

**18/07066/FUL**

## **Consultations and Notification Responses**

### **Ward Councillor Preliminary Comments**

#### **Councillor Zia Ahmed**

Comments: As local ward member I want this application go to planning committee.

### **Parish/Town Council Comments/Internal and External Consultees**

#### **High Wycombe Town Unparished – Sands Ward**

##### **Community Housing**

Comments: I can find no mention in the application of an intention to provide affordable housing but I understand that for proposals above the applicable threshold, the Council is now applying the National Planning Policy Framework (NPPF) of at least 10% of the homes to be available for affordable home ownership.

If the application meets all of the planning requirements then I am in support of the Council seeking homes for affordable home ownership in accordance with the NPPF.

##### **Control of Pollution Environmental Health**

Comments: Identified Environmental Services issues relevant to Planning:

Noise from traffic on railway affecting future residents

Air quality implications in adjacent Air Quality Management Area

Conclusion:

Noise readings have been taken alongside the railway, and levels have shown that the site falls within an area exposed to railway noise.

The internal noise levels should adhere to the levels as stated in BS8233:2014 and all habitable rooms fronting, or that have direct exposure to the railway will need to include acoustic glazing and mechanical ventilation.

- Air Quality is of significant concern along the neighbouring West Wycombe Road, as well as all arterial roads within High Wycombe, as monitoring found that the area has persistently exceeded national air quality objectives for a number of years. In December 2018 the whole of West Wycombe Road was included within a wider High Wycombe Air Quality Management Area (AQMA). Wycombe District Council, along with other key stakeholders, have a duty to ensure that Nitrogen Dioxide levels within this area are reduced to acceptable levels within the national air quality objectives. It is currently estimated that 144 excess deaths each year within Wycombe District area are caused by poor air quality, with the expectation that the majority of those deaths will be caused along the arterial roads of High Wycombe and Marlow. The application includes 17 parking spaces all vehicles movements must pass through the West Wycombe Road section of the High Wycombe AQMA. I would therefore recommend that the following principle is followed; Active provision of 1 electric vehicle charging unit for each dedicated parking space and at least 1 charging point per 10 unallocated spaces. With the spaces appearing to be allocated, I would recommend that all parking spaces (17 in total) are provided with an Electric Vehicle Charging Point and that such a point is maintained in working order thereafter.

Objection, unless conditions imposed.

##### **Arboricultural Officer**

Comments: WDC are aware of ash dieback in the area and the removal of the TPO'd ash is acceptable if its condition is as poor as described in the arb report. As of 05.10.18 the crown vitality was considered normal and the form typical for species. The arb officer could see no obvious lesions on the bark or a particularly large amount of deadwood as you may expect with ash die back. No obvious signs of the disease were noted on neighbouring younger ash (which one might expect to see affected first). However, there were a number of dead branch tips on the ground, also a proliferation of internal growth which can be an indicator that that tree is trying to

produce more leaves to support itself during a time of stress. The arb officer could not say with 100% certainty whether or not the tree is currently affected by *Hymenoscyphus fraxineus* (ash die-back). Long-term, ash dieback is known to be present in the district and it is likely that the tree will become affected within the next few years. Removal of T1 should require replacement planting and there is a need for more significant tree planting on the site in general. There is ample space within the parking area subject to suitable tree pit design and species selection.

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

Comments: The LLFA has no objection to the proposed development subject conditions.

#### **Surface Water Drainage Strategy:**

The applicant is proposing to use tanked permeable paving to attenuate water on site before discharging via an outfall to the public surface water sewer at a restricted rate of 1 l/s. Permeable paving will provide benefits of water quality and water quantity management. A connection will be made to the surface water sewer within West Wycombe Road, and permission to utilise this network from Thames Water has been provided in support of this application.

The calculation detail provided utilises an estimation tool, whilst this is acceptable for the initial design stage; for a development of this proportion we require detailed calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus 40% climate change storm event should be safely contained on site. These calculations must include details of critical storm durations, and demonstrate how the proposed system as a whole will function during different storm events. If any flooding occurs for the 1 in 100 year plus 40% climate change event, then we require details of where this flooding will occur and the volume of the flooding.

The applicant should be made aware that ground investigations including infiltration rate test (in accordance with BRE 365) and groundwater level monitoring are required. If results show that infiltration is possible the surface water drainage scheme should be redesigned to incorporate this. It is noted in the Flood Risk Assessment and SuDS Strategy for Planning that the feasibility for further SuDS components will be assessed at detailed design stage; we expect this assessment to be carried out should this application be granted approval. The applicant should consider the ecological, amenity and water quality benefits to be provided by the proposals; this is in line with paragraph 165 Part d of the National Planning Policy Framework (2018).

Lastly, a maintenance schedule for the surface water drainage system needs to be provided; it should include what maintenance tasks will be completed, who will be responsible for undertaking maintenance and how often the maintenance tasks will be completed.

#### **Existing Surface Water Flood Risk:**

As raised in our previous consultation response (dated: 10th September 2018) the proposed block of flats is at risk of surface water flooding. According to the updated Flood Map for Surface water depths of up to 0.3m are anticipated for events between a 1% and 0.1% Annual Exceedance Probability (AEP). The applicant has noted that the permeable paving (designed for a 1% AEP event with a 40% Climate Change Allowance) will manage the existing surface water flood risk; we request the calculations to demonstrate the proposed system can account for both the external surface water flood risk and the surface water flood risk generated as a result of development. If the existing surface water flood risk is unable to be accommodated in the system then appropriate resistance and resilience measures will need to be provided such as (but not limited to) the implementation of flood doors, locating sockets with a suitable freeboard above the designed flood level, the installation of airbrick ventilation systems above flood level. The application should also consider fitting the property with a damp proof membrane and using water resistant materials for the flooring. Further information can be found in Improving the Flood Performance of new buildings, Flood Resilient Construction (May 2007, Department for Communities and Local Government). Provisions should also be made to divert the flow route around the proposed dwellings to ensure no displacement of the existing surface water flood risk. This request is in line with paragraphs 157 and 163 of the National Planning Policy Framework (2018).

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

### **County Highway Authority**

Comments: The Highway Authority has previously provided comments on this application in a consultation dated 25<sup>th</sup> September 2018, for simplicity comments are repeated below.

The proposed development, although to the rear of No.210 West Wycombe Road, will utilise the existing Temple side Gardens estate road. Given that it is privately maintained, one assumes that the applicant either has a historical right of access across it or has negotiated one that will allow the traversal of vehicular and pedestrian traffic over it.

Upon comparing the featured level of parking with the optimum standards contained within the County Council's Buckinghamshire Countywide Parking Guidance policy document, they accord with the optimum provision based upon the amount of habitable accommodation proposed.

In terms of trip generation, and aside from some minor issues in the submitted interrogation of the TRICS (Trip Rate Information Computer System) database relating to the site perimeter selections, the site will generate around 40 additional vehicle movements per day. I am satisfied that this can be accommodated on the local network.

Temple side Gardens' junction with West Wycombe Road is anomalous in a local context in that it does not benefit from double-yellow line waiting restrictions to protect vehicular intervisibility as is the case with the respective A40 junctions at Desborough Park Road, Mill End Road and The Birches. Nonetheless, I have been informed by Transport for Buckinghamshire that there are plans to introduce waiting restrictions at this junction, whereby the formal/statutory consultation stage is imminent and will last for a period of 4 weeks. Should there be no relevant objections to the scheme, and subject to a report to the County Council's Cabinet Member for Transportation, implementation of the restrictions may take place in late 2018/early 2019.

Mindful of these comments, I do not have any objections to this application with regard to highway issues subject to the following condition:

**Condition 1:** The scheme for parking and manoeuvring indicated on the submitted plans shall be laid out prior to the initial occupation of the development hereby permitted and that area shall not thereafter be used for any other purpose.

**Reason:** To enable vehicles to draw off, park and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

Having assessed the amended plans provided I note that the same number of parking spaces have been demonstrated, and are afforded sufficient manoeuvring space within the site curtilage. I therefore have no objections in this regard to the amended proposals.

The amended proposals have not altered the quantum of proposed development on the site, I therefore still consider the Transport Assessment submitted and assessed previously to apply to the current proposals.

Mindful of the above, I do not consider the amended proposals to materially alter the impact of the development upon the publically maintained highway, therefore I have no objections to the proposed development subject to the condition above.

### **Thames Water**

Comments: Applicant advised to read guides on sewers.

Advise that if a sequential test is taken with regards to surface water drainage, there is no objection.

Advised there is no objection in relation to the waste water network or infrastructure capacity, nor water treatment infrastructure capacity.  
Informative recommended.

### Representations:

#### **County Cllr Darren Hayday:**

I have concerns about this application. This will increase traffic flow at the current junction at Temple Side Gardens. I have been working on a project to fund double yellow lines to make the junction safer, but they don't extend all that far on either side which means it still won't be completely safe to use. I have been working with the local residents for the last 12 months to make this junction safer and the last thing that I need now is to have an application such as present itself. We have a problem that vehicles park on the main road obstructing the vision when you leave this junction, it is very dangerous. I fully object on these grounds as the local County Cllr.

#### **Additional Letters:**

Objections have been received from 23 parties, on the following grounds:

- Use of Templeside Gardens as a main thoroughfare for proposed development is unacceptable.
- There are already problems accessing West Wycombe Rd from Templeside Gardens.
- Very limited parking in Templeside Gardens and inadequate parking proposed, leading to dangerous conditions
- No footpath on Templeside Gardens
- Poor drainage in area
- Unclear how drainage/ utilities would work/ would add strain
- Would lead to further re-development of gardens/ sets precedent
- Health and safety concerns during construction
- Clifton Lodge has an access that could be utilised during construction and for future residents
- Traffic problems in area already
- Refuse turning would only work if remains free from parked cars
- Would impede quality of life for Templeside Gardens residents.
- Templeside Residents pay for upkeep of road. Potential future occupiers should share responsibility.
- Increased traffic would make it difficult for 2 vehicles to pass on Templeside Gardens/ if visitor bays are being used, 2 vehicles cannot pass. Especially bad on bin day.
- Inadequate garden sizes
- Plans don't show full extent of Templeside Gardens
- Out of keeping with Templeside Gardens. Will change nature of road.
- Children play on road in Templeside Gardens
- Would result in wear and tear of highway of Templeside Gardens
- No road lighting on Templeside Gardens
- Templeside Garden is a well-kept road. Adding more traffic will degrade this.
- Residents have street parties on Templeside Gardens- this would make it more difficult to hold them.
- Poor air quality in area
- Daylight sunlight report skewed in favour of developer. Would impact on light serving neighbours.
- Have not taken into account difference in land levels with Templeside Gardens.
- Clifton Lodge may further develop, resulting in overdevelopment
- Is Templeside Gardens highway strong enough for construction traffic?
- Double yellow lines to be added on A40 by junction as very dangerous currently.
- 90 degree corner in Templeside gardens is dangerous
- Bizarre that amenity of a couple of dwellings alongside the hotel outweighs amenity of residents on Templeside Gardens
- Amended plans would result in overbearing impact on neighbouring property and greater

impact on light levels.