



Report to West Area Planning Committee

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| Application Number: | 21/07911/FUL |
| Proposal: | Construction of 10 x 1-bed flats, 10 x 2-bed flats, 3 x 2-bed houses, 22 x 3-bed houses and 5 x 4-bed houses (50 residential units in total), with associated landscaping, parking, amenity space and infrastructure. |
| Site Location: | Land Rear Of 33 To 45, Glynswood, High Wycombe, Buckinghamshire |
| Applicant: | Inland Ltd |
| Case Officer: | Chris Steuart |
| Ward(s) affected: | WTAH – Previous Terriers and Amersham Hill Ward |
| Parish-Town Council: | High Wycombe Town – Unparished |
| Date valid application received: | 28.09.2021 |
| Statutory determination date: | 31.12.2021 |
| Recommendation | That the application is delegated to the Director of Planning and Environment for APPROVAL subject to: resolving issues relating to ecology and tree canopy cover. |

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

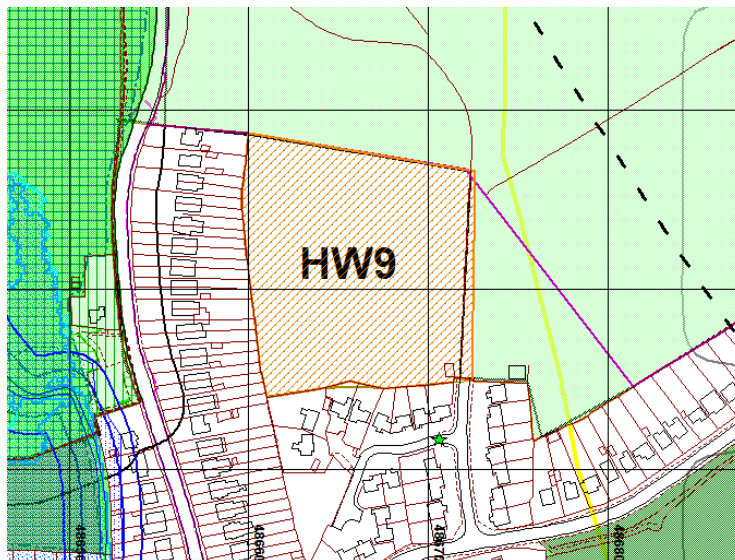
- 1.1 Land at Glynswood is identified for a development of up to 50 dwellings in the adopted local plan under the Policy HW9 housing allocation. It is the Council's planning policy to allow housing development at this site.
- 1.2 This application is being reported to Planning Committee at the Chairman's request as a 50 dwelling proposal at this site was refused by the Committee in March 2021.
- 1.3 The reasons for refusal of the previous scheme were discussed between the applicant and officers. The applicant's intention has been to address the Committee's previous concerns when drawing up this new proposal. The applicant has presented this proposal in a pre-committee presentation to members and has also spoken to key consultees.
- 1.4 The current proposal is considered to be acceptable in principle and in terms of its design, its impact on the AONB, impact on the historic environment, effect on flood risk, impact on amenity and parking and highway safety.
- 1.5 Further information will be required relating to biodiversity and tree canopy cover. The recommendation is that permission be deferred and to delegated to the Director of Planning and Environment for APPROVAL and that if the information submitted is

sufficient to satisfy the points set out in this report then planning permission be issued subject to a legal agreement and planning conditions. If the outstanding points are not resolved or if a satisfactory agreement cannot be negotiated, then the application would be refused under delegated powers.

- 1.6 It should be noted that bodies such as the Chilterns AONB Board, The Chilterns Society and the National Trust previously made strongly objections to the refused proposal but are now simply commenting on the application.

2.0 Description of Proposed Development

- 2.1 The application site comprises land accessed from Glynswood. The site can usefully be divided into two parts.
- (a) The western square shaped section of the site is proposed for housing development. This site was removed from the green belt and allocated for housing in the 2019 adopted Local Plan (Policy HW9).
 - (b) The eastern triangular shaped section is proposed to be public open space. It is proposed to be upgraded in terms of its biodiversity and used as public open space. This part of the site is located within the green belt.
- 2.2 The site (comprising both the housing and open space areas) is wholly located within the Chilterns Area of Outstanding Natural Beauty (AONB).



Policy context (showing HW9 allocation and green belt in light green shade.

The AONB is not shown but the site is located in the AONB)

- 2.3 The site is approximately 2.2 hectares in size and is located on the northern edge of High Wycombe. The two parcels can be described as follows:
- (a) The western square land parcel is 120m wide by 124m deep and set over to rough grazing land.
 - (b) The eastern triangular parcel is in a semi-wild state, and comprises a mixture of chalk grassland, scrub and sporadic self-seeded trees.

The two parcels of land are divided by a public footpath running from north to south linking Glynswood to the fields to the north (ref: HWU/148/1). Together these two parcels of land comprise the application site.

- 2.4 There are no designated heritage assets within the Site boundary. However, some 1.6 miles (2.6 km) to the northwest is Hughenden Manor (Grade 1), the associated Registered Park and Garden (Grade II) and the Disraeli Monument (Grade II*).
- 2.5 The site slopes down from east to west. The gradient of the slope is steepest in the eastern part of the site. A shallow depression traverses the site from northeast to southwest and comprises an overland flow route.
- 2.6 The site is accessed from Glynswood, an existing residential cul-de-sac to the south.
- 2.7 To the north and east of the site is a thick belt of trees followed by open countryside. To the south and west of the site is existing urban development on the outer edge of High Wycombe town.



Figure: Current proposed layout showing the housing area and open spaces.

- 2.8 The proposal equates to just under 35 dwellings per hectare. This density is listed for the site in the appendices to the local plan as an indicator of how much development could be accommodated.
- 2.9 This application follows the Planning Committee refusal of application 20/05980/FUL by the Council's West Area Planning Committee in March 2021. The application is now the subject of an appeal which is likely to be heard at a public inquiry (the Planning Inspectorate have not yet confirmed the arrangements). The Committee's substantive reason for refusal made the following points:
 - (a) Failed to deliver a landscape led design and layout,
 - (b) Lacked tree planting within the residential part of the site,
 - (c) Was out of character in the AONB by proposing 3 storey development, and
 - (d) Would impact on wider AONB views including from the Disraeli Monument.

A second reason for refusal was consequential of the first reason and related to the lack of a completed section 106 agreement noting that this second reason would not be pursued by the planning authority at appeal if an agreement was put in place.

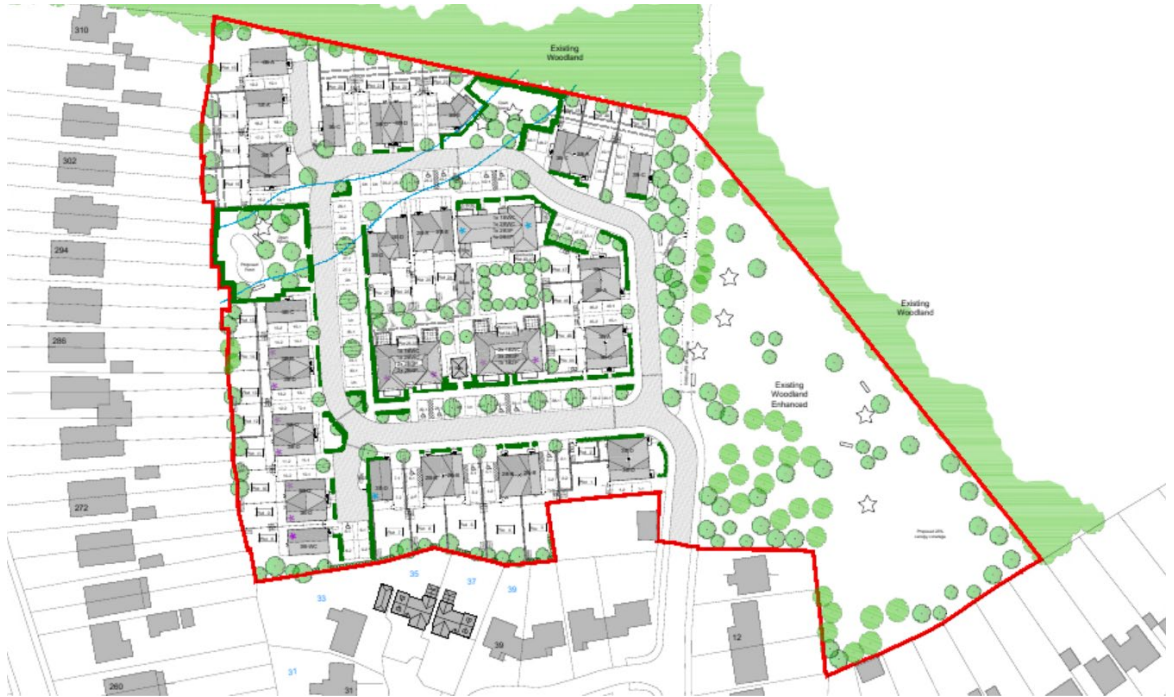


Figure: The layout that was refused in March 2021 and is now the subject of an appeal

2.10 Since that application was refused the applicant has worked on addressing the reasons for refusal and this has resulted in this current proposal. In drawing up the current proposal the applicant has:

- considered the representations that were made against the proposal,
- spoken to the public bodies that raised critical comments
- spoken to planning officers, and,
- sought advice from the Chiltern Ranger regarding green issues.

2.11 The principal differences between the refused scheme and the current application are:

- (a) There is no longer any three storey development within the proposal. The dwellings are now all two storeys in height.
- (b) There are no flats in the current proposal but there are maisonettes.
- (c) There is a significant reduction in floorspace of 353 sq. m. or 3,800 sq. ft. (this roughly equates to the floorspace of three and a half family sized dwellings)
- (d) Additional green space is now proposed particularly within the street scene of the housing area
- (e) A new area of open space is proposed within the housing layout bounded and overlooked by the maisonettes. The applicant has stated that overall an additional 500 sq. m. of open space is identified.
- (f) There is a change in dwelling mix (there is a greater proportion of smaller dwellings) which has resulted in 6 fewer car parking spaces being required under the council's parking standards. This results in the freeing up of space within the development.
- (g) The proposal now identifies significantly more trees (the applicant estimates 43% more)

2.12 The application was amended during the course of its determination. The amendments include a number of minor changes that have been made in response to points raised by consultees.

2.13 The development comprises the following:

| | Number | Private | Affordable | M4(3) Wheelchair user dwellings |
|----------------------|--------|---------|---------------------------------|---------------------------------------|
| 1 bed maisonettes | 10 | 2 | 6 Rent 2 Intermediate | 10 (8 affordable, 2 Private) |
| 2 bed maisonettes | 10 | 2 | 6 Rent 2 Intermediate | 0 |
| 2 bed house | 4 | 4 | 0 | 2 (2 Private) |
| 3 bed house | 21 | 13 | 7 Rent 1 Intermediate | 1 (1 affordable) |
| 4 bed house | 5 | 5 | 0 | 0 |
| Total | 50 | 26 | 24 19 Rent 5 Intermediate | 13 (9 affordable and 4 private) |

2.14 The application is accompanied by:

- a) Planning Application Forms (including ownership certificates);
- b) CIL Forms;
- c) Site Location Plan (ref: 18086 – S101);
- d) Full set of architectural drawings
- e) Planning Statement
- f) Design and Access Statement
- g) Statement of Community Involvement
- h) Transport Statement
- i) Ecological Appraisal
- j) Ecology – wildlife checklist
- k) Flood Risk Assessment
- l) Sustainable Urban Drainage System Statement
- m) Heritage Assessment
- n) Phase 1 Environmental Assessment
- o) Geo-Site Assessment
- p) Landscape and Visual Impact Assessment (inc. AONB assessment); and

q) Arboricultural Assessment

Statement of Community Involvement

2.15 During the course of drawing up proposals for this site the applicant has undertaken community engagement. This has included:

- Pre-application discussions with the planning and highway authorities,
- Pre –application member presentation (June 2021)
- Meetings with the Chilterns AONB Board, The National Trust, The Chiltern Society, The Brands Hill Residents’ Association, and The Hughenden Valley Residents’ Association.
- A newsletter to local residents with a dedicated phone line and email for enquiries.

2.16 Full commentary of the responses received is contained in the applicant’s Statement of Community Involvement. The Council has also widely consulted on the planning application and the responses are summarised in Appendix A of this report and are available in full on our web site.

Environmental Impact Assessment

2.17 The aim of the EIA Regulations is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.

2.18 The Town and Country Planning (EIA) Regulations 2017 (“EIA Regulations”) sets out that developments in sensitive locations require screening. In this case Glynswood is located in a sensitive location, the Chilterns AONB.

2.19 On 19th June 2018 an EIA screening request was submitted by Nexus Planning to the Council pursuant to the EIA Regulations for a development of up to 47 dwellings. On 4th July 2018, the Council responded confirming that the proposal was not considered to give rise to significant effects on the environment in EIA terms. Therefore, the proposed did not comprise EIA development and an Environmental Statement was not required. The fact that the Proposed Development now comprises 50 dwellings (3 more than previously screened) is not considered to materially impact on the conclusion reached by the Council.

2.20 The Government’s National Planning Guidance states:

“An Environmental Impact Assessment is more likely to be required if the project affects the features for which the sensitive area was designated. However, it does not follow that every Schedule 2 development in (or affecting) these areas will automatically require an Environmental Impact Assessment. “

3.0 Relevant Planning History

3.1 18/07274/OUT Outline application for up to 39 dwellings. The application was withdrawn.

3.2 20/05980/FUL Construction of 5 x 1-bed flats, 11 x 2-bed flats, 6 x 2-bed houses, 26 x 3-bed houses and 2 x 4-bed houses (50 residential units in total), with associated landscaping, parking, amenity space and infrastructure. Refused.

4.0 Summary of Representations section ahead of the considerations

- 4.1 The application was subject to the relevant consultation, notification and publicity. An initial round of consultation was undertaken in late October.
- 4.2 In response to the consultation 23 representations of objection from the local community were received.
- 4.3 The most frequently mentioned concerns/benefits are summarised at Appendix A of the Committee Report.
- 4.4 Objection: The grounds of objection include traffic and highway matters; provision for car parking; neighbour impacts; the volume of development; effect on the AONB and trees and ecology.
- 4.5 All representations received from statutory consultees, non-statutory consultees and other interested individuals, groups and organisations are also set out in Appendix A of the Committee Report

5.0 Policy Considerations and Evaluation

Planning policy framework

- 5.1 In considering the application, regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 In this case the site is allocated for development by Policy HW9 of the adopted local plan. There are other development plan policies that are also relevant. The policy framework will be set out below.

Principle (Housing)

Wycombe District Local Plan (August 2019): CP1 (Sustainable Development),
CP2 (Overall Spatial Strategy),
CP3 (Settlement Hierarchy),
CP4 (Delivering Homes),
HW9 (Parts of Green Farm, Glynswood, Green Hill, High Wycombe)
DM21 (The Location of New Housing),
DM42 (Managing Development in the Green Belt).

- 5.3 The principle of residential development and open space is acceptable.
- 5.4 The eastern part of the site (where residential development is proposed) was removed from the green belt and allocated for residential development in the new Local Plan. This followed lengthy public consultation and detailed consideration at the Local Plan examination.
- 5.5 The site appears in the Local plan as Policy HW9 – part of Greens Farm, Glynswood, Green Hill, High Wycombe.
- 5.6 The allocation was based on an indicative capacity for the site of 50 dwellings. The planning application is also for a development of 50 dwellings. It is noted that the amount of floorspace proposed by the development has decreased (by an amount that would equate to 3 and a half family sized houses) following the earlier refusal of a 50 dwelling proposal for the site.

- 5.7 No development is proposed in the eastern triangular part of the application site, which is proposed to be used as open space and upgraded in terms of its biodiversity value. That part of the application site remains in the green belt.
- 5.8 Residential development is considered to be acceptable in principle, subject to compliance with all other relevant policies in the Local Plan and other material considerations.
- 5.9 The development will deliver new homes and particularly affordable homes and will contribute towards the areas supply of housing. These are both matters of significant weight when considering this planning application. The development will contribute towards the council's 5-year housing land supply.

Chilterns AONB

Wycombe District Local Plan (August 2019): CP2 (Overall Spatial Strategy)

CP9 (Sense of Place)

CP10 (Green infrastructure and the natural environment)

DM30 – (The Chilterns Area of Outstanding Natural Beauty)

DM32 – (Landscape Character and Settlement Patterns)

DM44 – (Development in the Countryside Outside of the Green Belt)

Chilterns Building Design Guide and associated guides

- 5.10 The development will enhance the natural beauty of the Chilterns AONB in compliance with planning policy.

Landscape –led approach

- 5.11 Policy HW9 (Greens Farm. Glynswood) states that the development is required to provide a landscape – led positive approach to design and layout to limit its impact upon the AONB and not have an adverse impact on long distance views from Hughenden Park and Manor.
- 5.12 The development comprises predominantly 2 storey detached and semi-detached houses with two - storey maisonettes positioned in the centre of the development. The housing site has three areas of open space within it as well as the large area of open space to be provided to the east. A landscape-led approach has been followed in the layout and design of this development. The key points are:
- The development provides an understanding of the wider landscape character and setting of the development,
 - The development provides an analysis of the built character of the surrounding area,
 - An analysis has been undertaken of the opportunities and constraints for developing the site including: topography, drainage, trees, the public right of way, adjoining development, views into and out of the site, access and servicing, footpaths, perimeter block development, and the scale and design of the dwellings,
 - The layout includes undeveloped open space areas within the housing layout which breaks up the built appearance of the site. A new area of open space has been included within the residential part of the site when compared with the refused proposal,
 - There is considerable tree planting and the amount of tree planting has been significantly increased particularly within the residential part of the site,

- Recessive colour materials can be used for the dwellings which will help them blend into the landscape. The road surfaces are proposed to be predominantly block paved with some areas of tarmac,
- The development has minimal visual impact on distant views from within the Chilterns AONB,
- The landscape concept design has the effect of drawing treed areas into the site particularly on the boundary with the public footpath that runs north south across the site.

5.13 The land within the eastern triangle will be provided as public open space. Some play equipment will be installed in this area but can be of a design that suits the AONB location. The land will be upgraded in terms of its biodiversity value. The layout of the open space will need to be carefully planned so that the increased use of the area by the public does not undermine any biodiversity upgrades.

5.14 Policy HW9 requires that the development provides a landscape led approach to design and layout to limit its impact of the AONB. It is considered that the proposal accords with this policy. The proposal will not give rise to any significant visual harm.

5.15 Policy DM30 requires that development conserves and where possible enhances the natural beauty of the AONB. In the case of the Glynswood site the site has been allocated for development because it is considered that development would be capable of conserving and enhancing the natural beauty of the AONB. It is considered that it would achieve this policy objective by:

- The scale of development which is limited to two storeys and does not include excessively high ridge levels,
- The layout which includes three areas of open space and other green/verge space within the residential development,
- The layout has taken account of long distance views into the site from the Chilterns AONB.
- The potential for significant tree and other planting,
- The building and hard landscaping materials which will be controlled by planning condition and are indicated at this stage to be of an appropriate colour and quality,
- Boundary walling would be used in appropriate parts of the site to lift the quality of the development. It is proposed to require details of the boundary walls by condition.
- The building designs are considered acceptable within the Chiltern's AONB. The building designs would be high quality and incorporate features such as pitched roofs, chimneys, traditional materials and proportioned elevations which are advocated in the Chilterns Building Design Guide.
- The roads and paths would be in a variety of materials, which are permeable. A planning condition is necessary to ensure that the development achieves a high quality built finish in accordance with the proposed palette of materials.
- External lighting which will be controlled by planning condition. If the roads are to be unadopted then street lighting can be controlled under this condition.



Above: Examples of two dwelling types proposed for this site.



Above: Examples of street scenes proposed for this site

- 5.16 The comments of the Chilterns AONB Board and the Chilterns Society are presented at the end of this report. It is of note that they are no longer objecting to this proposal on the basis of AONB impacts (subject to relevant planning conditions). They did object to the previous proposal.

Affordable Housing and Housing Mix

Wycombe District Local Plan (August 2019): DM22 (Housing Mix),
DM24 (Affordable Housing),
DM41 (Optional Technical Standards for Building Regulation Approval)
Planning Obligations Supplementary Planning Document (POSPD)

- 5.17 The proposal is in compliance with the local plan in that it will comply with planning policies for housing mix, affordable housing and accessible housing.
- 5.18 The housing mix complies with the policy. The proposal exceeds 10 dwellings and therefore it is required to include a mix of dwelling size, type and tenure. The table set out earlier in this report shows the details of the housing. The table demonstrates that there is a good mix of 1 and 2 bed maisonettes and 2, 3, and 4 bed houses proposed for this site. There is both private ownership, shared ownership and affordable rented.
- 5.19 The proposal complies with the planning authority's detailed policies for affordable housing. These require 48% of the total number of dwellings at the site to be provided

as affordable housing. 24 of the 50 dwellings (48%) will be provide as affordable housing.

5.20 The proposal complies with the planning authority's policy for the tenure of the affordable housing. The planning authority's policy requires that there be an 80:20 ratio for affordable rent: intermediate affordable housing (e.g. shared ownership). In this case there are 19 rental units and 5 shared ownership (79:21 ratio rounded to 80:20).

5.21 The proposal includes accessible dwellings in accordance with the planning authority's planning policy. All developments that are required to provide on-site affordable housing are also required to provide 30% of affordable homes and 20% of market homes in accordance with the Building Regulation Standard M4(3) and the remainder of the dwellings in accordance with the Building Regulation Standard M4(2). The M4(3) standards relate to wheelchair user dwellings. The M4(2) standards relates to accessible and adaptable dwellings (similar to lifetime homes).

5.22 In terms of M4(3) housing:

- 7 of the 24 affordable dwellings (29% rounded to 30%) will be provided to M4(3) standards.
- 5 of the 26 units (19% rounded to 20%) will be provided to M4(3) standards.

The proposal complies with planning policies.

5.23 A S106 agreement is required to secure the affordable housing. Planning conditions are required to secure the accessible housing.

Transport matters and parking

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth)

CP12 (Climate change)

DM33 (Managing Carbon Emissions: Transport and Energy Generation)

DM35 (Placemaking and Design Quality)

DSA: DM2 (Transport requirements of development sites)

Interim Guidance on the Application of Parking Standards

Buckinghamshire Countywide Parking Guidance

5.24 The development is acceptable in terms of its highway impacts, sustainable travel, highway layout and parking provision in compliance with the planning authority's planning policies. The Highway Authority raise no objections.

5.25 The development takes its access from the existing Glynswood cul-de-sac in accordance with Policy HW9. A public right of way runs north south through the site connecting Glynswood to the National Trust estate to the north.

Highway capacity

5.26 The proposed development will have an acceptable impact on the local highway network in compliance with the planning authority's planning policies.

5.27 The applicant has produced a transport report. This has been considered by the Highway Authority. It is concluded that a suitable network has been considered with respect to the junction assessments and that it has been demonstrated to a satisfactory degree that the traffic impacts of this development will not constitute an

unacceptable impact on highway safety, or a severe impact to the local highway network. The Highway Officer therefore concludes that there are no grounds on which to base a highway objection to these proposals with regard to its trip generation and or impact upon local network capacity.

Sustainable travel

- 5.28 The proposal represents development within a sustainable location with respect to travel in accordance with the planning authority's planning policies.
- 5.29 The railway station is within a 2km walk of the site. The site has good access to existing bus stops and services. The site will link into the existing pedestrian network to the north of the town centre providing good pedestrian connectivity to facilities.
- 5.30 An informal footway that runs east west on National Trust land to the north of the site links the public right of way that runs along the eastern side of the housing site with Hughenden Road. Details of a scheme to improve pedestrian connectivity between this informal footpath and the existing pedestrian path on Hughenden Road including an existing pedestrian crossing island have been submitted as part of the application. These works can be secured by planning condition.

Site layout

- 5.31 The site is a cul-de-sac that is accessed from the existing road at Glynswood. A circuitous access road has been designed which has the advantage of eliminating the need for turning heads. A pedestrian footpath is located to the side of the site access road. The Highway Authority are satisfied that the road design will adequately access the development including provision for refuse and larger delivery vehicles.

Parking provision

- 5.32 Car parking will be provided within the site in a number of ways:
- Allocated on plot
 - Allocated off plot
 - Unallocated car parking
- 5.33 The amount of car parking to be provided is as follows:
- 30 houses x 2 spaces each = 60 spaces provided
 - 20 maisonettes x 1 space each = 20 spaces provided
 - Visitor parking: 80 total spaces provided x 20% = 16 spaces provided for visitors.
- 5.34 The proposal is considered to provide adequate car parking to meet the needs of the development.
- 5.35 Cycle parking is proposed. For the maisonettes it is provided within free standing cycle storage buildings. Cycle parking isn't identified for the houses but can be provided within the garden areas for each private dwelling by the future householders.

Public Rights of Way

- 5.36 Policy CS20 expects that development proposals ensure that the convenient use and enjoyment of existing public rights of way are not affected by development. The public right of way through the site will be slightly re-aligned as the access road enters the site but is otherwise not affected by the development. Additional tree planting will take place beside the right of way.

- 5.37 The public right of way enters the National Trust land at the northern end of the site. There is a footpath close to this point that heads west towards the A4128 Hughenden road. This path is not part of the formal rights of way network but is nonetheless used. The point where the path enters the road lacks a public footpath and the applicant is therefore proposing to construct a small section of pavement so that walkers can safely walk to the refuge crossing point. This can be secured by condition.



Above: The development will provide a short section of path on the eastern side of Hughenden Road to extend the current path beyond the refuge to a point where it will be joined by a path through the National trust land (not visible but on the right hand side of the photo).

Heritage

Wycombe District Local Plan (August 2019): CP9 (Sense of place)

CP11 (Historic Environment)

DM31 (Development Affecting the Historic Environment)

- 5.38 Subject to imposing a planning condition the development will not affect the significance of heritage assets.
- 5.39 Policy HW9 states that the development is required to not have an adverse impact on long distance views from Hughenden Park and Manor. The applicant has produced a Heritage Statement. The site is located close to Hughenden Manor Registered Park and Garden (Grade II), and in the vicinity of Hughenden Manor (Grade I), and the Disraeli Monument (Grade II*).
- 5.40 A photomontage has been provided by the applicant of the view from the Disraeli monument of the development site (see below). The site is currently viewed from the monument in its undeveloped state with the built up environs of High Wycombe

behind and to the right. Any impacts have to be viewed in the context that this site is allocated for a development of up to 50 dwellings. The test of any harms therefore is not whether the site when developed can be seen but what effect the development has on the view.

- 5.41 It is considered that the effect of the development on the viewpoint would be acceptable. The site is seen in the urban context of this part of High Wycombe. The appearance of the development is softened by the existing trees in the area, by the proposed new tree planting within the development and the use of appropriate coloured materials. The Landscape and Visual impact assessment can be viewed on the Council's website for this case.



Photo: A photomontage of the view of the development from the Disraeli Monument.

- 5.42 The Council's Conservation Officer is satisfied that the development will not harm the heritage assets and complies with the relevant statutory requirements. The materials for the development and landscaping will be controlled by planning condition.
- 5.43 The County Archaeologist has noted that the proposed site is located within an area of known multi period archaeological potential. It is located immediately to the east of an Archaeological Notification Area, defined by the boundary of the historic parkland of Hughendon Manor, and north of medieval hollow ways. In addition, artefacts of Roman building material, pottery and other artefacts have been recovered to the east of the application area, suggesting Roman buildings were present in the vicinity. The application site is therefore considered to have a good potential for archaeological remains to be present.
- 5.44 A planning condition is therefore required to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 199 and DOE Circular 11/95.

Raising the quality of place making and design

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth),
CP9 (Sense of place),
HW9 (Part of Greens Farm, Glynswood),

DM32 (Landscape character and Settlement Patterns),
DM34 (Delivering Green Infrastructure and Biodiversity in Development),
DM35 (Placemaking and Design Quality)
DSA: DM11 (Green networks and infrastructure),
DM16 (Open space in new development)
Residential Design Guide

- 5.45 The scheme is considered to represent good design that satisfies the planning authority's policies and guidance relating to place making and design quality.
- 5.46 The layout provides for a perimeter block structure which is the most robust and successful way to arrange residential layouts. The layout would:
- Clearly distinguish between public and private space, creating active streets and private backs, and protect existing adjacent rear gardens.
 - The layout would be legible and connect with the surrounding neighbourhood.
 - Be people friendly in that new streets would incorporate trees and be attractive to pedestrians.
 - Include new public open space that is useful, integrated and on the whole overlooked from the new dwellings.
 - Include parking that has been designed & arranged so that it would be afforded good surveillance, support activity in the street and not visually dominate the scheme.
 - The exposed rear garden boundaries of existing dwellings surrounding parts of the site would be now located behind rear gardens of new properties.
- 5.47 The Planning Committee's refusal of application 20/05980/FUL included reference to the then proposed 3 storey development at this site being out of character and keeping with the locality. This current proposal has removed the three storey development and replaced it with two storey buildings. The applicant has produced some comparative street scenes to demonstrate the effect this amendment has on the character of the development.
- 5.48 Planning conditions will be needed to ensure that the development is carried out in a way that reduces the fear of crime. This relates to matters such as garden gates being fitted with locks and to fencing design where fences are exposed to public spaces.



Streetscene A key plan



Street scene comparison 1: The above street scenes show the refused application under the now proposed application. The taller 3 storey flat block has been replaced with two storey development. The outline of the 3 storey building has been indicated on the street scene for comparison. This street scene looks towards the Disraeli monument and faces the new access road within the site.



Streetscene B key plan



Street scene comparison 2: The above street scenes also show the refused application under the now proposed application. The two taller 3 storey flat blocks has been replaced with two storey development. The outline of the 3 storey buildings has been indicated on the street scene for comparison. This street scene looks towards the existing houses in Glynswood and faces the new access road within the site.

Wycombe District Local Plan (August 2019): CP9 (Sense of Place),
DM35 (Placemaking and Design Quality)
DM40 (Internal space standards)
Residential Design Guide

DM35 (Placemaking and Design Quality)

DM40 (Internal space standards)

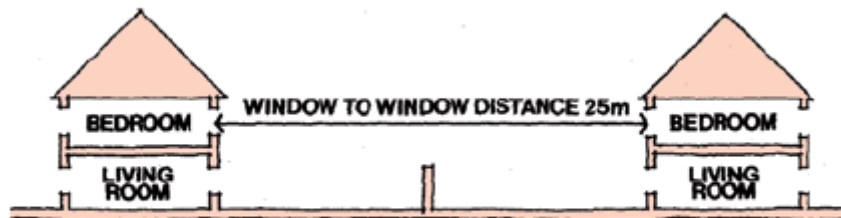
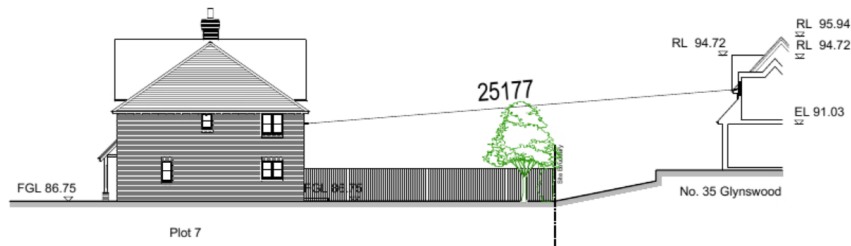
Residential Design Guide

5.50 The development will provide private, attractive, usable and conveniently located private amenity space of an appropriate size for each new home. Houses will be provided with private garden space, while maisonettes will be provided with either a ground level patio garden area or balcony.

5.51 The scheme will not result in adverse impacts on the amenities of neighbouring properties because:

- A 25m back to back distance is achievable with existing homes.
- Boundary screening will be achieved by the retention and enhancement of existing boundary landscaping.
- The perimeter block layout will ensure that existing gardens back onto new gardens thereby making it difficult for outside intruders to access back gardens.





Normal rear privacy distances

Plan showing distances between existing houses at 35 – 39 Glynswood and proposed dwellings. The distances exceed the 25 m standard (Residential Design Guide Policy B5)

- 5.52 The layout of the new development has been designed to comply with the Council's normal development standards in order to provide an adequate degree of amenity for the future residents of the proposal. The spacing between the dwellings is considered to be acceptable.
- 5.53 Some representations have commented that the proposal will result in the loss of views and devalue property prices. These are not matters that can be taken into account in making planning decisions.

Environmental issues

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth),

DM20 (Matters to be determined in accordance with the NPPF)

- 5.54 The Environmental Health Officer has not identified any concerns other than the inclusion of electric vehicle charging points in order to reduce the impact on air quality; although the site is not located within an Air Quality Management Area. The Environmental Services Officer has requested that one allocated car parking space serving every dwelling is provided with a charging point. The SPD states that:

“Residential (C class uses): 1 charging point per dwelling with dedicated parking (32 amp) or 1 additional dedicated charging point per 10 spaces (unallocated parking) or part thereof and ensure appropriate cabling is provided to enable increase in future provision.”

- 5.55 This aspect can be adequately addressed by planning condition.

- 5.56 A planning condition is recommended to control any lighting associated with the development. This is necessary in order to limit the impact on the appearance and character of the AONB and upon ecology.

Flooding and drainage

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth),
CP12 (Climate Change),
DM39 (Managing Flood Risk and Sustainable Drainage Systems),
HW9 (Part of Greens Farm, Glynswood).

- 5.57 The development is acceptable in respect of managing flood risk and complies with the planning authority's policies.
- 5.58 The site is not at risk of fluvial or groundwater flooding. The majority of the site is at very low risk of surface water flooding, however there is a surface water flow route through the site from north east to south west. No house or flats are proposed within this part of the site. The space is identified as public open space or car parking or road space. In accordance with policy DM39 a sequential test does not need to be carried out as the development has already been sequentially tested through the local plan process.
- 5.59 The applicant has supported the application with a Flood Risk Assessment. The Lead Local Flood Authority for the most-part accepted the applicants report but sought more information relating to surface water hydraulic modelling. The LLFA has considered additional information and has raised no objections.
- 5.60 The surface water runoff generated by the proposed development will be managed via infiltration; runoff from the dwellings will be directed into soakaways and the road will be constructed with permeable paving.
- 5.61 Any approval of the application will require legal agreement relating to sustainable drainage systems (SuDs) management and maintenance and planning conditions.

Green networks and infrastructure, biodiversity and ecology

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth),
CP9 (Sense of Place),
CP10 (Green infrastructure and the Natural Environment),
DM34 (Delivering Green Infrastructure and Biodiversity in Development),
DSA: DM11 (Green networks and infrastructure),
DM13 (Conservation and enhancements of sites, habitats and species of biodiversity and geodiversity importance),
DM14 (Biodiversity in Development)

- 5.62 The development:

- (a) Will not harm any protected species or designated conservation sites, and
- (b) Should be capable of achieving an appropriate tree canopy cover
- (c) Further information will be required relating to biodiversity net gain.

Biodiversity proposals

- 5.63 The applicant has provided a detailed ecological report to assess the biodiversity value of the site including protected species. The report goes on to consider the scope for

biodiversity enhancements. The report concludes that there would not be any adverse impacts on protected species. It also identifies the ecological mitigation measures that should be adopted to mitigate the harms caused by the impact of the development on the biodiversity value of the site.

5.64 The measures set out in the report include:

- (a) The restoration of existing hedgerows including the filling of any gaps with new planting and the creation of some new hedgerows.
- (b) The arrangement of the dwellings to allow habitat routes through the developed part of the site.
- (c) Extensive tree planting.
- (d) The creation of species rich grassland/meadow habitat within the open space areas. This will include the retention of two existing areas on site (one will be lost). The report suggests that this will be relatively straightforward with the right management regime in place.
- (e) Retaining and enhancing the small woodland in the centre of the site.
- (f) The creation of a pond on the sites western boundary. To include marginal planting.
- (g) During the construction phase, construction impacts on sensitive habitats to be controlled by good management and protective fencing to be placed around retained trees and hedgerows
- (h) A Landscape and Ecological Management Plan to be put in place (this should be the subject of a planning condition).
- (i) The control of lighting in the interest of ecology (this should be the subject of a planning condition).
- (j) The installation of bat and bird boxes and the provision of log-pile habitat for invertebrates and hedgehogs (this should be the subject of a planning condition).
- (k) A management plan for the construction phase (this should be the subject of a planning condition).

Policy Framework and Assessment

5.65 The policy framework is itemised above. Some key points are elaborated on below.

5.66 Under the terms of Policy DM14 where potential biodiversity interest is identified on a site or the development creates an opportunity to increase biodiversity the Council will require a survey to demonstrate how this will be addressed. In this case the applicant has provided a detailed survey. The policy also requires that all development proposals should be designed to maximise biodiversity by conserving, enhancing or extending existing resources or creating new areas or features. The development has the potential to conserve and enhance most features and create new features. There will be some loss of grassland and other vegetation but this has already been taken into account when the site was allocated for a development of up to 50 dwellings.

5.67 Policy DM11 relates to green infrastructure and networks. The site is not identified as a green infrastructure area or within a Green Corridor Opportunity Area. Nonetheless the principles behind the layout (i.e. where to place the buildings and undeveloped spaces) has been influenced by the desire to retain green routes through the site.

5.68 Under the terms of DM11 the highest level of protection will be given to sites and species of international and national importance; development affecting them will not normally be permitted. Development proposals in or potentially affecting important

habitat or protected species will be required to be accompanied by an assessment of the impacts.

- 5.69 There are 18 non-statutory ecological sites within 2km of the site (Local Wildlife sites and Biological Notification sites). There are no national designated sites (e.g. SSSI's). The Central Chilterns Chalk Rivers Biodiversity Opportunity Area (BOAs) is also located close to the site. Ecological surveys have been undertaken within the application site.
- 5.70 As already stated an Ecological Report was submitted with the application. The Ecological Report takes account of these designated sites of nature conservation and the impact of the development on protected species. Having considered the report your officers consider that the proposal would not result in an adverse impact on local designated nature conservation sites. Furthermore, the details of the desk- and field-based baseline investigations demonstrate that the habitats and species present within and around the application site are not considered to pose an 'in principle' constraint to the proposed development.
- 5.71 Under the terms of Policy DM34 all development is required to protect and enhance biodiversity and green infrastructure. Biodiversity and ecological features need to be thoroughly understood.
- 5.72 This is the one outstanding issue on this application. The site includes areas of grassland. The applicants report states that this does not qualify to be classed as calcareous (or chalk) grassland however the Ecological Report does highlight some areas of the grassland which have a higher diversity of chalk grassland species. The Council's Natural Environment Officer is concerned that this is not adequately dealt with in the applicant's biodiversity metric. Some of this grassland is located within the area to be developed for housing and the small open space areas within it and other areas of grassland are located within the larger triangular shaped open space area.
- 5.73 Planning policy currently requires that development is capable of demonstrating an increase in biodiversity value. The applicants have used an established practice of calculating biodiversity effects using a metric. This demonstrates a more than 10% increase in the biodiversity value of the site when the current situation is compared with the as developed situation. While 10% exceeds our current policy requirements the Natural Environment Officer has sought more information regarding the assumptions that have been used to input into the metric. In particular, the assumptions downgrade the ecological value of the current site. Additional information will provide more clarity on the ecological situation. A number of scenarios arise:
- (a) The metric is sound and the development will be capable of achieving its require enhancement on site. A legal agreement relating to the future management and maintenance of the site and planning conditions will then be required.
 - (b) The metric overstates the biodiversity gain. A discussion would be needed to see if any further gains could be achieved at the site especially within the large triangular open space. If not a legal agreement would be required to secure an off-site financial contribution to enhance biodiversity off-site to compensate for the harms and create a net gain.
- 5.74 Refusing the application of biodiversity impact grounds is not considered to be an option as the site has already been allocated for development and the work carried

out so far demonstrates that there is significant scope at this site for biodiversity enhancements.

Trees and canopy cover

- 5.75 The development would accord with policy DM34 in that it would achieve a future canopy cover of 25% of the site area. This would be achieved by the retention of existing trees and new tree planting both to boundaries and within the site itself.
- 5.76 The applicant's canopy cover calculations are set out in the Findings of Arboricultural Assessment report. The report is based on an assumed landscape scheme for the site. A planning condition is required to secured and landscape scheme and this scheme needs to include a revised canopy cover assessment to ensure that the final proposed landscape scheme is still able to achieve the 25% canopy cover.
- 5.77 The compliance with the tree canopy cover policy is not considered to give rise to other harms. The analysis assumes that trees will be planted:
- (a) In the back garden areas of proposed houses where they will also have some beneficial screening effects from surrounding dwellings. Even after this is done the gardens will still have adequate space that is not under a tree canopy.
 - (b) Within the street. Trees will be planted in key places within the street and this would accord with recent national design advice promoting street trees. The soil requirements required for such trees have already been considered.
 - (c) Within the smaller open spaces. The tree canopies will not result in the entire open space being in shade at all times.
 - (d) Within the large open space. The positioning of trees will have to have regard to the need to retain some areas of open grassland for ecological reasons. This is already accounted for in the calculations.

Building sustainability and climate change

Wycombe District Local Plan (August 2019):
DM33 (Managing Carbon Emissions: Transport and Energy Generation),
Air Quality SPD

- 5.78 The applicant has set out that the development will meet the relevant water efficiency requirements set out in policy. It is necessary to secure this with a planning condition.
- 5.79 A planning condition will also be required to secure a scheme to demonstrate how renewable technologies will be integrated into the development. The planning policy does not set out a target for the level to be achieved by such a scheme.

Public open space

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth)
DSA: DM16 (Open space in new development)
DM19 (Infrastructure and delivery)

- 5.80 The development will make provision for local public open space, including a play area, in accordance with policy DM16. The amount of open space to be provided on site exceeds the policy requirements.
- 5.81 The total open space to be provided on site is 0.66 hectares of land. This includes informal public open space proposed both within small land parcels within the housing

site and one larger area of land to the east of the housing area which includes natural play equipment. An additional area of open space has been provided when compared to the refused proposal. This is located in a square behind the maisonettes.

5.82 A planning obligation will be required to secure:

- (d) The provision of the open space
- (e) The provision of play equipment
- (f) The maintenance and future management of the open space

In accordance with DM16, strategic open space will be funded through CIL.

Infrastructure and Developer Contributions

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth)

DSA: DM19 (Infrastructure and delivery)

5.83 The development is a type of development where CIL would be chargeable.

5.84 It is considered that there would not be other types of infrastructure, other than those previously highlighted that will be put under unacceptable pressure by the development to justify financial contributions or the direct provision of infrastructure.

5.85 Having regard to the statutory tests in the Community Infrastructure Levy regulations and the National Planning Policy Framework it is considered that the following planning obligation(s) are required to be secured within a section 106 agreement:

- a) Affordable housing – at least 48% of dwellings to be provided as affordable housing.
- b) Provision of on-site public open space, including play equipment and its future management and maintenance.
- c) Future management and maintenance of on-site sustainable drainage system
- d) Provision of a scheme of biodiversity off-setting within the site including its future management and maintenance.

5.86 The applicant has confirmed willingness to enter into a legal agreement to secure all of the above aspects. It should also be noted that the recommendation requires further work to be carried out on the biodiversity impacts of the development. If off-site contributions towards biodiversity enhancements were required then these would also be secured within a section 106 agreement.

Weighing and balancing of issues / Overall Assessment

5.87 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.

5.88 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,

- b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
 - c. Any other material considerations
- 5.89 As set out above it is considered that the proposed development would accord with the development plan policies.
- 5.90 The development would bring the following benefits:
 - (a) The provision of housing on an allocated site for which there is a need and which will count towards the Council's 5-year housing land supply.
 - (b) The provision of affordable housing for which there is a significant need in the area.
 - (c) The provision of wheelchair user dwellings and accessible and adaptable dwellings.
 - (d) The provision of new open space and play equipment to serve the community.
 - (e) Upgrades in biodiversity and significant new tree planting.
 - (f) Community Infrastructure levy will be paid which will fund local infrastructure.
 - (g) In the short term employment in the construction industry.
- 5.91 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

6.0 Working with the applicant / agent

- 6.1 In accordance with paragraph 38 of the NPPF (2019) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 6.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 6.3 In this instance:
 - The applicant was provided with pre-application advice.
 - The applicant was provided the opportunity to submit amendments to the scheme/address issues.
 - The case was considered by the planning committee where the applicant had the opportunity to answer representations.

Recommendation: That the application is delegated to the Director of Planning and Environment for Approval subject to:

- A. The Director of Planning and Environment being satisfied that:
 - (a) The development will achieve a biodiversity net gain,
 - (b) The detailed tree canopy cover calculator being submitted to demonstrate that 25% canopy cover will be achieved at this site, and
- B. The recommended planning conditions and

C. The satisfactory completion of an agreement under s106 of the Town and Country Planning Act (as amended) in relation to the Planning Obligations broadly in accordance with the details set out in the main body of the report

- 1) Affordable housing – at least 48% of dwellings to be provided as affordable housing.
- 2) Provision of on-site public local open space, including play equipment and its future management and maintenance.
- 3) Future management and maintenance of on-site sustainable drainage system
- 4) Provision of a scheme of biodiversity off-setting within the site including its future management and maintenance.
- 5) Only if required as a result of (A) above, a financial contribution towards biodiversity enhancements off-site

or if the matters in (A) above cannot be satisfactorily resolved or a satisfactory S106 Agreement cannot be completed, for the application to be refused for such reasons as the Director of Planning and Environment considers appropriate.

It is anticipated that any permission would be subject to the following conditions:

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (As amended).

2 The development hereby permitted shall be built in accordance with the details contained in the planning application hereby approved and the details contained within the following drawings:

- | | |
|---------|--|
| S101 | Location Plan |
| C301E | Coloured Site Layout |
| C302A | Illustrative Street Scenes (AA, BB, CC & DD) |
| C302.1A | Illustrative Section/Street Scene (EE, FF) |
| P300G | Proposed Site Layout |
| P301A | Proximity Information to 35 Glynswood |
| P302A | Affordable Housing Layout |
| P303A | Building Material Layout |
| P304A | Key Buildings Layout |
| P305A | Boundary Material Layout |
| P306B | Surface Material Layout |
| P307A | Car Parking Layout |
| P308C | Refuse Strategy Layout |
| P310 | Plots 1 & 2 (Plans) |
| P311 | Plots 1 & 2 (Elevations) |
| P312 | Plots 3 (Plans) |
| P313 | Plots 3 (Elevations) |
| P314 | Plots 4 & 5 (Plans) |
| P315 | Plots 4 & 5 (Elevations) |
| P316 | Plots 6 & 7 (Plans) |
| P317 | Plots 6 & 7 (Elevations) |
| P318 | Plot 8 (Plans) |
| P319 | Plot 8 (Elevations) |
| P320 | Plots 9-10,11-12,13-14 (Plans) |

| | |
|-------|---|
| P321 | Plots 9-10,11-12,13-14 (Elevations) |
| P322A | Plots 15-16, 37-38 (Plans & Elevations) |
| P323 | Plots 17-18 (Plans) |
| P324 | Plots 17-18 (Elevations) |
| P325 | Plots 19, 20, 49 (Plans) |
| P326 | Plots 19, 20 (Elevations) |
| P327 | Plots 49 (Elevations) |
| P328 | Plots 21 (Plans) |
| P329 | Plots 21 (Elevations) |
| P330 | Plots 22-23 (Plans) |
| P331 | Plots 22-23 (Elevations) |
| P332 | Plots 24 (Plans) |
| P333 | Plots 24 (Elevations) |
| P334A | Plots 25-28, 33-36 (Plans & Elevations) |
| P335B | Plots 29-32 (Plans & Elevations) |
| P336A | Plots 39-42 (Plans & Elevations) |
| P337B | Plots 43-44 (Plans) |
| P338A | Plots 43-44 (Elevations) |
| P339 | Plots 45-46 (Plans) |
| P340 | Plots 45-46 (Elevations) |
| P341 | Plots 47 (Plans) |
| P342 | Plots 47 (Elevations) |
| P343 | Plots 48 & 50 (Plans) |
| P344 | Plots 48 & 50 (Elevations) |
| P345A | Ancillary Building - Bike Store & Shed |
| P346A | Ancillary Building - Bike Store |

Accommodation Schedule P300E 10.12.21 unless the Local Planning Authority otherwise first agrees in writing.

Reason: In the interest of proper planning and to ensure a satisfactory development of the site.

- 3 Notwithstanding any indication of materials which may have been given in the application, a schedule and/or samples of the materials and finishes for the development shall be submitted to and approved in writing by the Local Planning Authority before any development above ground level takes place. Thereafter, the development shall not be carried out other than in accordance with the approved details.
Reason: To secure a satisfactory external appearance and ensure the special character of the Chilterns AONB is respected.
- 4 Unless otherwise first agreed in writing with the Local Planning Authority and notwithstanding any indication given on the plans hereby approved the communal gates providing access to back gardens shall be made self-closing and fitted with a self-securing lock.
Reason: In the interests of security to back garden areas and to reduce the risk/fear of crime.
- 5 No development shall take place on the dwellings above damp course level until the details of the design of the garden enclosing brick walls within this proposal have been submitted to and approved in writing by the Local Planning Authority. The walls shall be designed to be appropriate to the Chilterns AONB setting. The development shall only take place in accordance with the approved details.

Reason: In the interests of the character and appearance of the Chilterns AONB.

- 6 Drawings of the site identifying the following shall be submitted to and approved in writing by the Local Planning Authority before any development takes place;

- (a) Existing ground levels on site (spot heights) including a datum point that is located off site.

Levels should be Above Ordnance Datum (AOD).

- (b) The level of the road outside the site. (AOD).
- (c) The proposed levels on site following completion of the development (for each existing height a proposed height should be identified).
- (d) The location and type of any retaining structures needed to support ground level changes.
- (e) The Finished Floor Level for every building that is proposed.
- (f) Cross sections within the site taken up to the site boundaries. The information supplied should clearly identify if land levels are being raised or lowered.
- (g) In the case of residential development, sections showing the level of the proposed garden(s) and retaining structures.

The development shall be carried out only in accordance with the approved details.

Reason: This is a pre-commencement condition. It is necessary to ensure accurate information can be provided regarding the levels for the development and thereby to ensure that the work is carried out at suitable levels in relation to adjoining properties and highways, to ensure that the impact on surrounding views is as assessed and in the interests of the street scene.

- 7 No development shall take place until a fully detailed landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The approved landscaping scheme shall be implemented in accordance with condition 9. Details shall include:

- a) A scaled plan showing all existing vegetation and landscape features to be retained and trees and plants to be planted;
- b) The design of all boundary enclosures. Where fencing is located on a boundary between a rear garden and a communal rear access alleyway it shall be 1.5 metres high above ground level with trellis fencing on top
- c) Details of all play equipment and any other structures to be placed in the open space (e.g. litter bins, seating);
- d) Location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - a. permeable paving
 - b. tree pit design, fully demonstrating how the soil volume in the canopy cover calculations will be achieved in hard landscaped areas and how underground services will be incorporated into the design where required
 - c. underground modular systems
 - d. Sustainable urban drainage integration
 - e. use within tree Root Protection Areas (RPAs);
- e) A schedule detailing sizes and numbers/densities of all proposed trees/plants. Individual trees shall be planted as Extra Heavy Standard 14-16mm minimum girth to BS8545;
- f) Tree pit designs including details of soil volumes. For street tree pits to include where appropriate a cellular confinement or other system for tree pits that are fit for purpose and suitable for vehicles and pedestrian usage.

- f) Specifications for operations associated with plant establishment and maintenance that are compliant with best practise
- g) A report to demonstrate how the Councils 25% canopy cover policy is being complied with at this site.
- h) Management and maintenance of the landscape scheme including details of how trees in back gardens will be protected from removal in the longer term.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

Reason: This is a pre-commencement condition required to safeguard and enhance the character and amenity of the area, to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces within the development. This is in accordance with policy DM34 of the Wycombe Area Local Plan

- 8 No development shall take place until a fully detailed scheme for the protection of the retained trees, in accordance with BS 5837:2012, including a tree protection plan (TPP) and an Arboricultural Method Statement (AMS) have been submitted to and approved in writing by the Local Planning Authority. Specific issues to be dealt with in the TPP and AMS:

- a) Location and installation of services/ utilities/ drainage that may impact on retained trees or areas of new planting.
- b) Methods of any construction-related activities within the root protection area (RPA as defined in BS 5837: 2012) of the retained trees.
- c) A full specification for the installation of boundary treatment works that may impact on the retained trees.
- d) A full specification for the construction of any roads, parking areas and driveways, including details of the no-dig specification and extent of the areas of the roads, parking areas and driveways to be constructed using a no-dig specification. Details shall include relevant sections through them. Tree protection and AMS
- e) A specification for protective fencing to safeguard retained trees and the land to the east of the Prow during both demolition and construction phases.
- f) A specification for scaffolding and ground protection within tree protection zones.
- g) Details of site access, temporary parking, on site welfare facilities, loading, unloading and storage of equipment, materials, fuels and waste as well concrete mixing and use of fires
- h) Methodology and specification for any facilitation pruning, including root pruning in accordance with BS3998:2010
- i) Arboricultural supervision and inspection by a suitably qualified tree specialist
- j) Methods to improve the rooting environment for retained and proposed trees and landscaping

The development thereafter shall be implemented in strict accordance with the approved details.

Reason: This is a pre-commencement condition which is required to satisfy the Local Planning Authority that the trees to be retained and the land to the east of the PRoW will not be damaged during construction and to protect and enhance the character of the site, in accordance with Policy DM34 and pursuant to section 197 of the Town and Country Planning Act 1990.

- 9 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the buildings or the completion of the development, whichever is the sooner. Any trees, plants or areas of

turfing or seeding which, within a period of 3 years from the completion of the development, die are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority first gives written consent to any variation. With the exception of any pruning, tree surgery or felling specifically shown in an approved tree report or landscaping scheme, no tree, shrub or hedge shall be pruned, felled or removed without the prior approval of the Local Planning Authority. If during construction of the development, or within a period of three years of its completion, any such tree, shrub, hedge dies or becomes damaged, destroyed, diseased or dangerous, it shall be replaced during the following planting season by another healthy, tree, shrub or hedge as the case may be of a similar size and species, unless otherwise approved in writing by the Local Planning Authority. Thereafter any such replacement planting shall be maintained or further replaced as necessary for three years after replacement.

Reason: In the interests of amenity and to ensure a satisfactory standard of landscaping and to ensure the satisfactory retention of existing trees, shrubs and hedges and in the interests of visual amenity.

- 10 No development shall take place until an Ecological Design Strategy (EDS) addressing protection, mitigation, compensation, enhancement, and restoration which builds on the recommendations set out in the Ecological Appraisal and the Illustrative Landscape Strategy, has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following.

- a) Purpose and conservation objectives for the proposed works.
- b) Review of site potential and constraints.
- c) Detailed designs and working methods to achieve stated objectives.
- d) Extent and location and area of proposed works on appropriate scale maps and plans.
- e) Specification and source of materials to be used where appropriate, e.g. native species of local provenance.
- f) Details for the translocation of soil for use in creation of wildflower meadow, from those parts of the site which will be built on, where there is semi-improved neutral grassland areas of the site (as identified on the Phase 1 Habitat Survey 8th December 2020 - Plan EDP C1 of the Ecological Appraisal).
- g) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- h) Persons responsible for implementing the works.
- i) Details of initial aftercare.
- j) Details for ecological supervision and monitoring and a procedure for deciding upon the most ecologically appropriate remedial measures if necessary.
- k) Details for disposal of any wastes arising from works.
- l) Retention and protection of existing habitats during construction.
- m) Habitat removal and reinstatement.
- n) Provision for wildlife corridors, linear features and habitat connectivity.
- o) Woodland, tree, hedgerow, shrub, pond and wildflower planting and establishment.
- p) Designs for the new pond including sections and materials used.
- q) Soil handling, movement and management.
- r) Creation, restoration and enhancement of semi-natural habitats.
- s) Provision and control of access and environmental interpretation facilities, e.g. paths, fences, gates and signs/information boards.

- t) Individual ecological features including hedgehog holes in fences, bat and bird boxes built into buildings and attached to trees, invertebrates' hotels and reptiles/amphibian refugia.

The EDS shall where appropriate be cross referenced in other relevant details (e.g. landscape plans, detailed building design, construction environmental management plan), and it shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: This is a pre-commencement condition. It is necessary to ensure compliance with the requirements of the Conservation of Habitats and Species Regulations 2017, Schedules 1, 5 and 8 of the Wildlife & Countryside Act 1981 (as amended), and the Protection of Badgers Act 1992. And to ensure that there is a net gain in biodiversity in line with the requirements of the National Planning Policy Framework (NPPF).

- 11 No development shall take place until a landscape and ecological management plan (LEMP) has been submitted to, and has been approved in writing by, the local planning authority. The content of the LEMP shall include the following:

- i) Description and evaluation of features to be managed.
- ii) Ecological trends and constraints on site that might influence management.
- iii) Aims and objectives of management.
- iv) Appropriate management options for achieving aims and objectives.
- v) Prescriptions for management actions.
- vi) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- vii) Details of the body or organisation responsible for implementation of the plan.
- viii) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.

The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The approved plan will be implemented in accordance with the approved details.

Reason: This is a pre-commencement condition. It is necessary to ensure appropriate protection and enhancement of biodiversity, to make appropriate provision for natural habitat within the approved development and to provide a reliable process for implementation and aftercare.

- 12 No development shall take place (including ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.

- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: This is a pre-commencement condition. It is necessary to ensure that development is undertaken in a manner which ensures important wildlife is not adversely impacted.

- 13 No floodlighting or other form of external lighting shall be installed unless it is in accordance with a "lighting design strategy" which shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and badgers and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) and detail how timing of lighting will be controlled, so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: In the interests of the character and appearance of the area and biodiversity.

- 14 In accordance with the approved drawings seven affordable (on plots 8, 25, 27, 33, 35, 39 and 41) and five private dwellings (on plots 15, 37, 44, 45 and 46) shall be designed to meet the standards set out in Building Regulations Approved Document M4(3) and the remaining dwellings shall be designed to achieve the standards in Building Regulations Approved Document M4(2), unless otherwise first agreed in writing by the Local Planning Authority.

Reason.

To meet the need for accessible, adaptable and wheelchair user dwellings as required by policy DM41.

- 15 No above ground construction shall take place until a scheme to integrate renewable technologies (e.g. heat pumps, photo voltaic cells) into the development has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be designed to comply with Local Plan Policy DM33 and Policy C12. The development shall be implemented in accordance with the approved scheme and no dwelling shall be occupied until the measures within the scheme relating to that house or flat have been provided. The scheme shall remain operational for the lifetime of the development unless otherwise first agreed in writing by the Local Planning Authority.

Reason: In the interests of managing carbon emissions and mitigating climate change as required by Local Plan Policy CP12 and DM33.

- 16 No other part of the development shall be occupied until the off-site highway works which include:
- The proposed footway connection/pedestrian footway improvements on Hughenden Road as identified in the Transport Statement,
 - A new means of access on Glynswood, constructed in accordance with the Buckinghamshire Council guide note "Commercial Vehicular Access Within the Public Highway"
- have been laid out and constructed in accordance with details to be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.
- Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.
- 17 The development shall not begin until details of the estate road (including matters such as the longitudinal sections of the roads, the details of the materials intended for use in construction and whether the road would be adopted) have been approved in writing by the Planning Authority (in consultation with the Highway Authority) and no dwelling shall be occupied until the estate road which provides access to it from the existing highway has been laid out and constructed in accordance with the approved details.
- Reason: This is a pre-commencement condition that is required in order to ensure that the estate road is of an appropriate design to minimise danger, obstruction and inconvenience to users of the highway and of the development.
- 18 No other part of the development shall begin until the new means of access has been altered in accordance with the approved drawing and constructed in accordance with the Buckinghamshire Council guide note "Commercial Vehicular Access Within the Public Highway".
- Reason: This is a pre-commencement condition required in order to minimise danger, obstruction and inconvenience to users of the highway and of the development.
- 19 No dwelling shall be occupied until
- (a) The car parking serving that dwelling has been provided. The unallocated car parking shall be provided before the occupation of any flat hereby approved.
 - (b) The scheme for manoeuvring and the loading/unloading provisions for refuse and delivery vehicles shown on the submitted plans has been laid out.
- The car parking, manoeuvring space and loading/unloading provisions for refuse and delivery vehicles shall not thereafter be used for any other purpose.
- Reason: To ensure that adequate car parking is provided in the interests of the amenities of the area.
- 20 Prior to the commencement of any works on the site, a Construction Traffic Management Plan detailing the management of construction traffic (including vehicle types, frequency of visits, expected daily time frames, use of a banksman, on-site loading/unloading arrangements and parking of site operative's vehicles) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with such approved management plan.
- Reason: This is a pre- commencement condition as development cannot be allowed to take place, which in the opinion of the Highway Authority, could cause danger, obstruction and inconvenience to users of the highway and of the development.

- 21 The facilities for the storage of refuse bins and cycles shall be provided in accordance with the approved plans before the development that they relate to is first occupied and thereafter the facilities shall be permanently retained for their purpose.
Reason: To ensure a satisfactory appearance and in the interests of the amenities of the occupiers and adjoining residents.
- 22 The development shall not begin until details of the disposal of surface water from the estate have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and no dwelling shall be occupied until the works for the disposal of surface water have been constructed in accordance with the approved details.
Reason: This is a pre-commencement condition and is required to ensure that all components of the development take into account the effects of the scheme which is needed to minimise danger and inconvenience to highway users.
- 23 No development shall take place, unless authorised by the local planning authority, until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in the form of a geophysical survey and trial trenching in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority. Where significant archaeological remains are confirmed these will be preserved in situ.
Where significant archaeological remains are confirmed, no development shall take place until the applicant, or their agents or successors in title, have provided an appropriate methodology for their preservation in situ which has been submitted to and approved in writing by the local planning authority and the approved methodology shall be complied with. Where archaeological remains are recorded by evaluation and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place until the applicant, or their agents or successors in title, have secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. The development shall thereafter take place in accordance with the approved scheme.
Reason: This is a pre-commencement condition in order to control the potentially harmful effects on historic assets. To ensure any archaeological remains that may be present are preserved in situ and/or recorded for future generations as appropriate. To comply with the requirements of policy CP11 and the NPPF.
- 24 Development shall not begin until a surface water drainage scheme for the site (including the roads), based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:
- No dwellings built within the surface water flow route
 - Assessment of SuDS components, as listed in the CIRIA SuDS Manual (C753) including small above ground SuDS components and active rainwater harvesting. A justification for exclusion is required if necessary
 - Demonstrate that water quality, ecological and amenity benefits have been considered

- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- Full construction details of all SuDS and drainage components
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.
- Flow depth
- Flow volume
- Flow direction

Reason: This is a pre-commencement condition ~~is~~ to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 163 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

- 25 Prior to occupation of the development hereby permitted, 50 electronic vehicle charging points with a minimum rating of 32amp must be installed. The charging points shall be provided so that one charging space serves each dwelling.

Reason: To manage carbon emission generation and mitigate for climate change in accordance with local plan policy CP12 and DM33 and to comply with the Council's air quality SPD to reduce carbon emissions and the impact on health arising from Nitrogen Dioxide emissions from the development.

- 26 The dwellings shall all achieve the higher water efficiency standard set out in the appendix to Building Regulations Approved Document Part G.

Reason: In order to meet the requirements of Local Plan policy CP12 and DM41 in the interests of water efficiency.

- 27 No dwellings shall be occupied until
- (a) A dropped kerb has been installed at the point where Footpath HWU/148/1 meets the roadway (Glynswood) in accordance with details submitted to and approved in writing by the Local planning authority.
 - (b) The existing gate across Footpath HWU/148/1 has been removed.

Reason: In the interests of promoting footpath use to all members of the community including those with ambulant disabilities.

Informatives

- 1 The planning permission is subject to planning obligations contained in a section 106 agreement.
- 2 In accordance with paragraph 38 of the NPPF2 Buckinghamshire Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments. Buckinghamshire Council work with the applicants/agents in a positive and proactive manner

by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.

- 3 It is contrary to section 163 of the Highways Act 1980 for surface water from private development to drain onto the highway or discharge into the highway drainage system. The development shall therefore be so designed and constructed that surface water from the development shall not be permitted to drain onto the highway or into the highway drainage system.
- 4 The applicant is advised that if it is intended to use soakaways as the method of dealing with the disposal of surface water then the permission of the appropriate Water Authority may be necessary.
- 5 The applicant is advised that the off-site works will need to be constructed under a section 278 of the Highways Act legal agreement. This agreement must be obtained from the Highway Authority before any works are carried out on any footway, carriageway, verge or other land forming part of the highway. A minimum period of 8 weeks is required to draw up the agreement following the receipt by the Highway Authority of a completed Section 278 application form. Please contact Highways Development Management at the following address for information:

Highways Development Management (Delivery team)
Buckinghamshire Council
6th Floor, Walton Street Offices
Walton Street,
Aylesbury
Buckinghamshire
HP20 1UY
- 6 It is an offence under S151 of the Highways Act 1980 for vehicles leaving the development site to carry mud onto the public highway. Facilities should therefore be provided and used on the development site for cleaning the wheels of vehicles before they leave the site.
- 7 No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under S137 of the Highways Act 1980.
- 8 The applicant is advised that adequate measures should be in place to ensure water is not carried out onto the highway. If water is carried out onto the highway during icy period, site inspectors will request salt is applied to affected areas.
- 9 The attention of the applicant is drawn to the requirements of section 60 of the control of pollution Act 1974 in respect of the minimisation of noise on construction and demolition sites. Application under Section 61 of the Act, for prior consent to the works, can be made to the environmental Services Division of the Council.

APPENDIX A: 20/05980/FUL

Consultation Responses and Representations

Councillor Comments

Cllr Green - Although removing the block of flats is an improvement, I have concerns that the provided parking provision will be insufficient and will result in parking in the roads both on this development and spilling out into Glynswood.

The additional traffic generated by this development will add to the pressure on the junction of Glynswood and Green Hill and the junction of Green Hill and Hughenden Road. The developer should contribute to junction improvements at both these junctions.

The Government has stated that future development should be on brown field sites not green field sites. This is not a brown field site and should therefore be refused in line with Government policy.

If officers are minded to approve this application, I would like it brought to committee for determination.

Parish/Town Council Comments

High Wycombe Town – Unparished.

Consultation Responses

Arboriculture

Arboricultural report, Canopy Cover Calculations, Landscape Strategy.

Recommendations: No objection in principle.

Arboricultural Report at 4.21 including appendix EPD 7 it is noted that the canopy cover calculations are only an extract and the applicant should provide a copy of the full calculator. This presents a degree of uncertainty as to achieving the minimum 25%.

The applicant will need to also demonstrate that if there is a short fall that other mitigation opportunities should be also considered and applied to redress this by way of New Green Infrastructure elements for this development.

Landscape/treescape for the General site layout regarding street tree planting is welcomed and subject to species selection as part of any detailed landscape scheme. Tree pit details and soil volumes will be crucial to ensure that the tree in paved areas have sufficient soil volume to sustain their growth.

The site is on chalk and any trees planted in the open areas and gardens will need to have a sufficient soil volume to grow. Therefore, tree pit and the soil volumes details will be required

Conditions

- Landscape scheme with details including soil volumes for all tree pits.
- Details of street tree pits and a cellular confinement or other systems for tree pits that are fit for purpose and suitable for vehicles and pedestrian usage.
- The application is to accord with the Arboricultural Report. Including all tree works referred to in Table EPD 4.1.

- In addition, and separate to the Arboricultural report that Arboricultural Supervision details at relevant key stages as part of the project are to be agreed prior to any development.

Archaeology

The proposed site is located within an area of known multi period archaeological potential. It is located immediately to the east of an Archaeological Notification Area, defined by the boundary of the historic parkland of Hughenden Manor, and north of medieval hollow ways. In addition, artefacts of Roman building material, pottery and other artefacts have been recovered to the east of the application area, suggesting Roman buildings were present in the vicinity. The application site is therefore considered to have a good potential for archaeological remains to be present.

If planning permission is granted for this development then it is likely to harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 199 and DOE Circular 11/95.

Buckinghamshire, Berkshire and Oxfordshire Wildlife Trust (BBOWT)

The Berks, Bucks and Oxon Wildlife Trust (BBOWT) is a local nature conservation charity, and as such our comments relate specifically to the protection and enhancement of the natural environment and wildlife. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval.

BBOWT object to the above application on the following grounds:

- Negative impacts on Millfield Wood SSSI and Green Wood LWS.
- No consideration of the presence of invertebrates and potential impacts on this group of species.
- Insufficient evidence to support biodiversity net gain.
- DEFRA 3.0 metric should be used.

Negative impacts on Millfield Wood SSSI and Green Wood LWS

The Ecological Appraisal states 'Given the relatively small scale and nature of the proposed development and spatial separation of the Application Site from nationally designated sites, no significant direct or indirect impacts are considered likely to arise upon their qualifying features.' I disagree with this statement. Millfield Wood Site of Special Scientific Interest (SSSI), an ancient woodland, can be accessed directly via a footpath which is a 0.75 km route north east of the site. As such, this SSSI is easily accessed on foot from the site and recreational impacts are highly likely.

The SSSI is also a BBOWT Nature Reserve and we have concerns over increased public pressure. Foot fall at the site has increased significantly in recent years and we have seen multiple desire lines appearing through the more sensitive parts of the site. The SSSI is notified as being a rare example of semi-natural Chiltern beechwood on chalk containing a substantial amount of relic wych elm coppice. It supports an unusually rich ground flora which includes nationally restricted species.

Increased public pressure with the use of unauthorised trails and dog fowling will have negative impacts on the woodland ground flora.

The Ecological Appraisal also dismisses any potential impact on Green Wood Local Wildlife Site (LWS). Whilst this woodland has no formal public access, looking at aerial imagery of the area there are clear footpaths leading to and through the woodland, some of which lead directly from the proposed site. With this LWS being just 250 m east of the site it is highly likely that residents will use these undesignated paths and access the woodland. The LWS is ancient woodland and supports

some rare plants. As with Millfield Wood SSSI, any increased recreational impact is highly likely to have negative impacts on the LWS.

No consideration of the presence of invertebrates and potential impacts on this group of species

No consideration has been given to invertebrates within the Ecological Appraisal. The site is a mosaic of tussocky semi-improved grassland, scrub, tall ruderals and woodland, and is bounded by woodland to the north and east. It is also situated on a south facing slope. These habitat elements indicate that the site could be of importance to invertebrate assemblages. There are a number of records from within the site/in the immediate area of priority moth and butterfly species, including striped lychnis, shaded broad-bar, grey dagger, scarce footman, and dot moth, and adonis blue butterfly. Invertebrate surveys should be carried out at the site and appropriate mitigation and enhancements provided for invertebrate species.

Insufficient evidence to support biodiversity net gain

BBOWT is pleased to see that the applicant has aimed to achieve biodiversity net gain (BNG) and that a biodiversity metric has been used to provide evidence of this. However, there is minimal justification provided in the Ecological Appraisal for the baseline habitat and hedgerow conditions. It is stated that 'All existing habitats have been given a condition rating of "poor": based on the guidance provided by Defra in the Technical Note released alongside the DEFRA Biodiversity Metric 2.0.' There is then no subsequent discussion of what condition criteria is met or failed for each habitat type to provide justification for this assessment, other than to say 'This was mainly due to lack of management, resulting in encroachment by non-native species and outgrown/leggy hedgerows, and poor species diversity'. Each habitat/hedgerow type should have clear evidence provided for its condition.

In addition, whilst the Ecological Appraisal recommends mitigation and enhancement measures for the retained, created and enhanced habitats and hedgerows, there is no evidence of how the proposed conditions will be achieved. This detail must be provided prior to determination of the application to be confident that the proposed conditions are attainable and therefore a measurable gain in biodiversity can be achieved, as required by the NPPF and Local Plan Policy DM34, and also a 10% uplift as made mandatory in the Environment Act 2021.

We also challenge that lowland meadow can be created from enhancing other neutral grassland at the site, and there is no evidence of how this is to be done, other than a note to say 'increases diversity of the sward and encourages wildflower growth' within the pdf of the metric.

It is considered unlikely that a priority pond can be created within the development as it is implied as being a SUDs feature in the landscape strategy and will likely be polluted from road surface run off.

No proposed habitat mapping, other than a landscape strategy, is provided and so it is unclear where the habitats proposed will be delivered within the site.

DEFRA 3.0 metric should be used

The DEFRA 3.0 metric was published in July 2021, several months prior to the submission of this application. This metric is now considered the best metric to use and given amendments are required as outlined above I would advise that the metric should be revised and DEFRA 3.0 used.

An excel version of the metric should be provided to allow a full review.

[Officer comment: the guidance on the use of the metric specifically states that where a development proposal has started under one metric, then this metric can continue to be used even

if a later version of the metric is published before the application has been finalised, as is the case here. S the use of DEFRA 2.0 is acceptable.]

Conservation Officer

Recommendation

The application has a neutral impact on the significance of the settings of surrounding heritage assets in accordance with Policies DM31, and HW9 of the WLP and advice in the NPPF.

Comment:

The site is located in proximity to a number of very important overlapping and complex designated heritage assets, associated with Hughenden Manor. The House, (Grade I) being the principle building of the estate with estate buildings and structures including the stable block, walled garden and estate cottages (grade II/curtilage listed), and the Disraeli Monument (Grade II*), together with its gardens and wider parkland (Hughenden Registered Historic Park and Garden (Grade II)/Hughenden Conservation Area and now a public park.

Policy HW9 of the WLP 2019 requires that the development of this allocated site (1) should not have an adverse impact on long-distance views from the Hughenden Park and Manor. Para 5.1.79 confirms that views from the Registered Park and Garden and other views associated with the wider historic landscape, in particular views from the Disraeli Monument are relevant.

Topography and planting means that views of the site from the Manor and the park are mostly filtered and development would be seen within the context of existing housing. While there are now more apartment blocks than that proposed on the previous application (20/05980/FUL), built form has been reduced in height across the site and is now a maximum of 2 storeys. This will enable the development to tuck in behind existing housing.

Consequently, the development will be viewed within the existing urban backdrop and that the blocks will not appear unduly prominent in views from the Disraeli Monument. It is recommended that:

- o external materials and the colour palate are subject to approval to ensure that the development is recessive in the landscape to further mitigate its visual effect.

Control of Pollution (EHO)

As per the air quality SPD, 50 electric vehicle charging points with a minimum rating of 32 amp (one per dwelling) must be provided prior to the occupation of the development.

Recommendation (with conditions if appropriate):

Objection, unless following conditions imposed;

Condition - Electric Vehicle Charging Points

Prior to the occupation of the development hereby permitted, 50 electric vehicle charging points with a minimum rating of 32amp must be installed (one per dwelling).

Reason to comply with the air quality SPD and, to reduce the carbon emissions and the impact on the health of Nitrogen Dioxide emissions from the development.

Construction/Demolition Noise

INFORMATIVE

The attention of the applicant is drawn to the requirements of section 60 of the control of pollution Act 1974 in respect of the minimisation of noise on construction and demolition sites. Application

under Section 61 of the Act, for prior consent to the works, can be made to the environmental Services Division of the Council.

Crime Prevention Design Adviser

Having reviewed the submitted documents there are some aspects which could be problematic in terms of attracting those intent on crime and anti-social behaviour. Therefore, I request that the following points are addressed with suitable amendments prior to planning permission being granted.

Bin and cycle stores

Double doors are present throughout the development and should be replaced with single wide doors where possible. Double doors require one leaf to lock into the other, reducing their physical security and increasing the potential for them to be left insecure when closed in the wrong order. Bin and cycle stores often attract anti-social behaviour providing shelter from the elements, lighting and an area with limited surveillance. Fitting single wide doors allows for self-closing hinges and locks to be provided to secure these vulnerable areas. Eg. Block F and Block A both only serve two dwellings therefore a singlewide door would be more appropriate for these store areas.

The communal cycle stores have been compartmentalised ensuring that if one unit is breached the whole store is not accessible which is good to see, however the presence of the double doors increases the likely hood of them being left insecure in the first place.

Parking

Plots 30 and 29 are allocated disabled spaces which are not next to the buildings they serve. Some unallocated spaces appear to be closer to these accessible units. This could not only undermine the parking strategy but have the potential to fuel neighbourhood disputes.

Plots 9 - 14 have parking located on plot to the side of the dwelling, however none appear to have visibility of their vehicles from this elevation. Windows from bathrooms will be fitted with modesty glass providing no surveillance potential. The floor plans should be amended to provide surveillance to parked vehicles located on the side elevation.

Environment Agency

No comment given – LPA should use the standing advice.

Housing Officer

I note the application includes an affordable housing tenure mix of 19 dwellings for Rent (6 x 1 bed flats, 6 x 2 bed flats and 7 x 3 bed houses) and 5 dwellings for Intermediate/ Shared Ownership (2 x 1 bed flats, 2 x 2 bed flats and 1 x 3 bed house). I also note this includes a total of nine affordable properties to M4(3) standards (6 flats and 1 house for rent; plus 2 flats for Intermediate/ Shared Ownership).

I trust you will ensure that any M4(3) properties meet the required technical standards in accordance with Building Regulations Approved Document M4(3) and Policy DM41 of the adopted Local Plan.

There is a need for affordable housing in the area, particularly affordable housing for rent and if the application meets all of the planning requirements, the proposed affordable homes will help to meet the need.

Highway Authority

Thank you for your letter dated 6th October 2021 with regard to the above planning application.

You will be aware that the Highway Authority provided comments upon previous applications for this, in addition to providing the applicant with pre-application comments in December 2017. This application proposes the erection of 50(no) residential units.

Access and Trip Generation

In terms of suitability to serve this purpose, Glynswood has an adequate carriageway width of 5.5m and is accompanied on each side by footways measuring between 1.8m and 2m. The site access is shown to be created through an extension of the existing cul-de-sac. The proposed extension is in alignment with the existing carriageway and forms a formalisation of an existing track access. Additionally, the Glynswood/Green Hill junction benefits from visibility splays in excess of those required for a 30mph road.

I have carried out my own TRICS® assessment and am in agreement that the trip rates shown in the Transport Statement are reasonable for this type and size of development.

The junctions within the vicinity of the site have been assessed by the applicant using the PICADY and ARCADY models. I am satisfied that a suitable network has been considered with respect to the junction assessments and that they demonstrate to a satisfactory degree that the traffic impacts of this development will not constitute a severe impact to the local highway network. Therefore, there are no grounds on which to base a highway objection to these proposals with regard to its trip generation and or impact upon local network capacity.

Layout

The point at which the estate road connects with Glynswood is approximately 35m in length, with a 5.5m wide carriageway and flanked on both sides by 2m wide footways. After this point, the estate road bifurcates and creates a circulatory route, where the footway within the estate is confined to the inner circuit and the footway on the eastern side of the carriageway spurs into the existing, realigned Public Right of Way.

In addition, within the western corners of the site, small spurs are shown to access dwellings not reached from the main estate road. These would be served by a shared surface which maintains a width of 4.8m. The spur in the north western corner of the estate does not feature a defined turning area. This may result in delivery vehicles for Plot 20 reversing relatively short distances onto the main estate road. However, this is likely to occur very infrequently and onto a lightly trafficked section of the estate where vehicle speeds are likely to be low. A swept-path analysis has been provided to demonstrate an emergency service vehicle could manoeuvre within this section of the development.

I am satisfied that the carriageway alignment and widths and the provision of pedestrian footways is suitable to serve this development.

I have some concerns with the private access drive to the parking area for Plot 43 which requires vehicles to drive approximately 7.5m along the pedestrian footway. Given the arrangement of these spaces, vehicles would either need to reverse into or out of these spaces. Whilst it is common and acceptable for vehicles to cross pedestrian footways when accessing or egressing private parking areas, the Highway Authority would not accept the arrangement shown whereby vehicles are required to drive along the footway.

[Officer comment: the drawings have been amended to remove this problem.]

Refuse Collection

Kerbside refuse collection is proposed to take place for dwellings fronting onto the primary circular street with additional localised collection points provided for the dwellings located on the spurs which extend from the corners of the primary street. Tracking data is provided demonstrating that a refuse vehicle could enter and exit the site and travel clockwise or anti-clockwise around the circulatory route.

Parking Provision

The site is within Residential Zone A, as defined by the Council's Buckinghamshire Countywide Parking Guidance (BCPG) policy document. As such, residential units on developments above ten dwellings with 1–4 habitable rooms are required to provide 1(no) parking spaces each, units with five habitable rooms should provide 1.5(no) spaces each, and houses with six or seven habitable rooms should feature provision for 2(no) spaces. Each half space should count toward the development's requisite unallocated visitor parking (which means an additional 20% of spaces when 50% or more of the site's parking are allocated).

The development would provide two parking spaces for each of the houses and one parking space for each of the maisonettes. An additional 16(no) unallocated parking spaces would be provided for visitor use. Having reviewed the habitable accommodation for each proposed housing type, I am satisfied that the development would provide a level of parking in accordance with the current guidance.

In accordance with the Buckinghamshire *Countywide Parking Guidance* policy document, parking spaces should have dimensions of 2.8m x 5m. I am satisfied that the spaces shown on the submitted plans accord to this standard and whilst I note the tandem parking arrangements proposed for the houses, in consideration of the residential nature of the development, this does not constitute a reason for refusal.

Sustainability

Proposals for residential development generally need to be well connected to non-car modes of travel in order to meet the overarching sustainable development principles set out in the National Planning Policy Framework.

The development site is located approximately 300 metres from a southbound bus stop and 400 metres from a northbound stop on Hughenden Road measured from the centre of the site. Both bus stops are served by the Max 300 bus service providing links to High Wycombe town centre and Aylesbury. Although slightly under the quantum threshold to which a larger residential development would need to technically adhere, the site does meet the objectives of Policy DM2 of the Wycombe District Council Delivery and Site Allocations Plan (2013) that requires developments to be within an achievable walking distance to frequent and reliable bus services.

It is noted that there are pedestrian routes available to link the site to the town centre and the associated services available. High Wycombe Railway Station is within a 2km walk of the site and therefore can be considered as within an appropriate distance from the site.

An informal footway to the north of the site links the public right of way that runs along the eastern side of the site with Hughenden Road. Details of a scheme to improve pedestrian connectivity between the informal footpath and existing pedestrian infrastructure on Hughenden Road including

an existing pedestrian crossing island have been submitted as part of the application. It is noted that this is outside of the red line of the site, and would constitute off site works. The proposed works can be achieved under a Section 278 off-site works agreement with the Highway Authority.

Further comments following receipt of amendments

You will recall my previous comments for this application whereby in a response dated 27th October 2021, this authority outlined that the development would:

- Provide a suitable vehicular access from Glynswood
- Provide a level of parking in accordance with the Buckinghamshire Countywide Parking Guidance
- Not severely impact on the operation of the local highway network
- Provide carriageway widths that could accommodate simultaneous two-way vehicular movements
- Provide adequate provision of pedestrian footways within the site
- Provide a suitable refuse strategy

However, within my previous response, concerns were raised regarding the private access to the parking area for Plot 43.

Having reviewed the amended plans, I am satisfied that vehicles accessing or egressing the private parking spaces for Plot 43 would not have to drive/reverse along the pedestrian footway.

Mindful of the above and in consideration of my previous comments for this application, the Highway Authority raises no objections to this application, subject to the following conditions being included on any planning consent that you may grant:

Mindful of the above, the Highway Authority raises no objections to this application, subject to the following conditions being included on any planning consent that you may grant:

Six conditions recommended relating to:

- 1 Off-site highway works
- 2 Adoptable estate roads
- 3 Details of disposal of surface water
- 4 Provision of access
- 5 Provision of parking and manoeuvring
- 6 Construction traffic management plan.

Informatives have also been recommended.

Landscape Officer

Landscape and Visual Impacts

There will be adverse visual impacts upon the PRow that passes through the site, immediately east of the proposed housing, and from elevated views from the west.

The layout and built forms have been amended and reduced in height and scale. Landscape treatment has been enhanced by further tree planting and an increase in width of some of the street frontage. These amendments in addition to those included in the previous application soften the built appearance and reduce visual impacts through screening and an enhanced appearance (less prominent built forms, reducing massing, breaking down built forms and roofscape, mixed detailing, etc.).

It is considered that overall the impact with the mitigation proposed is acceptable.

Landscape and Open Space

The broad approach is acceptable. In the latest revision, more robust planting fronting the PRow and within the open spaces / streetscape has been provided to soften the appearance of the development, boost screening and ensure adequate canopy cover. The street materials have also been amended from predominantly tarmac to now predominantly block paved. The approach to providing the principal open space in the eastern half of the site is acceptable.

The scheme now includes an additional central space primarily serving the residents of the maisonettes surrounding it, but also accessible to residents of the rest of the scheme. The area includes dwarf walls, planting and fences to ensure residents of the maisonettes have both private amenity space and more communal space. It will be important that the quality of the details illustrated in the D&A landscape layout/ strategy are reflected in the subsequent reserved matters application.

Details of hard and soft landscaping, management and maintenance throughout the scheme should be provided by condition prior to commencement.

Conditions

Hard and soft landscape details reflecting the illustrative details given in the Design and Access Statement and Landscape Strategy drawing.

Management and maintenance of landscape scheme, and submission of details of how trees will be protected from removal in the longer term in private areas.

Additional Information

Planted tree specification sizes for large, medium and small trees needed.

LLFA Authority

Buckinghamshire Council as the Lead Local Flood Authority (LLFA) has reviewed the information provided in the following documents:

- Technical Note – Glynswood Flood Modelling (330201661, 30th November 2021, Stantec)
- Flood Risk Assessment & Drainage Strategy (INL/E4695/1787/FRA, 28th September 2021, RCP Architecture & Civil Engineering)
- Phase 1 Environmental Site Assessment (20766R1 Issue No. C, January 2020, WDE Consulting)
- Geo-Site Assessment (20766R2 Issue No. C, January 2020, WDE Consulting)
- Groundwater Monitoring Report – November 2018 to March 2019 (20766c06, 15th March 2019, WDE Consulting)
- Soakage Letter Report (20766c10, 22nd November 2019, WDE Consulting)

The LLFA has no objection to the proposed development subject to the following planning conditions listed below being placed on any planning approval.

Flood Risk

Surface Water Modelling

A technical note regarding the surface water hydraulic modelling (330201661, 30th November 2021, Stantec) has been submitted which explains how the modelling was undertaken. The LLFA are satisfied with the information submitted.

Sequential Approach

The Planning Policy Guidance (paragraph 001, 2014) sets out that a sequential approach must be taken when locating development within site, whereby development must be located in the area of lowest flood risk. The Proposed Surface Water Drainage Strategy (INL/E4695/002G, 28.09.2021, RCP Architecture & Civil Engineering) shows that no dwellings are to be located in the surface water flow route therefore demonstrating that a sequential approach has been taken.

Surface Water Drainage

The surface water runoff generated by the proposed development will be managed via infiltration; runoff from the dwellings will be directed into soakaways and the road will be constructed with permeable paving.

Ground investigations have been undertaken to demonstrate the viability of infiltration. Infiltration rate testing, in accordance with BRE365, was undertaken in November 2019 which derived rates between $9.34 \times 10^{-6} \text{m/s}$ and $1.22 \times 10^{-3} \text{m/s}$, these rates demonstrate the viability of infiltration.

1m Freeboard

The results of the groundwater monitoring undertaken between November 2018 and March 2019 have been submitted (Groundwater Monitoring Results, 20766c06, 15th March 2019, WDE Consulting) which demonstrate that no groundwater was encountered to depths of 5m and therefore the 1m freeboard between the base of the infiltration components and the highest groundwater levels can be achieved.

SuDS Components

The proposed surface water drainage scheme does not provide any amenity or biodiversity, the site is over 2ha and therefore provides a great opportunity to incorporate an innovative surface water drainage design. Small above ground components such as rain gardens and tree pits can be incorporated to provide these benefits.

The LLFA also strongly encourages surface water reuse and so would encourage the applicant to investigate active rainwater harvesting. An active system enables water to be reused within the dwellings for non-potable uses such as toilet flushing and can therefore decrease the total volume of surface water which requires disposal at the site. The proposed flats provide a good opportunity to incorporate active rainwater harvesting.

Water Quality

The applicant must demonstrate their compliance with the water quality assessment criteria (Section 26, CIRIA SuDS Manual, 2015) to ensure that pollution is adequately managed. As the proposed surface water drainage scheme is infiltrating in an area where there is a source protection zone the assessment must be undertaken using Table 26.4. It should be noted that to achieve sufficient water quality treatment a combination of various SuDS components are required.

Calculations

Calculations for each of the proposed soakaways have been submitted, however only the 1 in 100 year return period plus 40% climate change have been provided. The LLFA also require calculations for the 1 in 30 year return period showing demonstrating that the proposed drainage system can contain up to the 1 in 30 storm event without flooding as well as that the half drain time of the system is within 24 hours. These calculations must include details of critical storm durations and demonstrate how the proposed system as a whole will function during different storm events.

Exceedance

If any flooding occurs for the 1 in 100 year plus 40% climate change event, details of where this flooding will occur and the volume of the flooding must be provided. For rainfall events over the 1 in 100 plus 40% climate change allowance event, a drawing showing the direction of exceedance flows must be provided.

Factor of safety

A factor of safety must be applied to any calculations for the proposed surface water drainage scheme in accordance with best guidance.

Urban creep

An urban creep value of 10% should be applied to surface water drainage schemes to take account of any future increases in impermeable areas within the site. For example, this includes patios, conservatories and small extensions (Section 24.7.2, CIRIA SuDS Manual, 2015).

Construction Drawings

At detailed design, construction drawings for all surface water drainage components are required. Drawings should include cover and invert levels along with details of materials.

Maintenance

A maintenance schedule needs to be provided; it should include what maintenance tasks will be completed, who will be responsible for undertaking maintenance (usually a maintenance company) and how often the maintenance task will be completed.

It is requested that the following conditions be placed on the approval of the application, should this be granted by the LPA:

Condition 1: Surface water drainage scheme

Condition 2: Whole life maintenance plan [Officer comment – this is being secured through a s106 obligation]

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

No Objection.

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutory designated sites and has no objection.

Natural England's further advice on other natural environment issues is set out below.

Protected Landscapes - Chilterns AONB

The proposed development is for a site within or close to a nationally designated landscape namely Chilterns AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraphs 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to

determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the Chilterns Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Biodiversity Net Gain

We welcome the implementation of the Biodiversity Metric and submission of a plan demonstrating measurable net gains for biodiversity will be applied.

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the Biodiversity Metric 3.0, can be used to measure gains and losses to biodiversity resulting from development. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain.

Protected Species

Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Natural Environment Officer - Ecology

(a) Initial comments:

Ecological Appraisal sets out how the site has been surveyed over the last few years. It sets out an approach which is considered broadly acceptable and includes recommendations which can form the basis for some conditions.

Screen shots of a Defra 2.0 metric are spread across part 1 and 2. There are several issues with this:

The metric needs to be metric 3 as this is the one which was current when the application was submitted.

The metric is included as images of the sheets, these are difficult to interrogate and check.

The metric needs to be submitted as a spreadsheet so that the details can be checked and properly verified.

Recommendations:

The Biodiversity metric needs to be Defra 3.0 and needs to be submitted as a spreadsheet. The areas of habitat need to cross reference to plans, (the habitat survey plan and also the Illustrative Landscape Strategy.

Conditions/Informatives

Conditions will be needed to cover the following:

- Construction Environmental Management Plan (Biodiversity) (CEMP)
- Ecological Design Strategy (EDS)
- Landscape Ecology Management Plan (LEMP)
- Details will need to ensure that the recommendations contained within section 5 of the Ecological Appraisal are included.

Further Information Required

Defra 3 metric, as a spreadsheet.

(b) Further comments:

In my last comments I asked for updated botanical surveying within the survey season and I also asked for the spread sheet of the metric to be submitted. I now have a copy of the metric but have not received updated surveys.

I am inclined to not require the survey, as the ecological condition will not have improved since the last surveying. Having reviewed the metric and the guidance which has been published to support it. It is clear that the current condition of some habitats has been incorrectly downgraded from its true condition and new habitats are being given slightly optimistic condition scores. These two deviations from likely reality, do impact upon the biodiversity accounting but it is likely that it will still be possible to achieve a biodiversity net gain if site management, establishment, enhancement and long term management of habitats is assured through conditions/legal agreements.

Recommendation: Conditions or legal agreements will be required to secure the translation of the recommendations set out in sections 4 and 5 of the Ecological Appraisal into the following documents:

- Construction Environmental Management Plans (Biodiversity) CEMP.
- Ecological Design Strategy (EDS)
- A Landscape and Ecology Management Plan (LEMP).
- Lighting design strategy for light-sensitive biodiversity

(c) Additional Further comments

The Sheet 'A-1 Site Habitat Baseline' shows the baseline assessments for the existing habitats. All of the habitats are given a 'Poor' condition score. This score is not explained in the 'Assessor comments' column on the sheet and it is not explained in the Ecological Assessment Document. The Ecological Assessment does highlight some areas of the grassland which have a higher diversity of chalk grassland species, however this is not clearly identified in the metric.

The distinctiveness and condition of habitats need to make direct reference to Defra guidance in its justification. This needs to include reference to the condition tables in the document 'Biodiversity Metric 2.0 Technical Supplement'.

It is necessary to identify what the local strategy is which means that Woodland and forests is considered for 'Strategic significance'.

The Sheet 'A-2 Site Habitat Creation' shows the Habitats to be created. Not information is given on why the pond is considered to be a 'moderately connected' habitats and the local strategy is which means it is considered for 'Strategic significance'.

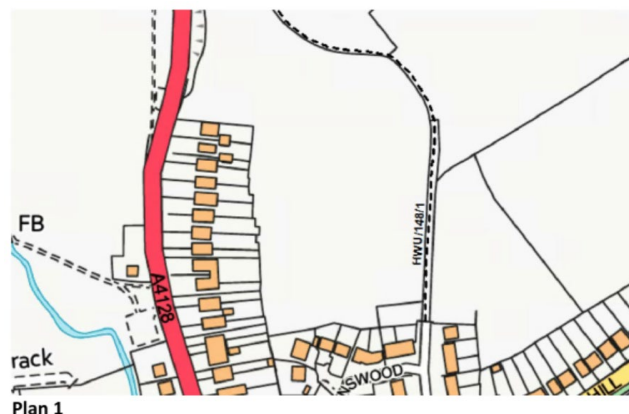
The Sheet 'A-3 Site Habitat Creation' shows that the distinctiveness of several areas will be increased, the condition will be increased and so will the connectivity for one of the areas. However, it seems like it would be quite a challenge to achieve the uplift suggested given the use of the site.

It needs to be made clear on a plan which areas are referred to with regards to created and enhanced areas of habitat. The use of green space on the site will be at least partly for recreation and this will make it more difficult to create and enhance some habitats.

Therefore, explanation and likely adjustments in the matrix and accompanying plans which cross reference with the areas, need to be submitted prior to determination.

Rights of Way

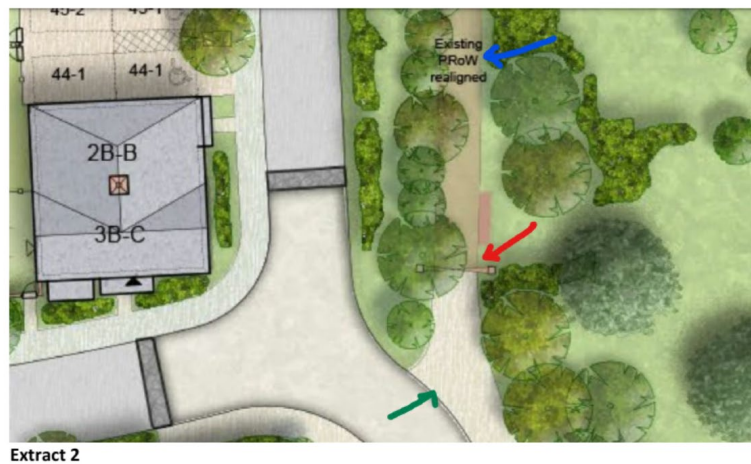
Footpath HWU/12/1 passes to the west of the site linking Glynswood with Hughenden Manor and park (Plan 1). More widely, there are links north-east to Four Ashes Road.



I'm content with Footpath HWU/148/1 remaining on the existing alignment even though it's positioned along the new vehicular access as demonstrated in Extract 1, which overlays the application plan onto the rights of way layer. All the existing roadside furniture at the top of Glynswood (field gate and wooden kissing gate) disappears and walkers will have unimpeded access along the proposed new footways which flank the vehicular access.



There should be a pedestrian dropped kerb to enable disabled access onto Footpath HWU/148/1 from the new development (green arrow in Extract 2), which would also assist walkers heading north along the east-side footway of Glyswood to access the development by wheelchair or mobility scooter.



Extract 2

I've marked a field gate situated across the footpath with a red arrow in Extract 2, which needs to be removed unless the land immediately north is being brought into use for agricultural grazing.

I've marked with a blue arrow an annotation 'Existing PRoW realigned'. This may mean to say 'Existing PROW retained', but as Extract 1 and Extract 3 below demonstrate, the existing alignment is satisfactory. Nevertheless, if the applicant wishes to divert the footpath onto the eastern side footway for completeness, I'd be content with that proposal, but suspect it would only meet the criteria under s119 Highways Act 1980 rather than s257 TCPA 1990.



Extract 3

Extract 3

Extract 4 illustrates a short cut-through from the development onto Footpath HWU/12/1 which facilitates easy access into the countryside and is supported. This appears to be stepped, which reinforces the need for a dropped kerb from the development onto Footpath HWU/12/1 at the location I've marked with a green arrow on Extract 2.



Extract 4

External Consultations

Chilterns AONB Planning Officer

The Chilterns Conservation Board (CCB) has a long-standing objection against the original local plan allocation of this site and then the detailed submitted matters refused by planning committee in April 2021. As the site is now allocated then the principle of development must be accepted. Nevertheless, the long-standing difficulties associated with reconciling a 'landscape-led scheme' (as in policy) with the delivery of 50 homes has proved very problematic. 50 need not be a target, even if in policy and the CCB supported the previous refusal. We accept and comment below, that the applicant's have worked to reduce the impacts upon the wider AONB, acknowledging of course that all this site is within the AONB.

Buckinghamshire West Area will be familiar with CCB's objections, stemming from the Local Plan examination (September 2018) and CCB previously raised objection to 39 home scheme (October 2018), which pre-dated the local plan process.

For this current application, the CCB would propose to confine its comments to the delivery of details in Local Plan HW9 and the site's location within the AONB. The Local Plan policy is based on the fundamental premise that any application coming forward is 'landscape led'. The policy seeks to minimise the impact on the wider AONB and views across (most acutely from nearby footpaths and to the west and the Disraeli Monument). The April 2021 refusal failed to deliver those key policy

objectives. We also would also note that the canopy cover policy can only apply in the HW9 area (i.e., figure 5.1 in the Local Plan) and that the previous design and layout here failed to respect the topography and its edge location.

Following a review of the submitted details, CCB is grateful for the opportunity to report that:

- (a) Procedural Matters. We see that application 20/05980/FUL has been appealed (paragraph 3.10 of the supporting planning statement), albeit PINS are not displaying that reference on the website (as of 18th November 2021). There has been much debate over the AONB major development test in the NPPF. The pre-application minutes (ahead of this application) report that the Local Plan Examination ruled against this point. In this case, the Inspector considered and dismissed our case that the site was 'major development'. Even so the local plan (i) establishes the need for development, (ii) has considered alternatives to the sites included in the plan, (iii) and the policy includes requirements for how the impact of the development can be moderated and/or mitigated.

The CCB supports the planning officer's report to 20/05980/FUL in which it was concluded that, should the details of an application not satisfy the AONB location / landscape -led approach, then the application could reasonably fall back and be captured by those tests. We only mention this if the appeal proceeds, as it is a valid argument and one that Buckinghamshire West Area has fielded. Paragraph 60 of the NPPF now states, 'For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Thus, the argument follows and is a reasonable one, that the design of the 'scale' of development can tip a scheme into the major development test, should it be out of context. 20/05980/FUL did just that because of the 3-storey development in the centre of the site.

- (b) Views from within the wider AONB towards the site are of great importance and must be given 'great weight' in any planning determination, consistent with DM 30 of the Local Plan, the NPPF and CROW section 85. LVIA viewpoint EDP 10 (from the Disraeli Monument) is a key view towards the settlement edge, with the magnificent dry valley and wooded landscape of the AONB washing up against the town. The current scheme is distinctly different in this respect, with the deletion of the original 3-storey apartment blocks (which were individually bulky and had disproportionately oversized roofs) and their replacement by current smaller blocks of 'maisonettes', with some additional planting. All lighting must be low level to reduce any impact upon the wider dark skies environment. At this stage, that matter would be controlled by condition.
- (c) Policy Compliance against details. The key question now is whether the proposal meets the adopted plan policy or not. To achieve that requires delivery of all the ecological mitigation as set out in the supporting ecology report (at its 5.1), the use of very carefully selected materials, especially bricks and roofing materials and the delivery of a dark skies environment (as above). Materials should be carefully selected from the CCB's Supplementary Technical Note on flint, brick and roofing materials. Such details and samples should be made available to planning officers and planning committee and at this stage. A suitable Chilterns supplier should be used, such as HG Matthews. It is important to remember that all of this land is within the AONB. The delivery of such details is fundamental and link to the delivery of the major development test (as above). The planning statement pre-application notes record a discussion over West's Yard at Saunderton (also AONB but brownfield). The planning officers are alert to this need for appropriate detail. The CCB would ask that these details are agreed at this stage.

- (d) On ecological matters we can see that the draft heads of the section 106 agreement will include ecological mitigation. The discussion in the planning statement surrounding the involvement of the Chiltern Rangers is interesting but inconclusive from a planning point-of-view (para 3.3 of the planning statement). Appropriate land management is to be encouraged but this would fall outside the realms of 'planning weight' when determining this application, unless such an involvement is linked to the section 106 or an appropriate condition on land management. We could not find that detail in the current submissions.
- (e) When arriving at an assessment on policy, weight must be given to the AONB Management Plan 2019-2024, as confirmed in planning practice guidance. Policy DP7 applies here where it states that, 'Only support development that is of the highest standards of design that respects the natural beauty of the Chilterns, the traditional character of Chilterns vernacular buildings, and reinforces a sense of place and local distinctiveness. Require a Design and Access Statement to accompany every application, explaining how it complies with the Chilterns Buildings Design Guide www.chilternsaonb.org/conservation-board/planningdevelopment/buildings-design-guidance.

One of the key actions in the Management Plans' Land, Woodland and Water chapter is to ensure (p57) 'the delivery of collaborative working with local advisers, land agencies, presentative organisations to encourage landowner, farmer and forester uptake of existing and future environmental land management measures.'

The applicant will need to clarify the involvement of the Chilterns Rangers and/or how they can be linked to the implementation of this proposal.

National Trust

The National Trust (NT) owns and cares for land on the Hughenden Estate that adjoins the application site. The Trust acquired the Hughenden Estate in 1946, comprising the Grade I listed Manor, the Gardens, Pleasure Grounds and wider Parkland (a Grade II Historic Park and Garden) and the wider farmed estate. As part of the wider estate the Trust also cares for the Disraeli Monument, a Grade II* listed structure.

The Trust recognises that the Glynswood site is allocated for housing in the Local Plan and that the principle of residential development is, therefore, established. In that context the Trust is concerned to ensure that the development is designed in a manner appropriate to the landscape character of the Chilterns AONB, that its visual impact is minimised and that it safeguards the setting of the Trust's heritage assets at Hughenden.

Having reviewed the documents and plans submitted with the planning application the Trust notes that the revised layout and design of the scheme have addressed concerns raised about the previously refused application. However, there are two matters which remain of concern to the Trust, relating to the finished ground floor levels of the proposed buildings on the higher (eastern) part of the site and to the details of the tree planting scheme.

Details of finished site levels

To minimise the landscape and visual impact of the development the Trust would expect the finished ground floor levels of the proposed buildings on the eastern, more prominent part of the site to be significantly below existing ground levels. From the submitted plans and sections it would appear that existing and finished ground levels are similar. If that reading of the plans is correct then it is disappointing that the design does not take the opportunity to 'dig into the slope' and drop the floor levels below the existing ground level.

In the Trust's view it is crucial that the applicants provide information about finished floor levels so as to enable a proper assessment to be made of the landscape and visual impact of the proposed buildings. This information should be supplied before the application is determined not least because the Trust wishes to be satisfied that the applicants have done everything they can to reduce the height of the buildings above existing ground level and to integrate the development into the landscape.

Details of the tree planting scheme

The Trust wishes to be satisfied that the proposed tree planting will achieve the screening of development and integration into the landscape which is sought. Whilst the application includes an indicative landscaping scheme it does not include a tree planting scheme with planting size and species. The submitted planting palette refers to various tree species that might be planted but, with the exception of oak and Wych elm, the selected trees are relatively low growing and are unlikely to screen the buildings from wider view. That being the case the Trust considers that further details of the tree planting scheme, including planting size and species, should be provided by the applicants prior to the application being determined.

To ensure that tree planting continues to integrate the development into the landscape in years to come the Trust would expect the Council to include a condition on any planning permission granted requiring the maintenance of trees in perpetuity and the replacement of dead, dying and diseased trees.

The Trust wishes to be kept informed about the application and would expect to have the opportunity to review and comment on any additional or revised information submitted in support of the application.

Representations

Amenity Societies/Residents Associations

Chiltern Society

These comments are submitted on behalf of the Chiltern Society. Of necessity, they reluctantly take account of the planning policy context, in particular that this is an allocated site in the Local Plan, and that a previous application 20/05980/FUL (currently subject to appeal) was refused by the LPA on only a narrow range of reasons, with the LPA finding acceptable several aspects we thought were not policy-compliant.

In particular, we believe that a priority for this site should always have been the bringing back into optimum condition, and expanding, the remnant calcareous grassland, with the piece of land to the east of the footpath providing the best opportunity to do this. The inclusion of significant tree planting in this area, partly, we are led to believe, to satisfy the tree canopy cover policy, will compromise optimum grassland management and condition.

With the new application, the welcome introduction (compared with the refused scheme) of more tree planting in the developed portion of the site and extra planting on the northern boundary, means that the tree canopy cover policy can be met in a more appropriate way, and allows for fewer trees on the grassland. Such an approach, in our view, would show a more informed understanding of the site-specific context, and better comply with the DM34 Policy requirement to maximise existing and new biodiversity assets, not just achieve some net gain.

We appreciate that the detail of the landscaping / biodiversity proposals is unlikely on its own to constitute a reason for refusal of the whole scheme, but we ask these adjustments are progressed through the conditions process.

We support the inclusion of "green corridors" within the built area to link up green spaces within it, and to link to the grassland to the east. But, for these to be most meaningful in biodiversity terms, rather than just being "pretty" for humans, the habitat features and management regime should be complementary; so the green spaces and green corridors should focus on flower-rich grassland, and other elements that support pollinators.

And these corridors need to be as continuous and unbroken as possible. We believe this connectivity is impaired by the continuous frontage of development on the eastern and western edges of the inner square, and believe that achieving 50 dwellings should not be seen as an imperative, when it impairs scheme quality in this way (see below).

We understand that the applicants and planners have talked to Chiltern Rangers, and are confident that their advice regarding planting and managing for biodiversity is sound and appropriate. We would encourage the applicants engage a contractor with that degree of expertise to carry out future management.

In relation to the details of the built area, we agree that the deletion / replacement of the three-storey development, and the softer approach to the design of the roads, improve the scheme. However, it remains essentially an urban scheme which does not properly acknowledge or have regard to it being in the AONB. Insisting on the full 50 dwellings referred to in the site allocation policy, whether this was at the instigation of the planners or the promoters, is a factor in this, and was not, in our view, appropriate.

Hughenden Valley Residents Association

These comments are submitted on behalf of the Chiltern Society. Of necessity, they reluctantly take account of the planning policy context, in particular that this is an allocated site in the Local Plan, and that a previous application 20/05980/FUL (currently subject to appeal) was refused by the LPA on only a narrow range of reasons, with the LPA finding acceptable several aspects we thought were not policy-compliant.

In particular, we believe that a priority for this site should always have been the bringing back into optimum condition, and expanding, the remnant calcareous grassland, with the piece of land to the east of the footpath providing the best opportunity to do this. The inclusion of significant tree planting in this area, partly, we are led to believe, to satisfy the tree canopy cover policy, will compromise optimum grassland management and condition.

With the new application, the welcome introduction (compared with the refused scheme) of more tree planting in the developed portion of the site and extra planting on the northern boundary, means that the tree canopy cover policy can be met in a more appropriate way, and allows for fewer trees on the grassland. Such an approach, in our view, would show a more informed understanding of the site-specific context, and better comply with the DM34 Policy requirement to maximise existing and new biodiversity assets, not just achieve some net gain.

We appreciate that the detail of the landscaping / biodiversity proposals is unlikely on its own to constitute a reason for refusal of the whole scheme, but we ask these adjustments are progressed through the conditions process.

We support the inclusion of "green corridors" within the built area to link up green spaces within it, and to link to the grassland to the east. But, for these to be most meaningful in biodiversity terms, rather than just being "pretty" for humans, the habitat features and management regime should be complementary; so the green spaces and green corridors should focus on flower-rich grassland, and other elements that support pollinators.

And these corridors need to be as continuous and unbroken as possible. We believe this connectivity is impaired by the continuous frontage of development on the eastern and western edges of the inner square, and believe that achieving 50 dwellings should not be seen as an imperative, when it impairs scheme quality in this way (see below).

We understand that the applicants and planners have talked to Chiltern Rangers, and are confident that their advice regarding planting and managing for biodiversity is sound and appropriate. We would encourage the applicants engage a contractor with that degree of expertise to carry out future management.

In relation to the details of the built area, we agree that the deletion / replacement of the three-storey development, and the softer approach to the design of the roads, improve the scheme. However, it remains essentially an urban scheme which does not properly acknowledge or have regard to it being in the AONB. Insisting on the full 50 dwellings referred to in the site allocation policy, whether this was at the instigation of the planners or the promoters, is a factor in this, and was not, in our view, appropriate.

Brands Hill Residents Association

I am writing to you on behalf of the Brands Hill Residents Association (BHRA) with regard to the above application and the amendments to the design which have been submitted by the applicants.

BHRA has considered the application against the background of the new Local Plan to 2033 which includes the protection of the AONB within which the subject site falls. In addition, the reasons for refusal of planning application Ref: 20/05980/FUL have been noted in the context of key policy objectives including the conservation, enhancement of the natural beauty of the Chilterns AONB and delivering the highest quality design which respects the natural beauty and built heritage of the Chilterns and enhances the sense of place and local character.

Representatives of BHRA recently met the applicants in order to inspect the revised layout plans which form part of the subject application and it is acknowledged that significant improvements have been made in relation to landscaping, a reduction in the impact of the buildings and softening the "urban edge" of the layout. BHRA considers that it is important to "soften" the impact of the proposed new buildings and that this can largely be achieved with appropriate landscaping and use of materials to achieve greater variety to the overall design.

Car Parking and Traffic

It is noted that the latest scheme has revised arrangements in respect of car parking, however, BHRA still has concerns with regard to the tandem car parking arrangements in particular. and these echo the views set out in our response to the previous application. It is noted that the revised scheme provides for 80 parking spaces plus 16 for visitors. The former includes a number of tandem spaces.

If tandem spaces are only 50% occupied then there are 80 available spaces, including 16 unallocated spaces. If unallocated spaces are left available for visitors and if tandem spaces are only 50% occupied then there remain 64 spaces available for 50 dwellings. 29 of the spaces are "off-plot" and this raises the likelihood of cars being parked on pavements outside, or closer to, the owner's property for tasks such as unloading, shopping or for longer term convenience. BHRA is concerned about the practical effects of managing parking on-site given the views set out above - see also comments below.

It is noted that no significant objections have been put forward by Buckinghamshire Highways, however, BHRA considers that the scheme will generate significant volumes of traffic in and out of the development. The junction between Glynswood and Green Hill is not of adequate standard for large volumes of traffic bearing in mind that there is a significant amount of parking taking place in Green Hill, opposite the junction with Glynswood. Nearby Coningsby Road exits onto Green Hill; this is a blind junction to the left due to buildings as well as the parking along Green Hill as referred to above. Furthermore, there are often large tail-backs of vehicles at the junction between Green Hill and Hughenden Road with Coates Lane opposite and where the existing bus shelter interferes with sight lines thus slowing down the passage of cars across this busy road junction. BHRA considers that this busy junction should be improved before any traffic from the proposed development at Glynswood is added.

In summary, BHRA considers that the scheme could have a detrimental effect on the surrounding road system and nearby residents. However, BHRA also considers that the applicants should demonstrate that an effective traffic management scheme will be implemented within the development which, if carried out, should alleviate some of the concerns which have been set out above. It is understood that, if planning consent is granted, the Developer will have to pay a significant Community Infrastructure Levy. BHRA would wish to see some of this spent on junction improvements at Green Hill and Hughenden Road as well as between Glynswood and Green Hill.

BHRA would wish to see the above points taken into account when the application is considered and would also wish the application to be considered by the Planning Committee.

Other Representations

23 comments have been received from local residents setting out concerns relating to the following:

Traffic

- The junction of Glynswood onto Green Hill and onwards down to Hughenden Road is already a hazard to both cars and pedestrians.
- Increased use of this junction will be dangerous.
- There will be a bottleneck created because of the development.
- There is only one car width access to the site.
- Green Hill has a steep incline comprised of two very sharp, blind bends, and on street parking reduces the road width to a single carriageway.

Other junctions will be made dangerous.

Parking

- There will be a lack of car parking.

Volume of development

- Too many dwellings are proposed

Trees and ecology

- There are a number of mature trees, both oak and sycamore which will need to be cut down in order to build these houses
- Many of these trees have bats (a protected species) which have been roosting in these trees for many years.
- The land is an established permanent habitat for local flora and fauna
- The proposal will destroy habitat.

AONB:

- The development is not landscape led.
- The development is out of character.
- The density has risen from 39 dwellings to 50.
- The site is currently well vegetated.
- There needs to be a tree belt planted around the development.

Impact on neighbouring property

- The new development will overlook property in Hughenden Road and in Glynswood.

Other matters

- The development will be detrimental to air quality.

The proposed location affects access from the woods at the back of Green Hill which provides a safe route to Hughenden Park for many people including families with young children.

The development will create noise.

APPENDIX B: Site Location Plan



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21/07911/FUL
Scale 1/2500



Planning Committee
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