



Report to Buckinghamshire Council – North Area Planning Committee

Application Number:	21/03284/APP
Proposal:	Temporary 7-year change of use of agricultural land for the establishment of an operator skills hub for training operatives in relation to the development of major infrastructure projects and caravan park and erection of temporary buildings
Site location:	Red Furlong Farm, Twyford Road, Poundon, Buckinghamshire, OX27 9BG
Applicant:	Mr Patrick Flannery
Case Officer:	Mrs Rebecca Jarratt
Ward affected:	GRENDON UNDERWOOD
Parish-Town Council:	TWYFORD
Valid date:	8 September 2021
Determination date:	12 January 2022
Recommendation:	Refusal

1.0 Summary & Recommendation and Reason for Planning Committee Consideration

- 1.1 *This planning application seeks temporary consent for a period of 7 years for the erection of temporary buildings and the change of use of land from business use and agricultural use to sui generis use as a training hub for large construction vehicle operators, along with a caravan site and temporary accommodation blocks for trainees to reside at the site for the duration of their course.*
- 1.2 *The site is located on land known as Red Furlong Farm on the road between Twyford and Poundon, within Twyford Parish but on the boundary with Poundon Parish. It is within open countryside. There is an existing vehicular access capable of being upgraded for the proposal. There are former agricultural buildings on the southeastern part of the site, two with previous consented use for Business uses with associated car parking. Some of the proposed temporary buildings would be located within the curtilage of this business use but not within the existing buildings. The proposed caravan parking area and amenity block and the admin, offices, reception, training rooms and canteen building would also be located outside of the authorised area for business use, along with some of the proposed area for car parking. There is also a dwelling on the site, which is not the subject of an agricultural tie. The area where it is proposed to undertake the practical training for large construction vehicles, which would involve earth moving, is a separately enclosed agricultural pasture field of 6.8ha which has ridge and furrow archaeological earthworks running in two perpendicular directions.*
- 1.3 *The application has been considered with regards to the Development Plan which comprises the Vale of Aylesbury Local Plan, and it is concluded that the development is contrary to policies S1, S2, S3, S7 and D6 by virtue of its unsustainable location within open countryside. It is also considered*

contrary to policies BE1, BE2, NE4 and NE5 due to the harm to character and appearance of the area and loss of historic ridge and furrow earthworks, which it is not considered could be sufficiently reinstated at the end of a temporary consent period. The proposal would result in the total loss of a significant part of a non-designated heritage asset of regional importance. As this relates to a non-designated heritage asset, in accordance with policy BE1 and the NPPF, this harm has been balanced against the overall benefits of the proposal in the general balancing below.

- 1.4 There would be benefits to the proposal which are material planning considerations that need to be weighed against the conflict with the development plan and related harm, including harm to the non-designated heritage asset. The proposal would provide opportunities for some local people, as well as those from further afield, to train for qualifications in construction vehicle operation which would be of benefit in terms of upskilling of local employment force and in terms of meeting the needs of local construction projects of all scales, not just the major infrastructure projects; so, there would be indirect economic benefits. Construction is a major part of the local economy and skilled workers are required to ensure that the housing growth projected for the area can be achieved. There may also be a small number of employment opportunities at the site for local people.*
- 1.5 However, the submission indicates that the facility is mainly proposed to serve the large infrastructure projects and the needs of that project span a large area of the country. The on-site living accommodation indicated that people are expected to arrive from a wide area and it would be impractical and undesirable, as well as unsustainable, for them to have to travel each day. No credible justification has been presented as to why the facility needs to be located close to the junction of these infrastructure projects because the training is a separate function carried out over a limited time period with trainees proposed to reside mainly on site. The machinery also remains on site. There is no integration of users or machinery with the infrastructure projects during the time of the training and so it is unclear why this facility would not be better suited adjacent to a major conurbation with good transport links and high levels of sustainability. The exploration of alternative sites appears to have been very limited in both area (compared to the infrastructure projects the development would be focused towards) and time.*
- 1.6 Other benefits to the local economy would be limited by the intention for trainees to reside and their needs to be met on the site, and the site's lack of nearby facilities and transport links, including pavements, which means that there will be less benefit to local businesses such as shops, B&Bs, guesthouses, Public Houses, etc. than for the same use in a sustainable location.*
- 1.7 Overall, when weighing the significant level of harm across the sustainability, landscape character and design, heritage and ecology aspects of the development, against the identified benefits of the development including the economic benefits which are attributed significant weight, officers consider that the other material planning considerations are not sufficient to outweigh the conflict with the development plan and the identified harm associated.*
- 1.8 Twyford Parish Council called in the application for consideration by committee because the development is within an unsustainable location, concern regarding transport impacts and harm to the character and appearance of the rural area including the loss of ridge and furrow which is a non-designated heritage asset. The Chairman and Vice Chairman consider that it would be appropriate that the proposal be considered by the Development Management Committee because of the economic case in support of the proposal needing to be taken into consideration as a balanced decision against the conflict with the development plan, and in the interests of openness and transparency.*

1.9 *Recommendation – Refusal for the following reasons:*

1. The proposed development, by reason of its remote and unsustainable location within the open countryside, would require users to be entirely reliant on private motor vehicle transport, and would not provide good access for sustainable modes of transport. There is no clear justification for the use needing to be located within this rural location and the development is not serving to meet local business and community needs in this rural area. The application fails to adequately demonstrate that there are no more suitable sites for the development within an appropriate area. Furthermore, the proposed development would fail to have regard to the sensitivity of its surroundings. The proposed development is therefore considered contrary to Policies S1, S2, S3, S7 and D6 of the Vale of Aylesbury Local Plan and paragraphs 85 and 174 of the NPPF 2021.
2. The proposed development by virtue of its design, scale and massing would result in major adverse impacts on the landscape character and visual amenity of the site and its surroundings, and significant adverse impacts on the landscape character and visual amenity of the wider area, including during hours of darkness given the lighting that would be reasonably required to serve the intended uses, which would not and could not be adequately mitigated. The proposed development is therefore considered contrary to policies S1, NE4, NE5 and BE2 of the Vale of Aylesbury Local Plan and paragraph 174 b) and Section 12 of the NPPF.
3. The proposed development by virtue of its siting, would result in the loss of a significant area of ridge and furrow medieval earthworks which the Local Planning Authority identify as a non-designated heritage asset of regional importance. The proposed development necessitates digging up and moving of earth over the area of ridge and furrow, which would result in the total loss of a significant area of ridge and furrow and permanent harm to the historic environment. The benefits of the proposal are not considered sufficient to outweigh this harm to the non-designated heritage asset, and therefore the proposed development is contrary to policies S1 and BE1 Vale of Aylesbury Local Plan and paragraph 203 of the NPPF.
4. Due to insufficient information, the application fails to demonstrate that the proposed development would be adequately drained both in relation to foul and surface water drainage arrangements, such that the proposal would not lead to increased flood risk elsewhere. The proposed development is therefore considered contrary to policies I4 and I5 of the Vale of Aylesbury Local Plan, paragraph 169 of the NPPF and guidance within the Planning Practice Guidance.
5. Due to insufficient information, the application fails to demonstrate that the proposed development would result in a net gain in biodiversity and it is considered likely that the development would result in harm to protected species, namely Great Crested Newts. The information provided is insufficient to demonstrate that the protected species license could be granted by Nature England or the District Licensing programme. As such, the proposed development fails to comply with the requirements of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 and is contrary to policy S1 and NE1 of the VALP and paragraph 174 d) of the NPPF.

2.0 Description of The Site and Proposed Development

- 2.1 The site lies within open countryside within Twyford Parish, adjacent to the parish boundary with Poundon. The site lies around 750m west of the edge of Twyford village and 400m north of the

edge of Poundon village. Overall the site extends to 8.2ha. It lies wholly within the Environment Agency Flood Zone 1. The site is not subject of any formal landscape designation but does feature medieval ridge and furrow earthworks across the agricultural field to that comprises the majority of the site.

- 2.2 The site benefits from an agricultural field gate access at the corner of Bicester Road, and a main vehicular access roughly midway along the eastern boundary of the site which serves agricultural, light industrial and domestic properties.
- 2.3 The site comprises a former farmhouse that is without agricultural tie, two former agricultural buildings and hardstanding (edged red on the below drawing extract) that were the subject of an application for change to B1 use and have been used for light industrial purposes, access from Twyford Road, a further building which was constructed at some point between 2017 and 2018 (for which there is no planning history), an area of rough ground and hardsurface to the southeast which includes a pond and a small area of woodland to the southern corner, and an agricultural field of approximately 6.9ha which is crossed by a public footpath and displays ridge and furrow landform, and has a pond on the northern boundary.
- 2.4 The application seeks temporary consent for a period of 7 years for the erection of temporary buildings and the change of use of land from business use and agricultural use to *sui generis* use as a training hub for large construction vehicle operators, along with a caravan site and temporary accommodation blocks for trainees to reside at the site for the duration of their course.
- 2.5 The temporary buildings comprise:
 - Amenity block to serve caravan site: 48 sqm.
 - Two parallel blocks of 5 double stacked EasyCabin sleepers, totalling 40 cabins (2 x 6.3 sqm cabin per sleeper). Each block with a footprint of 146 sqm with a 3.4m gap between them.
 - Two storey main training centre building with canteen: footprint of 279 sqm.
- 2.6 56 of the 74 on-site parking bays stated in the Planning Statement have been shown on the site plan. This includes two disabled bays located close to the training centre building. A number of other areas are identified for additional parking if/as required.
- 2.7 The capacity of the caravan site has been taken to provide for 10 caravans.
- 2.8 The application is accompanied by:
 - a) *Drawings – Location Plan, Block Plan, Elevations and Floor Plans of temporary buildings.*
 - b) *Planning Statement*
 - c) *Landscape And Visual Appraisal*
 - d) *Noise Assessment*
 - e) *Preliminary Ecology Assessment*
 - f) *Flood Risk Assessment and drainage strategy report*
 - g) *Access Appraisal*
 - h) *Desktop heritage appraisal*
- 2.9 *During the course of the application, the location and block plans were amended in order to ensure the proposal would not encroach on the public right of way (Drawings 5612.01 B & 5612.02 A).*

3.0 Relevant Planning History

3.1 Relevant planning history for the site:

Reference: 00/01055/APP

Development: Relocation, demolition and erection of agricultural buildings

Decision: Approved Decision Date: 11 August 2000

Reference: 04/02690/AOP

Development: Change of use of barns from agricultural to class B1

Decision: Outline consent granted Decision Date: 26 November 2004

Reference: 07/13026/DIS1

Development: Discharge of condition of application 04/02690/AOP

Decision: Details approved Decision Date: 26 March 2008

Reference: 11/02690/ACL

Development: Certificate of lawfulness for proposed extension for B1 use

Decision: Certificate granted Decision Date: 16 March 2012

Not implemented

Reference: 12/02350/AOP

Development: Demolition of existing Commercial Building and Erection of No.6 dwellings

Decision: Outline consent refused Decision Date: 28 January 2013

Reference: 13/00078/REF / PINS Appeal Ref: APP/J040S/A/13/2202298

Appeal against refusal of 12/02350/AOP

Dismissed at appeal Decision Date: 18 December 2013

At the time of the appeal Aylesbury Vale District Council did not have a 5-year housing land supply and the tilted balance in favour of sustainable development was engaged. However, the inspector found:

“By reason of the site's isolated location within the countryside, the appeal scheme would not represent a sustainable form of development. Further, the fact that the appeal site could comprise previously developed land is also outweighed by it not being in a sustainable location.”

Reference: 21/01601/COMM

Development: Development proposal particularly linked to HS2 -establishment of an operator skills hub for training operatives of heavy construction plant and machinery

Decision: Pre-application advice not supportive Decision Date: 11 October 2021

3.2 *Dwelling on site*

Reference: 15/03944/APP

Development: Two storey side extension with balcony to rear.

Decision: Householder approval Decision Date: 14 January 2016

Reference: 18/04631/APP

Development: Two storey side extension with balcony to the rear (resubmission of ref: 15/03944/APP approved 14/01/2016)

Decision: Householder approval Decision Date: 27 February 2019

4.0 Representations

- 4.1 58 comments objecting to the proposal and 2 supporting the proposal have been received. Objection has also been received from the Parish Council and 7 neighbouring or nearby parishes. Consultation responses received from Archaeology, Landscape and Urban Design, Ecology and the Lead Local Flood Authority have raised concerns regarding the development as submitted. In addition, Economic Development have identified economic benefits from the scheme.
- 4.2 Summaries of the representations and consultee responses received are provided within Appendix A.

5.0 Policy Considerations and Evaluation

- 5.1 The site does not lie within a neighbourhood plan area.
- 5.2 On the 15 September 2021 the Vale of Aylesbury District Local Plan (VALP) was adopted and its policies hold full weight.

Vale of Aylesbury District Local Plan (VALP):

- S1 (Sustainable development for Aylesbury Vale)
- S2 (Spatial strategy for growth)
- S3 (Settlement hierarchy and cohesive development)
- S5 (Infrastructure)
- S7 (Previously developed land)
- D6 (Provision of employment land)
- T5 (Delivering transport in new development)
- T6 (Vehicle parking) & Appendix B (Parking Standards)
- T8 (Electric vehicle parking)
- BE1 (Heritage Assets)
- BE2 (Design of new development)
- BE3 (Protection of the amenity of residents)
- C3 (Renewable Energy)
- C4 (Protection of Public Rights of Way)
- NE1 (Biodiversity and geodiversity)
- NE4 (Landscape character and locally important landscape)
- NE5 (Pollution, air quality and contaminated land)
- NE8 (Trees, hedgerows and woodlands)
- I4 (Flooding)
- I5 (Water resources and Wastewater Infrastructure)

- 5.3 **National Planning Guidance**

EVALUATION

Principle and Location of Development

VALP Policies S1 (Sustainable development for Aylesbury Vale), S2(Spatial strategy for growth), S3 (Settlement hierarchy and cohesive development), S7 (Previously developed land), D6 (Provision of employment land)

- 5.4 S38(6) of the Planning and Compulsory Purchase Act 2004 requires that decisions should be made in accordance with the development plan unless material considerations indicate otherwise. In this instance the Development Plan comprises the Vale of Aylesbury Local Plan (VALP) which was adopted on 15 September 2021.
- 5.5 Policy S1 of the VALP requires all development must comply with the principles of sustainable development. Policy S2 sets out the spatial strategy for growth. Policy S3 seeks to avoid new development in the countryside other than for specific proposals which accord with policies in the plan to support thriving rural communities and the development of allocations in the Plan. Policy S7 of the VALP supports the reuse of previously developed (brownfield) land in sustainable locations, subject to site-specific considerations including environmental value and impact on local character.
- 5.6 The proposals comprise change of use of land from business and agricultural uses to a sui generis use; nevertheless, these types of construction vehicle training centres are typically viewed as employment uses.
- 5.7 Policy D6 of the VALP supports employment development **in sustainable locations:**
- a. through allocations in this plan and appropriate allocations in neighbourhood plans
 - b. through the intensification or extension of existing premises**
 - c. as part of a farm diversification scheme
 - d. through the appropriate re-use or replacement of an existing building provided this is well designed, appropriate to its context having regard to the scale of the proposal, location and impact on the surrounding area, Or
 - e. in a rural location where this is essential for that type of business. (my emphasis)**

This policy reflects paragraph 84 and 85 of the NPPF (2021). Paragraph 85 states: “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

- 5.8 There are no specifically designated settlement boundaries to any nearby settlement, nevertheless the site is located well beyond the built-up area of any settlement. Poundon is the nearest settlement; it is identified in the VALP as an “other settlement”. The VALP states “Other settlements” are not sustainable locations for development and are places where it is likely that any development would cause harm to the local environment.
- 5.9 Twyford is the other nearby settlement and is identified in the VALP as a “smaller village”. The VALP says “Smaller villages” are smaller, less sustainable villages which have relatively poor access to services and facilities. It is expected that some small scale development could be accommodated at smaller villages without causing unreasonable harm. This level of development is also likely to help maintain existing communities.
- 5.10 The site is 7km in a direct line from the nearest railway station at Bicester North; and 17.2km in a direct line from Aylesbury Parkway station. Bicester is also the nearest major settlement that could provide a range of services that would be required by users of the site who would be residents at the site for the duration of the week.
- 5.11 The site is around 500m from the nearest bus stops at the Poundon Turn south of the site, which is served by the No.16 and No.18 buses. No.16 bus runs 3 buses per weekday to Aylesbury and 2 buses per day from Aylesbury and going on to Marsh Gibbon. No.18 runs 5 buses per weekday to and from Bicester and Buckingham. However, the road between the site and the bus stop is narrow and unlit with no pavements and subject to national speed limit. It is highly undesirable for pedestrians to travel to and from the site and bus stop. The same can be said of the road to the bus stop at the edge of Twyford, 800m away which is served by the same bus route.
- 5.12 The site is located in an area of minor ‘c-classified’ rural roads that is not served well by major A or B classified roads. The nearest is an A road at around 5km in a direct line. The Highways Authority has not raised any concerns regarding the capacity of the surrounding road network to accommodate the proposed use, on the basis that the majority of users would be accommodated on the site throughout the week. However, the above serves to demonstrate that the site is located within an area that has very poor access to the types of services that tutors and students would need to access whether attending daily or as on-site residents.
- 5.13 The site was subject of a failed appeal in 2013 where the inspector determined the site to be in an unsustainable location and that the remoteness of the site outweighed the fact that the site, which then comprised only part of the business site, could be considered previously developed land.
- 5.14 It is concluded that the site cannot be said to be a ‘sustainable’ location for development; and so, the proposed site fails the first point of policy D6 of the VALP. Furthermore, the proposal is for a new enterprise and does not comprise the intensification or extension of an existing premises. While the submission identifies the need for a large area of open land for the operation of large construction vehicles, this does not amount to a need to be located in a rural area and could equally be found at the periphery of an urban area or within an existing industrial area.
- 5.15 The applicants have sought to address some of this inaccessibility through the provision of accommodation and catering facilities at the site. There would be 40 ‘bunk house’ style units and space for 10 touring caravans. The Access Statement submitted to support the application reports that it is envisioned that most students will stay on site for the duration of the 4-week courses. The Planning Statement asserts that there would be little reason to leave except for recreational/family reasons thereby reducing the number of daily traffic movements. This however does not resolve the fact that there would be a distinct reliance on private motor vehicles to access the site, at least

at the beginning and end of the course. In all reasonableness there is likely to be a desire for occupants of the site to at least leave for recreation during evenings and also to see family at weekends, and there is no way that they could be compelled to use the facilities on site or to not access off-site facilities; such conditions would not meet the 6 tests that planning conditions must satisfy. With such few facilities in the locality and none within safe walking distance, users of the site would be heavily reliant on private motor vehicles and would have poor access to services and facilities for those residing at the site during their courses.

- 5.16 The nature of the proposal is likely to attract students from a wide area rather than serving the nearby communities. Furthermore, due to the need to access local services by motor vehicles and residential accommodation being provided on site, it is considered unlikely that nearby settlements would benefit economically from the increased population. Therefore, it cannot be said that the proposal meets the needs of businesses or communities local to the site as referenced in paragraph 85 of the NPPF.
- 5.17 The proposal is therefore considered contrary to Policies S1, S2, S3, S7 and D6 of the VALP and the NPPF (2021).

Employment issues

- 5.18 The submission indicates 10-12 full time equivalent posts might be created, but this has been calculated using the Homes England Employment Density Calculator rather than the applicant's experience of their existing site. It is unclear what types of jobs these would be and whether they would be to the benefit of local people. These jobs would be for a temporary period of the 7 years of the requested temporary permission. There would be further, more temporary posts associated with the installation of the modular buildings.
- 5.19 Indirectly, as the proposal would result in the upskilling of construction vehicle operators, it would result in an improved workforce which could be for the benefit for Buckinghamshire employers and employees as well as the national infrastructure projects.
- 5.20 The Council's Economic Development Officers have raised concerns that there is no assurance of course places being offered to local people from the surrounding area, and that securing a minimum number of places for local people could reduce the need for on-site accommodation and ensure the above economic benefits associated with a skilled local workforce would benefit the local economy.
- 5.21 The existing business consent for buildings on the site would generate a number of jobs which, from the submission, would not operate during the course of the application. This further limits the benefit that should be attributed to the creation of jobs by the proposed development.
- 5.22 Overall, with regards to the principle of development, it is concluded that the proposed development, by reason of its remote and unsustainable location within the open countryside, would require users to be entirely reliant on private motor vehicle transport, and would not provide good access for sustainable modes of transport. There is no clear justification for the use needing to be located within this rural location and the development is not serving to meet local business and community needs in this rural area. The application fails to adequately demonstrate that there are no more suitable sites for the development within an appropriate area. Furthermore, the proposed development would fail to have regard to the sensitivity of its surroundings. The proposed development is therefore considered contrary to Policies S1, S2, S3, S7 and D6 of the Vale of Aylesbury Local Plan and paragraphs 85 and 174 of the NPPF 2021.

Landscape and Design Issues

VALP policies BE2 (Design of new development) NE4 (Landscape character and locally important landscape) NE5 (Pollution, air quality and contaminated land) and NE8 (Trees, hedgerows and woodlands)

- 5.23 The VALP identifies that all the landscape in Aylesbury Vale is considered to have character and particular distinctive features to be conserved, positive characteristics to be enhanced and detracting features to be mitigated or removed. The 2008 landscape character assessment (LCA) is the primary evidence base which divides the entire landscape (beyond towns and Areas of Outstanding Natural Beauty) into landscape character areas and landscape character types and sets out landscape conservation guidelines for each landscape character area. The site lies mainly within the Twyford Vale (LCA 5.4), which covers all of the agricultural field and part of the rest of the site, and partly within and adjacent the Poundon - Charndon Settled Hills (LCA 7.1), which covers the dwelling and part of the business site and the land beyond the site to the east and south.
- 5.24 Twyford Vale is considered to be a landscape in good condition with moderate sensitivity. It's historic hedgerow pattern and a low level of settlement unify it. It has few visual detractors. Of particular importance to this site, the landscape contains some good examples of ridge and furrow; and the LCA identifies this is vulnerable to change in more intensive areas of arable farming.
- 5.25 Poundon – Chardon Settled Hills is a landscape in moderate condition with moderate sensitivity. The landscape has a distinctive character and a good sense of historic continuity. The LCA also highlights historic field and hedgerow pattern and ridge and furrow as key components of its landscape character.
- 5.26 Policy NE4 of the VALP addresses the need to consider landscape impact in terms of a hierarchical assessment, which includes avoiding harm through site selection as well as on-site mitigation. It requires development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment (LCA), their sensitivity to change and contribution to a sense of place. The policy requires that applicants must consider the enhancement opportunities identified in the LCA and how they apply to a specific site.
- 5.27 The guidelines for Twyford Vale to conserve and enhance the landscape character, those points which are relevant to this site and development proposal are:
- Maintain the condition and extent of unimproved and semi-improved grassland wherever possible. Encourage good management practices.
 - Improve the management of historic meadows and pastures.
 - Ensure the preservation of archaeological earthworks by maintaining grassland.
- 5.28 The guidelines for Poundon – Chardon Settled Hills is to conserve and enhance the landscape character. The small area of the site that falls within this LCA the area of existing buildings and it has a hedgerow adjacent to the highway which is characteristic of the LCA. Views from publicly accessible land within this LCA would be affected by this development, and enhancement of these views is a priority within the LCA guidelines.
- 5.29 A Landscape and Visual Assessment (LVA) has been provided with the application. The LVA concludes that the visual envelope associated with the proposals would be extremely localised and that the majority of the surrounding landscape would be completely unaffected visually. It also concludes that the proposal is entirely reversible and therefore any landscape harm is temporary for the period of the proposal.

- 5.30 The Council's Landscape and Urban Design Officer (L&UDO) refutes the conclusions of the LVA, both that the harm would be localised and that the harm is temporary. The L&UDO attributes:
- Major adverse landscape character impact on the site, including the area around the existing buildings, its setting, with potential for noticeable adverse landscape character effects over a much greater distance due to a number of points of high ground (e.g. Poundon Hill, Goddington Hall (Cherwell), Windmill Hill).
 - Major adverse visual impact from public rights of way and highways on and adjoining the site.
 - Significant - major adverse visual impact on the setting and surroundings on pedestrians and horse riders and surrounding residential receptors, e.g. from Poundon, and potentially other residential properties.
- 5.31 Officers note that the LVA does not identify the ridge and furrow landform within the site. Officers consider this a significant omission from the LVA. The Planning Statement suggest that the loss of amenity for those using the public right of way would be temporary and that at the end of the seven years consent the loss of amenity for those using the public right of way would be restored. However, this omits reference to and identification of the harm caused by the loss of ridge and furrow; a key landscape characteristic of the area, that it is not considered could be adequately recreated at the end of a seven year period. This would be a permanent loss of landscape character.
- 5.32 The site is directly in front of those travelling southwest out of Twyford and would be highly visible in the line of sight when leaving the village. The site is also opposite the end of the Main Street Poundon junction by the Sow and Pigs Public House and it is believed that the activity would be visible here. It is the opinion of Officers that these viewpoints have not been adequately considered in the LVA and that the LVA has failed to look at visibility from the identified high ground surrounding the site.
- 5.33 Furthermore, the disruption of the site would be a significant detractor in terms of visual and aural harm for the duration of those seven years, which is not an insignificant time period. The sight and sound of very large brightly coloured moving vehicles, and light coloured caravans would also draw the eye towards the development. The public footpath TWY/9/1 runs immediately adjacent to the proposed training area, to be separated by security fencing. Contrary to the assessment in the LVA, the development, particularly the training area would also be perceived on approach, from the public footpath within the field to the south (POD/6/2), from footpaths in adjacent field (POD/5/1) and also, particularly during the winter, from the restricted byway (TWY/8/2) that traces up the hill to the north, towards Twyford Mills, due to the movement of the vehicles and their visibility over the relatively low hedgerows. The LVA fails to identify that even if the ground level of the field or the farm buildings are not readily visible from a point, the large earth moving vehicles that would be taller than the surrounding low hedgerows would be visible.
- 5.34 Policy NE4 of the VALP requires that development should not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value. The public right of way crossing the site is part of the Cross Bucks Way long distance walking route. The LVA identifies the site as calm and peaceful. While the Noise Assessment concludes that there would be no harm to residential amenity of nearby dwellings as the noise created would be comparable to agricultural machinery, it is considered that it would be very apparent to those looking to seek recreation from the public rights of way that this noise would be for, the noise assessment estimates, 50% of the training time, which is at variance to

agricultural activity which tends to be occasional and seasonal, particularly with pasture grazing.

- 5.35 The proposed buildings would be temporary and modular in construction. The proposed modular buildings would be utilitarian in design, form and materials and are not considered to accord with or enhance the character of the area.
- 5.36 The proposed amenity block would be small in scale and unobtrusive.
- 5.37 The layout of the modular cabin blocks would mean that these would appear like a 25m long by 10m wide by 6m tall building. The massing would be similar to the agricultural building on the site; however, it would be located further back. This agricultural building, although described in the application as temporary, had been erected and present on the site for some years and was substantial enough to be considered a building that would have required planning permission. In the absence of a Certificate of Lawfulness it is unclear whether the building would now be 'immune' from enforcement action. The building would be unattractive but if its removal could be secured at the end of the 7-year temporary period, then it is not considered it would be appropriate to recommend refusal on the external appearance of the building.
- 5.38 The two-storey nature of the proposed stacked cabins and their location on the plot would mean that light from the numerous windows would be visible beyond the buildings, intruding into the open countryside.
- 5.39 The training centre building would be located a greater distance from the existing buildings on the site and its location here would be more intrusive in the open countryside. It too would have a modular appearance, typical of temporary buildings, and would be 21m long by 15m wide by around 6m tall. As with the cabins, if the removal of the building were secured at the end of the temporary period then it is not considered reasonable to refuse on the grounds of external appearance.
- 5.40 The training building would also have a high number of windows which would draw attention to the building after dark. The business use buildings within the site have retained their agrarian character and have few windows and little, if any, external lighting.
- 5.41 The area around the buildings for car parking shows no planting or other improvements to the aesthetic quality of the site for trainees and temporary residents.
- 5.42 These parking areas and the area around the caravan parking and cabins would require lighting to ensure adequate security and crime prevention, which is likely to have a significant detrimental impact on the character and appearance of the deeply rural site within the open countryside.
- 5.43 Therefore, while the temporary buildings would not be unacceptable in appearance for a temporary period, by virtue of the location of the cabin blocks and training building extending beyond the grouping of the existing buildings and the associated lighting, this would fail to respect the context of the site and its setting and the natural qualities and features of the area, within the open countryside. The proposed training area would also visually intrude into open countryside.
- 5.44 The site is located in the open countryside where there is very low light pollution; there is high potential for the proposed use to result in light pollution to the night sky due to the security requirements of the site and due to people residing on the site. Illumination, even if limited to the areas of the buildings, would be over a considerable area and would be at great variance to the existing dark environment. The existing use of the site would have nominal lighting. Policies NE4 and NE5 of the VALP both have criteria seeking to protect the landscape character of rural areas associated with the darkness of the night sky.

- 5.45 Policy NE5 of the VALP seeks to prevent undue light pollution by requiring details of any external lighting in order to find a compromise between the minimum external lighting required for security purposes and to achieve working activities which are safe; minimise light spill and potential glare and the impact on the night sky through the control of light direction and levels; minimise the daytime appearance and impact on the streetscape through choice and positioning of the light fittings, columns and cables, and protect and where possible enhance wildlife corridors. Due to the significance of the landscape character harm identified above, it is considered that it would not be possible to reduce the light pollution impact to an acceptable level and this could not have been resolved by condition.
- 5.46 Policy NE4 of the VALP requires that proposals minimise the impact of the development on visual amenity and ensure that the development is not visually prominent in the landscape. The hedgerow at the southern boundary of the site is around 2m high, those to the west and north are only around 1.5m high. Their limited height, deciduous nature and the topography of the site and adjacent land means the hedgerows would be insufficient to effectively screen the use including lighting. Additional planting would be ineffective due to the short timeframe of the development, it would not be established by the end of the temporary consent. The submitted Landscape and Visual Assessment includes an indicative landscape scheme which indicates a 3m high bund along the southeastern extent of the Public Right of Way. This bund is not included within the application site plans or description of development. It would block views of the training area northwest from the public right of way and provide some sense of safety and screening from the noise beyond; however, it would itself have a considerable magnitude of change and an adverse impact. The bund is not accurately represented on any plan submitted as part of the application. The Council's Landscape and Urban Design Officer has calculated that even with steep sides, the bund would be around 20-25m wide. As such, a bund of this scale would form a significant new feature in the landscape which would significantly detract from and result in harm to the character and appearance of the area.
- 5.47 The first stage in mitigating impact is to avoid any identified significant adverse impact; given the area of the site affected by the significant landscape character feature, and the activity to be undertaken, Officers consider the only effective way to avoid the identified impact would be through selecting an alternative site. Policy NE4 of the VALP mitigation hierarchy requires that if harm to the landscape character is accepted, such as where it cannot be avoided but the proposal is otherwise desirable at the location, specific on-site mitigation is required to minimise that harm. In this instance, it is not accepted that the proposal is otherwise desirable in this location and no appropriate mitigation is being proposed, nor is it apparent that such mitigation could be provided. As a last resort, where the development is otherwise desirable on the site, compensation can be accepted; however, due to the overriding concerns regarding the principle of the proposed development in this location, Officers consider this would not apply in this instance.
- 5.48 In addition to considering that 7 years is a relatively long period of time to endure such negative impacts and doubting the possible re-creation of ridge and furrow, the Landscape and Urban Design Officer also suggests that if planning consent renewal is likely to be justified, such as the need for construction worker training had not diminished (if the major infrastructure projects are still running, more are begun, or if there is a requirement associated with the local major development areas), the impact should be considered permanent.
- 5.49 The temporary nature of the development may not be relied upon, because there is little certainty that the demand for trained operators, which is stated as the reason for the development, would

have reduced at the end of a 7-year period. Indeed it is noted that the plan period of the VALP it through to 2033 – with the VALP having only been adopted in September 2021 and therefore there are a significant number of sites likely to emerge both within but also beyond a 7 year timeframe. While it may be possible to secure better, permanent designed buildings and screening planting on a permanent consent, this would not be sufficient to overcome the overall change of character and urbanisation of the site.

- 5.50 Overall, it is concluded that the development would fail to have regard to the Landscape Character Assessments and to the mitigation hierarchy outlined in policy NE4 of the VALP and would result in substantial permanent landscape character harm given the loss of ridge and furrow and significant harm for a period of 7 years (the length of the temporary permission sought), which cannot be appropriately mitigated. Furthermore, the development would fail to achieve the standard of design required by policy BE2 of the VALP and Chapter 12 of the NPPF and the National Design Guide. as it would fail to create a high quality, beautiful place that would add to the overall quality of the area. It would be visually unattractive as a result of poor layout and lack of appropriate affective landscaping, and it would fail to have regard for the local character and historic context of the site. The proposed development is therefore contrary to policies S1, BE2, NE4 and NE5 of the VALP and paragraph 174 b) and section 12 of the NPPF.

Transport matters and parking

VALP policies T5 (Delivering transport in new development), T6 (Vehicle parking), Appendix B (Parking Standards), T7 (Footpaths and Cycle routes), T8 (Electric vehicle parking) and C4 (Protection of public rights of way)

Sustainability

- 5.51 As explained above, Poundon is a hamlet, and whilst Twyford is larger it remains a ‘smaller settlement’ in sustainability terms under the VALP. There are also no pedestrian footway links between the site and the local area, nor any street lighting along the roads. The development is likely to draw people from further afield and there are limited public transport links. The site is poorly located for access by non-car modes. The site is not a sustainable location for transport and travel choice.

Trips / Traffic Impacts

- 5.52 The applicant’s Access Appraisal includes a chapter on Traffic Generation. This notes that, ‘Traffic generation numbers aren’t readily available however, it is envisioned that up to 40 vehicles would arrive at the start of the training process with most staying on site for the duration of the 4 weeks of training. Some daily trips may occur if the trainers live locally, or for leisure and recreational activities.’ It is acknowledged that there are no comparable uses within the TRICS® database for example, though it would have been helpful if the applicant had provided traffic figures from a comparable existing site. Also, whilst the applicant’s first principles approach assumes a worst-case scenario of one vehicle movement for every person arriving to stay at the site for a 4-week training course, and leisure / recreational trips are likely to occur outside of traffic peak periods, it does not take account of those students and staff travelling to and from the site each day. Officers therefore consider that the assumptions made do not accurately indicate the likely vehicle movements arising from the proposal, as not all individuals shall be staying at the site for a 4-week period.
- 5.53 A traffic count has been undertaken along Twyford Road during May 2021, which recorded an average daily traffic flow of 1,300 vehicles using Twyford Road, and therefore the potential traffic increases arising from the proposed development would represent a small percentage increase in

traffic. Furthermore, there are no apparent congestion issues along Twyford Road, and it would be difficult to demonstrate that the additional traffic would have a material impact on the surrounding highway network in terms of queuing or delay.

- 5.54 The provision of on-site accommodation would reduce the need to travel to and from the site on a daily basis, which would reduce the potential for daily vehicle movements. Cycling can cover reasonable distances and may be an option for some students and staff travelling to and from the site more locally, and Main Street is part of a cycle route. Realistically, there are few locations within a reasonable 5km cycling distance and so this might account for a very small percentage modal split.

Access

- 5.55 The proposed development would utilise the existing access to Red Furlong Farm off Twyford Road, a classified C-road which is derestricted. The applicant has provided an Access Appraisal in support of this planning application. This indicates that recorded vehicle speeds are well below the posted speed limit along Twyford Road, and that Twyford Road is wide enough to accommodate two-way traffic. In addition, the highways officer has assessed the layout of surrounding roads and notes there are no specific collision locations on the surrounding highway network that would be exacerbated by this proposed development.
- 5.56 Whilst this operator skills hubs would include heavy plant operative training, which is likely to be transported to and from the site by large vehicles, the site access off Twyford Road currently caters for large agricultural and commercial vehicles. Also, as large plant vehicles will remain on the site during the training time, the number of HGV movements using surrounding roads would be relatively low.
- 5.57 Acceptable visibility splays are provided in either direction of the access, this existing access is wide enough for two vehicles to pass simultaneously, and there have been no recorded collisions at this access in recent years. The access is currently used for access to commercial buildings, agricultural land, and a dwelling, and can cater for the proposed operator skills hub and associated caravan park and temporary buildings, provided that the access construction is upgraded, which could be secured by condition. The development is therefore capable of being compliant with policy T5 of the VALP.

Rights of Way

- 5.58 Policy C4 of the VALP seeks to enhance and protect public rights of way to ensure the integrity and connectivity of this resource is maintained. Planning permission will not normally be granted where the proposed development would cause unacceptable harm to the safe and efficient operation of public rights of way.
- 5.59 The application has been amended to correctly show the route and position of the public footpath, and shows existing stock fencing that obstructs part of the public right of way to be removed and replaced with 2m security fencing as shown by the blue line on the location plan and the block plan, positioned off of the public right of way. This will provide security to the site and separation from the training area. The width provided of the public right of way that crosses the site is shown on the drawings at around 9m to ensure that sufficient width is provided for users of the public right of way.
- 5.60 Secure gates will be placed within the fencing in order to allow the plant machinery to cross the public right of way from building complex to the open training area. A banksman arrangement

would be operated when large machinery crosses the public right of way. This crossing point would be surfaced in a loose stone finish or similar in order to reduce the wear and tear of plant machinery crossing the public right of way. This would be acceptable providing there would be no upstands across the public right of way.

- 5.61 Subject to conditions to secure the above, the Strategic Access Officer has no concerns regarding the proposal in terms of harm to the safe and efficient operation of the right of way and the development could accord with policy C4 of the VALP, notwithstanding the previously raised concerns regarding the amenity for right of way users.

Parking and Site Layout

- 5.62 The applicant's Planning Statement notes that, 'around 74 on-site parking bays will be provided for both the students and teachers. Of these, 2 of the bays will be dedicated disabled bays.' Also, parking is shown on the Block Plan (drawing: 5612.02) with some areas noted as, 'parking zones extended if / as required'.
- 5.63 The highways officer recommends that the parking is clarified to ensure adequate provision for the proposed development and for existing commercial uses on the site if these are intended to remain, or these should be restricted by conditions; to ensure that parking does not interfere with access and manoeuvring for larger vehicles within the site, or result in over-spill parking on the highway where parking / waiting is un-restricted. The development would also need to provide for 3 fast charge Electric Vehicle charging points with larger (3m x 6m) EV charging parking bays. Also, Appendix B requires 4 disabled parking spaces (5% of the 74 bay capacity). A revised parking layout to secure these requirements could have been secured by planning condition if the proposal we supported. The development is capable of being compliant with VALP policy T6 and T8, and the parking standards at Appendix B.

Cycle parking

- 5.64 Policy T7 of the VALP requires on-site cycle parking to be provided. The provision of secure, covered cycle parking commensurate to the use could therefore be secured by planning condition on any permission granted.

Travel Plan

- 5.65 In addition, if the application is to be supported due to other material considerations outweighing the unsustainable location of the site, the applicant should explore other travel planning measures, e.g. collection of students and staff via mini-bus and promotion of car sharing, and which would be secured by a planning condition requiring approval of and adhered to a Travel Plan for the lifetime of the development.

Highways Conclusions

- 5.66 While there is a fundamental objection on sustainability grounds, the proposed development would not have a severe transport impact or result in increased risk to highway safety that would not be capable of mitigation by conditions. Overall, subject to the imposition of appropriate conditions, the proposal could be designed to accord with policies T5, T6, T7, T8, C1 and the parking standards detailed within Appendix B of the VALP and would not conflict with the NPPF (2021) in this regard. Notwithstanding this, it is maintained that the site represents an unsustainable location for the proposed development.

Amenity of existing and future residents

VALP policy BE3 (Protection of the amenity of residents)

- 5.67 Due to the proximity of the proposed use to dwellings outside of the site, the nearest being Pembridge Farm and 11-13 Twyford Road at about 280m, the proposed development would not result in any harm to amenity by virtue of loss of light or loss of privacy. The proposed buildings would be situated sufficient distance away from the nearest residential properties such to not have an overbearing impact.
- 5.68 As trainees would only be resident at the site for up to 4 weeks, it is not considered that the residential amenity afforded to them by the proposed accommodation would be unreasonable. However, as stated above, they would have poor access to services.
- 5.69 Given the conclusion of the Highways Officer in relation to traffic generation, it is considered that the proposal would not harm residential amenity by way of traffic impacts. The Council's Environmental Health Officer also raised no concerns regarding the impact of dust, fumes or smells from the development. Matters of noise pollution are dealt with below; but on the above grounds, the proposed development would not unreasonably harm the amenities of existing nearby residents and therefore accords with policy BE3 of the VALP and paragraph 130f) of the NPPF.

Environmental issues

VALP policy BE3 (Protection of the amenity of residents) and NE5 (Pollution)

Noise

- 5.70 The application is supported by a Noise Assessment which has been considered by the Environment Health Officer. The noise assessment concludes that the proposal would result in noise which would be similar in type and magnitude to agricultural and other machinery that would presently be heard from the site and surrounding uses. The Environmental Health Officer is satisfied with the conclusions of the Noise Assessment and raises no objection to the application. The proposed development would therefore accord with policy NE5 of the VALP in terms of noise impacts.

Flooding and drainage

VALP policy I4 (Flooding)

- 5.71 The site lies within the Environment Agency flood zone 1 and is also at low risk of surface and ground water flooding.

Surface water and Sustainable Drainage Systems (SuDS)

- 5.72 Policy I4 of the VALP and paragraph 169 of the National Planning Policy Framework require major developments, such as this, to incorporate SuDS unless there is clear evidence that this would be inappropriate.
- 5.73 The application is accompanied by a flood risk assessment that indicates excess flows of surface water would be directed to ditches at the border of the site and that a combination of Sustainable Drainage Systems (SuDS) comprising permeable paving, swales, basins and pond areas will be used to attenuate surface water before discharging it. Precise details of how this would be achieved within the red line of the application site have not been submitted. Ground investigations have not been undertaken to demonstrate that infiltration is inadequate such that the use of SuDS should be discounted. Ground investigations with regards to infiltration rates are required because infiltration is higher on the SuDS hierarchy and is desirable, and the potential use of SuDS should be excluded before discharge into ditches is considered.

5.74 The Lead Local Flood Authority (LLFA) object to the application due to inadequate information. The information submitted fails to demonstrate that the development would not result in an increased risk of flooding elsewhere and that the site would be adequately drained. The LLFA have advised that if the proposal is to be accepted, to accord with the requirements of policy I4, the following additional information is required:

- Ground investigations to identify whether infiltration is appropriate.
- If infiltration is not appropriate, discharge rates to demonstrate better than brownfield run off rates and as close to greenfield rate as reasonably possible.
- Calculations to demonstrate there would be no surface water flooding in a 1 in 30 year storm event and details of any storage if there would be flooding in a 1 in 100 year +40% for climate change storm event.
- A drainage layout showing the connectivity between the proposed drainage components and any new buildings. A final detailed design would then be required by condition.

5.75 In the absence of this information, inadequate information has been provided to demonstrate that the development would not result in an increased risk of flooding and to demonstrate that the development would be adequately drained. The proposed development is therefore contrary to VALP policy I4, paragraph 169 of the NPPF and Planning Practice Guidance.

Foul Water Drainage

5.76 Policy I5 requires that water quality will be maintained and enhanced by avoiding adverse effects of development on the water environment. Development proposals will not be permitted which would adversely affect the water quality of surface or underground water bodies. Planning applications must demonstrate that adequate capacity is available or can be provided within the foul sewerage network and at wastewater treatment works in time to serve the development.

5.77 The Flood Risk Assessment proposes that foul water runoff would be discharged to a new sewage treatment plant with treated effluent discharging to ground via a new drainage field, or that foul water effluent will be stored onsite within a cesspool and periodically tinkered away. The application does not include details of the size and location of a new sewerage treatment plant and drainage field or cesspool and this has not been included in the description of development.

5.78 In drawing up proposals for wastewater treatment, the PPG outlines that the first presumption is to provide a system of foul drainage discharging to a public sewer. It further advises that proposals relying on anything other than connection to a public sewage treatment plant will need to be supported by sufficient information to understand potential implications for the water environment, and that septic tanks or package sewage treatment plants may only be considered if it can be clearly demonstrated that discharging into a public sewer is not feasible. It is considered that these are issues which may impact upon the layout of the development and therefore it would not be appropriate to reserve consideration of these matters via planning condition. In the absence of an appropriate method of dealing with foul waste, the proposal would be contrary to policy I5 of the VALP, the NPPF and Planning Practice Guidance.

Trees, Hedges and Hedgerows

VALP NE8 (Trees, hedgerows and woodlands)

5.79 The Primary Ecological Assessment submitted with the application recommends that existing trees,

woodland and hedgerows around the site should be protected for the duration of the development by Heras fencing at the edge of the root protection areas. A detailed drawing and specification showing these could be secured by condition if the application is supported.

- 5.80 A short section of hedgerow would be removed to facilitate access from the building complex to the training area. Compensation for this could be secured through landscaping secured as part of the post development plans for biodiversity net gain.

Ecology

VALP NE1 (Biodiversity and geodiversity)

- 5.81 Policy NE1 of the VALP seeks to prevent individual or cumulative adverse impact on an internationally or nationally important Protected Site or species unless there are exceptional circumstances. It also seeks to preserve and enhance biodiversity and geodiversity by preventing significant harm to biodiversity more generally and to secure net gains in biodiversity.

Great Crested Newts

- 5.82 The site lies within a NatureSpace Great Crested Newt District Licence Red Zone and there are ponds and suitable terrestrial habitat on site. The Preliminary Ecology Assessment submitted with the application identifies that site is considered to offer high suitability for use by Great Crested Newts (GCN) and other amphibians.
- 5.83 The Council's Ecology Officer has advised that either further surveys need to be undertaken to confirm the presence or absence of great crested newts from the site or the site needs to be registered under the NatureSpace District Licence (DL) prior to determination. The registration will enable NatureSpace to conduct a metric assessment and produce a report, which will contain the necessary conditions and informative required pre-determination, that allows the use of the district licence. The report is the document which the Local Authority use to satisfy themselves that the legal obligations for GCN have been met.
- 5.84 Alternatively, the applicant can also opt to conduct all the necessary further (traditional) GCN surveys and provide the council with the impacts, mitigation, compensation and monitoring requirements to satisfy the council, prior to determination, that they could be granted a Natural England EPSL post planning.
- 5.85 The applicant has indicated that they wish to pursue the District License option but are reluctant to invest in this in the absence of a positive recommendation from the Local Planning Authority. They have indicated that if the application receives support at Committee, they would undertake to register for the NatureSpace District License prior to determination. This would mean that the committee would need to defer determination to officers subject to this being completed.
- 5.86 In the absence of either the NatureSpace License or the further GCN surveys, mitigation, compensation, etc., the Council cannot be satisfied that a European Protected Species License would be capable of being granted, which is the legal obligation that must be met prior to authorising development which would impact Protected Species such as GCN.
- 5.87 To be satisfied that a license could be granted the proposal must meet 3 tests:
- That the purpose is for preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
 - That there isn't a satisfactory alternative; and

- That the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

5.88 As submitted, the application fails to demonstrate that the proposed development would not have an unacceptable impact on Protected Species at this stage.

Other ecology matters

- 5.89 Policy NE1 requires applications demonstrate a measurable net gain in biodiversity using best practice in biodiversity and green infrastructure accounting, such as the Biodiversity Metric. The application is not supported by any calculations or proposal of measures to achieve net gain.
- 5.90 In addition, to protect existing habitat during construction works and secure a measurable biodiversity net gain, if the application were to be consented, a Construction Environment Management Plan (CEMP) and Habitat Management Plan (HMP) would be required prior to the commencement of any works, detailing, in full, measures to protect existing habitat during construction works and the formation of new habitat to secure a measurable biodiversity net gain (post development) to accord with VALP policy NE1 and the NPPF. At this stage, it has not been demonstrated that a net gain in biodiversity could be achieved within the site.
- 5.91 To ensure that the proposal does not harm nocturnal wildlife, it would be necessary for all external lighting to be sensitively designed and this would be secured by planning condition, should the application be recommended for approval. External lighting would also need to accord with policies NE4 (Landscape character and locally important landscape) and NE5 (Pollution) of the VALP.
- 5.92 Overall, with regards to ecology, it is necessary to recommend refusal of the application based on the failure to demonstrate that the proposed development would not have an unacceptable impact on Protected Species at this stage and given that it has not been demonstrated that a net gain in biodiversity could be achieved. The information provided is insufficient to demonstrate that the protected species license could be granted by Nature England or the District Licensing programme. As such, the proposed development fails to comply with the requirements of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 and is contrary to policy S1 and NE1 of the VALP and paragraph 174 d) of the NPPF.

Historic environment and Archaeology

VALP policies BE1 (Heritage Assets)

- 5.93 Policy BE1 of the VALP seeks to conserve and enhance heritage assets, both designated and non-designated. The nearest designated assets are some 750m from the site and so the proposed development is not considered to have any impact upon those heritage assets or their settings.
- 5.94 However, the whole of the site would once have contained ridge and furrow earthworks, the visible remains of medieval to post-medieval open field systems, which are considered to be non-designated heritage assets and of historic and archaeological importance. Also, medieval and post-medieval coins have previously been found during metal detecting survey at Red Furlong Farm.
- 5.95 Policy BE1 of the VALP requires that proposals which affect the significance of a non-designated heritage asset be properly considered, weighing the direct and indirect impacts upon the asset and its setting. There is a presumption in favour of retaining heritage assets wherever practical, including archaeological remains in situ, unless it can be demonstrated that the harm will be outweighed by the benefits of the development.

- 5.96 The ridge and furrow has already been lost over the area now enclosed at the southeast corner of the site, but remains in a partly eroded state across the whole of the agricultural field. Although partially eroded, the condition of the ridge and furrow is still considered be well preserved by the Archaeology Officers. This would be lost over the whole 4.5ha of the enclosed outside vehicle training area to the northwest of the public right of way.
- 5.97 The application is supported by a desktop assessment, however, the Archaeology Officer disagrees with the method for scoring the significance of the ridge and furrow which looks at just the surviving ridge and furrow within the site rather than as part of the wider historic landscape character within which it sits. This method is opposed because assessing ridge and furrow earthworks in such an isolated way, which results in low scores used to justify their destruction, will only result in the continued erosion of these once common historic landscape features.
- 5.98 The Archaeology Officer also disagrees with the report's assessment that the ridge and furrow is not visually apparent, which is asserted by the report's author despite stating that their site visit was in unfavourable conditions. Furthermore, the public footpath crosses the site in a diagonal fashion, so users of the footpath experience under foot the undulation created by the ridge and furrow.
- 5.99 In the Turning The Plough (TTP) assessment of ridge and furrow across the English Midlands, while the Twyford ridge and furrow earthworks were not classified high enough to make Twyford parish a Priority Township under the initial assessment process of TTP, they were assessed as grade 3 (out of a maximum 4). Grade 3 was defined as: 'Good, fair quantity of ridge and furrow with vill and other associations.' They are therefore deemed as regionally (if not nationally) important.
- 5.100 The proposed activities, comprising driving large heavy machinery, excavation, moving and regrading soil, and the indication within other documentation that the area would be gravelled and formation of a bund, would all result in considerable harm to the ridge and furrow to amount to the loss of the non-designated heritage asset across the whole of the training area. The development would truncate the ridge and furrow which runs the other side of the public right of way, disrupting its characteristic linear form. The site also has multiple systems running perpendicular to each other which would be almost entirely lost.
- 5.101 Further to the comments received from the Council's Archaeology Officer, the agents have suggested that as the proposed works are only temporary for a period of 7 years they would agree to a condition that would require the ridge and furrow earthworks to be reinstated at the end of the 7 year period. They suggest that part of this condition would include a brief recording the significance and characteristics of the earthworks, agreed with the Archaeology Officer before development commences, in order to ensure that the earthworks are reinstated to a standard that reflects or improves their current condition. The agents put forward that reinstatement of the ridge and furrow represents an opportunity to better reveal the significance of the heritage asset.
- 5.102 This fails to have regard for the significance of ridge and furrow deriving from the historic manner in which farming with ox-driven ploughs formed the landscape, providing evidential and historic significance in addition to archaeological and aesthetic significance. Once the existing landform were lost, the historic significance would be permanently and irreparably lost. Any proposal to "reinstate" a similar landform would be a crude facsimile that would not have historic significance. The proposal also does not include investigation of the soil to recover any archaeological finds.
- 5.103 The Council's Archaeology Officer opposes the loss of the non-designated heritage asset. In accordance with policy BE1 and the NPPF, the harm to a non-designated heritage asset is weighed

against the overall benefits of the proposal in the overall assessment below.

Building sustainability

Policy C3 (Renewable Energy) of VALP

- 5.104 Policy C3 of the VALP states that development schemes should achieve greater efficiency in the use of natural resources, including measures minimise energy use, improve water efficiency and promote waste minimisation and recycling. Developments should also minimise, reuse and recycle construction waste wherever possible. The proposed buildings would be temporary and modular in nature and so would be removed and reused on another site following the temporary consent period.
- 5.105 The policy also required an energy statement for all non-residential development, to demonstrate how the energy hierarchy has been applied. An energy statement has not been submitted but the reuse of temporary modular buildings would minimise construction energy and given the temporary nature of the proposal it is accepted that most renewable energy options would be unviable over the short period.
- 5.106 Overall, it is considered the development would accord with policy C3 of the VALP.

Other material considerations

- 5.107 It is accepted that there is a national and regional need for trained operatives of large heavy construction plant and machinery for the construction of major infrastructure projects and major development sites; and that there are two major regional infrastructure projects, HS2 and East West Rail, which cross this part of Buckinghamshire; and that the Aylesbury Vale area is identified as an area of significant construction over the coming years. The provision of these trained operatives would be of benefit to the national/regional economy by enabling these regional infrastructure projects to be constructed, and there would be similar benefit to the local economy mainly through the construction of the major developments to meet local needs, and East West Rail improvements to regional public transport provision.
- 5.108 The proposed use would create limited employment opportunities for local people, likely limited to supportive roles, such as caterers and cleaners, as it is probable that tutors for the specialist courses would be recruited across a much wider area. The submission indicates 10-12 full time equivalent posts might be created, but this has been calculated using the Homes England Employment Density Calculator rather than the applicant's experience of their existing site. Furthermore, this would be off-set by jobs that may take place within the existing business units that will not be otherwise occupied during the development. The submission highlights that links are being discussed with Buckinghamshire University Technical College, but it is unclear to what extent trainees are likely to be locally recruited.
- 5.109 The submission highlights the Buckinghamshire Local Industrial Strategy 2019, produced by the Buckinghamshire Local Enterprise Partnership (LEP), and need identified within the strategy to bringing employers and skills providers together to understand the current and future skills needs, and planning provision to meet them. The proposed development would help to provide skills required for the major infrastructure projects identified within the Local Industrial Strategy, although construction is not itself one of the major industries that the Strategy focuses on.
- 5.110 For locally recruited trainees, the development would upskill the local workforce and the LEP has identified that a higher proportion of residents within Buckinghamshire are employed in

construction than the national quota. This would provide those residents with improved employability and potentially higher wages which would have indirect benefits to the local economy through increased spending power.

- 5.111 The above are all economic, and to a less degree social, benefits of the proposal which are material considerations to weigh in favour of the proposal. However, these benefits are dependant only on the proposal and not on the proposal at this site.

6.0 Weighing and balancing of issues / Overall Assessment

- 6.1 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.
- 6.2 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
- 6.3 As set out above it is considered that the proposed development would fail to accord with development plan policies S1, S2, S3, S7 and D6 by virtue of its unsustainable location within the open countryside. The proposal is also considered contrary to policies BE1, BE2 and NE4 of the VALP due to the harm to the character and appearance of the rural area and the loss of historic ridge and furrow earthworks, which it is not considered could be sufficiently reinstated at the end of a temporary consent period. The proposal would result in the total loss of a significant part of a non-designated heritage asset of regional importance. As this relates to a non-designated heritage asset, in accordance with policy BE1 and the NPPF, this harm must be balanced against the overall benefits of the proposal. The application also fails to demonstrate the provision of adequate drainage arrangements and fails to demonstrate that the proposal would not result in harm to protected species or result in a net gain in biodiversity. It is therefore considered that the development is contrary to the Development Plan when taken as a whole.
- 6.4 The application submission identifies a number of economic and social benefits mainly associated with improved employment opportunities for those that undertake training at the facility. This could be significant benefit to those employed within the construction sector. There would also be indirect benefits more widely as a result of ensuring that some of the employment requirements of the economic and housing growth construction projects can be resourced. The benefits are not unique to this proposal or this site.
- 6.5 Insufficient evidence has been provided to demonstrate that there would not be a more suitable site within an appropriate area, located within a more sustainable location, and that would not result in the harm identified. This is considered to be very important when considering development that does not comply with the development plan.
- 6.6 Overall, when weighing the significant level of harm across the sustainability, landscape character

and design, heritage and ecology aspects of the development, against the identified benefits of the development including the economic benefits which are attributed significant weight, officers consider that the other material planning considerations are not sufficient to outweigh the conflict with the development plan and the identified harm associated.

- 6.7 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.
- 6.8 Similarly, with due regard to the requirements of the Human Rights Act, it is not considered that the proposal would be likely to result in infringement of Human Rights.

7.0 Working with the applicant / agent

- 7.1 In accordance with paragraph 38 of the NPPF (2021) 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.
- 7.2 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.
- 7.3 In this instance with the proposal was subject of pre-application advice,
- The agent submitted some amendments to address issues raised by some consultees.
 - The applicant was informed/ advised how the proposal did not accord with the development plan, that no material considerations are apparent to outweigh these matters and provided the opportunity to amend the application or provide further justification in support of it.
 - The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

8.0 Recommendation

- 8.1 Having regard to applicable national and local planning policies, and having taken all relevant material considerations into account, it is therefore recommended that planning permission should be refused *for the following reasons:*
1. The proposed development, by reason of its remote and unsustainable location within the open countryside, would require users to be entirely reliant on private motor vehicle transport, and would not provide good access for sustainable modes of transport. There is no clear justification for the use needing to be located within this rural location and the development is not serving to meet local business and community needs in this rural area. The application fails to adequately demonstrate that there are no more suitable sites for the development within an appropriate area. Furthermore, the proposed development would fail to have regard to the sensitivity of its surroundings. The proposed development is therefore considered contrary to Policies S1, S2, S3, S7 and D6 of the Vale of Aylesbury Local Plan and paragraphs 85 and 174 of the NPPF 2021.
 2. The proposed development by virtue of its design, scale and massing would result in major adverse impacts on the landscape character and visual amenity of the site and its surroundings, and significant adverse impacts on the landscape character and visual

amenity of the wider area, including during hours of darkness given the lighting that would be reasonably required to serve the intended uses, which would not and could not be adequately mitigated. The proposed development is therefore considered contrary to policies S1, NE4, NE5 and BE2 of the Vale of Aylesbury Local Plan and paragraph 174 b) and Section 12 of the NPPF.

3. The proposed development by virtue of its siting, would result in the loss of a significant area of ridge and furrow medieval earthworks which the Local Planning Authority identify as a non-designated heritage asset of regional importance. The proposed development necessitates digging up and moving of earth over the area of ridge and furrow, which would result in the total loss of a significant area of ridge and furrow and permanent harm to the historic environment. The benefits of the proposal are not considered sufficient to outweigh this harm to the non-designated heritage asset, and therefore the proposed development is contrary to policies S1 and BE1 Vale of Aylesbury Local Plan and paragraph 203 of the NPPF.

4. Due to insufficient information, the application fails to demonstrate that the proposed development would be adequately drained both in relation to foul and surface water drainage arrangements, such that the proposal would not lead to increased flood risk elsewhere. The proposed development is therefore considered contrary to policies I4 and I5 of the Vale of Aylesbury Local Plan, paragraph 169 of the NPPF and guidance within the Planning Practice Guidance.

5. Due to insufficient information, the application fails to demonstrate that the proposed development would result in a net gain in biodiversity and it is considered likely that the development would result in harm to protected species, namely Great Crested Newts. The information provided is insufficient to demonstrate that the protected species license could be granted by Nature England or the District Licensing programme. As such, the proposed development fails to comply with the requirements of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 and is contrary to policy S1 and NE1 of the VALP and paragraph 174 d) of the NPPF.

APPENDIX A: Consultation Responses and Representations

Councillor Comments

No Councillor comments received.

Parish/Town Council Comments (verbatim)

Twyford Parish Council

Twyford Parish Council resolved at their meeting held on 11th October 2021 to submit the following OBJECTIONS to Buckinghamshire Council concerning the following planning application:

21/03284/APP for “Temporary 7-year change of use of agricultural land for the establishment of an operator skills hub for training operatives in relation to the development of major infrastructure projects and caravan park and erection of temporary buildings” at Red Furlong Farm Twyford Road Poundon Buckinghamshire OX27 9BG

1.The site:

The application site is situated at Grid reference SP 65229 25903, which is found to be on the boundary towards the south-west extremity of the civil parish of Twyford. It comprises the farmstead of a former County Council smallholding surrounded by an adjacent pasture paddock.

2.Constraints:

The agricultural land included as part of the application site is shown on the MAGIC site maintained by DEFRA as the subject of an extant mid-Tier Countryside Stewardship agreement.

The land element of the application site is traversed by a public footpath (TWY/9/1)

3.Proposal:

Twyford Parish Council questions the ‘need’ for the construction plant bespoke training facility proposed. It is understood that many civil engineering and groundworks contractors prefer on-site training of operatives in real-time work environments, rather than at a ‘sanitized’ training ground. The Construction Industry Training Board (“CITB”), for instance, is prepared to provide trainers and assessors who visit active construction sites and assess operatives in real-time for their relevant plant and equipment competence. Similarly, there are recognized operator competence schemes such as the Construction Skills Competence Scheme (“CSCS”) or the Construction Plant Competence Scheme (“CPCS”) where training and assessment is usually carried out on site. In this way student operatives can be efficiently employed and engaged in productive site activities whilst undergoing training and assessment, to the financial benefit of the groundworks employer.

4.Conclusions:

The Twyford Parish Council OBJECTS to the application on the grounds (inter alia) that the use proposed will:

- Take place in a location in the open countryside on the periphery of the civil parish on a site which, as a discrete entity, has not previously assessed for commercial development as part of the evidence base for the recently adopted Local Plan;
- Harm the countryside and impair the rural area;
- Generate intolerable additional levels of traffic, including heavy vehicles, in an area already stressed by

the juxtaposition of high levels of construction traffic generated by both the HS2 and East-West railway - both of which run through, traverse and afflict this parish;

- Be incompatible with the pedestrian traffic using the public footpath through the site;
- Cause the unnecessary loss of ridge and furrow pasture land;
- Involve the generation of artificial light for extended periods at night and throughout the winter months on the site, offering levels of luminosity which will prejudice the principal of “dark skies” and damage the natural environment in this rural location;
- Not comprise sustainable development;
- Offer the temporary use of premises and land for a 7-year term on a site which will then have assumed brownfield status; and

respectfully request that this application is not dealt with by officers under delegated powers, but rather ‘called in’ for determination by the Council’s area planning committee.

Poundon Parish Council (adjoining):

Poundon Parish Meeting opposes the application for the following reasons:

1) The proposed site is currently accessed by class c & unclassified roads. These roads have been under a huge increase in traffic by EWR & HS2 already, they were not constructed for this amount or type of traffic.

Perhaps a more suitable site can be found, with better road access, such as The Old Station Yard at Finmere.

2) The noise pollution is bad enough from the EWR compound A4 which can be heard in the hamlet. The proposed training centre is even nearer, during practical driving training, the machines will be clearly audible in the hamlet.

3) Poundon is a small hamlet with no street lighting, therefore we have a low level of light pollution. The lighting from the compound would have an impact on this.

4) The increase in traffic this application would bring both during construction & when the centre is operating will add to an already overloaded road system. Being a small hamlet, we have no footpaths, the school children & residents who rely on public transport have to walk along the road to the T junction with the Twyford/Marsh Gibbon road to catch buses.

5) The applicants archaeological survey states that “The site visit (carried out on 9th June 2021) did not identify observable remains of ridge & furrow within the site & surrounding land.”

Planning application 11/02690/ACL, Bucks County Archaeological services found ridge & furrow earthworks from medieval to post medieval open field systems survive extensively across the site.

6) Many of the footpaths in the area have been closed due to EWR works. The obstruction, even with security guards & gates, on the footpath across the site is not acceptable.

We therefore feel that the nature of the planning application is not suitable for this site & ask the council to refuse permission.

Other nearby Parish Councils:

Grendon Underwood Parish Council:

At a properly constituted meeting of Grendon Underwood Parish Council held on 28th September 2021, it was resolved to OPPOSE this application, in the strongest possible terms, on the following grounds and further detailed overleaf:

Environment - noise and light pollution to neighbouring properties;
Impact on wildlife;

Loss of green field;

Impact on footpaths.

Sustainability-traffic on small country roads;

Danger to schoolchildren walking to bus stop on Twyford road from Poundon because of lack of footway.

In summary this application is manifestly unsuitable for this rural location and contravenes several sections of the local VALP, the NPPF & Government Manifesto slogans to build on brown field sites. This is a green field site in an area with low unemployment levels and numerous job opportunities which is already severely impacted by HGV & personnel traffic already 'consented' by County from HS2 & EWR construction traffic. Therefore, Council respectfully requests that this application is dismissed.

Council notes the proposed development would contravene several requirements of the now adopted Vale of Aylesbury Local Plan (VALP) and the latest NPPF, as amended June 2021, namely:

VALP para 7.22 "The National Planning Policy Framework (NPPF) requires planning decisions to take account of whether safe and suitable access to a development site can be achieved for all people.

Developments should be located and designed, to create safe and secure layouts which minimise conflict between general traffic and; emergency service vehicles, public transport, cyclists and pedestrians. Suitable and safe highway measures must be provided to mitigate the impact of development and enhance the use of the local road network for all users. "

The site is not easily accessible and all journeys to the proposed development would be by road and with minimal public transport resulting in private cars being the only practical means of accessing the site. This goes against all Government policies of reducing carbon emissions.

The proposed development would generate significant additional traffic which will further compound the disruption to local infrastructure and traffic misery that local residents continue to suffer and will intentionally coincide with peak construction phases of HS2 and EWR.

VALP para 8.46 "It is a central theme of planning that good neighbourliness and fairness are among the most important factors against which development proposals should be measured. While planning decisions should always be made on balance in the public interest, this should not be at the expense of unreasonable harm to peoples' peaceful enjoyment of their property. Most development will have some impact on its neighbours, but it is important to ensure that this impact is reasonable in relation to the benefits of the development. "

VALP para 8.47 "Amenity can be harmed in a number of ways, for example by privacy, noise, light pollution, fumes or odours, excessive or speeding traffic, loss of light, and/or the overbearing nature of a new structure which would impact on the character of outlook. Aylesbury Vale is a valued place in which to live, and the council aims to protect this aspect of its residential environment. "

The proposed development comprises 2 storey modular units with 40 rooms for trainees and around 74 parking spaces on a rural site of 8.53 hectares which would have an undesirable urbanising effect on the local landscape.

The construction work and the nature of the work carried out at the proposed Training centre would have an adverse effect on the surrounding landscape and its residents in terms of night-time light pollution and day-time noise pollution.

NPPF 120. "Planning policies and decisions should: (c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;"

There is no evidence to show that the applicant has given serious consideration to other more appropriate sites with Westcott Venture Park being the only other potential site mentioned.

The development and its intended purpose is patently more suited to brownfield sites and this should have been considered a priority for this type of development rather than causing the harmful loss of further

green and rural spaces.

There appears to be no local economic benefit from selecting this location and the applicant states that 10 to 12 full time new employment opportunities will benefit the surrounding area through increased spending and the support of local services and then contradicts this by saying that there will be little reason to leave the site due to facilities on site.

Edgcott Parish Council:

Edgcott Parish Council objects to this application for the following reasons:

The new Vale of Aylesbury Local Plan (V ALP) has now been adopted and the proposed development contravenes para 7.22 which states:-

"7.22 The National Planning Policy Framework (NPPF) (2012) requires planning decisions to take account of whether safe and suitable access to a development site can be achieved for all people. Developments should be located and designed, to create safe and secure layouts which minimise conflict between general traffic and; emergency service vehicles, public transport, cyclists and pedestrians. Suitable and safe highway measures must be provided to mitigate the impact of development and enhance the use of the local road network for all users."

The site is not easily accessible and all journeys to this proposed development will be by road and with poor public transport most visitors to the site will be reliant on private cars. This goes against all Government policies of reducing carbon emissions.

The proposed development is designed to train workers for the local infrastructure projects of HS2 and EWR but the additional traffic generated by this proposed Training Centre will further compound the traffic misery that local residents continue to suffer and will intentionally coincide with peak construction phases of HS2 and EWR.

VALP also specifies under para 8.46 and 8.47 the protection of the amenity of residents as follows:-

"8.46 It is a central theme of planning that good neighbourliness and fairness are among the most important factors against which development proposals should be measured. While planning decisions should always be made on balance in the public interest, this should not be at the expense of unreasonable harm to peoples' peaceful enjoyment of their property. Most development will have some impact on its neighbours, but it is important to ensure that this impact is reasonable in relation to the benefits of the development.

8.47 Amenity can be harmed in a number of ways, for example by privacy, noise, light pollution, fumes or odours, excessive or speeding traffic, loss of light, and/or the overbearing nature of a new structure which would impact on the character of outlook. Aylesbury Vale is a valued place in which to live, and the council aims to protect this aspect of its residential environment."

The proposed development comprises 2 storey modular units with 40 rooms for trainees and around 74 parking spaces on a rural site of 8.53 hectares which would have an undesirable urbanising effect on the local landscape.

The construction work and the nature of the work carried out at the proposed Training centre would have an adverse effect on the surrounding landscape and its residents in terms of night time light pollution and day time noise pollution.

Brownfield sites should be considered as a priority for this type of development rather than causing the harmful loss of further green and rural spaces. This policy is supported in the National Planning policy Framework as follows:-

"NPPF 120. Planning policies and decisions should:

(c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled,

degraded, derelict, contaminated or unstable land;"

There is no evidence to show that the applicant has given serious consideration to other more appropriate sites with Westcott Venture Park being the only other potential site mentioned.

There appears to be no local economic benefit from selecting this location and the applicant states that 10 to 12 full time new employment opportunities will benefit the surrounding area through increased spending and the support of local services and then contradicts this by saying that there will be little reason to leave the site due to facilities on site.

To summarise this proposed development is totally unsuitable for this rural location and goes against the Government Manifesto which promised building on brown field sites and levelling up. This is a green field site in an area with low unemployment levels and numerous job opportunities which is already under siege from traffic and in particular construction traffic. It follows that Edgcott Parish Council respectfully requests that this application is dismissed.

Calvert Green Parish Council:

Comment Calvert Green Parish Council objects to the Red Furlong Farm proposed development for many reasons. Firstly, the whole local area has been devastated by the cumulative impact of construction from High Speed Two and East West Rail projects and if approved, this application will add more blight, disruption and mental health issues to local communities.

The local road infrastructure is potholed and failing with several roads becoming dangerous from the impact of increased HGVs. Most roads have no pavements and are unlit and the increase in traffic will be a danger to pedestrians, especially school children at rural bus stops. The situation is exacerbated by the ongoing closures to footpaths.

The location is not easily accessible being several miles distant from an A or B road and therefore all access will be along country lanes and through local villages.

All journeys to this proposed development will be by road and with poor public transport most visitors to the site will rely on private cars. This goes against all Government policies of reducing carbon emissions and highlights why it is such an inappropriate location.

The National Planning Policy Framework (NPPF) (2012) requires planning decisions to take account of whether safe and suitable access to a development site can be achieved for all people. Developments should be located and designed, to create safe and secure layouts which minimise conflict between general traffic and; emergency service vehicles, public transport, cyclists and pedestrians. Suitable and safe highway measures must be provided to mitigate the impact of development and enhance the use of the local road network for all users.

The CPCS training certification is a national accreditation and there is no reason this training needs be undertaken near to a construction scheme. There are already two suitable training establishments in the local area providing the required accredited training.

The proposed accommodation block is very large and will completely change the setting of the site, as will a caravan park so close to residential dwellings. Additionally, the combined overnight accommodation appears to require far in excess of the number of parking spaces in the application.

Hundreds of acres of local farmland have already been lost in the area due to major construction and the proposed location will destroy ancient ridge and furrow farmland that will be impossible to revert back to its former state should this development go ahead.

On these grounds Calvert Green Parish Council respectfully request that this application is rejected.

Charndon Parish Council:

This planning application supporting the vanity project of HS2 should not be approved. The time has come to say enough is enough. The devastating effect on local villages from this infrastructure, and EWR, have seen large levels of traffic, road closures and diversions on local roads not robust enough to accommodate them. Many of these roads do not have footpaths or street lighting and are continuously used by pedestrians, school children, horse riders and cyclists. Indeed, the said roads are falling into disrepair with potholes, subsidence, and damaged verges. This is another example of the 'couldn't care less about you' mentality being driven by the hierarchy of HS2. This planning request is for 7 years with assurances to reinstate the land to its original condition! Highly unlikely. Retrospective requests to extend over the seven years and the former Green Belt changed to Brownfields is the possibility and it would have a major impact on the surrounding villages.

Marsh Gibbon Parish Council:

Marsh Gibbon Parish Council has reviewed some of the objections listed on the Buckinghamshire (AVDC Area) website for the above planning application and also would like to object on the grounds of noise, light pollution, increased traffic, devastation to local business and mental health issues. It also supports the objections submitted by Edgcott Parish Council, repeated below for your convenience, pointing out that this application goes against the recently issued VALP and the contradictions in the application itself regarding benefits to local businesses.

East Claydon Parish Council:

East Claydon Parish Council has reviewed some of the objections listed on the Buckinghamshire (AVDC Area) website for the above planning application and also would like to object on the grounds of noise, light pollution, increased traffic, devastation to local business and mental health issues. It also supports the objections submitted by Edgcott Parish Council, repeated below for your convenience, pointing out that this application goes against the recently issued VALP and the contradictions in the application itself regarding benefits to local businesses.

MP Greg Smith Letter:

I wish to register my concern regarding the proposed training centre on the site of Red Furlong Farm in my constituency, as part of the HS2 project, which is to be delivered by Flannery Plant Hire.

Of great concern is the use of greenfield land for what should unmistakably be a brownfield site.

The extent to which the HS2 project has acquired arable land in my constituency has already had a severe impact on local businesses' income and their operations, with many forced to scale back production. This has, in turn, impacted the community, as their customer base is largely comprised of residents.

Indeed, it appears this application has fallen short of the National Policy Planning Framework, which requires developers to:

"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."

Yet this application has not demonstrated due regard for the sufficient availability of suitable brownfield land elsewhere along the HS2 line of route, where more populated areas with a fully developed road network able to support its presence - not only regarding construction and long-term maintenance of the site but also the daily movement of site personnel both during its construction and subsequent operation. It must be said the local infrastructure cannot support the additional pressures which would result from

both the construction and operation of this site. The developer has not demonstrated a willingness to invest in and enhance the poor condition of roads leading to the site, yet the accompanying planning statement produced by Chartered Town Planning Consultants identifies the importance of fulfilling: "the need to have a site that is strategically well placed in terms of providing direct access to the construction sites. "

In this regard, the said document takes a nebulous view on the nature of the local infrastructure network. The site falls within a complex system of roadways supported by ageing structures; a key road in the area has now closed for several months to undertake urgent repairs on a failed railway bridge. An interconnected series of utility lines also permeates the surrounding area, necessitating frequent road closures to maintain this network, which in addition to the plethora of closures associated with both HS2 and East West Rail works in the area, has left residents and businesses with limited access to and from their homes and premises. Any further construction outside the current scope of HS2 works would therefore heighten the risk of my constituents being cut off from their surrounding community.

HS2 Ltd and the main works contractor EKFB have demonstrated a lack of oversight and competence in their approach to the proposal made by Flannery. Both HS2 Ltd and EKFB are fully aware of the impact that excessive land acquisition has had on my constituents and on the community as a whole, yet neither has exercised their ability to prevent a sub-contractor such as Flannery from acquiring land at will. This once again directly contradicts HS2's good neighbour claim.

I hope you will strongly consider my concerns and those of my constituents regarding this planning application and recommend it for refusal.

Consultation Responses (Summarised)

Natural England: 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. *Biodiversity Net Gain*: We advise the implementation of the Biodiversity Metric and submission of a plan demonstrating measurable net gains for biodiversity will be applied.

Buckingham And River Ouzel Drainage Board: The site is outside the Boards district, in this instance the Board has no comment to make.

Environmental Health - The inacoustic noise assessment report dated 7 June 2021 has been considered and is acceptable from an Environmental Health point of view. The report concludes that the proposed development will not cause any unacceptable noise impacts on neighbouring noise receptors. Informative RE: Caravan License recommended.

Rights of Ways – First comments: **Object.** Footpath TWY/9/1 would be obstructed in 3 places were the security fences to be located as proposed, contrary to Local Plan Policy GP84 and VALP Policy C4. Further clarity is sought to confirm the width for pedestrians of 8.88m, this width would be satisfactory. The proposed loose stone surface, to accommodate the heavy machinery from farm buildings to adjoining field, appears to be acceptable for pedestrians, providing there is no upstand on the track edges. In summary, the proposals would obstruct Footpath TWY/9/1 in three places. This would need to be resolved with revised plans or a draft application to divert the footpath under s257 TCPA 1990. Further information is requested on how the applicant wishes to proceed.

Second comment following amended plan: **Object.** The fence around the existing farm curtilage has not

moved far enough south to avoid the footpath.

Ecology/Protected Species – **Object, insufficient information at this time.** The site lies within a NatureSpace Great Crested Newt District Licence Red Zone and there are ponds and suitable terrestrial habitat on site. Either further surveys need to be undertaken to confirm the presence or absence of great crested newts from the site OR the site needs to be registered under the NatureSpace District Licence (DL) prior to determination.

The recommendations of the preliminary ecological appraisal include:

- GCN presence on site remains a risk within suitable habitats and as the site lies within an identified “red” risk zone for this species. As such a District Level Licence (DLL) application should be made to NatureSpace Partnership to ensure an appropriate derogation to legislation relating to GCN and by way of compensation for the loss of suitable GCN habitat as a result of the proposals.
- A Construction Environmental Management Plan (CEMP) should be produced to outline any detailed mitigation measures for habitats (including protection of retained features such as woodland, hedgerows and ponds) and species (including mitigation for badgers, bats, reptiles and amphibians and nesting birds).
- Opportunities to secure a net gain in biodiversity should be considered in relation to the re-establishment of this grassland habitat post operation. Enhancement to the floristic diversity through appropriate seeding, of this currently species poor habitat would offer a gain in biodiversity value

Archaeology - The application site is located within a well preserved historic landscape, with extant ridge and furrow earthworks covering the site. Disagree with the approach used in the Heritage Assessment and thus disagree with its conclusions. Disagree with the scoring of the significance and with the assessment of the preservation and visual appreciation. The Twyford ridge and furrow earthworks are deemed as regionally (if not nationally) important. Use of heavy plant within the site will result in impact to the ridge and furrow earthworks. It is difficult to see how it would be possible to reinstate the earthworks like for like at the end of the seven year temporary period, and no indication of such a scheme of works is included within the planning statement.

Economic Development:

ED welcomes the creation of 10 new jobs. ED does not welcome the meagre 4% of proposed training for local people, ED thinks this should be at 50% for local people to be trained in much needed skills to enable them to have long term careers and improve the overall prosperity of the area. With a higher percentage of local people being trained this would reduce the need for as much on-site living. This would benefit local B&Bs and hotels. The NPPF paragraphs supports 81 and 84 to allow rural business to grow and diversify provided they can satisfy the concerns over sustainability and being in an appropriate location.

Landscape:

The landscape and urban design officer refutes the conclusions of the Landscape and Visual Appraisal, extremely localised and temporary harm is not accepted.

Invites the planning officer to attribute:

- Major adverse landscape character impact on the site, including the area around the existing buildings, its setting, with potential for noticeable adverse landscape character effects over a much greater distance due to a number of points of high ground (e.g. Poundon Hill).
- Major adverse visual impact from public rights of way and highways on and adjoining the site.
- Significant - major adverse visual impact on the setting and surroundings on pedestrians and horse riders and surrounding residential receptors, e.g. from Poundon, and potentially other residential properties.

Included within L&UDO assessment is:

- Impact should be considered permanent if planning consent renewal is likely to be justified. Furthermore, 7 years is not insignificant period of time.
- The character and visual impacts would extend after dark, the illumination of the site would be over a considerable area and would be at great variance to the existing dark environment.
- The sight and sound of very large brightly coloured moving vehicles, and light coloured caravans would also draw the eye towards the development.

Development is considered contrary to VALP policy NE4 and BE2.

Representations

Amenity Societies/Residents Associations

The Paroichal Church Council of St Mary's:

The Parish includes the 3 villages of Twyford, Poundon and Charndon. The PCC considers that it is not in the interests of the parishioners living in these 3 settlements to have such a unnecessary development on this site. All will be affected.

There will be considerable unsettling activity during the working day, an increase in local traffic movements which will mostly be at the beginning and end of the day at a time when school buses are collecting or delivering children who will be walking to/from their bus stops.

There will be light, noise and dust pollution.

The vehicular access is not suitable and the local roads are already over burdened and under maintained.

The visual impact assessment is unrealistic.

The site is in a rural setting and this is the last side of Twyford to retain this status.

There will be no apparent benefit to the parish.

We feel this application should be rejected.

A Residents Petitions signed by 158 residents oppose the application stating "With reference to the above Planning Application, yet again we are expected for our lives to be disrupted which now is causing harm against the safety and wellbeing of the residents of Twyford and Poundon. The continual stress of the inability to access our homes and businesses by uncoordinated road closures and damage to the infrastructure around us, has now become intolerable."

Other Representations

2 comments have been received supporting the proposal:

Support:

- Opportunities created for Buckinghamshire residents.
- Opportunities created for the regional and national infrastructure sector.
- Plant operatives were specifically identified as a skills shortage area in HS2 Ltd's 2021 Labour Market Forecast.
- The proposed Operator Skills Hub plans to help combat the UK skills gap in the construction sector.
- Construction is the second largest industry by numbers of business establishments in Buckinghamshire, many major national infrastructure projects are expected to be delivered within or close to the County over the next decade that will require a significant volume of construction expertise and skills.

- The sector has traditionally relied on EU workers to address the construction skills shortage in the UK workforce. The availability of overseas workers has become increasingly constrained in recent months. Therefore, there is a greater need to train and develop UK residents.

258 comments have been received objecting to the proposal:

Highways

- The road the site is located on is already dangerous due to the volume of traffic using it to service the two EWR sites on the edge of the village.
- Volume of traffic has risen ten-fold in past few years. The roads have no further capacity for this project.
- Increased danger to horse riders who ride along this road regularly due to bridleways being closed.
- Local roads and bridges have been damaged by the volume of heavy vehicle traffic.
- Road systems and services not set-up to take this level of traffic or this number of increased residents.
- Continuous road closures and diversions from EWR and HS2 works causing disruption in the local area.
- Poundon has no footpaths or streetlighting. Danger to children and the elderly who walk along the highway to the bus stop on the road where this facility is proposed.
- Roads becoming increasingly unsafe for other road users i.e. pedestrians, cyclists and horse riders.
- Disagreement with the access appraisal – 40 people and 10 touring caravans staying 4 weeks at a time will produce far more traffic movements.
- This location has no sustainable transport options and would therefore be against Government policies to promote sustainable travel.
- The site is several miles in any direction from an A or B classified road therefore all access to the site will be along country lanes and through Twyford, Poundon and Marsh Gibbon.
- The absence of any recorded accident in the vicinity of the entrance to Red Furlong Farm is not evidence that the exit from the farm is safe. It is very close to a blind bend that drivers take at inappropriate speeds.
- Increased traffic will increase danger to the cyclists using the popular National Cycle Network Route 51.
- The claim of 40 vehicle movements doesn't seem to correspond with the 74 parking spaces and 40 rooms plus caravans.
- On-street parking on Bicester Road which makes access for large vehicles difficult.
- The access point to this proposed development is between two sharp bends, reducing visibility to vehicles entering and leaving the site.

Residential amenity

- This proposal will create an eyesore.
- It will negatively affect the wellbeing of local people.

- It will destroy village life.
- Mill Lane, Twyford provide a tranquil and picturesque walk and is used extensively by residents of Poundon and Twyford for recreation. The field at the rear of the farm is visible throughout most of this walk and this amenity will be destroyed by this development.
- Visual impact of caravans and stacked units will be obtrusive.
- Quality of life and stress levels of residents is being negatively impacted by these projects.
- The site is divided by the Cross Bucks Way, one of the County's prime footpaths.
- The erection of 2m security fences and two storey accommodation blocks will urbanise the area.
- Constant road closures and increased noise and traffic levels are already having a detrimental effect on resident's mental health.
- Many local footpaths have been diverted but not maintained, rendering them almost useless. The footpath which passes Red furlong Farm is to be contained within a security fence which will be too narrow for maintenance and will effectively close off another local footpath.
- It will change the character of the area.
- There are no local amenities and services for the people using and staying at the centre.

Drainage

- Flooding has been significantly worse since EWR and HS2 developments started.
- The treatment of foul sewage via a cesspit or spread onto the fields will not be acceptable.
- Local surface water infiltration opportunities will be extremely limited resulting from the largely impermeable local clay topsoil and substrate.
- The Poundon Road junction is already subject to frequent seasonal flooding and additional impermeable surfaces will exacerbate flood impacts.
- Surface water run-off from the disturbed soils of the training area will likely carry high loads of sediment and silt. This will be detrimental to the existing agricultural drainage ditch infrastructure.

Natural Environment

- Loss of green land and countryside.
- Damage to wildlife including red risk zone for great crested newts, nesting birds, badgers, bats, grass snake, common frog, smooth newt, common toad.
- Long established flora and fauna will be lost.
- Silt laden surface discharge will negatively impact local ecological systems.
- The site will not be able to be restored to agricultural land. Even if the topsoil and subsoil were scraped off and stored, the nature of this intended use would ensure that substitute imported materials could never be adequately removed from the site. Spills/leaks of diesel and hydraulic oil would further contaminate the land.
- Negative impact of light pollution on nocturnal wildlife.

- Concerns around the accuracy of the Ecology Study
 - The study was conducted by the applicant's agent over 2 hours on one day when the total area of the site is around 6 hectares. The study should be redone by an independent and qualified Ecologist.
- The submitted plans show the fence going through the existing, established pond which will greatly impact on the natural ecology and surrounding environment.
- The land to be used is unsuitable as it is heavy clay that does not drain well in the winter, so you can't drive across the field without sinking.

Pollution and Environmental Impact

- Has there been a light pollution survey carried out for this site?
- Has there been a noise pollution survey carried out for this site?
- Increased light and noise pollution to residents that are already experiencing this from existing development sites.
- Poundon has no streetlights and therefore a low level of light pollution and so this proposal will have a large impact.
- The noise impact on the PROW that crosses the site.
- Concern that fuel spillages at the machinery refuelling bunds and leakages from vehicles may leech into the ground over time and contaminate the nearby river and watercourse.
- The site will also create air pollution from the high-powered diesel machines which will be operating for at least 50% of the 10-hour working day which will create a significant health risk due to its proximity to a residential area.
- Air and noise pollution will travel directly to Twyford due to the prevailing wind direction.
- Concerns around accuracy of Noise Assessment Report
 - The siting of the noise monitoring equipment should have been taken from the area where the most noise will be generated (the field where equipment will be operating).
 - The claim that most of the equipment being used will only generate around 75db or less is misleading. The manufacturers specification for specific equipment states that they generate noise at higher levels.
 - The Penalty Assessment states that "The character of the sound would also be ostensibly similar to the agricultural activities that are intrinsic to the character of the area." The 4 high powered diggers/excavators working continuously for 5 hours a day wouldn't be similar to the operation of a tractor to cut, turn and bale hay for less than 20 hours a year.
 - Nowhere in the report is the effect of wind, temperature and elevation on noise levels considered.
 - The cumulative noise effect of the site running, the heavy plat running, the students and staff, the caravans and other vehicles, and the HGVs needed to service the site will be worse than the report indicates.
- Environmental impact of emissions and non-renewable fuels being used.

- Removal of mature trees which can absorb up to a ton of CO₂ every year

Alternative sites

- There is space further away from villages and existing industrial estates for this proposal.
- The Construction Industry Training Board National Construction College in Bircham Newton is already built and underutilised, why can't training be carried out there?
- Half of the MOD land in Bicester lies empty or unused, this facility could be housed there.
- HS2 and EWR have already created very large brownfield sites in the vicinity of the proposal. Further development, if considered essential for HS2, should be confined to those areas.

Infrastructure

- This area doesn't have the shops, petrol stations, catering services, or infrastructure to support this.
- This proposal will likely cause damage to surrounding infrastructure.
- Concerns about the capacity of the electric, water mains and sewage services to cope with the increase in demand.
- Unlikely that the house currently on the site has services (e.g. water, mains electricity) that would be adequate for this development. May create a negative impact on those services in Twyford and Poundon.

History

- The majority of the site is unploughed grazing land which still has remnants of ancient ridge and furrow field layouts and an ancient field pond, which will be lost if this goes ahead.

Concerns around accuracy of Landscape and Visual Appraisal

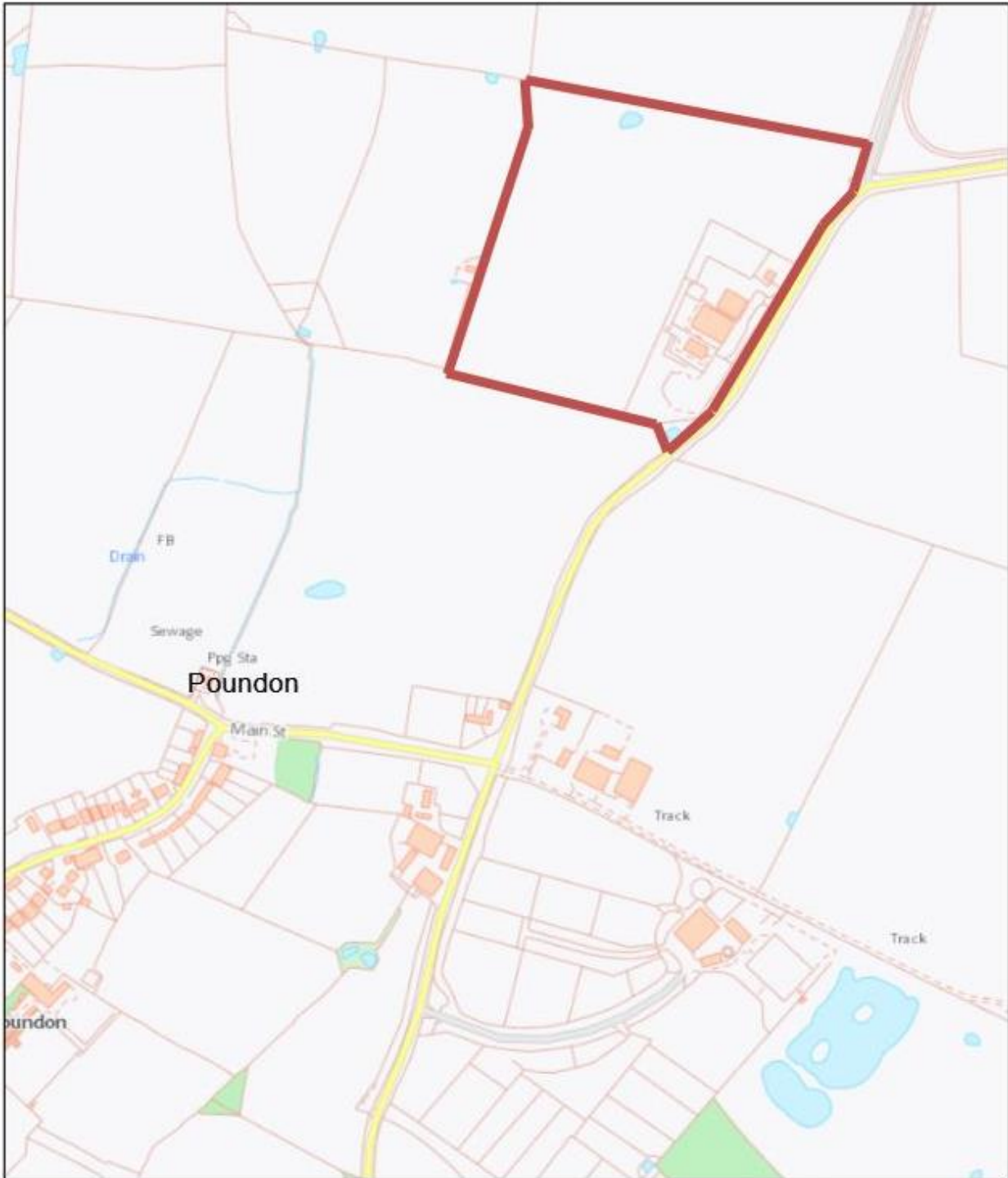
- It states that "there are no water features within the site or within close proximity." This is contradicted in the applicant's own report by Griffin Ecology which shows two ponds within the site and another eight within close proximity.
- The statement that "there are no residential receptors close enough to have any visibility of the site" is incorrect.

General points

- This will bring no benefit to the local area.
- The equestrian centre at Twyford Mill will be badly affected and the distress to the animals from noise may result in people that currently stable their horse there leaving.
- Concerns about what will become of this site after 7 years and how it can be guaranteed that it will be reinstated.

- There is no reason CPCS training need be undertaken near to any particular construction scheme as the certificate is a national accreditation valid of most construction sites. There are already suitable training establishments in the local area: Bucks Training Academy, Middle Blackgrove Farm, Quainton and KJN in Marsh Gibbon.
- Previous planning applications for Red Furlong Farm have been rejected as development has been outside the Local Plan for the area, as this application is.
- This is an unsustainable location.
- Potential impact on property values for local residents.
- At Dunton Wharf the case officer identified “the need to have a site that is strategically well placed in terms of providing access to construction sites”. This criterion is not met as Red Furlong Farm has no direct access to HS2 or EWR.
- Potential negative economic effect to the Sow & Pigs pub in Poundon which is one field away from the site due to noise pollution and dust from the site.
- If the proposed development is constructed and the company subsequently decides to liquidate, prior to the restatement taking place, there is no mechanism in place to return the land to its original condition or the financing thereof.
- Flannery’s are already storing heavy plant on site, in disregard to their current use class (B1) for the site. On Ref planning application 04/02690/AOP, condition 7 states “no goods, plant or materials shall be deposited or stored outside the buildings on the site.” The heavy plant currently stored on site and visible from Twyford road is not stored in the existing buildings.

APPENDIX B: Site Location Plan



Do not scale – this map is indicative only

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