

18/08309/FUL

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor L M Clarke OBE: If you are minded to approve please bring to the Planning Committee for determination. This application is causing a lot of adverse comment in the local area.

Internal and External Consultees

County Highway Authority

As you will have noted from the Transport Statement submitted in support of the proposals, the Highway Authority provided pre-application comments pertaining to the development currently proposed. It was consistently evident during the process that the residential units were for the purposes of temporary accommodation (TA) only. Therefore the scoping and advice issued was based upon this specific use.

Site access

The scheme will remove the car park access on West End Road, create an access on Desborough Road in order to serve three spaces for the proposed development (two accessible parking spaces and a loading/unloading space) and seven spaces for the King's Church, in addition to having three direct-access spaces on West End Road (one for an ambulance and two for the use of the British Red Cross).

In terms of the three spaces on West End Road, whilst located on a 90⁰ bend, it is acknowledged that there are no other access points or parking areas on the section that once had a junction with Desborough Avenue (the closest access being for Courtyard House car park, opposite the three spaces). Nonetheless, the proposed space adjacent to the north/south section of West End Road can achieve approximately 18m to the centre of the road to detect any vehicle that could conceivably travel toward the space from the north.

The main access feature of the proposed development is the aforementioned Desborough Road access that serves three spaces for the TA and seven spaces for the adjacent King's Church. This access has satisfactory junction spacing, adequate width to allow simultaneous two-way flows and can achieve minimum requisite visibility splays.

Sustainability

The application site is situated in a highly sustainable location, being in close proximity to the High Wycombe bus station, and comfortable walking distance of the nearby Eden Centre, three large town centre supermarkets, Wycombe Hospital and High Wycombe Church of England Combined School. As a result, a significant contributory factor of the Highway Authority's view of this application is based upon the services in close reach to the proposed TA.

Parking provision & car park relocation

Another substantial influence on this Authority's determination of this developments transport impact is the provision of an effective replacement car park on East Richardson Street (as proposed within application 18/08040/R9FUL). A concern was expressed during pre-application discussions that the proposed TA units would remove a public car park. In consideration that several planning applications

proposing private flats within the local area in recent years have included this car park as being available for peak residential parking, it was imperative that a similarly-sized facility was enabled to ensure that on and off-street parking for local residents did not become saturated. Therefore I will recommend a condition guaranteeing that the car park proposed within application 18/08040/R9FUL is operational prior to the closure of the West End Road car park that would be required to implement any permission granted to application 18/08309/FUL.

The third main reason behind the Highway Authority's support of this application is the nature of the accommodation proposed. In recognition of the specific use of these units, combined with the site's location, is that a lack of on-site parking provision is likely to result in any displaced parking on the local network. This stance is further enforced by the existence of a high level of local waiting restrictions (i.e. double-yellow lines, single yellow lines and resident parking zones). Nevertheless, a parking beat survey featured within the Transport Assessment submitted in support of the application does show a reasonable level of off-site parking available should any residents require parking for their vehicles during times of peak residential demand (late night into early morning).

Mindful of these factors, I do not have any objections (or reasons to lodge any opposition) to this application subject to the following conditions:

- Condition 1:** No other part of the development shall be occupied until the new means of access to the West End Road parking spaces has been sited and laid out in accordance with the approved drawing and constructed in accordance with Buckinghamshire County Council's guide note "Private Vehicular Access Within Highway Limits" 2013.
- Reason:** In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.
- Condition 2:** No other part of the development shall be occupied until the new means of access has been sited and laid out in accordance with the approved drawing and constructed in accordance with Buckinghamshire County Council's guide note "Commercial Vehicular Access Within Highway Limits" 2013.
- Reason:** In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.
- Condition 3:** Within one month of occupation, the West End Road car park access not incorporated in the development hereby permitted shall be stopped up by raising the existing dropped kerb and reinstating the footway and highway boundary to the same line, level and detail as the adjoining footway and highway boundary.
- Reason:** To limit the number of access points along the site boundary for the safety and convenience of the highway user.
- Condition 4:** Notwithstanding the provisions of Part 2 of the Second Schedule to the Town and Country Planning (General Permitted Development)(England) Order 2015 (or any Order revoking or re-enacting that Order) no gates shall be erected over the Desborough Road vehicular access point.
- Reason:** To enable vehicles to draw off clear of the highway for the safety and convenience of the highway users.
- Condition 5:** 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.

Condition 6: Prior to the commencement of any works on the site, a Construction Traffic Management Plan detailing the management of construction traffic (including vehicle types, frequency of visits, expected daily time frames, use of a banksman, on-site loading/unloading arrangements and parking of site operatives vehicles) shall be submitted and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with such approved management plan.

Reason: This is a pre-commencement condition as development cannot be allowed to take place, which in the opinion of the Highway Authority, could cause danger, obstruction and inconvenience to users of the highway and of the development.

Condition 7: The West End Road car park shall not be permanently closed to allow implementation of the development hereby permitted until a public car park has been opened and operated at the Manley's Trade Centre site on East Richardson Street.

Reason: To ensure public car parking provision and avoidance of saturated on-street provision to the detriment of highway safety and convenience of use.

Cadent Gas Ltd Plant Protection Department

Comments: No reply

Waste Management

Comments: We note the provision of what appears to be a single communal bin store and collection point from West End Road. We have some concerns at the lack of a suitable turning facility for the collection vehicle. Assuming collections coincide with those at Peddle Court, it would be possible for the RCV to reverse the short distance to the proposed collection point, after exiting Peddle Court. Use of a reversing assistant would be required to undertake this manoeuvre. It is recommended that a development this size would require the following waste capacity and containment solution: 9 x 1100 litre refuse bins; 9 x 340 litre mixed recycling bins; 9 x 340 litre paper recycling bins; 4 x 240 litre food recycling bins. This configuration is based on fortnightly refuse collections and fortnightly recycling collections and weekly food waste collections.

Bin dimensions available within the service planning guidance doc available online <http://www.chiltern.gov.uk/wastepolicy>

We have no objections or further comments at this time.

Crime Prevention Design Advisor

Comments: I have reviewed the documents, crime statistics and discussed the application with the Neighbourhood/Problem Solving Team for the area.

There are some concerns regarding the design and layout of the building which we believe to be problematic in terms of crime and ASB. To address these concerns we ask that conditions (detailed below) are placed on the applicant. These conditions should run in conjunction with a risk assessment process already established between the Local Authority's Emergency Housing Department and Thames Valley Police and in use at other developments in Wycombe. This management procedure, whilst outside of the planning process, is vital to safeguard the development and its occupants.

Surveillance

I have significant concerns relating to the lack of surveillance provided from the development to the surrounding streets especially on the West End Road eastern elevation. This generally lacks a suitable level of surveillance capable of safeguarding the development especially on the ground floor where bins and stores are located. Whilst surveillance is potentially available from the floors above windows are located in bedrooms and not active rooms in the dwellings. The TA office is located in this area and will be able to provide some guardianship however this will be restricted by the hours of

operation, as will the surveillance provided from the neighbouring office block based on West End Road.

In the absence of a suitable level of surveillance being achieved from the design and layout, I ask that a condition is placed on the applicant to provide formal surveillance around the development. A security needs assessment should be conducted and submitted to ensure an adequate system is present to safeguard the development and its occupants.

Condition

This can be addressed by condition requiring a security needs and operational requirement assessment to be conducted and the resulting security strategy be implemented. .

Physical Security

It is pleasing to see that the applicant has shown a commitment to achieving the physical security requirements of 'Secured By Design'. Secured By Design provides a minimum standard that should be present in the development to achieve the Silver Award for physical security however it allows crime risk to be taken into consideration to ensure it is appropriate and proportionate to the development and its location. Therefore additional requirements are requested of the applicant to achieve the standard, these relate to external doors including associated stores accessible from the public realm to prevent unauthorised activity and entry and a requirement to fit laminated glass to all ground floor/easy to reach windows to deter forced entry or damage.

Condition

This can be addressed by condition requiring an application for Secured by Design – Silver Award to be submitted and then once approved the development carried out in accordance with these details

Lighting

I have been unable to find any details relating to the additional lighting that was agreed for West End Road at the meeting held on the 13th February 2019. This was to provide sufficient lighting utilise any natural surveillance that may be present on Desborough Road. This should be submitted prior to planning permission be granted. (Officer note: This can be the subject of a condition.)

Buckinghamshire County Council (Major SuDS)

Comments received 11th January 2019

The LLFA objects to the proposed development due to concerns of surface water and groundwater flood risk.

Flood Risk Assessment to take account of all sources of existing flood risk

- Indicative flood risk resistance and resilience measures
- Site investigations report including groundwater monitoring results
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of how and when the full drainage system will be maintained, this should also include details of who will be responsible for the maintenance.

Comments received 14 February 2019

The LLFA has a holding objection to the proposed development due to concerns of existing surface water flood risk.

Failed to address concerns about surface water flood risk along the lines identified in the first consultation response.

We still require the following information from the applicant:

- Flood Risk Assessment to take account of all sources of existing flood risk

- Indicative flood risk resistance and resilience measures
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Indicative whole-life maintenance plan

Further information has been submitted to address the concerns of the Lead Local Flood Authority.

Updated consultation response 1st April 21019. The LLFA has no objection to the proposed development subject to recommended conditions.

It is proposed to use permeable paving to attenuate surface water flows on site. Using a flow-control device, the system will then discharge at a rate of 5 l/s to the Thames Water surface water sewer network to the North of the site. Permission from Thames Water to utilise this network has been provided. It is also understood that at detailed design stage rain gardens and other small-scale above ground SuDS features will be incorporated. The LLFA welcomes proposals of sustainable drainage components with multifunctional benefits.

According to the updated Flood Map for Surface Water, the application site is at low risk of surface water flooding, with depths up to 0.6m anticipated for events between a 1% to 0.1% Annual Exceedance Probability (AEP) (there is between a 1% to 0.1% chance of this event occurring within any given year). Within the Technical Note the applicant has noted that due to the height of the boundary wall along Desborough Road (0.4m) the risk of surface water flood risk to the site is reduced, as it is understood the wall will be retained post-development. The applicant is required to demonstrate that the proposed building will be appropriately flood risk resistant and resilient; this is in accordance with paragraph 163 part B of the National Planning Policy Framework 2018.

The LLFA have concerns that the proposed development could lead to the potential displacement of the existing surface water flood risk and consequently increase flood risk off site. The current site, due to its nature, is a flat area which likely acts as informal storage during times of flooding, the proposed development will lead to an obstruction of the area, causing a potential displacement of floodwater. The Technical Note outlines that the permeable paving will manage the excess floodwater for the 1% to 0.1% AEP events however, it has only been designed for a 1 % AEP event with a 40% Climate Change allowance. We therefore request that the existing surface water flood risk is appropriately managed ensuring no increase of flood risk elsewhere in accordance with paragraph 163 of the NPPF 2018. This could be through measures such as increasing the storage capacity of the permeable paving or creating storage elsewhere. Alternatively, the applicant may wish to provide calculations to show the residual surface water flood risk for events between the 1 to 0.1% AEP event will be managed by the proposed system.

Indicative maintenance measures have been provided for the proposed surface water drainage scheme, the LLFA request a detailed whole-life maintenance plan is provided for the all SuDS components at detailed design stage.

We would request the following condition be placed on the approval of the application, should this be granted by the LPA. (Officer note: All suggested condition have been included in the recommendation.)

The Licensing Officer Buckinghamshire Fire Rescue

Comments: None received.

Ecological Officer

Comments:

The ecology report and the bat survey show that there is very little of ecological value on site and that no bats are using the buildings. The proposals will result in the loss of a small number of trees but it has the potential to create good ecological enhancements and the Ecological report makes several suggestions in section 5 of how this could be done through the inclusion of green roofs and green walls as well as landscaping.

Although details of landscaping (and the ecological enhancement associated with them) can be left to condition the details of green walls and green roofs needs to be shown sooner as they could have structural implications into the design of the building.

Conditions will be required relating to lighting and potentially about resurveying is for bats if the buildings are not demolished within a year.

Lighting condition: All external lighting must be designed in consultation with an ecologist to ensure that bats and other wildlife are not adversely impacted upon by lighting. Details and plans showing how this will be achieved must be submitted to and approved in writing by the LPA prior to occupation.

Reason: to ensure that wildlife are not adversely impacted by lighting and to ensure proposals are in line with paragraph 180 of the National Planning Policy Framework.

Arboriculture Spatial Planning

Comments:

Existing trees on the Desborough road frontage are ornamental fruit trees, and are therefore likely to cause nuisance to the new development. They are also likely to suffer through the construction works. These trees should be replaced with three new trees; Sweet Gum, fastigiate, for example, would have a more elegant shape, suited to the design of the building.

RECOMMENDATION: No objection subject to condition

Control Of Pollution Environmental Health

Comments:

I have no objection to this application.

Representations

High Wycombe BIDCo

Represents local business in High Wycombe Town Centre and has responded to the application on behalf of their members. They strongly oppose the proposal.

- Desborough Road already is known for being a place for people in transition who are particularly vulnerable to anti-social behaviour.
- Proposed location for temporary accommodation will be detrimental to businesses and the local area.
- This will just exacerbate those who are facing hardship in one area.
- The replacement car park will not meet the need for affordable long stay car parking or free short stay parking to help boost Desborough Road businesses.
- The existing car park and the new car park are both required to increase access.
- There has been significant disruption by virtue of road works and development and further disruption will mean more businesses will cease to trade.
- Car parking strategy needs to be addressed to allow some free on-street parking.

9 representations received objecting to the proposal:

- Unacceptable level of noise from the development will impact upon neighbouring properties.
- Loss of light.

- Unacceptable design which will not age well – more appropriate development would be a brick building.
- Rendering weathers poorly.
- Loss of car park which is used a lot by shoppers.
- Living environment for occupiers of the units is poor – noise, disturbance, lack of privacy.
- Is the proposed new facility appropriate in the town centre?
- Design is out of character with the area.
- Unacceptable impact upon Peddle Court.
- Density too high – reduce the number of floors and the number of occupants.
- Design of the building and its use do nothing to improve the living or shopping experience of the centre of High Wycombe.
- Does not respect local context, street pattern, local scale and proportions of local buildings and out of character.
- Change to residential without regard to the local businesses.
- Overbearing development.
- Insufficient parking either on road or off road for residents, businesses, customers, staff and shoppers to the town centre.
- Car park is nearly always full – important facility.
- New Road layout of Desborough Road is not safe for vehicles and pedestrians.
- A site out of town should be found for this type of use.
- Issue with homelessness, drug abuse and advertising and meeting area for prostitution this is not an appropriate location for temporary accommodation.
- It is not appropriate location for children as there are needles from drug use and environmental issues arising from rough sleeping.
- Lack of support for Desborough Road traders from the local council.
- Crime hot spot is not a suitable location for this type of development.
- Has the Council conducted a social and equalities risk assessment to show that this site is the most sustainable and suitable.
- Has the Council conducted an Equality and Diversity Impact Assessment that would outline the reasons the Council took in its overall decision.
- There has been an opportunity to work with local partners such as the neighbouring Church and this has been missed.
- Displacement of parking and also no parking to be provided for the use of the site which is contrary to parking policies and BCC parking guidance.
- The area has seen a net loss of parking.
- The loss of the car park affects local businesses and the neighbouring Church (members and attendees) who use the car park particularly those with mobility difficulties.
- The opportunity to provide onsite underground car parking has been missed.
- Missed opportunity for an iconic building in this prominent location.
- Scale of the building dominates the adjacent buildings.
- Overbearing impact on the adjacent Church despite a 10m separation and also overlooking.
- Support the general redevelopment of the site the proposed use is unsuitable.