

Policy Ref	Examiners Comments	SG Response
Examiners Comments		
Policy 4	does the Plan allocate this site for residential development?	Yes
Policy 4	Appendix J comments that the availability of the overflow car park for development would need to be confirmed with Network Rail and/or the train operating company. Please can the Town Council provide an update on this matter, and advise on its assessment of the ability of the site to be developed within the Plan period.	The site was promoted by the landowners through the call for sites through the South Bucks HELAA (Jan 2020) SB0046. Network Rail have been contacted to confirm current availability of the site within the plan period, we are awaiting a response (26/11/24).
Policy 8	does it bring any added value to national and local policies? In addition, is a 'priority' a matter that can properly be addressed in a land use planning policy as every application is considered on its merits and applicants will usually have no control over land elsewhere in the neighbourhood area?	Through community engagement, the reuse of brownfield sites proved to be important to the local community, therefore we feel it important to include it to show residents this importance has been recognised and highlighted through the Neighbourhood Plan. We would also hope that this policy will emphasise the support for the reuse of brownfield sites.
Policy 9	is the reference to Part Q of the Building Regulations necessary as the Regulations are applied in a matter-of-fact way and through different legislation?	If the examiner believes Part Q of the building Regulations will be applied through other routes, the SG are happy for reference to this to be removed, as the principle of the policy (to encourage inclusivity in the community) will not be lost through the removal of the reference to Part Q of the building Regulations.
Policy 10	does it bring any added value to national and local policies?	The issue of traffic and highways improvements was a frequently raised issue through the Neighbourhood Plan engagement and consultation process. 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.
Policy 13	I am minded to recommend that parts a and c of the policy are applied proportionately. Does the Town Council have any comments on this proposition?	The SG welcome any suggestion that would strengthen the Plan or make it more achievable.

Policy 14b	The relationship between the policy and the supporting text is unclear. Does the Plan define the proposed Safeguarded Areas either in text form or on a map base? Is it any land in the parish outside the Settlement Boundary (Figure 2)?	Bucks Council currently do not identify any safeguarded land (NPPF para 148) within the GX parish boundary. The reference has been included in the interest of durability of the NP and any potential changes Bucks Council may make to this.
	On a related matter, what is the intended purpose of the identification of Green Belt release sites in Appendix E (and referenced in paragraphs 8.1.5 to 8.1.8 and 10.1.3 of the Plan)?	Options for development sites within the GX parish boundary are extremely limited, as the town is bounded on all sides by Green Belt. The SG tried very hard to find land which could be used for residential development within the NP. This highlighted some Green Belt sites which border the built up area of the town and are considered to offer limited Green Belt benefits, and could therefore potentially provide sites for residential development. Again, in the interest of durability of the NP, the SG wanted to include these identified sites, whilst recognising that the NP cannot release land from Green Belt.
Policy 15	is part c) of the policy necessary given that Buckinghamshire Council will consider the justification for the designation of local green spaces in determining any planning applications affecting such areas on a site-by-site basis?	Green Spaces are extremely valuable to the community. The SG wanted to bring reassurance to local residents the significant weight the NP put on preserving these areas by highlighting the individual concerns which are important to the community.
Policy 18	does the policy bring any added value beyond Section 13 of the NPPF both generally, and especially as one of the five objectives of the Green Belt (as described in paragraph 143 of the NPPF) is to prevent neighbouring towns merging into one another?	Again, the strategic gaps proved to be of great importance to the community. In addition, as the Green Belt status and the NPPF is subject to review by successive governments, it sets out our objective to keep the strategic gaps within the Gerrards Cross Parish boundary.
Reg 16 Responses		
Thames Water Reg 16 Response		We are very pleased that Thames Water support the updates made following their response to Regulation 14 consultation and believe we have addressed all their concerns in a positive manner. If the examiner believes there are more amendments which need to be made in order to conform with Thames Water, the SG have no objection to these amendments.

<p>Montagu Evans Reg 16 Response</p>	<p>We would like to express our objection to Policies 14 and 18 of the GXNP as they fail to have regard to national policy and will prevent the achievement of sustainable development.</p>	<p>The GXNP seeks to reflect the desires of the community through planning policy. The community strongly expressed their desire to preserve the existing settlement boundary and the existing strategic gaps surrounding Gerrards Cross. The NP has tried to ensure the highest regard can be applied to these areas, whilst having due respect for National and Local Policy.</p>
<p>Montagu Evans Reg 16 Response</p>	<p>Policy 14 and Policy 18 both concern the increased restrictive imposition on future development above and beyond existing Green Belt policy. In this respect, it is relevant to consider the purpose and spirit of Green Belt policy and how policies 14 and 18 significantly differ without reasoned justification.</p>	<p>Policy 14 and Policy 18 differ in order to have regard to national policy and be in general conformity with strategic policies.</p>
<p>Montagu Evans Reg 16 Response Policy 14</p>	<p>This proposed policy does not allow for any assessment nor judgement of exceptional circumstances nor very special circumstances and therefore conflicts directly with national policy. Further, Green Belt policy allows for “appropriate development”, but Policy 14 does not.</p>	<p>Neighbourhood Plans do not aim to repeat National or Local policy, rather to add local context. Therefore the repetition of National Policy wording regarding exceptional circumstances etc is not required within the Neighbourhood Plan. In addition, the Neighbourhood Plan does recognise the Local Authorities right to identify Safeguarded land in the future and the right to review and alter Green Belt boundaries in exceptional circumstances, which is also the privilege of the Local Authority.</p>

<p>Montagu Evans Reg 16 Response Paragraph 10.1.3</p>	<p>Paragraph 10.1.3 of the GXNP recognises that Green Belt release may be required in the future in order to accommodate future development requirements and that this evidence will be assessed through the emerging Buckinghamshire Local Plan. However, the only justification for subverting Green Belt policy by sterilising the site for development is described in paragraph 10.1.5 as to “ensure the longevity of the Neighbourhood Plan”. As described above, Green Belt policy is permissive whereby exceptional and very special circumstances can be demonstrated, and the delivery of objectively assessed needs have been shown to be cases where development is allowed. In the absence of any assessment of future development needs with respect to residential dwellings, employment generating uses, energy projects and critical national infrastructure, and the ability to accommodate this land within the settlement boundary, this policy directly conflicts with national policy and should be struck out.</p>	<p>This is not policy, and therefore does not conflict with national policy.</p>
<p>Montagu Evans Reg 16 Response Policy 18</p>	<p>In the first instance it is noted that paragraph 10.5.5 is incomplete and key text has been obscured by the images. It is therefore difficult to comment on the whole of the policy justification and we request that the document is amended in the interests of transparency and completeness. Indeed, an extension of the consultation period to allow for stakeholders to contemplate this additional wording may be warranted.</p>	<p>Missing wording from para 10.5.5 reads: <i>'It supports wildlife and provides residents and visitors with walks and fresh air as well as many mature trees and farmland. Wapseys Wood (which forms part of this gap but not visible from the A40) currently provides infrastructure in the form of landfill to the wider towns and villages as well as providing a Travellers' site.'</i> This is a typographical error, for which we apologise, but do not believe it changes the essence of the evidence.</p>
<p>Montagu Evans Reg 16 Response Policy 18</p>	<p>It is contended that Policy 18 is written to place a prohibition on development around Gerrards Cross. This assertion is reinforced by paragraph 10.5.1 which recognises that “Local Authorities have the power to review Green Belt boundaries” which is used as justification for the more restrictive Policy 18. It is clear that the Strategic Gap policy is an effort to undermine Buckinghamshire Council’s emerging Development Plan.</p>	<p>Para 10.5.1 acknowledges that the Local Authorities have greater powers with regards to Green Belt than the Neighbourhood Plan. As mentioned above, the Green Belt status and the NPPF is subject to review by governments that change, therefore Policy 18 sets out our objective to keep the strategic gaps within the Gerrards Cross Parish boundary.</p>