

**17/06702/FUL**

**Consultations and Notification Responses**

Ward Councillor Preliminary Comments

**Councillor Mohammed Asif** – if minded to approve please bring to planning committee

Parish/Town Council Comments/Internal and External Consultees

**High Wycombe Town Unparished**

**Conservation Officer Spatial Planning**

**Initial comments** - Leigh Court, a substantial factory building in the Leigh Street Conservation Area, is an increasingly rare physical reminder of the Wycombe Furniture industry and has been prominent in views of the town for the last century: as such fully deserves its status as a locally listed building. The building is now in a state of neglect and the proposals seek to conserve and convert it into residential use. The constrained nature of the site results in some compromises and the scale of the new buildings to the rear exceed Leigh Court. It also involves the demolition of the managers' houses on Leigh Street and the print works which were ancillary buildings within the furniture manufacturing complex. While this is a high price to pay, on balance the proposals are acceptable in conservation terms as they safeguard the future of the main block and enhance the public realm. The elevations do not provide sufficient detail of the new door openings proposed onto Leigh Street or those into the internal atrium and larger scale joinery details should be provided along with details of the roof dormers, junction with the steel/glazed atrium and external materials.

Additional Comments: I refer to the Design & Access Statement Addendum, dated Sept 17, together with the amended plans and comment as follows: General - The redevelopment of this site provides the opportunity for Birch House to act as the catalyst for heritage-led regeneration and enhance place-making opportunities to transform perceptions of this area of High Wycombe. The extent of demolition of existing buildings together with the proposed variety of styles, materials and details of the different blocks and spaces between buildings risks diluting the industrial character of the area. The public realm should create a robust, coherent and unifying structure for the built form, and the theme continued through into street furniture and associated ironwork, including balconies, screens, gates and railings to evoke the town's furniture manufacturing past. Surviving examples of the ironwork from the manufacturing times of the furniture factory around the site - fire escapes, walkways etc - should influence new street furniture for this former factory site. The DAS illustrates a number of different potential themes but the details now need to be clarified to ensure a clear and comprehensive identity for the development. Proposed Interventions - the character of Birch House is in part derived from the simplicity, repetition and regularity of the existing openings. While Sec 2.12 DAS Addendum describes an accepted conservation approach to show new work, in this case, the contrasting style of new openings, large glazing panels and heavy frames effect detracts from the overall cohesion of the building and the elevations become somewhat muddled and disordered. As the building has largely retained the integrity of its design, it would be appropriate to reinstate lost elements and to replicate the existing details in new openings so that they are less distracting visually, eg: Front elevation and Pg 14 - New glazed entrance door to shared lobby - The heavy frames to the large glazing panels look chunky against the lighter original small paned windows. The discordant appearance emphasises the new openings (to accommodate entrance doors to lobbies and the different proportions of other new openings which fail to pick up on otherwise

consistent detailing (type 1 - typical window details)), and jars with the existing elevation. Continuing the existing fenestration pattern of square panes to ground level around the door, and a grid effect across the door, would reduce the disruption to the uniformity of the elevation. Alternatively, industrial wooden or metal doors may be appropriate to continue the industrial theme. Elevation 4 - as above, the new windows are incongruous in the otherwise coherent elevation Atrium stairwells - It is not clear whether the staircases are intended to be metal or glazed and there is no information on the construction of the floors.

Further details to be supplied.

Rear elevation (pg 24)- the character of this elevation is eroded by the combination of new openings, existing openings, new staircases and platforms. The elevation should be simplified by utilising the existing doorways as flat entrances within the conversion and other windows only altered where access is required. Unifying the fenestration patterns and picking up the glazing pattern and continuous string courses in the door design would also give a more harmonious appearance.

As stated above, the redevelopment of Leigh Street should project a strong and positive identity which responds to the designated heritage asset. Outstanding details should be submitted for approval:

- New openings and amended window details to show restored/replicated window patterns
- Junction between Birch House with the frameless structural glazing proposed for the atrium, including at eaves level and details of fixings
- Detail of Metal roofing to show standing seams
- junction of the car park deck/courtyard with Birch House
- Method statement for the construction of the car park and courtyard deck with details of any underpinning
- Rainwater goods
- Details of extracts, flues, plant, air conditioning etc. Pipework and extracts should not be placed on the front elevation.
- Internal atrium stairwells and platforms
- Gates and staggered gates
- Balconies and screens
- Railings to apartment blocks

### **Environment Agency (south-east)**

Comments: The previous uses of the proposed development site includes activities which present a risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is within Source Protection Zones 1, 2 & 3 and is located on a principal aquifer.

The submitted Geo-environmental desk study/preliminary risk assessment dated 04 April 2017 submitted in support of the application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. It is our opinion that it would be an unreasonable burden to place on the developer to ask for more detailed information prior to granting planning permission but respect that this is a decision for the Local Planning Authority.

We consider that planning permission could be granted to the proposed development as submitted if planning conditions are included on any permission.

### **Ecological Officer**

Initial Comments - There is very little wildlife value currently on the site and so simple mitigation measures can deal with the existing situation, this can be emphasised through the use of the standard ecological informative. Ecological enhancement can come through the proposed landscaping if they are correctly specified, some detail (esp engineering requirements) would

need to be submitted prior to a decision. Section 4 of the Ecological Report contains some standard recommendations, these need to be taken through to the landscaping scheme in terms of the choice of species. Specification and location of bat and bird boxes can be covered by condition. Tree planting needs to be done in a way in which ensures that they can survive through to maturity. In these constrained circumstances this means that engineered solutions will be needed which ensure adequate soil volume, suggest a minimum of 10m<sup>3</sup> per tree based on the space, but this might need adjusting depending upon the species chosen. There are opportunities for green walls in the following locations: North west and south east elevations of the Birch House extension, North west elevation (northern end) of Entrance Block, Southern gable end of building 2 'Leigh Court'. These green walls need to be designed to suit their aspect and have sufficient soil and water supplied to ensure that they thrive, they must include species which are particularly beneficial to wildlife. The roof of the entrance block should be a green roof (this could be multi-functional and form a roof garden and be integrated with the SuDS system. The SuDS system will also need to be integrated with the soil volume used for trees, planting beds and green walls, ensuring they are appropriately watered and also contributing to the capacity of the SuDS system. Final Comments: The updated Development Overview, shows improvements but the detail and extent is lacking. I have the following questions: Why is there only one additional green wall and why have the other suggested locations not been used? Some details of the type of green wall are necessary. There is a green roof shown on one building - this is potentially a positive step forward, but considering the fact that the hard standing between the buildings has been categorised as a 'Landscaped area' despite only a small proportion of it having planting, there is uncertainty about what the intention for the green roof might be. Does it have any ecological benefit? More detail is needed. I would not expect the Development Overview Plan to show details of soil volumes required for trees or for SuDS, but these are still important issues which need addressing.

#### **County Highway Authority**

Comments: non-received

#### **Buckinghamshire County Council (Major SuDS)**

Comments: Based on the information provided, the Strategic Flood Management Team at Buckinghamshire County Council removes our objection to the proposed development subject to the following conditions listed below.

##### **Infiltration rate testing to BRE 365 standard and Ground Investigations**

As the Environment Agency have conditioned contamination investigation, we must also condition infiltration testing and ground investigations, including groundwater monitoring during the winter months. The results of the contamination testing will inform the need for infiltration testing and groundwater monitoring. Should the results of the contamination report prove favourable to infiltration, the applicant will revise the Drainage Strategy accordingly, in compliance with the discharge hierarchy.

##### **Method of surface water disposal**

Connection to a surface water sewer is acceptable in principle, once the discharge hierarchy has been adhered to. The applicant has not submitted evidence that Thames Water has the capacity for surface water from this site to discharge into their surface water sewer system, nor have they submitted evidence from Thames Water that they have been given permission to discharge into the surface water sewer at an agreed rate.

We would request the following conditions be placed on the approval of the application, should this be granted by the LPA

### **Arboriculture Spatial Planning**

Comments: The few trees on site are not of any significance to be a constraint of any form of development. Tree species are specimen to be Sweet Gum (Liquidambar) and Fastigate Oak. The issue in regard to the proposed new planting is how this would be achieved. Some trees will be in raised planters while it is unclear for others as there will be standing on the roof of the understory car park. Each tree will require a significant amount of soil volume to allow for growth both now and in the future. The design needs to reflect a rooting area of between 10 to 16 cubic metres of soil volume per tree more is preferred given the species in the landscape list will be large trees once mature subject to the rooting area available. SUDs will also need to be considered as to how it will link into providing some form of irrigation as oak are high water demanding trees. Finally any static loading will need to be engineered for the additional weight of the planters, trees, soil, water movement and future growth. These details will be required to offer confidence and demonstrate that the planting will have longevity and provide good amenity to the residents both now and in the future.

### **Control Of Pollution Environmental Health**

Comments:

The noise assessment submitted by the applicant states that the proposed development is affected by noise from traffic along Green Street and noise from surrounding commercial/industrial premises (particularly Wycombe MOTs). It recommends that the residential areas of the development should be protected from such noise disturbance by the installation of varying standards of glazing and mechanical ventilation. Details of the proposed glazing and ventilation should be provided for approval prior to occupation.

There are also concerns that the proposed B1 commercial space may disturb the proposed residential units. As B1 use can involve a broad range of uses, it is sensible to require a scheme of noise mitigation prior to the occupation and use of the proposed B1 commercial space.

Additional comments:-

In addition to our previous submission, we would like to add the following comment and condition; The brownfield nature of this site has been fully recognised by the applicant and the risk assessment process has already begun. The applicant will be required to investigate the site further in order to quantify the risks posed by potentially contaminated land. Condition: Contaminated Land.

### **Crime Prevention Design Advisor**

Comments: on initial plans

The existing site has fallen into a poor state of repair which is undoubtedly affecting the level of crime and ASB it attracts. The re-development of the site is the perfect opportunity to design out crime from the outset.

I have fundamental concerns over the excessive permeability of the site and have been unable to locate any details relating to the proposed boundary treatments or access controls.

If public access is required east to west through the site the relationship between these parcels of land and developments need to be further examined. Consideration needs to be given to maximising surveillance, active frontages, defensible space, physical security and the appropriate activity and movement whilst preventing excessive permeability. I would urge the applicant therefore to seek further consultation.

There are numerous opportunities to make this a safer development which are not at this time being addressed in the Design and Access Statement.

If this planning application is successful I ask that a planning condition be placed on the applicant to achieve Secured By Design accreditation (Homes 2016).

From the plans there are four vehicular access routes into the site from Leigh Street and an additional pedestrian route. Crime and anti-social behaviour is more likely to occur if private space is easily accessible to people who have no right to be there and where a building has a large number of sides exposed to the public realm. Footpaths and access routes should lead to places that people want to go however this development contains residences and a private car park alone and access to no other areas at this time. For this reason I can see no legitimate need for public access to this area. Clear demarcation should be provided to distinguish between the public and private areas via a secure line, for the perimeter this should be located as close as possible to the front of the development thus reducing the number of sides exposed to the public realm. This not only increases the physical security but the ownership felt by future residents empowering them to challenge the presence of strangers.

The same level of security should be provided to each residential building. Unlawful free movement should be curtailed where a large number of dwellings is proposed with the additional use of compartmentalisation to create smaller communities and a sense of ownership. (Ref: *Secured By Design – New Homes 2016 section 27.8*)

I have been unable to locate any details relating to postal services. The physical security of the development should not be undermined by unrestricted postal delivery access. This provides a legitimate excuse for unauthorised individuals to be in private areas of the development. (Ref: *Secured by Design - New Homes 2016 Mail delivery for communal Section 29*).

### Recommendations

Access controls should be installed on the vehicular and pedestrian routes into the site providing clear demarcation of the change from public to a semi-private area.

I ask that that vehicle access to the development is secured via robust, visually permeable, self-closing, access controlled, electronic gates which allows the driver to operate them without exiting the vehicle. This should meet the minimum standard LPS 1175/SR2. This will ensure only authorised access to the residential development.

I ask that further details relating to the proposed boundary treatments be provided.

I ask that the communal doors on all residential buildings meet the current Document Q and SBD New Homes 2016 requirements relating to physical security and access controls. The communal doors should be minimum LPS 1175 and Access controls should be installed on the main entry and subsequent communal doors on preceding floors. Access controls on the main communal doors should be vandal proof and both audio and visual with record facility due to the number of dwellings served and should not be installed with any trades button present.

Three options are offered by SBD in relation to postal services. However due to the size of this development I request that they are located either in an airlock in the front entrance behind the main communal door of each residential block or that secure post boxes are fitted externally.

I make the following comments and observations in relation to the individual building components of the proposed development.

### The Entrance Block

There is a mix of (public) commercial and (private) residential activity on this site. Whilst from the plans these activities appear to have been separated, the parking area at the rear of the Entrance

Block is accessed via the goods in for the commercial area which could be a source of conflict. Places should be structured to minimise opportunities for conflict, especially when designing for mixed use development. The commercial premise is likely to attract a level of anonymity which should not mix with the private areas of the development. (Ref. *Safer Places – Structure p22*). It is unclear who this parking is intended for however located in the semi-private area of the development this should be solely for the use of residents.

The rear elevation of the Entrance Block appears to be a blank wall on the 1<sup>st</sup> floor with the subsequent floors protruding above. This provides a lack of surveillance over the proposed parking and is likely to be underutilised as a result making it a perfect gathering area for inappropriate behaviour/activities. Developments where the design denies residents the ability to see what is taking place outside and around them will be more likely to suffer from crime and anti-social behaviour. (Ref. *Natural surveillance – places, streets and movement*)

The vehicular access at the side of the entrance block appears to border the landscaped amenity area of the development with no clear boundary preventing vehicles from entering this pedestrianised area. (This is also true of the access route to the multi-storey car park)

#### Recommendation

To prevent the access of vehicles into the pedestrian areas I ask that a suitable perimeter be applied –this could be the use of a high kerb or suitably placed planting containers capable of preventing the entry of a moving vehicle.

I ask that the overhang and parking area at the rear of the building be removed. This will not only resolve issues over ownership relating to the parking spaces but the potential for ASB and crime. It will also provide separation between the commercial and private development.

#### Birch House

Access controls will be particularly pertinent to this building due to the number of proposed dwellings and layout depicting bedroom windows looking out on to the communal hall area. Larger developments should be split into communities to promote a sense of ownership and protect privacy and additional access controls installed to control unauthorised access.

#### Recommendations

I ask that additional access controls be installed on each floor allowing access only to residents of that floor. This could be achieved by extending the stair well out into the corridor albeit in a visibly permeable construction so as not to obscure the light from above. This would segregate the east side of the corridor on each floor from the west to form smaller communities.

#### Leigh Court Block 1

I consider this building to be excessively permeable with linked cores appearing from the second floor up (third floor site plans). Crime and anti-social behaviour are more likely to occur if there are several routes into and out of an area – providing potential escape routes for criminal activity. (Ref. *Access and Movement – Safer Places – P16*)

I can find no details relating to boundary treatments around the gardens. It is important that the boundary treatment are fitted with robust fencing especially to vulnerable areas e. g. exposed side and rear gardens.

I have concerns relating to the level of defensible space provided to the dwellings on the lower floor levels. Windows and doors look out onto the public domain and it is important to provide demarcation between the public and private realm. This not only protects the privacy of the occupants but prevents curtains and blinds being constantly closed, maximising surveillance from the private dwellings over the semi- private realm outside.

#### Recommendations

I ask that the linked cores be removed from the building to reduce the permeability. This could be resolved by increasing the size of one of the flats allowing it to protrude into the corridor providing the required separation.

I ask that closed board fencing is fitted to the side and rear gardens to a minimum 1.8m.

I ask that low level visually permeable metal railings be installed to the front of the building provide privacy and space from the public realm whilst still allowing surveillance from the dwellings.

### Leigh Court Block 2

I have concerns relating to the green areas to the rear of the block. It is unclear if the intended users are communal use for the residents of the block or if these are accessible to other residents on the site. Again I can find no details relating to the proposed boundary treatments to confirm either. Should they be accessible to anyone other than the resident of the dwelling to which they border then suitable defensible space should be provided to the windows and doors. This defensible space is also required at the front of the building. There should be clear demarcation of these public/private realms and obvious ownership, neither is apparent when looking at the green space between Leigh Court Block 1 and 2.

### Recommendations

I ask that low level visibly permeable railings be installed around the green at the front of the development. This should be extended to the front of Leigh Court Block 1 to create a secure line at the front of the buildings. To the rear I ask that boundary treatment plans are confirmed.

### Car Park

It is vital that suitable access controls be applied to the proposed car park on the site and that appropriate lighting is also provided. This multi-storey will provide ample opportunity for vehicle crime and for offenders to go unseen due to lack of surveillance. If residents perceive the risk of parking there to be too great this will result in it becoming underutilised which will then provide a perfect location for unauthorised activities, crime and ASB. (*Ref Park Mark Safer Parking*)

### Recommendations

Suitable access controls should be installed to prevent unauthorised access and removal of vehicles. This could be a fob activated barrier if robust vehicle gates are fitted as requested to the main vehicle access from Leigh Street.

I ask that the lighting within the parking area should conform with British Standards 5489-1:2003. As ground floor car parking is provided I request that a visibly permeable perimeter should be installed to allow surveillance from the surrounding street scene into the car park.

The comments above are made on behalf of Thames Valley Police and relate to CPTED only. You may receive additional comments from TVP with regard to the impact of the development upon policing and a request for the provision of infrastructure to mitigate against this impact.

Revised plans- no comments received

### **Thames Water Utilities Ltd**

Comments: Waste Comments

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the

construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover).

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <http://www.thameswater.co.uk/business/9993.htm> or



alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### Water Comments

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Thames Water recommend the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

#### Supplementary Comments

The proposed development is located within a Source Protection Zone of a groundwater abstraction source. These zones are used for potable water sources for public supply for which Thames Water has a statutory duty to protect. Thames Water are currently in discussions with the Developer. As long as the result of those discussions is adhered to once an agreement is in place, we will not require the need for any planning conditions regarding groundwater resources. More detailed information can be obtained from Thames Waters' Groundwater Resources Team by email at [GroundwaterResources@Thameswater.co.uk](mailto:GroundwaterResources@Thameswater.co.uk) or by telephone on 0203 577 3603. Reason: To ensure that the water resource is not detrimentally affected by the development.

#### **Bucks County Council: Education Department**

Comments: I have considered the details of the above application and I can confirm that we would require a financial contribution to provide additional primary school facilities arising from the above development in accordance with BCC's adopted S106 policy.

Primary schools across High Wycombe are currently at capacity with projections indicating a need for additional capacity. To accommodate the rising demand from new housing, BCC is looking to expand provision at Oakridge School. I have included the education infrastructure costs per dwelling type to allow an assessment to be made of the scale of contributions which would be required on the scheme.

## **County Archaeological Service**

Comments:

We welcome the Archaeological Desk Based Assessment undertaken by CgMs Consulting included with the application documents. Section 6 Summary and Conclusions includes:

In terms of local designations, the southern/central parts of the site lie within the Birch Furniture Factory Archaeological Notification Area (ANA), while the northern end of the site lies within the Medieval Leper Hospital ANA. The Birch Factory within the southern/central parts of the study site also comprise a locally listed building.

The study site can be considered likely to have an archaeological potential for the Medieval, Post Medieval and Modern periods.

Past-post depositional impacts within the study site are considered likely to have had a severe negative archaeological impact.

Proposals include the mixed use, residentially led redevelopment of the study site.

On the basis of the available information we recommend the implementation of programmes of historic building recording, for the former furniture factory buildings, together with archaeological trial trench evaluation within the northeastern part of the study site. Dependent upon the results of evaluation works, further mitigation may then be necessary.

As remains of national significance are not anticipated, it is recommended that further archaeological mitigation measures are secured by appropriate condition to the granting of planning consent.

If planning permission is granted for this development then it is likely to harm a heritage asset's significance so a number of conditions should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 141. With reference to the NPPF, we therefore recommend that, based on the advice in DOE Circular 11/95, any consent granted for this development should be subject to the following conditions:

### Representations

Amenity Societies - The High Wycombe Society

Initial comments

On balance, we support this application for the following reasons.

Birch House is one of the few remaining fragments of the High Wycombe furniture heritage, and a characterful building in its own right. Unfortunately, it is now in a parlous state, and we believe that it is therefore essential that action is taken urgently to ensure its rescue and retention.

This scheme will achieve that, and also bring the building back into beneficial use.

It is clear that thought has been given to many elements of the design - of the extension to Birch House, the new blocks, and the public realm - and the results are not unsympathetic.

And although there are some downsides - for example the lack of affordable housing, and the loss of other parts of the Birch factory - we believe that these are clearly outweighed by the benefits of the scheme in saving Birch House, possibly the last chance to do so.

One point we did note, and would seek some reassurance on, is the reference in the Planning Statement to the work relating to Birch House itself not taking place until a later phase of the programme, "due to logistics, health and safety". It is clearly essential that protections are put in place so that there is no possibility of revisions being sought mid-way through the development to pull out from that fundamental element of the scheme.

With that proviso, we ask, that in your consideration of this application, you keep in mind the "big picture", and the urgency and uniqueness of the situation, and not allow progress to get bogged down by any disputes or discussions over relatively inconsequential matters or unrealistic expectations. It may not be a perfect scheme in terms of full compliance with every policy, but it is a good scheme, and should, in our view, be received positively and brought to fruition speedily.

#### Residents Associations

The following comments have been received supporting the proposal:

This is, on the whole, a well thought-out scheme and I sincerely hope it succeeds since I believe it is probably the last hope of saving Birch House. Since 2004 several more historic factory buildings have been lost, making it even more important to save Birch House. It always was the best architectural example and deserves conservation for its significant connections with the Birch and G-Plan brands. I urge the Council to grant permission.

3 comments have been received objecting to the proposal:

- Concerns over the existing parking arrangements for properties on Green Street and the loss of Leigh Street as a place to park.
- Request that Leigh Street is allocated for people in Green Street to park