Core Policy 17 to state:  "- OTHER DEVELOPMENT SITES"	To make the Contents page consistent with the body of the Plan - refer Core Policy 17.
Page ii Contents Page	Delete "Appendix 7 - Changes to Proposals Map".  Amend the next item to be Appendix 7.	Update to reflect deletion of previous Appendix 7, "Changes to Proposals Map" (see the Schedule of Further Proposed Changes, CD1/35 and the Consolidated Version, CD1/36).
Diagram 1	Amend to insert a box entitled " <u>South East Plan</u> " between the "National Planning Guidance" and the "Local Development Framework" boxes.  Add new footnote after "South East Plan" in Diagram 1, to read:  <u>"At the time the Core Strategy was adopted, the South East Plan was part of the development plan. However, the Government intends to abolish the South East Plan (and the other Regional Strategies) through the Localism Act, which is likely to receive royal assent in 2011 or 2012."</u>	At the time that the Core Strategy was submitted for Examination, the South East Plan had been revoked by the Government. However, following the Cala Homes decision on 10 <sup>th</sup> November 2010, the South East Plan is again part of the development plan.
Para 1.1.7	Insert " <u>and the South East Plan</u> " after "...national planning policy" in the first sentence.	Following the Cala Homes decision on 10 <sup>th</sup> November 2010, the South East Plan is again part of the development plan.
Para 1.1.10 - 1.1.12	Reinsert heading 'Regional Planning Policy'. Add new text as follows:  <u>"At the time the Core Strategy was adopted, the South East Plan was part of the development plan. However, the Government intends to abolish the South East Plan (and the</u>	Following the Cala Homes decision on 10 <sup>th</sup> November 2010, the South East Plan is again part of the development plan. The proposed new text is an amended version of a change that was proposed following the revocation of the South East Plan in May 2010 (now ruled to be illegal).

Paragraph / Policy	Proposed Change	Commentary
	<p><u>other Regional Strategies) through the Localism Act, which is likely to receive royal assent in 2011 or 2012.</u></p> <p><u>In developing policy options and drafting the Core Strategy, the Council sought to ensure general conformity with the South East Plan. Some of the key aims of the South East Plan include:</u></p> <ul style="list-style-type: none"> <li>• <u>Maintaining the existing broad extent of the Green Belt</u></li> <li>• <u>Reducing carbon emissions</u></li> <li>• <u>Delivering more affordable housing</u></li> <li>• <u>Supporting the UK's long term competitiveness and retaining existing employment land in employment use</u></li> </ul>	
Para 1.1.20	Delete all of paragraph 1.1.20, except for the first sentence.	Following the Cala Homes decision on 10 <sup>th</sup> November 2010, the South East Plan is again part of the development plan. The deleted section of text has been modified and moved to para 1.1.10 (see above), where it replaces paragraphs 1.1.10 -1.1.13 of the Consolidated Core Strategy (CD1/03).
[NEW 1]	<p>Amend first sentence to read:</p> <p><del>"Locally based plans and strategies taken into account in preparing the Core Strategy</del> <u>These</u> include those produced by the District Council..."</p> <p>Move all of [NEW 1] to follow on directly from the first sentence of para 1.1.20, to create a single paragraph.</p>	This change is consequential to the above change to para 1.1.20.
Para 1.2.3	<p>Amend footnote 1 to read:</p> <p>"The scale of new housing development planned in the local</p>	To reflect the uncertainty associated with planned housing targets (given the intention to revoke the South East Plan).

Paragraph / Policy	Proposed Change	Commentary
	authority areas adjoining South Bucks, in the period 2006-26 - <del>was (at 1<sup>st</sup> April 2010)</del> Slough Borough (6,300), Windsor and Maidenhead (6,920), Wycombe District (7,800) and Hillingdon Borough (circa 7,300)."	
Para 1.2.10	Update the last sentence of paragraph 1.2.10 (as proposed to be amended - refer CD1/02) to read:  "Whilst housing completions in the first <del>three</del> <u>four</u> years of the Plan period totalled ( <del>768</del> <u>876</u> units) the net gain in affordable housing was just <del>70</del> <u>45</u> units."	To reflect the latest housing monitoring data (2010) - refer CD2/07 (Overall Affordable Housing Target - Background Paper).
Para 1.2.25	Amend final sentence of paragraph 1.2.25 to read:  "There are also <del>four</del> <u>five</u> <u>Local Geological Sites (LGS)</u> <del>Regional Important Geological Sites (RIGS)</del> ."	To reflect the change in terminology, first recommended in the Defra Local Sites Guidance (2006), and adopted in Buckinghamshire from March 2010. Also, to provide an update on the number of sites (see below for the Proposed Further Changes to the Proposals Map).
Para 1.2.41	Amend the sentence to read:  "The household recycling and composting rate in South Bucks <del>2008/09</del> <u>2009/10</u> was <del>34</del> <u>33</u> %."	To reflect the latest monitoring data (2010).
Strategic Objective 3, First Critical Success Factor	Amend the first Critical Success Factor (as proposed to be amended in the Proposed Changes Schedule - CD1/02) to read:  "Delivery of <del>at least</del> 350-500 new affordable dwellings in the period 2006-26 (see Core Policy 3)."  See also consequential amendments to Appendix 8.	To remove the anomaly of having a range expressed as a 'minimum'.
Strategic	Replace the first Critical Success Factor with two separate	This change is proposed to reflect the amendments to Core

Paragraph / Policy	Proposed Change	Commentary
Objective 12, First Critical Success Factor	<p>Critical Success Factors, as follows:</p> <ul style="list-style-type: none"> <li>• <u>"All new development within or adjoining the Chilterns AONB has conserved (and preferably enhanced) its natural beauty.</u></li> <li>• <u>New Development over the Plan period has not had an adverse effect on the integrity of Burnham Beeches SAC."</u></li> </ul> <p>See also consequential amendments to Appendix 8.</p>	<p>Policy 9. It helps to ensure that the Core Strategy wording more accurately reflects national guidance in PPS7, PPS9 and Circular 06/05.</p>
Strategic Objective 13, First Critical Success Factor	<p>Amend the first Critical Success Factor to read - "No overall net loss of employment floorspace (B Use Class) on the <u>important employment sites</u> in the period to 2026".</p> <p>Also amend this Critical Success Factor in Appendix 8, where it appears as the second target against Core Policy 10 Employment.</p>	<p>To reflect the Proposed Changes to Core Policy 10 (as set out in the July 2010 Schedule, document reference CD1/02), which allows for the reuse or redevelopment of some existing B Use Class employment land and premises for alternative 'economic uses'.</p>
Para 2.1.3 second sentence & Footnote 16	<p>Amend the second sentence to read - "As at 1<sup>st</sup> April <u>2010</u>, outstanding planning permissions and dwellings under construction represented <u>11.5</u> years of housing land supply."</p> <p>Amend the footnote to read - "Calculated using the "residual approach" - the lower end of the housing range set out in the Core Strategy (2,200 units) minus completions in the first <u>four</u> years of the plan period (<u>876</u> units). Outstanding <u>target</u> (<u>1,324</u> units) divided by the number of years remaining in the Plan period (<u>16</u>) provides the residual annual <u>target</u> (<u>83</u> units). Outstanding planning permissions and dwellings under construction as at 1<sup>st</sup> April <u>2010</u> (<u>979</u>) divided by the residual annual <u>target</u>, gives a housing land supply figure of <u>11.5</u> years.</p>	<p>To reflect the latest housing monitoring data (2010).</p>

Paragraph / Policy	Proposed Change	Commentary
First Para of 'Community Needs' section	Delete "It is expected that approximately" at the beginning of the sentence.	To simplify the opening statement of the 'Community Needs' section of the Spatial Strategy.
Second Para of 'Community Needs' section	Replace the words "more than" at the end of the first line with " <u>approximately</u> ".	To reflect the latest housing trajectory figures (2010), and provide additional flexibility.
Sixth Para of 'Community Needs' section	Amend the first sentence to read: "The rate of new development in the final five year period (2021-2026) is projected to be low (with approximately <del>300</del> <u>200</u> dwellings completed..."	To reflect the latest housing trajectory figures (2010).
Para. 2.1.5	Insert "and regional" after "national" in first sentence.	Following the Cala Homes decision on 10 <sup>th</sup> November 2010, the South East Plan is again part of the development plan.
Para 2.2.30 (Rest of the District box)	In second paragraph, amend final word of final sentence to read "sites"  In the last paragraph of the 'Rest of the District' Box, delete "16 and 17", and replace with " <u>15 and 16</u> ".	Typo.  Typo.
Para 3.2.2	Amend the first sentence to read:  "To put the planned level of new housing development in context <del>– prior to its revocation in July 2010, the South East Plan required</del> <u>requires...</u> "	Following the Cala Homes decision on 10 <sup>th</sup> November 2010, the South East Plan is again part of the development plan.
Para 3.2.3	Amend the second sentence to read:  "In the first <u>four</u> years of the plan period, <u>876</u> dwellings	To reflect the latest housing monitoring data and housing trajectory figures (2010).

Paragraph / Policy	Proposed Change	Commentary
	<p>were completed, with a further <u>977</u> dwellings either under construction or committed."</p> <p>Replace the figure "160" with "<u>347</u>" in the last sentence.</p>	
Para 3.2.6	Replace the figure "11" with " <u>11.5</u> " in the first sentence.	To reflect the latest housing trajectory figures (2010).
Para 3.2.8	<p>Amend paragraph 3.2.8 to read:</p> <p>"...The District will aim to provide at least <del>95%</del> <u>80%</u> of all new residential development on PDL to ensure that effective use is made of this land and to help protect the Green Belt."</p> <p>Replace the year "2009" with "<u>2010</u>" in the footnote.</p>	<p>To reflect the amendments made to PPS3: Housing (June 2010). The relevant change to PPS3 is the reclassification of back garden land as greenfield.</p> <p>To reflect the latest housing monitoring data (2010).</p>
Core Policy 1	In the first sentence, delete the word "distributed" and the words "(see Table 1)".	To reflect the fact that the Spatial Strategy addresses other matters than just the distribution of new housing development.
Core Policy 1	<p>Amend the final sentence to read: -</p> <p>"The policies in <u>this Core Strategy and</u> subsequent Development Plan documents..."</p>	This change is proposed in the Council's Written Statement No. 2 (CD9/10). Its purpose is to make it clear that it is the Core Strategy <u>and</u> subsequent Development Plan Documents that will have the effect of slowing the rate of development in the District.
Para 3.2.21	<p>Amend the start of the second sentence of paragraph 3.2.21 to read:</p> <p>"It is based upon development at <del>35</del> <u>30</u> dwellings per hectare, and seeks..."</p>	To correct a factual inaccuracy. Importantly, the 30 dwellings per hectare figure sits in the middle of the density range proposed in Core Policy 8 (25-35 dph).

Paragraph / Policy	Proposed Change	Commentary
Para. 3.2.23	<p>Amend the last sentence to read: -</p> <p>"The commuted payment will be broadly equivalent to the <del>reduction in residual value</del> <u>cost to the developer</u>, were the affordable housing to be provided on site."</p>	<p>To clarify the Council's approach to commuted sum payments and remove a technical term from the explanatory text.</p>
Para 3.2.25	<p>Amend footnote 44 to read: "...as "designated rural areas"<u>.</u> These are <del>including</del> Dorney, Fulmer, ..."</p>	<p>To clarify that the list of designated parishes provided in footnote 44 is the complete list of parishes where Rural Exceptions site housing could be delivered, providing there is local need and local community support.</p>
Core Policy 3	<p>Amend the start of Core Policy 3 to read:</p> <p><del>"A minimum of</del> 350-500 affordable dwellings will be provided in South Bucks District between 2006 and 2026."</p> <p>Add a new sentence at the end of the associated footnote to read:</p> <p>"The top end of the range (500 units) is not to be treated as a maximum."</p>	<p>To remove the anomaly of having a range expressed as a minimum.</p> <p>To make it clear that the top end of the range is not a maximum figure.</p>
<p>Para 3.2.27</p> <p>Para [NEW4]</p> <p>Para [NEW5]</p>	<p>Amend the last sentence to read: -</p> <p><del>"...which resulted in a figure of reduction from 11 to 7 additional pitches in South Bucks in the period 2006-11, with a corresponding increase of 4 pitches in Wycombe District."</del></p> <p>In the third bullet, after the words "Provision of", insert "<u>a</u>".</p> <p>Delete first two sentences of NEW5, and replace with: -</p>	<p>Change proposed in response to representations received from Royal Borough of Windsor and Maidenhead relating to the Schedules of Proposed Changes and Further Proposed Changes. They clarify the context relating to the corresponding changes proposed to Core Policy 4 (see below).</p> <p>Typo.</p> <p>Factual correction - in response to comment from</p>

Paragraph / Policy	Proposed Change	Commentary
<p>Para [NEW6]</p>	<p><u>"The Panel Report on Gypsies, Travellers and Travelling Showpeople was not completed and never issued, although a draft version was made available following a Freedom of Information request. This draft version does not form any part of the planning system."</u></p> <p>In the penultimate sentence, delete "Buckinghamshire" and replace with "<u>the District</u>".</p>	<p>Buckinghamshire County Council.</p> <p>Change proposed in response to representations received from Royal Borough of Windsor and Maidenhead relating to the Schedules of Proposed Changes and Further Proposed Changes.</p>
<p>Core Policy 4</p>	<p>Amend the first two paragraphs to read: -</p> <p><u>"The Council will identify suitable additional provision for Gypsies, Travellers and Travelling Show People. In the period to 2011 it will provide a minimum of 7 additional pitches, but will provide a further 4 pitches if these are not to be provided elsewhere in Buckinghamshire. For the post 2011 period the Council will provide additional pitches in accordance with new regulations and guidance due to be published by the Government.</u></p> <p>The following factors will be taken into account in assessing the suitability of potential new sites."</p> <p>In the first bullet, amend the start of the sentence to read:</p> <p><u>"Be located outside of the Green Belt, although in exceptional where very special circumstances have been demonstrated, consideration may also be...."</u></p>	<p>This change is proposed in response to representations received from Royal Borough of Windsor and Maidenhead relating to the Schedules of Proposed Changes and Further Proposed Changes. It provides a more explicit position on the level of provision to be made.</p> <p>To be consistent with national policy in PPG2.</p>

Paragraph / Policy	Proposed Change	Commentary
Core Policy 8	<p>Amend the second sentence of the first paragraph to read: -  <u>"In particular, nationally designated historic assets and their settings..."</u></p> <p>Insert a new sentence at the end of the first paragraph: -  <u>"The protection and where appropriate enhancement of historic landscapes (including archaeological sites, Historic Parks and Gardens, and Ancient Woodlands) and townscapes, especially those that make a particular contribution to local character and distinctiveness, will be informed by evidence, for example, characterisation studies such as the Bucks Historic Landscape Characterisation Study."</u></p> <p>Delete the third paragraph of Core Policy 8.</p>	<p>To clarify that the settings of nationally important heritage assets will be protected and enhanced, as well as those of local assets. This ensures compliance with PPS5.</p> <p>To remove duplication and improve effectiveness of the policy with respect to the protection and enhancement of the historic environment.</p>
Core Policy 9	<p>Amend the first sentence of the first paragraph to read:  <u>"The highest priority will be given to the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation."</u></p> <p>Start a new paragraph with the new second sentence (as inserted by the Scheduled of Proposed Changes, CD1/02). In the third sentence of Core Policy 9, replace the words "significant harm to" with <u>"adverse effect on"</u>.</p>	<p>To ensure consistency with national policy and Circular 06/2005. To improve legibility of the policy, with the first sentence as a stand alone paragraph providing the overall context for Core Policy 9.</p>
Core Policy 11	<p>Above the table, insert the heading, <u>"Table 8 - Indicative Floorspace Requirements"</u></p>	<p>To correct a drafting oversight.</p>
Para 3.5.6	<p>In the 3<sup>rd</sup> sentence, insert a footnote after the words "South East Plan" which reads: <u>"The Evidence Base for Sustainable</u></p>	<p>Additional reference to indicate the specific aspect of the South East Plan evidence base which is relevant to this topic.</p>

Paragraph / Policy	Proposed Change	Commentary
	<u>Energy Policies in the South East, September 2006</u> ".	
Para. 3.5.7	<p>In the last sentence, after the words "Uttlesford District Council", insert the following footnote : -</p> <p><u>"In 2005, Uttlesford District Council adopted a Supplementary Planning Document that requires cost effective energy efficiency measures to be carried out on dwellings when they are extended, wherever possible. In this way, the extra energy that is used and carbon dioxide that is produced by the extension is compensated for by improvements elsewhere. As well as benefiting the environment, this reduces energy bills and improves comfort."</u></p>	<p>This change is proposed in the Council's Written Statement No. 12 (see CD10/10). Its purpose is to provide further explanation to accompany the reference to the approach pioneered by Uttlesford District Council.</p>
Core Policy 12	<p>At the end of the policy, add the following:</p> <p><u>"The <del>targets</del> requirements in this policy will be kept under review in the light of new evidence and technological advances and may be updated in a future Development Plan Document."</u></p>	<p>Sustainable energy is a rapidly changing field. This change will provide a 'hook' to enable the Council to review the energy requirements in the Core Strategy in a future DPD. This would provide more flexibility to reflect new evidence and technologies.</p> <p>Appendix A includes a Proposed Change to Core Policy 12 - inserting the word 'requirements' in place of the word 'targets'.</p>
Para 3.5.17	<p>Delete third and fourth sentences and replace with:</p> <p><u>"The coalition Government has decided not to proceed with the planned expansion of Heathrow Airport. Nevertheless, the Council will continue to work closely with other affected local authorities to ensure that noise and other environmental impacts from the airport are minimised."</u></p>	<p>On 12 May, the new Government pledged to drop the third runway at Heathrow (in the environment section of the coalition agreement). This was brought to our attention by BAA Heathrow, in an email dated 16/8/10.</p>

Paragraph / Policy	Proposed Change	Commentary
Para 3.6.3	Delete "(see Appendix 7)".	Update to reflect deletion of previous Appendix 7, "Changes to Proposals Map" (see the Schedule of Further Proposed Changes, CD1/35 and the Consolidated Version, CD1/36).
Para 3.6.16	In the first sentence, add " <u>County</u> " before "Biodiversity"	This clarifies that the Mill Lane site lies within a County level Biodiversity Opportunity Area, and not one of the more important Regional BOAs, as listed in paragraph 1.2.25 on page 11 (CD1/36).
Para 3.6.24	Delete the final sentence of paragraph 3.6.24 - and incorporate the wording in an amended paragraph 3.6.34 (see below).	To provide clearer cross referencing between Core Policies 7 and 16 (and the related supporting text). The Core Strategy would also benefit from more consistent wording in paragraphs 3.6.24 / 3.6.34 and 3.2.55.
Para. 3.6.29	In second sentence, replace "Action" with " <u>Opportunity</u> ".	Typo. The correct term is "Biodiversity <u>Opportunity</u> Area".
Para 3.6.34	<p>Delete second sentence and replace with:</p> <p><u>"Should these measures prove unsuccessful, or other opportunities arise<sup>93</sup>, consideration will be given to the scope for provision of relief road or alternative means of access to the employment sites in the South of Iver Opportunity Area (see also Core Policy 7 and paragraph 3.2.55)."</u></p> <p>Add new footnote as shown below:</p> <p><u>"<sup>93</sup> For example, in relation to proposals for significant new transport infrastructure in the area, or in the future, through the preparation of a Community Infrastructure Levy or Development Management DPD."</u></p>	To provide clearer cross referencing between Core Policies 7 and 16 (and the related supporting text). The Core Strategy would also benefit from more consistent wording in paragraphs 3.6.34 and 3.2.55.

Paragraph / Policy	Proposed Change	Commentary
Core Policy 16	For consistency with Core Policies 14 and 15, add a further sentence to the penultimate paragraph of Core Policy 16, to read: "The Development Brief will be adopted as a Supplementary Planning Document".	To correct a drafting oversight.
Appendix 6	Under Core Policy 2, amend the second sentence of the Project/Scheme description to read: "Projected need, <u>accounting for the upper end of the housing target</u> , is for <u>up to</u> 105 accommodation units during the Plan period."	To clarify the relationship between the projected number of adult social care units needed, and the housing target, which is expressed as a range.
Appendix 6	Under Core Policy 5, amend references to "Farnham" to " <u>Farnham Royal</u> ".	To correct a factual inaccuracy.
Appendix 6	Under Core Policy 6, delete the row dealing with Building Schools for the Future.	The BSF capital funding programme has been withdrawn. Although it would have presented opportunities for cost-effective capacity additions to be undertaken alongside (and so was included on the Infrastructure Schedule originally), the BSF funding did not in itself address capacity issues relating to new growth. Therefore, removing this item from the Infrastructure Schedule does not impact upon the deliverability of planned development more generally.
Appendix 6	Under Core Policy 6, amend the Project/Scheme Description for the Beaconsfield area to end with: "... (currently projected to be <u>around 100</u> places during the Plan period, <u>or 190 if the Wilton Park Opportunity Site comes forward</u> )."  Amend the Project/Scheme Description for the Burnham area to read: "... (currently projected to be <u>around 110</u> places during the Plan period, <u>or 140 if the Mill Lane Opportunity Site comes forward</u> )."	To clarify the relationship between the projected primary school place needs, and the Opportunity Sites. This makes it clearer that if the Opportunity Sites do not come forward, there is still a separate understanding of the need for school places to support other planned development.  The change to the Burnham location updates the change already proposed in the July 2010 Schedule (CD1/02).

Paragraph / Policy	Proposed Change	Commentary
Appendix 7	Delete Appendix 7.  As a consequence of this change, Appendix 8 will need to be renumbered as Appendix 7.	Appendix 7 shows changes proposed to the Proposals Map. Subject to the outcome of the Examination, the Proposals Map will incorporate these changes once the Core Strategy is adopted.
Appendix 8	Amend the second target for Core Policy 1 to read:  "80% of new housing development in the period 2006-2026 on previously developed land".	To update the target taking into account the amended definition of previously developed land in PPS3.
Appendix 8	Amend the first target for Core Policy 2 to read:  "Over the Plan period, an increasing proportion of new homes built to the full Lifetime Homes standard (CSF)."	To ensure consistency with the CSF in Part 1.
Appendix 8	Amend the second target for Core Policy 2 to read:  "Sites of 5 or more, <del>or 0.16ha and above,</del> to deliver a mix of dwelling types and sizes post adoption".	To ensure consistency with amended Core Policy 2.
Appendix 8	Amend the first target for Core Policy 3 to read:  "Delivery of <del>at least</del> 350-500 new affordable dwellings in the period 2006-2026 (CSF)."	To ensure consistency with the amended Critical Success Factor on page 18.
Appendix 8	Amend the third target for Core Policy 5 to finish, "...created in the District <u>through</u> new development."	Typo.
Appendix 8	Amend the fourth target for Core Policy 7 to read: "Over the Plan period, a measurable reduction in the number of HGV movements <u>through</u> Iver Village and Richings Park (CSF)."	Typo, and correction to align with the corresponding Critical Success Factor (on page 20).

Paragraph / Policy	Proposed Change	Commentary
Appendix 8	<p>Split the third indicator under Core Policy 9 into two separate indicators. The amended Indicators and related targets to read:</p> <p>Indicator - "Impact of development on the natural beauty of the Chilterns AONB."</p> <p>Target - "All new development within or adjoining the Chilterns AONB has conserved (and preferably enhanced) its natural beauty (CSF)."</p> <p>Indicator - "Impact of development on the integrity of Burnham Beeches SAC".</p> <p>Target - "New Development over the Plan period has not had an adverse effect on the integrity of Burnham Beeches SAC (CSF)."</p>	<p>This change is proposed to reflect the amendments to Core Policy 9. It helps ensure that the Core Strategy wording more accurately reflects national guidance in PPS9 and Circular 06/05.</p>
Appendix 8	<p>Amend the indicator for Core Policy 17 to read: -</p> <p>"Number of <u>Development</u> Briefs prepared."</p> <p>Amend the target for Core Policy 17 to read: -</p> <p>"Most planning applications for <u>developments on sites of 1 hectare or more (on land excluded from the Green Belt)</u> to be accompanied by a <u>Development</u> Brief."</p>	<p>For consistency with the wording of Core Policy 17.</p>
Proposals Map	<p>Update the Proposals Map to show the five current Local Geological Sites in South Bucks. Amend the Proposals Map Key to read:</p> <p>"Local Geological Sites</p>	<p>PPS12 advises that Proposals Maps should identify locally designated areas. The amendments to the Proposals Map will show the Local Geological Sites in South Bucks, as at September 2010.</p>

Paragraph / Policy	Proposed Change	Commentary
	(formerly Regionally Important Geological Sites) C15"	