18/05002/R9OUTE

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor Miss Katrina Wood – There has been much local discussion regarding this application and there are still concerns locally with the application. I would therefore request that because of this the application be bought before the Committee for a full discussion and decision.

Councillor David A C Shakespeare OBE – No comment received.

Councillor Lawrence Wood – No comment received.

Parish/Town Council Comments/Internal and External Consultees

Chepping Wycombe Parish Council -

- 1. Objection to the Cock Lane widening beyond the new entrance to Ashwells, which would reduce Tylers Green sense of place.
- 2. Object to Ashwells being used during the ground works and site infrastructure phase.
- 3. Kings Wood and Cock Lane cemetery car parks are not available for parking during or after development.
- 4. Ashwells to Horse and Jockey PH would benefit from improvement.
- 5. Further clarity required on the affordable housing offer at Ashwells. Minimum of 20% affordable housing at Ashwells.
- 6. The Parish would wish to be involved in the future management of the green spaces at Ashwells and request participation in any future governance board.
- 7. The Copse at the northern end of the site should be protected and not reduced in size.
- 8. Request that a representative of the Parish be invited to join the governance board.
- 9. Insufficient parking.
- 10. Not clear that refuse vehicles will be able to navigate road network

County Highway Authority – following initial consultation the County Highway Authority raised a number of concerns, observations and requests for further information/clarification. Their final comments can be summarised as follows:

<u>Trip Generation and Distribution</u> – baseline census data is now agreed. It was accepted that the alterations to the census data did not adversely affect the TRICS data and was considered to give a fair representation of trip distribution.

Traffic Impact Assessment -

- The Safety Teams objection to the proposed one-way system at Ashwells has been overcome by making it two way.
- LinSig analysis for the Cock Lane and London Road junction has now been submitted, which indicates that the impact from queuing is not so severe that planning permission could be withheld on this basis. However, a payment towards London Road will be required.

<u>Traffic Calming</u> – details of traffic calming on Cock Lane have not yet been submitted. A Safety Audit for the New Road/Church Road junction was not submitted. It is considered that these matters are capable of being secured via condition.

<u>Accessibility by Foot</u> – concerns raised about the accessibility by foot and links to the existing Ashwells Road and the Gomm Valley site. It is advised that this matter is addressed via condition.

<u>Railway Shuttle Signals</u> – it is accepted that the impact on the railway bridge shuttle signals will not be severe.

<u>Sustainable Transport Provision</u> – The site is within walking distance of the No.31 bus. Money should be secured via S106 towards bus stop improvements and access by foot as proposed by the applicant.

<u>Cock Lane</u> – support the widening of Cock Lane at its northern end to 6.5m. Advise that this is secured via S.278 agreement.

<u>Narrow section of Cock Lane</u> – the County Highway Authority retain their view that the narrow section of Cock Lane is of insufficient width and character to accommodate any further vehicular intensification as a result of further development. The restrictive carriageway does not permit satisfactory simultaneous twoway vehicle flows, nor does it have a segregated pedestrian footway or conducive for use as a cycling route. Although some exist, the passing places are substandard and infrequent, particularly for a route connecting Tylers Green and High Wycombe, and are more akin to an isolated rural location. On this basis alone, the Highway Authority has recommended refusal of the application. However, in recognition of the sites designation for development and the fact that it is for the Local Planning Authority to balance the vehicular intensification of Cock Lane with housing delivery. On this basis conditions are also proposed.

Buckinghamshire County Council (Major SUDS) – The Lead Local Flood Authority (LLFA) initially raised objection to the proposal on the basis of inadequate infiltration testing and sustainable urban drainage (SUD) solution. The SUD solution was amended to reflect the first stage objection. Following amendment the LLFA removed their objection subject to conditions securing a detailed SUDs scheme, ongoing maintenance and the submission of a verification report.

Community Housing – it is understood from Savills' covering letter dated 12 March 2019 that the affordable homes (68 for Affordable Rent and 32 for Discounted Market Value sale) are to be provided across two sites - Ashwells Field and land at Bellfield Road, High Wycombe - another current planning application.

I also understand from the case officer that the proposal is for all 68 homes for Affordable Rent to be provided on the Bellfield Road site, with the 32 for Discounted Market Value sale to be on Ashwells Field. The housing service preference would be for a mix of rented and low cost housing on both sites. However, as the Bellfield site is an accessible location for facilities in High Wycombe and the stated overall provision is for 45% bedspaces for affordable housing (and therefore above policy level) this is considered to be a useful benefit.

There is a need for affordable housing in the District, particularly affordable housing for rent and if the proposal meets all of the planning requirements then it is supported.

Environment Agency (south-east) – Comments received 17 January 2018. No comment.

County Archaeological Service – Requests that the whole of the proposed development area to be assessed through trial trenching. If planning permission is granted it may harm a heritage asset of significance so a condition should be applied to require the developer to secure appropriate investigation, recording publication and archiving of the results in conformity with the NPPF para. 141. Therefore, no objection subject to an appropriate condition.

Rights of Way and Access – No objection is raised subject to relevant conditions and S106 sums securing contributions towards footpath improvements in the vicinity of the site.

- a. Kings Wood S106 £210,000.
- b. CWY/14/1 Site to Horse and Jockey £14,000
- c. East Side of site permissive right of way provide on-site 2m wide asphalt with concrete edging.
- d. CWY/15/1 Site to Hammersley Lane S106 £24,500 or S278. (Granite to dust)
- e. CWY/15/1 provide on-site 3m wide asphalt with concrete edging.
- f. HWU/50/1 Site to Cock Lane on AVIVA land S106 £36,000 or S278. (Asphalt with thermoplastic coloured surfacing).
- g. HWU/49/1 Cock Lane to Herbert Road S106 £39,900 or S278 (Crushed Lime Stone).
- h. CWY/14/1 Cock Lane to Ashwells 2m wide asphalt with concrete edging.

Bucks County Council Education Department - 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. A breakdown of the contribution is shown below:

Contribution Calculation

Ashwells Field Cock Lane Tylers Green	Houses			
	2 Bed	3 Bed	4+ Bed	Total
Number of dwellings	20	66	16	102

	Pupil yield	Pupil yield rates per 100 dwellings			Pupils estimated from development					Total
	Houses				Houses				Build Cost	Education
School Phase	2 Bed	3 Bed	4+ Bed	Average	2 Bed	3 Bed	4+ Bed	Total	per pupil	Contribution
Primary Places	22.1	38.8	46.7	36.8	4.4	25.6	7.5	37.5	£14,915	£559,313
Total Contribution										£559,313

[Officer Comment – it is noted that the above contribution is based on the original quantum of development and mix. A revised quote has been sought].

Control of Pollution Environmental Health – no object subject to a condition securing electrical vehicle charging points within the development to reduce the impact on the High Wycombe Air Quality Management Area (i.e. London Road).

Urban Design – At the first stage consultation the Council's Urban Designer raised significant objection in respect of the proposed layout in terms of connectivity (vehicular, pedestrian and cycle), parking, capacity for street tree planting and the amenities of future occupiers. The plans were amended to address these concerns. In response the amended plans the Council's urban designer concluded that the illustrative master plan demonstrates that 109 units can be accommodated on the site whilst satisfying the requirements of the Development Brief. The remaining detailed design issues are capable of being dealt with via condition, or at the Reserve Matters stage. Conditions have been requested in respect of:

- a) A limitation on the height of dwellings backing onto the properties in Greenridge.
- b) Alterations to the carriageway widths in the two squares to widen them. It is considered that this is capable of being addressed at the Reserved Matters stage.
- c) The distribution of unallocated parking requires further work. It is considered that this is capable of being addressed at the Reserved Matters stage.
- d) Informatives are recommended in respect of pedestrian priority (particularly at the first junction in the site), distribution of unallocated parking and inefficiencies in the parking layout.

Crime Prevention Design Advisor – no comment received. (Officer Note: as application is in outline it will be possible for the Crime Prevention Design Advisor to influence the proposal at the Reserved Matters Stage).

Natural Environment Officer (Ecology + Arboriculture) – The Council's ecology and arboricultural officer raised a number of concerns in the first stage of consultation in respect of:

- the absence of bio-diversity accounting,
- the introduction of gabions at the entrance to the site, which could comprise a barrier to wildlife,
- the approach to SUDs (inclusion of swales and ponds), and,
- the impact on a number of trees on the site due to road alignments and pressure for pruning/felling.

Following amendments to the scheme the majority of the core issues were overcome and it is acknowledged that the situation for the retention of existing trees and planting of new trees has improved significantly. Concerns were raised in respect of:

- 1. The absence of bio diversity accounting.
- 2. The absence of ponds (Officer Note: swales have now been included).
- 3. The need to be mindful of the steepness of the bank adjacent to Cock Lane to ensure that it does not form a barrier to wildlife (Officer Note: can be addressed at the Reserve Matters stage).
- 4. Clarity is required for how the remaining underdeveloped areas of grassland will be developed (Officer Note: this is capable of being addressed via condition).

Natural Environment Officer (Landscape) – In landscape and visual terms, the parameter plans and accompanying illustrative master plans demonstrate that 109 units can be accommodated on the site whilst satisfying the requirements of the Development Brief. The remaining detailed design issues can be dealt with at the Reserve Matters stage.

In more detail the comments can be summarised as follows:

- The retained trees on the eastern boundary will provide a sylvan back drop. (Officer Note: capable of being controlled at Reserved Matters stage).
- Protective fencing required for retained vegetation. (Officer Note: capable of being controlled at Reserved Matters stage).
- Proposed green lane provides good opportunities for large scale structural planting to break up views from the west. (Officer Note: capable of being controlled at Reserved Matters stage).
- Structural street tree planting required to break up the development. (Officer Note: capable of being controlled at Reserved Matters stage).
- The open spaces will provide opportunities to enjoy views out of the site.
- Good pedestrian and visual connections between open spaces.
- Housing fronting onto green spaces will provide natural surveillance.

Listed Building & Conservation Officer - The site shares its northern boundary with the adjacent former school (now residential), the principal building of which is Grade II listed. The proposals are acceptable in terms of their impact on the setting of the listed building: there is no functional relationship between the application site and the former school buildings. At most it provides a pleasant backdrop to the school grounds. The landscape plan illustrates new planting along this boundary which will provide screening, reducing any impact further.

Thames Water –

Waste Water – Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of the development. A Grampian style condition has been requested to address the matter.

Surface Water – surface water should be addressed on-site. Where a developer proposes to discharge to a public sewer the prior approval of Thames Water is required.

Potable Water – The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water have requested a condition be imposed on any planning permission granted until an impact and mitigation study has been approved.

Other Matters – an informative has been requested reminding the developer of the need to divert the main that currently crosses the site. No development within 5 metres of the water mains on adjacent land and no pilling other than in accordance with an approved method statement.

Bucks Berks Oxon Wildlife Trust - no comment received.

Bucks County Fire Officer – consideration needs to be given to the provision of water supplies for firefighting and access for fire vehicles. Water supply matters are addressed at the Building Regulations stage.

Community Officer – The master plan mentions the play areas. Community would like to see more specific plans for the play facilities. Clarification is needed. (Officer Note: this is capable of being secured via condition)

Chiltern Conservation Board – the Chilterns Conservation Board commented on the application as originally submitted and as revised. Their comments can be summarised as follows:

- Burying of powerlines is supported and should be secured.
- Density should not exceed 25dph.
- Widening of Cock Lane will be detrimental to its Chilterns character. Cock Lane is unsuitable for upgrading.
- The site forms part of an important green infrastructure link between eastern and north High Wycombe. This should be retained.
- Management of the undeveloped area will need to be addressed at the Reserved Matters stage.
- Impact on the AONB should not be limited to visual impact.
- The Land Use Consultants approach to landscape impact is comprehensive. It takes account of AONB policies and the CCB would conclude here that some weight and regard must be given to setting and the relationship of density, dwelling height (design coding), green infrastructure and habitat connectivity. CCB recommends that suitable planning conditions are attached to limit density, maintain green infrastructure connectivity, remove overhear powerlines and control lighting.
- the documentation does not set out to address earlier points with regard to landscape impact, scale of development green infrastructure networks and the cumulative impact of development.

Bucks County Council Strategic Planning - No comment received.

The Chiltern Society -

- Object to the conditions requested by County Highway Authority.
- Object to the footpath through Gomm's wood being upgraded to a bridleway on ecological grounds.
- The package of measures sought by Buckinghamshire County Council Strategic Access officer seem to stray beyond what should be provided. The focus should be with the site and public transport.
- Object to widening of Cock Lane due to loss of semi-rural character.
- Object to widening to create school drop off area.

Representations

Circa seventy representations have been received over the course of two rounds of public consultation. The representations include submission from the Penn and Tylers Green Residents Society, the Ashwell's Forum, Tylers Green Middle School and the adjacent developers. The representations can be summarised as follows:

Principle:

- Affordable housing arrangements require clarification. No indication where affordable housing will be located.
- Support the provision of affordable housing across the Ashwell's and Bellfield Road sites.
- It is stated that the total amount of affordable housing by bedspace will be 45% across the two sites, however there is no information provided on the split.
- Development needs to provide a range of tenures and typologies that respond to local needs, in terms of family sizes and lifestyles, and provide decent homes of the right quality and at prices people can afford. Info. supporting these needs has not been provided. No consultation with the local community to establish what would be an appropriate housing mix.
- Number of dwellings sought cannot be accommodated.
- The application does not provide a vehicular link to the AVIVA land. Parcel 9 in the Development Brief. It is shown on the illustrative master plan, but not the parameter plan. The parameter plan should be amended and a condition imposed requiring details to be submitted and implemented prior to beneficial occupation.

Design:

- Poor quality pastiche design that fails to enhance the character of Tylers Green.
- In order to overcome original objections re: back to back distances, the proposal results in six repetitive perimeter blocks produces a stock answer to residential planning, resulting in the estate 'feel' of the masterplan that we should be seeking to avoid.
- There is little evidence of a strong concept driving the masterplan, for example by adopting a more structured approach to the creation of the village street, with more extensive frontages that clearly define meaningful open space in between. The masterplan as proposed just has more of the same with little relief, as you move through a repetitive assembly of standard house types. Ashwells deserves better.
- Application needs to be reviewed against the aims and aspirations of the recently appointed 'Building Better, Building Beautiful' commission.
- Some of the confusion and concern about the character and identity of the Ashwells development might have been avoided by the availability of a Design Code.
- Scheme lacks any coherent vision.
- There should be no street lighting on the new development.
- DAS refers to removal of rear parking courts, but parking courts remain.
- The proposal does not achieve its aim of avoiding an 'estate feel'. The images provided in the Brief either fail to follow the local vernacular, are a pastiche or both. They do not enhance the character of Tylers Green.
- Landmark buildings are not present in the illustrative masterplan.
- Discrepancies in the DAS regarding the use of materials. There is reference to clay tiles (p.52), coloured concrete tiles (p. 54) and stone (p.52).
- Northern Section of site will need to be redesigned to take account of Copse and rerouting of pumped foul water main.
- This is a street light free area.
- Three references in DAS to non-existent design code.

- The DAS refers to road types by multiple names.
- It was stated that parking courts should be removed, but the NE parcel contains a parking court.
- Chalk Pit is not bounded by continuous frontage development which would enclose all sides of the space.
- How will self-build plots be regulated.
- Concern about merging Tylers Green with High Wycombe and Loudwater.

Green Infrastructure:

- Encroachment into the Copse in the northern section of the site. Encroach beyond post and wire fence. Copse is undersized by circa 11%. Unclear whether the fence boundary is to serve as the development site boundary.
- Impact on copse of pumped foul water main.
- Chalk Pit not topographically suitable for wider community activity.
- Improved screening for properties in Carter Walk (privet, laurel etc.).
- CWPC have asked to be consulted on the future stewardship of green spaces.
- Objection to the rerouting of the footpath through the copse on the following grounds:
 - Invasion of the privacy of the nearby housing to the north.
 - Effect on wildlife in the copse
 - There is an existing path outside of the copse that can continue to be used.
- Adjoining residence would like to be involved in future maintenance of the copse.
- Wycombe District Council have a statutory duty under section 40 of the NERC Act 2006 to conserve biodiversity and the NPPF requires bio-diversity gain.
- Loss of a habitat for a gold crest bird.

Amenity:

- Concerned about the impact on privacy and light for properties in Green Ridge and require strict guidelines in place regarding the 7 self-build units.
- Additional screening required for properties in Ashwells and Greenridge.
- Request that the seven houses to the rear of Greenridge are moved.
- There is no shop, no café, no village hall or church room, no live/work units. This will promote use of private cars.
- Would like assurances that there will be no construction at weekends.
- Skate park for older children.

Highways:

- Cock Lane is unfit and unable to take any additional traffic. Additional houses and widening of Cock Lane will encourage additional and non-local traffic.
- New access road should be built first and all construction traffic should use that to limit impact on the surrounding road network.
- If the road [Cock Lane] were to be widened to allow for two lanes of traffic and a pedestrian footpath along the full length of Cock Lane, I would withdraw my objection.
- TGMS expresses concern due to increased traffic and construction traffic. Restrictions need to be in place to prevent site traffic passing the middle school during school pick-up and drop-off times.
- Do not agree with any widening of Cock Lane beyond the new access to Ashwell's. No justification on basis of:
 - Demand generated by the development.
 - Predicted traffic flows.
- No actual flow calculations in the Addendum document, just the original Jan 2018 Transport Assessment report.
- Widening of Cock Lane could potentially lead to a flood or some 700 vehicles per hour.
- Object to two way access onto the existing Ashwell's.
- Wycombe District Council have not demonstrated that they have a viable method of reducing the doubling of traffic volume that Cock Lane widening would cause.

- A Transport Assessment is required from both the Gomm Valley and Ashwells developments before a decision can be made about Cock Lane.
- Cock Lane has a good safety record so there is no safety justification for widening it.
- Appendix E of the Transport Assessment forecasts that out of 60 trips only 26 will be through the single lane section that Buckinghamshire County Council wants to widen. This falls to 7 vehicles per hour if only the existing Ashwell's development is surveyed.
- Scant evidence that traffic calming reduces traffic volumes only reduces speed and improves safety.
- Traffic calming on New Road likely to be circumvented by traffic taking slightly different routes.
- Traffic calming will make vehicles start/stop and accelerate thereby exacerbating air pollution in the area.
- Wycombe District Council are unable to explain why:
 - Cock Lane needs to be widened for safety reasons;
 - That increased traffic from the development justifies the work to Cock Lane; and,
 - Traffic calming measures can't prevent an increase in traffic.
- Confusing reference to street hierarchy in the DAS (March 2019) multiple use of different methodologies for the same thing.
- Confusing reference to a bus service. This is not envisaged in Ashwells.
- DAS (March 2019) makes reference to traffic calming there is no indication where this will be.
- No foot or cycle route adjacent to Cock Lane.
- No foot/cycle link to the North/South walk/cycle route on Gomm Valley.
- Parking based on Wiltshire standard. Results in a high parking standard than required by County Highway Authority.
- Discrepancy in the number of parking spaces indicated. DAS suggests 254. The Housing Mix and Parking' plan states 224. Buckinghamshire County Council standards suggests a need for 247 spaces; 225 allocated and 22 unallocated.
- There are a lot of garages, which should be removed from the available parking as they are rarely used for that purpose. MfS (8.3.40) suggests only 45% of garages used for parking. Carports would be preferable.
- Provision of garages and houses between perimeter blocks does not match. It does not make sense for an occupier of one perimeter block to park in any adjacent perimeter block.
- Insufficient parking. Parking required for walkers, cyclists and people visiting the playground.
- Insufficient parking leading to overflow into Ashwells.
- Object to lay-by parking adjacent to Sandpits boundary. Likely to become a regular default parking space for local residents at cost of green buffer for Sandpits residents.
- Long sinuous route to dwellings in northern corner of the site. Advise route is taken along one side of the chalk pit.
- If as stated bin lorries will only collect from adopted roads some of the houses that front onto unadopted roads will be required to drag their bins some distance.
- Bins only collected from adopted roads. This will lead to lengthy bin drag distances for dwellings in the northern corner of the site.
- Yellow lines may be required on the bend on New Road.
- Cock Lane widening: The suggestion that it needs to be widened down the whole length until it connects to the Gomm Valley development or the top of the lower 2 lane section of Cock Lane is based on a wholly inappropriate assessment of the direction of traffic flow from the site (calculating 28 vehs / hour heading south in the AM peak [vs 221 v / hr current baseload] whereas the percentage heading south from the existing Ashwells estate (11%) would indicate just 5 vehs / hr certainly not justification for widening which would then have the appalling effect of attracting in an extra 700 v / hr past our Middle School (according to BCC's own numbers). The adverse effects of this flood of out-of-area vehicles far outweighs any insignificant effect from the development's extra 5 v / hr down Cock Lane which is anyway inherently safe as it is (no accidents at all in the last 5 years in the single lane section that BCC wants widened).
- Traffic flow past the middle school could increase to 1317 veh/hr.

- Minimal accidents on Cock Lane in the last 5 years and none in the narrow section. This supports the view that Cock Lane is safe.
- Cock Lane currently acts as a natural traffic calming route.
- Ashwell's, taken on its own, will not result in a material impact on Cock Lane.
- Concern over the traffic calming measures in New Road. These measures could result in traffic rerouting.
- Traffic calming measures will require street lighting.
- Transport Assessments from both Ashwells and Gomm Valley are required before a decision can be made as to whether Cock Lane should be widened.
- Impact of widening Cock Lane on the Middle School safety.
- The Spine Road needs to be addressed as a cross boundary issue.
- Inconsiderate parking at the junction of Cock Lane and New Road.
- Traffic calming on New Road is not supported:
 - o Unlikely to deter traffic passing through the village
 - Not needed as there is no justification for widening Cock Lane.
 - Need illumination on an unlit road. This is contrary to the dark character of New Road.
- Roads in a terrible state of disrepair that the proposal will only make it worse.
- Visibility splays for the Cock Lane access are insufficient.
- The traffic model has been run without Gomm Valley reserve site.
- The access road stops short of the Gomm Valley boundary.
- The parking TGMS is poor and the proposed improvements are not enough.
- Construction traffic will park in Ashwells and Greenridge.
- Local roads need zebra crossings to help people cross.
- Needs a greater focus on walking, buses and cycling.
- Proposed school parking/turning area should be sensitive to the rural location.
- Ashwell's is dangerous in snowy weather and should be added to the gritting schedule.
- The current proposal does not address the highway capacity issues by ensuring that the transport requirements of the new development are met through new road provision rather than relying on the existing network.
- If the road is not widened no bus routes can come down the road.
- Cock Lane increasingly reaches full capacity at peak times with stand still traffic stretching from the single track road down to London Road.
- The pick-up and drop-off measures for TGMS were not subject to consultation and are not agreed. The proposals provide for parking restrictions outside TGMS. These parking restrictions are welcome provided that they are properly consulted on, planned and implemented and that adequate provision is made for parking/dropping off elsewhere.
- The proposals also provide for a "drop off area" within Kings Wood car park along with a new pedestrian refuge within a newly widened section of Cock Lane. Neither Kings Wood carpark nor the area to the south of TGMS is within the ownership of the applicants. The owners must be consulted and terms agreed.
- Due to the need to cross Cock Lane the proposed drop off area is unlikely to be used solely for drop off.
- It is unclear why a drop off area on the east side of Cock Lane has been discounted.

Infrastructure:

- Not clear where money collected for education will be directed.
- There should be equitable S106 contributions with the Gomm Valley site to the south.
- Ashwell's is circa 20% of the Gomm Valley and Ashwell's development and therefore contributions should be on that basis.
- Footpath to Horse and Jockey PH needs considerable improvement.
- Support approach to school parking.
- Pumped mains sewer is required to be rerouted. There is no indication where this will go. May impact on numbers.

- No location is shown for the electricity sub-station.
- HV cables should be buried.
- The proposal to move the PRoW along the southern boundary of the Ashwell's properties forgets about the pumped sewer running under the footpath.
- AVIVA remain unclear on the strategy to ensure that the Ashwell's planning application is making its fair and reasonable contribution towards the Reserve Sites infrastructure package.
- Increased pressure on hospitals, doctor's surgeries, school places and congestion on roads.

Other Matters:

- Road should be taken to boundary to parcel 9 to allow comprehensive development and any potential ransom issues.
- Gomm Valley and Ashwell's applications should have a joint legal agreement.
- Sale values need to be published to ascertain if they address local needs.
- No separate sustainability statement submitted with the application unacceptable for a development of this size.

General Points:

- Careless and error strewn application.
 - o Reference made to AXA land. This should be updated to AVIVA.
 - Scale bar and north point non-existent.
 - Reference Semmington Brook
 - Reference to 'wetlands and traditional water meadow'
 - The illustrative masterplan indicates 109 houses; the note on p.43 states 108 houses; car parking calculations are based on 102 houses. Numbers have clearly not been checked for consistency.
 - The seven self-build houses shown on the 'Self Build and Custom Build Units' plan include a pair of semi-detached houses. It is difficult to see how this would work.
 - If the roads area of 0.9ha is part of a total site area of 7.6ha, then either the net residential (3.8ha) or the POS (3.8ha) figure is wrong.