

18/05363/FUL

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor R Farmer
Councillor Marten Clarke

Parish/Town Council Comments/Internal and External Consultees

High Wycombe Town Unparished

County Highway Authority

The County Highway Authority has raised no objection to the proposed development. Subject to appropriate conditions and legal obligations being imposed the impact of the development on single junctions and the cumulative residual impact is not considered to be severe. The County Highway Authority has been consulted twice in respect of the application. Their comments can be summarised as follows:

- a. Site Access – The proposed ‘T’ junction to Abbey Barn Lane is considered to be acceptable. The visibility splays accord with 85%ile speeds of around 40-41mph. A condition will be required to ensure that the access is delivered and that the ghost turn late requested during the course of the application is implemented. The access with Daws Hill Lane is considered to be acceptable.
- b. Walking and Cycling – Walking and cycling provision within the site is considered to be acceptable. The proposed walk/cycle route to Flackwell Heath and Amersham and Wycombe College will provide a sustainable link to the nearest local services and shops with a walk time of circa 25 minutes and cycle times of under 5 minutes to the college and 7-8 minutes to the shops. The walk/cycle routes are capable of being secured via condition.
- c. Layout (Phase 1 and illustrative master plan) – the main estate distributor is 6.5 metres wide and is flanked by a walk cycle route. This is capable of accommodating a bus. The roads range in width from 6.5 metres to 4.1 metres for private drives. With the exception of the private drives all roads are capable of adoption. The internal road network and arrangement is considered to be acceptable. The detail of the road construction and the final arrangement beyond phase 1 is capable of being secured via condition.
- d. Parking – there is considerable over provision of parking when assessed against the standards contained in the Buckinghamshire County Council parking guidance. Given the sites nature and location. The parking levels are considered to be acceptable.
- e. Sustainable Public Transport – the proposal is capable of contributing towards an enhanced No.36 bus service through the site (30 minute service), providing a link to the town centre and provision of two minibuses providing a peak time only 20 minute frequency service to the train station.
- f. Traffic Generation and Distribution – The applicant has assessed the site using the Wycombe Strategic Transport model, which includes current and planned development levels. The model indicates a relatively equal weight of traffic travelling towards London Road and Marlow Hill. The key areas identified as being over capacity and therefore requiring improvement are:
 - i. The Abbey Barn Lane /Health End Road junction would operate beyond capacity by 2026. However, proposed construction of a roundabout at this junction would mitigate the impact of the development.

- ii. The Abbey Barn Lane/Kingsmead Road junction is expected to be over capacity by 2026. Wycombe District Council has developed a scheme for the realignment of Abbey Barn Lane and reconfiguration of the Abbey Barn Lane/Kingsmead/Abbey Barn Road junction. This formed part of the Housing Infrastructure Fund (HIF) bid in early 2018. These improvements once completed would improve the junction. It is considered reasonable for Abbey Barn South to make a commensurate contribution towards this scheme. In the event Abbey Barn South is significantly occupied in advance of the Abbey Barn Lane realignment being implemented it would be necessary for Abbey Barn South to implement a temporary signalisation of the bridge.
- iii. The London Road is known to have capacity issues and Abbey Barn South along with the other Reserve Sites will have a material impact on the capacity of this arterial route. There is a scheme in place to improve the London Road, journey time reliability and pedestrian and cycle access. A scheme has secured funding from the National Productivity Fund (NPIF). Abbey Barn South and other Reserve Sites can reasonably be expected to contribute to extend the scope of this work and further improve the London Road.
- iv. Following initial objection the Daws Hill Lane/Marlow Hill junction was assessed. The assessment demonstrates that the development will impact on queue lengths at the junction taking it very close to capacity in the 2026 base situation. The junction would remain within capacity and therefore this impact cannot be said to be severe. The County Highway Authority has identified a package of measures that the development could make a commensurate contribution towards to mitigate the impact of the development and improve traffic flow in the Daws Hill Lane/Marlow Hill area generally. The package would include:

- Installation of CCTV cameras to monitor traffic along Marlow Hill and Dawes Hill Lane
- Ensure Marlow Hill from Dawes Hill Lane to the M40 is placed entirely onto SCOOT (instead of current mix of two systems)
- Installation of queue detector loops outside the hospital & Dawes Hill Lane junction.
- Installation of duct and fibre with CCTV at Desborough Avenue roundabout in order to make Marlow Road to Desborough Avenue a Urban Traffic Control (UTC) corridor
- Make the existing Marlow Road Pelican crossing UTC compliant in order to improve traffic flows from Desborough Avenue to the Gyratory.
- Install Variable Message Sign (VMS) at the M40 exit onto Marlow Hill to give advance notice to traffic of any traffic delays at the gyratory, Marlow Road, Dawes Hill junction and London Road.
- Installation of Automatic Number Plate Reader (ANPR) cameras on the signalised Coachway exit so that traffic counts and journey time data can be collected.
- Provision of footway link and pedestrian crossovers at Dawes Hill junction
- Installation of a Clear Way along the whole of Marlow Hill (consultation required).
- Supply and installation of temporary CCTV/ANPR cameras to link into the 'In' station at ITS County Offices at key locations to monitor traffic
- Replacement of the existing signals installation to include pedestrian crossing facilities on Dawes Hill Lane.
- Provide CCTV for monitoring of the junction Marlow Hill/Daws Hill Lane.

- Provide ANPR cameras for queue measuring along the A404 in both directions and Dawes Hill Lane (at positions specified and agreed with the Highway Authority).

In summary the County Highway Authority has concluded that the site access arrangements and internal road design are acceptable and that subject to appropriate off-site mitigation the development would not give rise to a severe highway capacity issue. The provision for sustainable travel choice (walk/cycle/bus) is also considered to be acceptable. The following conditions and S106 contributions have been requested to make the development acceptable and ensure the accessibility and sustainability features of the site are delivered:

- 1) An adoptable internal road network.
- 2) Access onto Abbey Barn Lane with requisite speed limit changes and visibility splays;
- 3) A roundabout at the junction of Abbey Barn Lane and Heath End Road;
- 4) A scheme for parking and manoeuvring;
- 5) Traffic management plan during construction.

And S106 contributions towards:

- The creation of a user-led peak passenger shuttle service between the development and High Wycombe town centre/railway station.
- To increase frequency of existing No.36 bus service.
- Contribution towards the construction of a Heath End Road shared footway/cycleway.
- Contribution towards the Abbey Barn Lane re-alignment and Abbey Barn Lane/Kingsmead Road junction works HIF scheme.
- A40 London Road Corridor Improvements.
- Contribution to secure UTMC augmentation package.

Carousel bus service – Carousel operates Route 36 from High Wycombe to Bourne End serving Marlow Hill and Flackwell Heath. The proposal within the planning applications Travel Plan (para.4.28) is to divert bus route 36 through the site.

Carousel is concerned that the new development will exacerbate the existing congestion around Daws Hill Lane/Marlow Hill junction.

Carousel support the proposal to divert bus No.36 through the site. However, they would require:

- 1) The minimum width of the carriageway along the spine road to be 6.5 metres to allow two buses to pass.
- 2) A High Wycombe-bound bus stop should be provided near the new Pine Trees roundabout. [Officer note: off-site works].
- 3) Clarity on where the pair of bus stops near the playing pitch on the Pine Trees development would be sited. [Officer note: off-site works].
- 4) Bus stops within the Abbey Barn South development boundary are shifted to maximise new bus users from the development. Currently the main bus stop is adjacent to Phase 4 but there should be one central to Phase 1 in order to encourage use of the bus from first occupation. This may mean that a further stop is required adjacent to Phases 2 and 3.
- 5) The S106 provides for:
 - a) The additional cost of operating route 36 as a result of the diversion into the development;
 - b) Providing and operating an additional bus on Saturdays, due to a lack of running time in the current timetable to perform the diversion into the development and maintain a 30 minute service on the 36 route using two buses;

- c) Providing funding to support the operation of a Monday to Friday peak time public transport link to High Wycombe railway station;
- d) Providing and operating an additional bus on Sundays and Bank Holidays, to provide an hourly service on service 36 on these days.

Rights of Way and Access – An alteration to the realigned PROW has been submitted and is currently under determination. No in principle objection is raised by the Buckinghamshire County Council PROW officer. Conditions/S106 contributions are required in respect of:

- 1) the surfacing of the diverted footpath in phase 1 to be surfaced and edged to a footpath specification (i.e. 2m wide, tarmac finish with concrete edging);
- 2) the surfacing of the footpath on the northern boundary linking to HWU/60/1 to be surfaced and edged to a footpath specification;
- 3) £21k towards upgrading of walk/cycle route linking to the Daws Hill/Rye walk/cycle route.
- 4) £15k¹ towards upgrade of Bridleway HWU/156/1 between the Abbey Barn South and Daws Hill Site.

Lead Local Flood Authority (LLFA) – The Flood Risk Assessment as originally submitted demonstrated that the site is not at risk of flooding from any source (i.e. river or surface water), but the details of the Sustainable Urban Drainage strategy for the site were considered to be inadequate. Objection was raised and additional information was duly submitted by the applicant.

Following the submission of a revised drainage strategy for the site the Lead Local Flood Authority (LLFA) withdrawn their earlier objection subject to 4 conditions; 2 in respect of the outline element of the application and 2 in respect of the detailed element of the application. The detailed conditions seek additional infiltration testing, finer details of overland flood flow routes, details of the future maintenance regime and the submission of a verification report prior to first occupation. The outline conditions seek detailed surface water drainage schemes for all subsequent phases and a verification report.

Bucks County Council Strategic Planning – No comment received.

Thames Water Utilities Ltd – first stage comments were submitted in March 2018. Second stage comments were submitted in June 2018. Initial concerns were raised in respect of the potential for sewer flooding as a consequence of surface water entering the sewage system and the potential lack of supply capacity. These objections were later withdrawn following the submission of a revised Flood Risk Assessment. A condition has been requested ensuring that the revised Flood Risk Assessment is complied with.

Bucks County Council Education Department – a financial contribution would be required towards the expansion of a new primary school at the Daws Hill site to accommodate the development. The kick about area, into which the school will expand, will need to be re-provided at Abbey Barn South.

The education infrastructure costs per dwelling are as follows:

Provision Type	Flats			Houses			
	1 Bed	2 Bed	3+ Bed	1 Bed	2 Bed	3 Bed	4+ Bed
Primary	£403	£1,298	£2,640	£1,715	£3,296	£5,787	£6,965

For phase 1:

Accommodation Type	Number	Value
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¹ Changed from £28,000 following addendum response from Jonathan Clark on 27 June 2018.

1 Bed Flat	7	2,821
2 Bed Flat	21	27,258
2 Bed House	14	46,144
3 Bed House	64	37,0368
4 Bed House	25	174,125
		£287,416

A financial sum of £55,631 would also be required to upgrade the current kick about area.

Environment Agency (south-east) – The site was considered to be at low risk of fluvial flooding and therefore no bespoke comment was sent.

Sport England – consultation response can be summarised as follows:

The proposal would result in the partial loss of a playing field the loss of two baseball diamonds/fields. It is understood, however, that the baseball use has relocated outside the District and due to ownership/access matters access to the baseball diamonds/pitches would be restricted in the future. The revised proposal would result in one junior baseball diamond remaining and two junior football pitches and a Multi-Use Games Area being provided. No changing facilities are proposed, which is regrettable, but generally junior teams do not utilise such facilities compared to senior teams. Access to toilet facilities, however, would be preferable and could encourage more recreational users to use the entire site. This should be explored.

It is noted that the management and maintenance of the site would be included in the s.106 Agreement. This should be carefully considered in relation to the sports facilities as it is key that the sports facilities remain in a good condition to accommodate play. In this respect, an agronomy report should be submitted to ensure the new playing pitches can be constructed to a standard that can accommodate play and set out what maintenance would be required. Having regard to the location of the proposed sports facilities, the adjacent school could be considered to maintain the facilities and/or share maintenance equipment to minimise costs. Sport England also notes that the school also provided additional playing field in the area and community use is being considered. Sport England recommend that the school enter into a Community Use Agreement with the Council to secure community use of the facilities in the long term.

The applicant would also provide contributions to local sports facilities that would allow those facilities to be enhanced to attract/accommodate more community participation. The applicant has identified local projects that would benefit from the contributions, which has been based on information provided by Sport National Governing Bodies. Sport England understands that the Council's Leisure/Green Space Team also have priority projects where the contribution could be directed. There is currently ongoing discussions regarding the appropriate project. Sport England advises that the Council's Leisure Team is further engaged in this process.

Notwithstanding the above, Sport England have not seen a draft S. 106 Agreement, or a heads of terms, therefore it is not in a position to remove its holding objection at this stage. [Officer Note: At time of writing the S106 was not at a sufficiently advanced stage].

The above is in relation to meeting Sport England's Playing Field Policy however Sport England notes that new residential accommodation is also proposed. As raised in Sport England's initial comments on 9th April 2018 it is not clear if there has been consideration of the demand generated on sporting provision from the proposed increase in local population. Although the proposed facilities/contribution proposed would have some impact, existing sports facilities within the area may not be able to accommodate the increased demand without exacerbating existing and/or predicted future deficiencies. Indoor sport facilities are included on the Council's CIL Regulation 123 list and, while Sport England acknowledges that there is no requirement to identify where CIL monies will be directed

as part of the determination of any application, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport. Outdoor provision, such as playing field/pitches, are not included within the Regulation 123 list therefore it is advised that the applicant liaises with the Council's leisure/Green Space Team in relation to the impact on outdoor sport caused by the increase in the local population.

Conclusions and Recommendation

Given the above assessment, Sport England still maintains a holding objection until the S106 Agreement, or the heads of terms, have been submitted at which point Sport England is likely to remove its objection as it would consider that the proposal would result in increased opportunities for sport participation broadly similar to the current playing field that would be lost. In this respect, the proposal would then broadly meet the spirit of Sport England's Playing Field Policy provided a condition is imposed securing appropriate ground conditions (Emphasis Added).

Should the local planning authority be minded to approve this application against whilst there is a Sport England Holding Objection or without the conditions (or alternative mechanism) above, in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State via the National Planning Casework Unit.

Leisure and Community Services – Community consultation response has been summarised under the following headings – Allotments, Play Areas, MUGA, Outdoor Sports, Chiltern Rangers, Other Facilities, Circular Walk, Informal Play Area, Open Space, Car Parking, Mobile Mast:

Allotments – no objection to provision of allotments. The findings of the desktop survey are noted; however, a soil survey is required. This should be obtained before planning permission is granted.

Play Areas - the layout plan has been amended to show the provision of 1 x NEAP, 1 x LEAP, 3 x LAPs and 1 x MUGA. Community Services considers this will meet the play facilities requirement resulting from the proposed development.

The play areas should be constructed in line with the guidelines set out in the Fields in Trust '6 Acre Standard'. The play facilities should be sympathetic to the location, interesting in order to attract the children and contain a wide variety of equipment, appropriate for children of a range of ages. Community Services would like more details of the proposed equipment, design and layout. We favour natural materials for this location.

MUGA - 1 x MUGA the location of this has been moved to the area adjacent to the school site at the end of The Ride. It should be constructed to District standard, being 'a rectangular flat surface, usually of tarmac, with the court measuring a minimum of 30m x 15m with fencing around the perimeter, regulation markings for a range of sports (typically five aside football, basketball, netball and tennis) and goals/hoops at each end of the court'

Outdoor Sports – the applicant has offered 2 x mini football kickabout areas, retention the planning application shows that 2 x informal mini football kickabout areas will be provided on site with the remainder of the sporting facilities requirement being met via an offsite contribution. In the Open Space Strategy and in communications with Sport England the developer has made reference to using the contribution to improve various sporting facilities.

The application documents are unclear on the subject of the football facilities that are being proposed. They refer to both informal kick about areas and formal mini pitches. This needs to be clarified for a proper assessment to be made. There is currently no predicted deficit of mini pitches; youth pitches

are required.

The developers state a single playing field on a school site will provide sufficient access for teams to count towards fulfilling the playing field deficit. We do not consider this to be the case as the pitch is undersized and variously described as a kick about area.

The developer has made reference to the re-provision in part of the baseball pitches at Farnham Park which is not within Wycombe District. It is unclear who will be playing on the junior baseball diamond which will remain in situ, and whether this will be sufficiently used to justify its retention.

Community Services do not consider these proposals to be sufficient to fulfil the requirement of new facilities to meet the growing and changing demand from the new development.

In addition Community Services have do not believe that the contribution of £130,000 is sufficient to provide the outdoor sports requirements resulting from this development.

Chiltern Rangers - the Open Space Strategy mentions the possible provision of land to be used to construct a facility for use by the Chiltern Rangers. Community Services welcome this opportunity to develop a purpose built facility and look forward to receiving further information on the proposals.

Other Facilities - the beacon at the end of The Ride is now a possible place for public art. Further details about who would be responsible for funding the art, as well as its installation/ removal are required.

Circular Walk - this should be constructed with an all-weather surface and accessible to all. Further details are needed on the fitness stations which are proposed around the site.

Informal Play Areas - further information is required about what exactly these will entail and who will be responsible for maintaining these areas.

Open Space - further information about whether WDC will be asked to take on the maintenance of the open spaces, or whether this will be undertaken via a management committee. The Ride is a significant open space but in need of significant tree works, scrub removal, waste remediation and levelling in order to perform a park-style function for the development.

Car Parking - there is no dedicated provision for parking for those people wishing to visit the site.

Mobile Mast - there is mention of the site boundary being changed on GIS to reflect the removal of the telecom mast. Community Services would welcome clarification on whether the mast area is being removed from The Ride demise, or whether the mast itself is being dismantled. If the mast area is being removed, further details are required on how vehicular access from Abbey Barn Lane to The Ride will be maintained to permit any grounds maintenance vehicles to access the site.

Bucks County Fire Officer – no objection raised. Access and facilities for Fire and Rescue Services is a functional requirement of Approved Document Part B (ADB) of Schedule 1 of the Building Regulations 2000 (as amended).

County Archaeological Service – welcome the inclusion with the application documents of the archaeological desk based assessment undertaken by Thames Valley Archaeological Service. The reports summary of results includes:

“...it is therefore considered that it may be necessary to provide further information about the potential of the site from field observations in order to draw up a scheme to mitigate the impact of

development on any below-ground archaeological deposits if necessary. This work could be implemented by a suitably worded condition attached to any consent gained.....”

Therefore, if planning permission is granted for this development then it is likely to harm a heritage asset's significance so a number of conditions (undertaking of a geophysical survey, appropriate methodology for preservation in situ or recording) should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF para. 141.

Crime Prevention Design Advisor – The following concerns remain:

- The proposed access to and from the development onto the amenity land is not suitable to support the public access and increased footfall being a shared pedestrian/vehicle surface. A footpath should be provided to support public access with suitable defensive space provided to clearly define public from private spaces.
- A footpath on the Ride leads towards the private rear courtyard of Block B.
- Blank elevations are still present and should be removed. Where possible windows should be provided from active rooms in the dwelling. Due to rear access routes plots 56, 40, 33 should have windows on the first floor to increase surveillance to the neighbouring amenity area.
- The parking area located behind plots 29 & 30 needs to be redesigned to include a suitable level of surveillance. The footpath around these plots provides public access to a private area where rear vulnerable elevations are also accessible, increasing the risk of both vehicle crime and burglary.

Block A and B

- Block A and B. Vehicle gates should be present on the courtyard parking areas and electronically operated (not manual operation) without the need to exit the vehicle. They should be of a suitable height to prevent unauthorised access and visibly permeable. Pedestrian gates into this area should also be access controlled and suitably robust to prevent unauthorised access. Bulk head lighting or similar should be provided within the courtyard area (bollard lighting should be avoided as it does not aid facial recognition).
- Block A and B rear courtyard parking should be secured with robust perimeter fencing. Block A should have robust fencing 2.1m in height with defensible planting to prevent future damage from vehicles. Block B - Similar should be provided for block B but the southern perimeter overseeing The Ride should include visibly permeable (open top railings or similar) to increase surveillance to the amenity area.
- Robust electronic access controls should be provided to the communal entrances of blocks A and B. Bin and cycle stores should also be accessed controlled and (where accessible from the public realm) doors should meet the minimum standard of PAS 24.

I ask that a condition be placed on the applicant in terms of the physical security of the communal dwellings which is not addressed by Doc. Q. This should be extended to the security of the courtyard parking for Blocks A and B. To aid the applicant the access controls for the communal entrance should include the following for dwellings less than 25 units.

- Electronic key or fob activated
- Remote door release of the primary door set from the individual dwellings
- Tradesperson release mechanism will not be present.
- The system will support both audio and visual communication.

Urban Design and Landscape Comments – The proposal is broadly in accordance with the Development Brief. A significant level of pre-application discussion has taken place. The proposal

has responded positively to a number of the issues raised at the pre-application stage. The outstanding concerns can be summarised as follows:

Phase 1 – Resolved

- 1) Route of PROW appears adequate.
- 2) Improvement to the arrangement and variety of dwellings fronting Abbey Barn Lane.
- 3) Perimeter block arrangements though site is largely satisfactory.
- 4) Back to back distance now adequate.

Phase 1 - Unresolved

- 1) Turning space is tight in some cul-de-sacs.
- 2) Visitor parking is not always conveniently located.
- 3) The development to the southeast of the spine road does not face the Ride.
- 4) The layout and building elevations convey only a limited degree of variation that does not always embrace the name or design intent of character areas.
- 5) Limited incidental green space within the streetscapes in the Village character area.
- 6) Insufficient street tree planting.
- 7) Some parking courts have insufficient soft landscaping.
- 8) East/West landscape belt could be wider.
- 9) Concern about use of tarmac for the PROW; however acknowledge the potential maintenance liability.
- 10) Parking spaces encroach into the green spaces.
- 11) Concern about servicing strips in soft landscape areas.
- 12) Photomontages of phase 1 not provided.

Master Plan – Resolved

- 1) Subject to reserve matters the broad issue of road hierarchy and permeability is resolved.
- 2) Illustrative parking arrangement fronting Dell is resolved.
- 3) Buildings fronting the Ride now shown as apartments, which may serve to maximise the potential of this space.
- 4) Location of MUGA in NW corner now considered acceptable.

Master Plan - Unresolved

- 1) There is no indication of how the site might be integrated with Wycombe Summit.
- 2) The master plan is not always clear in terms of detail.
- 3) Parking courts lack planting.
- 4) Relationship with TW site is poor. Needs to be resolved at the Reserve Matters stage.
- 5) Barriers to access the Ride should be omitted.
- 6) Levels information required for master plan area.

Arboriculture Spatial Planning – There were two rounds of consultation with the arboricultural officer. The final comments can be summarised as follows:

- a. Survey of woodland edge is required to understand impact of footpaths and SUDs and take appropriate mitigation. [Officer Note: Matter to be addressed at the detailed/condition stage].
- b. The master plan and flood drainage plan are inconsistent. [Officer Note: Matter to be addressed at the detailed/condition stage].
- c. Tree Group 11 should be retained. Matter to be addressed at Reserve Matters stage. [Officer Note: Matter to be addressed at the Reserve Matters stage].

- d. Tree T9 should be retained and illustrative master plan amended accordingly. [Officer Note: Matter to be addressed at the Reserved matters stage].
- e. Large fallen tree adjacent to T9 should be retained as a play feature. [Officer Note: Matter to be addressed at the Reserved matters stage].
- f. More tree planting required. Would like to see trees in rear gardens.
- g. Need a strong green link between Deangarden Wood and the Ride. North/South link in phase 1 is narrow in places and has an absent section in the north.
- h. Bio-diversity accounting has not been undertaken.

Control of Pollution Environmental Health – No objection. However, due to concerns over air quality a condition has been requested in respect of the provision of electric vehicle charging points and implementation of the recommendations contained in the noise impact assessment.

Ecological Officer – There were two rounds of consultation with the arboricultural officer. The final comments can be summarised as follows:

- 1) Trees are numbered differently in the arboricultural and ecological reports. This is confusing.
- 2) Habitat surveys are poorly overlaid.
- 3) Bio-diversity accounting has not been submitted.
- 4) Several trees, which either do, or are likely to contain bat roosts are shown to be removed. In particular T93, T99, T106-T108 (Group G11 in the arboricultural report). Badgers also have a set in this area. Barn Owls and reptiles also recorded in T93.
- 5) North/South link is severed at its northern end.
- 6) Barriers in the Dell are an issue (SUDs, Play and road).
- 7) 500m of hedgerow proposed to be removed.
- 8) The site contains a good population of common lizards and slow worms. Some habitat will be lost as a consequence of the development. Possible to enhance area adjacent to the motorway.
- 9) Planting of trees in the area to the east of the allotments will have a negative impact on ecology.

Community Housing – I note the planning application is a hybrid application and the precise number and mix of homes in the whole development is not known at this stage.

It is stated that the proposed development will comply with the policy for the provision of 40% affordable housing. I am unclear whether the applicant's claim of 40% is based on the number of dwellings or the current policy of bedspaces.

The indicative affordable housing mix for the whole development, set out in Appendix 1 of the Affordable Housing Statement, shows 50% of the number of affordable dwellings to be for Affordable Rent and the other 50% to be for shared ownership. This does not appear to follow the guidance in the WDC April 2013 Planning Obligations SPD, the WDC March 2018 Advice Note: Affordable Housing, or the Buckinghamshire HEDNA.

The Phase 1 affordable housing element is shown as 13 affordable flats (a mix of 1 and 2 bedroom) for shared ownership sale and a mix of 8 x 4 bedroom houses and 5 x 3 bedroom houses for Affordable Rent. If rents are at or close to the Local Housing Allowance level, I have concerns regarding the affordability of the 4 bedroom houses for households affected by the benefit cap and other households on low incomes - who make up the majority of the demand for 4 bedroom affordable homes for rent.

The housing service expects a mix of affordable housing for rent, to include homes with 1, 2, 3 and 4 bedrooms - in accordance with the Buckinghamshire HEDNA.

County Commissioner – Adult Social Care – there is uncertain about the need for further investment for rental extra care at the site until the 75 rental nominations at Hughenden Gardens have been filled, which is still ongoing. From the information given, it is not clear how Hughenden Gardens has been taken into account or about the particular demand for Abbey Barn South.

If the site were to proceed for housing use and considering the immediate housing priorities, this would be in the area of general needs affordable housing, for which there is a shortage. However, there is still the matter about the site being designated for employment use that will also need consideration by the District Council.

The County Council's priority is now for extra care development in the Aylesbury District and in particular the north of the county as there are no pipeline schemes for that area.

Bucks Clinical Commissioning Group – This development (extra-care) will significantly impact delivery of primary care services in this area of High Wycombe and will increase pressure on local GP practices in a number of ways:

- Accessing the clinical team based on capacity versus demand for appointments.
- Infrastructure i.e. the need for more consulting space and larger / additional waiting areas.
- Car parking.

Access to GP appointments is a national issue and the Clinical Commissioning Group are working to promote different ways of offering consultations to cope with the increase in demand. Nationally primary care providers will need to look at new models of care, using the skillsets of different types of clinical professions to offset the demand from increased patient numbers. Additionally there needs to be a focus on patient education to understand the correct use of GP appointments as there has been an increase in inappropriate use of GP time.

Chiltern House Medical Centre, Carrington House Surgery, Desborough, Cressex Health Centre, Priors Surgery, Riverside Surgery, Tower House and Cherrymead Surgery will all have to contend with considerable housing growth from this and other developments in the area which collectively, will pose a real challenge to these practices in terms of infrastructure:

In responding to this consultation, the CCG has also considered the following basic principles:

- The CCG will strive to develop modern, fit purpose services that are accessible to local populations.
- To ensure that practices remain resilient and sustainable, the CCG will no longer support the establishment of new single-handed GP practices and would only wish to fund new practices that can cater for at least 10,000 population (approximately 5 GPs).
- Wherever possible, the CCG will promote the consolidation of services onto fewer sites to maximise the use of existing infrastructure and to promote joint working.
- The CCG will increasingly commission services that can be delivered in primary care that have traditionally been delivered in secondary care, thus promoting care closer to home. The CCG would like to explore the development of out of hospital services provided in a community hub-type setting.
- Development plans need to be in line with the Buckinghamshire Primary Care Strategy http://www.aylesburyvaleccg.nhs.uk/wp-content/uploads/2015/06/Primary-Care-Strategy-FINAL_170615.pdf

The CCG has been consulted by WDC on the longer term local plans and has submitted a response stating our commitment to the provision of adequate and appropriate primary care facilities to meet the

needs of the local population. However, in order to make best use of resources, we will need to be involved in more detailed planning for this development to meet the needs of new patients coming into the area. Particularly the proposal that a medical facility is part of this new development.

The Development of the 120 apartment Extra Care Facility on the site

Looking after residents in Extra Care Housing is intense and often complex and there are no extra resources nationally for practices which have higher home visiting rates. Practice income generated from the patient list size supports the practice employing a certain number of doctors across the week – it does not cover additional primary care input often “expected” by providers of these services.

We also know from past experience of new extra care facilities starting up in Buckinghamshire that they struggle to recruit staff resulting in a high turnover of staff or very inexperienced staff often caring for very complex patients. This in turn has led to a much higher demand on medical services which can be two or three times the expected workload.

A further development like this in this area will create significantly more pressure on GP services and put existing patients at risk, if the current GPs are unable to cope with any additional workload.

The CCG would ask the District Council to carefully consider the impact on local health infrastructure and services should the decision be made to approve this outline planning consent. At the very least, we would expect to have further involvement in the detailed planning of this proposal.

Conservation Officer Spatial Planning - The Heritage Statement is a well-considered report which provides a good basis to understand and assess the impact on the surrounding heritage assets. The impact on the Abbey Barn Farmhouse and the other listed barns within the farmstead are the assets most directly affected. The development of part of agricultural land formerly associated with the farm for housing, highway works to Abbey Barn Lane and the new junction into the site urbanise the wider setting of the Farmstead and potentially result in less than substantial harm to its significance. There is concern that the masterplan appears to show conventional suburban housing tight up to the eastern site boundary. There are no details of signage, road markings or lighting associated with highway improvements to Abbey Barn Lane and the junction into the site but the design should be carefully considered to avoid an overly engineered character. It is recommended that the plan is amended to minimise the impact as follows:

- The development brief indicates that there should be a wide verge and landscaping to soften the edge of the development on the opposite side of the road.
- Appropriate landscaping will also assist in integrating the development into this countryside location.
- The selection of materials and building form on the Wycombe Summit site responded to the farmstead.

These approaches should be adopted for the development fronting Abbey Barn Lane. In accordance with Para 196 NPPF any residual harm should be weighed against the public benefit of the provision of housing.

The Ride is a significant landscape feature that may be considered a non-designated heritage asset. The Development Brief notes "Planted in the early C20th, The Ride is a remnant historic landscape feature of the parkland formerly associated with the Daws Hill House estate, which lies to the west of the site, within the registered historic park of Wycombe Abbey. "

The Ride presents a unique opportunity to connect new development with a historic landscape feature in the form of public open space. However, it is important that new uses and features are

accommodated sensitively to reinforce the existing natural character. Formal playing pitches would be contrary to such an expectation. Artificial level changes, removal of vegetation to accommodate pitch dimensions, addition of lighting and marking out etc. would appear incongruous in this environment. It is recommended that the formal pitches are removed from The Ride and replaced with more informal uses more sympathetic to its character.

Bucks Berks Oxon Wildlife Trust – No comment received.

The Ramblers Association – No comment received.

Chiltern Conservation Board – Comments are summarised as follows:

- Section 85 of the Countryside and Rights of Way Act 2000 establishes a duty ‘in exercising or performing any function in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purposes of conserving and enhancing the natural beauty of the area of outstanding natural beauty’. Para. 115 of the NPPF applies a similar test.
- Abbey Barn South is visible from some vantage points within the AONB beyond the M40.
- A condition is required at the reserve matters stage that requires layout and mitigation planting to be verified against LVIA methodology.

Chiltern Society – no in principle objection, but maintains detailed objections on a number of grounds. The Chiltern Society’s comments can be summarised as follows:

- 1) Brief was adopted less than 2 years ago with widespread stakeholder and developer engagement, so should carry very considerable weight.
- 2) No objection in principle.
- 3) Welcome the relocation of the multi-use Games Area.
- 4) Welcome the replacement of the proposed extra care home with business development.
- 5) The green infrastructure network proposed in the application has been watered down compared with that in section 7.3 of the Development Brief. Some links are reduced in width/quality or absent in any meaningful sense.
- 6) Green infrastructure improvements are required in line with the advice given in respect of landscape and ecology.
- 7) Need a commitment to provide a high quality bus service from occupation of phase 1.
- 8) Failure to revisit the ski-centre site is disappointing.
- 9) Object to a three arm roundabout with Heath End Road as this would impact on the Chilterns AONB and encourage use of Winchbottom Lane.

Wycombe Society - comments can be summarised as follows:

- 1) Developer appears in the most part to have responded well to the design of the brief for the site.
- 2) Prefer fewer dwellings.
- 3) Extra care preferred over warehousing. If warehousing is decided up it should be sympathetic to its surroundings. Concerned about HGV movements associated with warehousing and relatively few jobs that would be created.

Representations

8 representations have been received, including one from the Flackwell Heath Residents Association. These representations can be summarised as follows:

Principle

- Affordable housing should be dispersed throughout the site and tenure blind.
- Support the Chiltern Rangers on the Ride and the creation of a multifunctional facility.
- Extra care preferred over warehousing. If warehousing is decided upon it should be sympathetic to its surroundings. Concerned about HGV movements associated with warehousing and relatively few jobs that would be created.
- Baseball facility on the site (3 diamonds) needs to be provided to mitigate the current loss. The baseball pitch was used by little league and adult teams (Spitfires and other baseball programmes). Facilities should be re-provided in accordance with policy RT3 and NPPF 74.
- The provision of an extra care facility is a clear departure from the Development Brief. This is not an appropriate location for a care home being removed from other residential development and public transport on a noisy part of the site.

Design and landscaping

- Need either robust and enforced maintenance schedule or use of maintenance free materials (i.e. cladding, soffits etc.).
- Concern about scale - prefer to see 5.5 or 3.5 storey buildings rather than 3 or 4.
- Request removal of balconies and full length windows to block B to reduce appearance of a Victorian warehouse.
- The ski-centre site should be fully incorporated into the Abbey Barn South site thereby removing the need for a separate access.
- Further assurance is sought at the Reserved Matters/Condition stage that the impact on the Chilterns AONB can be mitigated, particularly at the Northern end of the site. Any future reserved matter application should be verified against LVIA methodology.
- Regard should be had to the Chilterns Conservation Boards Position Statements.
- Lighting glare needs to be controlled via condition.

Green Infrastructure

- The location of the MUGA is incompatible with the protection of its landscape quality, character and ecology. Perhaps relocate next to sports facilities associated to the school.
- Improvements to the green infrastructure network are required, particularly the secondary green link to the woodland.

Traffic and Parking

- Tandem parking rarely used.
- Are parking barns large enough to accommodate gardening tools and bins etc.
- Rear courtyards are not properly overlooked and may be abandoned in favour of frontage parking.
- Need to see infrastructure package.
- Main spine road needs to be traffic calmed.
- The development must deliver a reliable/frequent bus service.
- Object to the creation of a three arm roundabout serving Abbey Barn Lane. Would have an urban character which is detrimental to the AONB and increase attractiveness of Winchbottom Lane as a rat run.
- Could a new pedestrian footpath be considered alongside Heath End Road.
- Impact on the Chilterns AONB from additional traffic movements and construction traffic needs to be investigated.

- Lack of commitment to a fully functioning bus service from the outset.

Other Matters

- No details of play equipment provided for Phase 1.
- Multi-use games area not proved popular in other parts of Flackwell Heath. Would like to see a number of different sports catered for in the Ride (tennis, netball etc.).
- Chiltern Society welcomes the relocation of the MUGA and replacement of the proposed extra-care with B1 business development.