

Comment from team	Policy/Para	Page	Comment	SG Response
Ecology	1m & u.	5 & 6	It is stated “ <i>Sustainable Development m. ...develop brownfield sites ahead of greenfield’ and u ..‘Prioritising the use of brownfield sites’</i> ” .	No objection to this amendment
			Policy 8: Brownfield Land. It is stated “ <i>Priority should be given to the development of previously developed or ‘brownfield’ over ‘greenfield’ land unless evidence clearly demonstrates this is not a viable option. b) Support will be given to the re-use of previously developed or ‘brownfield’ land within the settlement policy boundary...</i> ”	
	Policy 8 /8.6	35	It should be however recognised in the Neighbourhood Plan that brownfield sites can support a diverse assemblage of protected species and priority invertebrate species and some have conservation importance. Land that falls within the brownfield site category may meet the criteria for the Priority Habitat (NERC Act Section 41 Habitat of Principal Importance) designation ‘Open Mosaic Habitat on Previously Developed Land’. Therefore, future development on brownfield sites should consider the importance they may have in relation to biodiversity.	
Ecology	1 m	5	It is stated: “ <b>increase or, as a minimum, maintain biodiversity</b> , soil, water, air, climatic factors, archi- tectural and archaeological heritage as well as landscape setting”.	noted
			It would be beneficial if the Neighbourhood Plan considers biodiversity enhancements within each new development.	
			All new buildings and existing buildings subject to development works should incorporate integrated biodiversity features such as bat boxes/bat tubes and swift bricks or other bird boxes e.g. house sparrow boxes.	No objection to this amendment
			Additional biodiversity enhancements can be stated following consideration of existing species records within the Parish. The Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) should be consulted for records of protected and notable species records within the Parish.	No objection to this amendment

Transport Strategy	Local Infrastructure, Road Network (4.5)	15	This section is somewhat lacking in detail – further detail needed on pinch points and speed of traffic through the town. This is particularly needed to support the reasoning behind Objective/Policy 10, and does not currently feel representative of the level of concern raised by residents in the Community Engagement survey.	It is recognised that a Neighbourhood Plan has limited influence over highways issues, as they are not necessarily related to development, however, as it is an important issue to the community, the SG wanted to bring reassurance to local residents who may not be aware of national and local policies.
Transport Strategy	Local Infrastructure, Public Transport 4.6	15	This section is somewhat lacking in detail. The rail destinations beyond London are not captured. The frequencies of the High Wycombe-Uxbridge bus services may not be correct – this appears to be 2 buses every hour, and the description does not capture the fact that 1 bus per hour serves Heathrow Airport.	No objection to this amendment
Transport Strategy	Traffic and transport: Community Aspiration 4	20	We welcome the aspiration of provision for electric vehicles charging points. Note that Buckinghamshire Council (BC) are reviewing potential on-street chargepoint sites to be funded by the Local Electric Vehicle Infrastructure fund. Details of the criteria for the types of locations under consideration are available online here: <a href="https://energysavingtrust.org.uk/grants-and-loans/local-electric-vehicle-infra-structure-scheme/">https://energysavingtrust.org.uk/grants-and-loans/local-electric-vehicle-infra-structure-scheme/</a> . We encourage further contact with BC to ensure any suitable sites are considered.	No objection to this amendment
Ecology	8.1.13/Policy 3	29	It is stated that “ <i>Policy 3 Protection of European Sites To protect the Burnham Beeches from an increase in recreational pressure, developers of new housing development will need to be in compliance with the adopted Burnham Beeches Special Area of Conservation Strategic Access Management and Monitoring Strategy (SAMM), which sets out a 500m development exclusion zone and a 500m – 6.5km SAMM mitigation zone</i> ”. The figure 6.5km should be corrected to 5.6km. The mitigation zone (Burnham Beeches SAC Zone of Influence) applies to 5.6km.	No objection to this amendment
Highways				
Development Management	Policy 4	29	No details provided as to how the loss of parking would be mitigated/replaced.	local evidence suggests this overflow carpark is rarely used since Covid/2020. In 2023 and in 2024, encampments of travellers taking over the site were reported to Buckinghamshire Council. Therefore the SG believe there would be no loss of parking to mitigate for.
	8.1.13/		Proposal Map 4 Orchehill Rise Car Park Allocation	

Ecology	Policy 4	30	As an existing car park (hardstanding) is proposed to be developed into housing the development will be exempt of biodiversity net gain requirements as far as no more than 25 square metres of boundary trees are to be affected.	noted
			The development should still incorporate biodiversity enhancements such as integrated bat and swift boxes in new dwellings and ‘hedgehog highways’ between boundary fences (gaps in fences at ground level for the movement of hedgehogs).	No objection to this amendment
Ecology	8.2.9	31	It is stated that:	The figure 'approx 10.5km' was taken from the HRA, pg 15. No objection to this amendment, if the figure is incorrect.
			<i>“Recreational pressure is an emerging theme for the Chilterns Beechwoods SAC, with trampling damage, contamination and deadwood removal identified as key issues in a recent impact assessment.</i>	
			<b><i>While Gerrards Cross Parish lies at a considerable distance from the closest part of the SAC (approx. 10.5km, an in-combination contribution of the plan to recreational footfall cannot be excluded. Developers will ensure that any residential development coming forward under the Neighbourhood Plan will make financial contributions to any mitigation approaches (e.g. SANG and SAMM) that form part of an emerging mitigation strategy for the SAC developed by Buckinghamshire Council.’</i></b>	
			However, it appears from maps that the Gerrards Cross Parish is well outside the Chilterns Beechwoods SAC 12.6km Zone of Influence. It is therefore <u>not a current</u> requirement for any of future Gerrards Cross residential developments to contribute into any SANG or SAMM relating to the Chilterns Beechwoods SAC (as far as the development site is outside the 12.6km Zone of Influence).	
Transport Strategy	Policy 10	37	BC supports Policy 10 specifically the requirement for traffic mitigation in new developments to ensure the “free and safe flow of traffic and the safety of pedestrians and cycle users”.	noted
Highways DM	Policy 10	37	It may be hard to quantify what needs to be mitigated/secured through financial contributions, in the context of the condition tests and the NPPF.	noted

Transport Strategy	Policy 11	37-38	The parish should take into consideration that BC has parking guidance for new developments, which can be found here: <a href="https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-planning-guidance/parking-guidance-for-new-developments/">https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-planning-guidance/parking-guidance-for-new-developments/</a>	noted
			We would advise the Parish to look at this guidance when assessing provision for car parking associated with new developments to ensure that the requirements can be supported. Please refer to this page from the parking guidance for recommended numbers of parking spaces per dwelling based on house size: <a href="https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-planning-guidance/parking-guidance-for-new-developments/the-standards/">https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-development-plans-and-guidance/local-planning-guidance/parking-guidance-for-new-developments/the-standards/</a>	noted
			Parking considerations should also take into account provision for sustainable travel, such as cycle racks and EV charging points. BC's Electric Vehicle Action Plan is available online here: <a href="https://buckinghamshire.moderngov.co.uk/documents/s43677/Appendix%204%20Electric%20Vehicle%20EV%20Action%20Plan.pdf">https://buckinghamshire.moderngov.co.uk/documents/s43677/Appendix%204%20Electric%20Vehicle%20EV%20Action%20Plan.pdf</a>	No objection to this amendment
Highways DM	Policy 11	37	Again, may be difficult to justify not supporting proposals based on on-street parking where it can be safely accommodated. This may be more focused on an amenity perspective rather than highway safety.	noted
			The Buckinghamshire Countywide Parking Guidance (BCPG) was published by Buckinghamshire County Council to provide a more accurate guide to determining parking provision for proposed developments in consideration that the existing guidance had been used for many years and did not appear to have been based on empirically sound reasoning.	noted
			To this end the standards within the BCPG were calculated on Census data, which in turn provided the optimum standards (and visitor parking on larger developments) based upon habitable floor space per unit. As a result, the standards did not automatically differentiate between houses and flats.	noted

			Moreover, should the GCTC seek to review the parking standards and data upon which the BCPG recommends and was based upon, the most appropriate time to do this would be if/when the BCPG is revised or overhauled (potentially as part of the work behind the Buckinghamshire Local Plan).	noted
			It would be inappropriate for the GCNP to stipulate its own parking standards, something which would erode the BCPG's effectiveness for developments outside the Gerrards Cross area, and would not take into account that the parking issues referred to within the GCNP are historical and cannot be attributed to developments whereupon the BCPG has been used in determining parking provision for only the last 6 years.	As can be seen from the evidence, parking was an important issue that arose from public consultation. The GX NP Supports sustainable development, but does not want this to be at the expense of safe and secure residential parking.
Transport Strategy	Policy 13	39	We support the requirement for new developments to contribute towards the provision, enhancement and mitigate traffic impacts on walkway routes for pedestrians. We would suggest that 'cyclists' and 'cycle routes' need to be featured more strongly in part a), b) and c) to reflect the comments in the part 9.3 policy justification.	No objection to this amendment
			BC is working on the Buckinghamshire Local Cycling & Walking Infrastructure Plan (LCWIP) which is a countywide network focusing on active travel links through and between villages and towns. Local Members and Community Boards have already been consulted and we would welcome your engagement when the plan goes out to public consultation later this year.	noted
Highways DM	Policy 13	39	This will also need to be taken into context with the requirements of the NPPF and the condition tests. It is unlikely that financial contributions could be sought and secured without opposition for all developments. It may need quantifying as to a qualifying number of dwellings/commercial floorspace, or we may be subject to appeals and subsequent costs incurred.	No objection to this amendment
			It is stated that: " <i>The following areas, as shown on green space maps A/B/C (Appendix D), are recognised as important to the local community and as such are designated as Local Green Spaces..</i> "	

Ecology	Policy 15	43	<p>It is recommended that a map of existing biodiversity assets (such as Local Wildlife Sites, Biological Notification Sites, NERC Act Section 41 Habitats of Principal Importance - Priority Habitats), Biodiversity Opportunity Areas (BOAs) in addition to statutory designated sites and ancient woodland within and adjacent to the Parish is incorporated into the Neighbourhood Plan using records collected from BMERC and Magic Maps (<a href="https://magic.defra.gov.uk/MagicMap.aspx">https://magic.defra.gov.uk/MagicMap.aspx</a>).</p>	No objection to this amendment
			<p>For example, part of the Gerrards Cross Parish lies within a county water vole key area and parts of the Parish lie within Biodiversity Opportunity Areas (the Central Chilterns Chalk Rivers BOA and the Colne Valley BOA). There are also Local Wildlife Sites, areas of ancient woodland and priority habitats (NERC Act Section 41 Habitats of Principal Importance) including Lowland Mixed Deciduous Woodland and Traditional Orchard that need to be considered.</p>	
Archaeology	17a	45	This policy is not needed as Scheduled Monuments and Listed Buildings are already protected at a higher level	One of the purposes of a Neighbourhood Plan is to ensure that new development is sympathetic to the local history and character, and that the local distinctiveness is maintained. This is the aim of this policy.
Archaeology	17b and Appendix F	45	Care should be taken with the term Non Designated Heritage Asset. This should not be used to define all buildings/sites that the NP team feel to be important, it is only for those assets defined either through inclusion on the Local Heritage List or through the planning process.	
Archaeology	17c and Appendix F	45	We would recommend Appendix 7 is omitted. As well as potentially becoming 'out of date' very quickly, it does not include all archaeological assets, and is misleading in terms of NDHAS. Instead we suggest that the NP recommend that development proposals consult with the Historic Environment Record (HER), as a minimum. This would be in accordance with paragraph 194 of the NPPF which states that in determining applications "As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."	
Archaeology			Buckinghamshire Council is currently compiling a local list of heritage assets, which will include archaeological sites. Any archaeological sites confirmed on the local list will be taken into consideration in the planning process. For further information, see <a href="http://Home - Buckinghamshire's Local Heritage List (local-heritage-list.org.uk)">Home - Buckinghamshire's Local Heritage List (local-heritage-list.org.uk)</a>	noted

Heritage	Policy 17 b)	49	To be in line with NPPF p209, rather than saying 'taking account' the Framework refers to 'balanced judgement'.	No objection to this amendment
Heritage	Appendix F		Does not include any criteria as to how these we assessed. In fact, the information relating to the NDHA is limited overall. It is assumed the GXNPSG have used the criteria set out in <i>Historic England Advice Note 7 (HEAN7) : Local Heritage List: Identifying and Conserving Local Heritage</i> and as such, should state this.	The SG would like appendic F to be retained as it identifies historic assets of local importance to the community and believe this enhances county-level records of historic assets.
Heritage	Appendix F		Column includes 'Permission sought'. Technically 'permission' is not required, it either meets the criteria or not. However, other NPs have engaged and/or notified owners out of courtesy.	No objection to this amendment
Heritage	Appendix F (or could be in Policy 17		No reference to the council's Local Heritage List – which does use the HEAN7 criteria. So if the GXNPSG have used the same criteria they can confirm as such.	The list was created by the SG, using information available to the Gerrards Cross Town Council. The HEAN7 criteria was not used.