

19/05142/FUL

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor Hanif - I would like the above planning application to be taken in the committee where members can discuss and raise concerns if any.

Parish/Town Council Comments/Internal and External Consultees

High Wycombe Town Unparished

Arboricultural officer

Drawing referenced: Soft Landscaping plan SK 94.202 REV F

Comments:

The landscape plan makes reference to section 10 of BS8545:2014. This section of the guidance refers to design of the planting pits, site preparation and the variability of soils, particularly in the urban environment. The soil on the Castlefields site will be highly disturbed and inhospitable for root growth following development, even in soft landscaped areas.

Recommendation:

Tree pit design showing how sufficient soil volume will be achieved is highly recommended for both hard and soft landscaped areas. In the hard landscaped areas it may need to incorporate below ground structures. It is likely this could be dealt with by condition, but the developer is advised to seek specialist input to avoid delays.

A condition for post-planting maintenance and replacement trees for any which fail to become established is strongly recommended.

Drawing referenced: TPP 8518A/02 REV D

COMMENTS

The majority of trees are either identified for removal or off-site. The TPP is acceptable.

Buckinghamshire Healthcare NHS Trust

A 19 page report has been provided together with references to appeal decisions. The Trust comments:

As a consequence of the above and due to the payment mechanisms and constitutional and regulatory requirements the Trust is subject to, it is necessary that the developer contributes towards the cost of providing capacity for the Trust to maintain service delivery during the first year of occupation of each unit of the accommodation on/in the development. The Trust will not receive the full funding required to meet the healthcare demand due to the way contracts are negotiated based on previous year's performance and there is no mechanism for the Trust to recover these costs retrospectively in subsequent years as explained. Without securing such contributions, the Trust would be unable to support the proposals and would object to the application because of the direct and adverse impact of it on the delivery of health care in the Trust's area. Therefore the contribution required for this proposed development of 188 flats is £346,646.00. This contribution will be used directly to provide additional health care services to meet patient demand as detailed in Appendix 3.

The contribution requested is based on these formulae/calculations, and by that means ensures that the request for the relevant landowner or developer to contribute towards the cost of health care provision is directly related to the development proposals and is fairly and reasonably related in scale

and kind. Without the contribution being paid the development would not be acceptable in planning terms because the consequence would be inadequate healthcare services available to support it, also it would adversely impact on the delivery of healthcare not only for the development but for others in the Trust's area.

Environment Agency (south-east)

No comments.

Crime Prevention Design Advisor

Further comments on amended drawings:

Thank you for consulting me on the above planning application. Having reviewed the amendments I make the following comments in the interest of reducing the potential for crime and anti-social behaviour.

Unfortunately I consider some aspects of the floor plan layout for the communal dwellings to be problematic in terms of crime and anti-social behaviour, specifically the absence of a secure lobby on the additional entrance/exits to safeguard the stairwell and lift area. This position could be addressed with suitable amendments.

Apartments

The modification to the floor plan for the apartments has introduced an additional entrance into the building. Without a secure lobby this leaves the stairwell and lift vulnerable to crime and ASB. If this elevation was located behind a secure line this would be acceptable however these are public accessible areas. Lifts and stairwells are often abused areas which can undermine the feeling of safety and security for residents.

Recommendation

A secure lobby should be present at additional points of entry into the building that are publicly accessible.

The National Planning Policy Framework demonstrates the government's commitment to creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion, and with the level of crime and anti-social behaviour. With this in mind it is important to consider all appropriate crime prevention measures when viewing the proposals. I therefore ask that the following points are addressed through additional submissions or amendments to the submitted plans to further reduce the potential risk of crime and ASB.

- Compartmentation

It is pleasing to see that Fob activated access controls are proposed for the entry into the communal blocks. This access control system should be extended to provide compartmentation within each communal block, preventing free movement. Developments can suffer adversely from ASB due to unrestricted access to all communal corridors. Neighbour disputes can quickly escalate and the provision of additional stand-off space can reduce the risk of further escalation whilst also providing a strong sense of community and ownership to individual communal corridors.

Recommendation

The communal doors located off the stair well should be accessed controlled restricting access only to the occupants of the dwellings they provide access to. Whilst this is generally a recommendation for developments incorporating 25 or more dwellings in each block this would be beneficial in this type of development to further reduce the risk of crime and ASB. Ref Homes 2019 – Secured By Design – Section 27.29

- Defensive space

There are areas around the development that would benefit from additional defensive space.

Defensive space provides clear demarcation of the change from public to private realm hopefully prompting the consideration of activities that might be inappropriate for either.

Parking - The parking areas are in some cases positioned away from the dwellings they serve but close to footpaths. This will give those intent on criminal activities the legitimate excuse to be close to parked vehicles increasing the potential for vehicle crime.

Recommendation

Defensive space should be provided to parked vehicles. This could be provided with low level defensive planting and /or the addition of a knee rail.

The side boundary treatment of plot H9 is particularly vulnerable to damage and unauthorised entry located next to a publicly accessible amenity area.

Plot H9 - The side boundary treatment of plot H9 is particularly vulnerable to damage and unauthorised entry located next to a publicly accessible amenity area.

Recommendation

Strong defensive planting should be present providing stand-off from the private realm and fence line.

- Boundary Treatment plot H7 and H8

Public accessible amenity space is located to either side of this plot making it vulnerable to crime and anti-social behaviour.

Recommendation

The amenity space either side should be absorbed into these plots. There should be no general access past the front garden boundary treatment. In addition a secure line should be provided at the front fascia of the building by repositioning the boundary treatments.

- Community office/drop in

Due to the size of the development it would have been beneficial for a community office or drop in to be provided – this was feedback provided from our neighbourhood team. A dedicated office would allow the neighbourhood team to drop in at a central point within the development potentially enhancing the relationship between the policing team and the community they serve.

I hope you find my comments useful in deciding this application. Please do not hesitate to contact me should you require any further information.

OFFICER COMMENT: The CPDA above identifies issues with the security arrangements for the entrance doors on the lower side of the flat blocks. The issue is that there is only one door so once entered there is no other restriction on intruders accessing the rest of the building. These entrance doors face Chairborough Road, Longland Way and downslope into the open space. Ideally there would be an external door, a secure lobby and an internal door. The issue has been discussed with Red Kite who consider that their current design should be acceptable. In the light of this the CPDA has commented:

It is disappointing to see the applicant's response especially as their previous plans appeared to make real headway in terms of the building floorplan, reducing the potential for crime, disorder and anti-social behaviour.

I understand that amendments to these new submitted plans are unlikely. However I reiterate my previous concerns that the additional entrances provided will leave the stairwells and individual dwellings vulnerable to crime and anti-social behaviour. Should this risk come to fruition it could negatively impact police resourcing with a detrimental effect on the wider community.

All previous and current observations/comments addressed to the applicant are made in the interest

of safeguarding the development and its occupants, reducing the risk of crime and anti-social behaviour and the fear of crime.

The additional access points into the communal buildings are located in close proximity to public realm, these are the more connected routes of Chairborough Road and Longland Way. They are more directly and publicly accessible and therefore more likely to be used by visitors and occupants approaching the development on foot. These areas will have a high level of anonymity and activity associated with them but have been designed with a diminished level of physical security in comparison to the main entrances where lobbies are present providing a secure internal line. It is inappropriate and unreasonable to expect residents to safeguard an area that could be addressed with appropriate physical security designed in from the outset.

Recommendation

Additional lobby areas should be provided creating a secure line within the building similar to that present at the main entrance when initiated with robust access controls.

In the absence of these amendments and to mitigate the risk, I ask for conditions to be placed on the applicant regarding physical security including access controls, cctv, postal services and physical performance of communal doors with the requirements as below. The development shall be carried out in accordance with the following requirements with appropriate certification provided and shall not be occupied or used until the council acknowledge the receipt of written compliance from either a licensed SBD consultant or Thames Valley Police.

Reason: In the interest of creating safer, sustainable communities.

Communal entrance door sets

All communal entrance door sets must have third party certification to one of the following standard ensuring it is suitably robust and able to withstand 'day to day' use in a communal application

- STS 202 Issue 6:2015 Burglary Rating 2; or
- LPS 1175 Issue 7.2:2014 Security Rating 2+; or
- LPS 1175 Issue 8:2018 Security Rating A3+; or
- LPS 2081 Issue 1.1:2016 Security Rating B;

NB: installed electronic hardware must form part of the certificated door set range.

Audible door alarms should be fitted and operational on the external communal entrance door sets preventing them from being propped open evading the access control system.

Access controls

Access controls must provide compartmentation throughout the development. Residents should be assigned access to their floor only via the security encrypted key (fob/card).

Access controls should be provided to both the external door in the front lobby and secondary internal door creating a secure lobby for postal services.

The following attributes must be present within the access control system provided:

- Access to the building of a security encrypted electronic key (fob or card)
- Vandal resistant external door entry panel linked with a camera
- Ability to release the primary entrance door set from the dwelling
- Live/audio communication with the visitor
- Ability to recover from power failure instantaneously
- Unrestricted egress from the building in event of an emergency or power failure
- No Trades button to be present

- Capture of images in colour of people using the door entry panel and store of these for at least 30 days. If the visitor entry system is not capable of capturing images then it should be linked to CCTV system or a dedicated CCTV camera installed for this purpose. This information should be available to police within 3 days upon request.
- All visitor and resident activity should be recorded and stored for at least 30 days upon request.
- Systems must comply with General Data Protection Regulations.

It is imperative that the fire service should have unrestricted access to all floors therefore the most appropriate means is to install a switch within an ACB (access control box) which should meet the requirements of LPS 1175 Issue 7.2 (2014), Security Rating 2 or STS 202 Issue 3 (2011), Burglary Rating 2. The location and additional requirements should be made following consultation with the local fire and rescue service.

Postal Services

Letter boxes are to be located within the front secure lobby area. Post boxes should be robust with anti-phishing properties. Individual dwelling door sets should not have postal apertures.

CCTV

CCTV should be present providing coverage of the lift and stairwells to deter crime and criminal behaviour, assisting the identification of offenders and providing reassurance for residents and visitors. The system should have the following attributes

- Vandal resistant
- Recording images in HD quality
- Any 'on-site' recording unit will be contained in a lockable cabin to LPS 1175 SR1 or STS 202 BR1
- Provide suitable methods to export and incorporate software to view the exported footage
- Identify each camera's location, time and date stamping

Alternatively a condition to meet the required standard of Secured By Design with the addition of compartmentation and CCTV is appropriate. I offer the following wording for considerations

'No development shall commence until details of the measures to be incorporated into the development to demonstrate how 'Secured by Design' accreditation will be achieved have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details, and shall not be occupied or used until the Council has acknowledged in writing that it has received written confirmation of SBD accreditation. This accreditation should include a cctv requirement to safeguard the lift and stairwells with compartmentation present through access controls between floors as requested by the Thames Valley Police Crime Prevention Design Advisor'.

Thames Water Utilities Ltd

Waste Comments

Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided The application indicates that surface waters will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Thames Water would advise that with regard to sewage treatment infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.

No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”

The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken.

Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-divertingour-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

The comments are based on the assumption that foul flows will be connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the public sewer.

County Highway Authority

Thank you for your letter dated 30th May 2019 regarding the above application.

The proposals seek to erect a total of 188(no) new dwellings, comprised mostly of 1-bed and 2-bed flats, but with a small number of houses. However, it is important to acknowledge that the scheme sought will lead to the demolition of 97(no) existing dwellings that fall under the control of the applicant, giving a consequent net increase of 91(no) units.

From a highway perspective, there are several main considerations:

Access

The proposed redevelopment is accessed either directly from Chairborough Road (as per the direct access spaces between Blocks S07 and S08 and the Chairborough Road footway), Pettifer Way, the spur road section of Chairborough Road (that currently serves Nos.193 to 245) or Longland Way.

Specifically, the vast majority of parking is unallocated direct-access spaces, with Houses 1 – 8 having dedicated respective private vehicular accesses from Pettifer Way (H7 and H8) or the Chairborough Road spur (H1 – H6).

The applicant previously discussed the proposed removal of the two mini-roundabouts at the respective Chairborough Road junctions with Pettifer Way and the Chairborough Road spur. These features formed part of the traffic calming scheme installed in this area by the Highway Authority years before the present time. Therefore the replacement of these features with a raised table (or variant thereof) covering both junctions is deemed acceptable, subject to the outcome of a public consultation stage.

Local junction capacity will not be detrimentally impinged by the proposed scheme, as demonstrated by the junction capacity assessments contained within the submitted Transport Assessment (TA).

Layout

The redevelopment utilises existing (or slightly amended) estate roads. Amendments to the road, in addition to the removal of the existing double-mini roundabouts to incorporate a raised table, can be achieved under a Section 278 off-site works agreement with the Highway Authority. In addition, any existing areas of highway that will host any features (e.g. structures) will have to be subject to an extinguishment of highway rights via an application under Section 247/8 of the Town and Country Planning Act 1990, which are processed by the Department for Transport.

Drawings have been submitted demonstrating that a refuse vehicle can traverse the site, conduct collections at the bin store points, turn and then proceed in a forward gear. As a result, I do not have any concerns that the servicing arrangements for the development proposed would result in a detrimental impact upon highway safety.

The direct access spaces on Chairborough Road to the south of its junction with Pettifer Way will require the relocation of the existing bus stop. Again, this can be agreed and implemented as part of the requisite off-site works.

Car Parking

According to the TA, the redevelopment contains a total of 210(no) parking spaces. Discounting the allocated provision (inclusive of garages) for the proposed 8(no) houses in accordance with the County Council's Buckinghamshire Countywide Parking Guidance policy document (BCPG), this leaves a remainder of 194(no) unallocated spaces for use by occupants and visitors of the 180(no) flats.

The BCPG states that a larger number of unallocated spaces within a development allows for a more dynamic level of parking provision. Specifically, schemes with more than 50% of the parking unallocated to specific dwellings allows a flexibility in the use of these spaces and a lower total amount required (although not less than 1 space per dwelling).

Therefore the proposed amount of parking adheres to the standards currently in use, limiting the potential for displacement upon the highway and does not give me any grounds on which to lodge or sustain an objection.

In terms of their dimensions, the TA states that there is a mix of historically-sized spaces (i.e. 2.4m

x 4.8m) and those more closely adhering to the currently recommended standards (measuring 2.5m x 5m). According to the number of spaces for each respective size, I have calculated the percentage to be around 17% of spaces measuring up to the former size and 83% toward the current standards. Given the historically occupancy of the site and the constraints of the land, I am content that all spaces are practically usable and an improvement over the historical provision.

Sustainability

Chairborough Road forms part of the route for the No.33 bus service. This travels between Totteridge and Castlefields and provides a bus to the High Wycombe bus station every 12-15 minutes throughout its hours of operation (approximately 06:30 to 21:20 weekdays and 07:25 to 17:25 on weekends). The journey time from the service's maximum Castlefields extent (the former Jolly Bodger public house) is only expected to take between 10 and 13 minutes to reach the bus station.

When considering the availability of public transport for residents of the proposed redevelopment, the frequent and reliable No.33 service accords with Policy DM2 of the WDC Delivery and Site Allocations Plan and will allow travel to and from the town centre itself or to connect with other bus and rail services to other destinations as part of a linked trip.

Summary and Conclusion

The site, located within a predominately residential area, already hosts 97(no) units. The proposals seek to effectively double this amount by increasing density, the level of floors per block and the addition of eight separate dwellings.

The access and servicing arrangements are acceptable, as are the proposed changes to the existing network (on the proviso of the outcome of public consultation stage and requisite off-site works). The parking provision adheres with the standards contained within the BCPG and their dimensions, although varied, are largely in accordance with the current guidance or are acceptable within historical context where they are not.

Mindful of these comments, I do not have any objections or conditions to recommend for this application with regard to highway issues:

Condition 1: No other part of the development shall commence until the off-site highway works, which include (but not limited to):

- Removal of the mini-roundabouts and replacement with a speed table
- Relocation of the Chairborough Road bus stop
- Construction of the respective direct access parking spaces and private crossovers
- Changes to the exiting Chairborough Road and Pettifer Way carriageway, footways and/or verge in order to facilitate construction of the accommodation blocks and houses hereby permitted

Have been laid out and constructed in accordance with details to be first approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

Condition 2: The scheme for parking, garaging and manoeuvring and the loading/unloading provisions for refuse and delivery vehicles shown 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, load/unload and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

Condition 3: 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.

Informatives

- (I11CC) It is contrary to section 163 of the Highways Act 1980 for surface water from private development to drain onto the highway or discharge into the highway drainage system. The development shall therefore be so designed and constructed that surface water from the development shall not be permitted to drain onto the highway or into the highway drainage system.
- (I12CC) The applicant is advised that if it is intended to use soakaways as the method of dealing with the disposal of surface water then the permission of the appropriate Water Authority may be necessary.
- (I20CC) The applicant is advised that the off-site works will need to be constructed under a section 278 of the Highways Act legal agreement. This agreement must be obtained from the Highway Authority before any works are carried out on any footway, carriageway, verge or other land forming part of the highway. A minimum period of 8 weeks is required to draw up the agreement following the receipt by the Highway Authority of a completed Section 278 application form. Please contact Development Management at the following address for information:-

Development Management (Works Co-ordination & Inspection)
Buckinghamshire County Council
6th Floor
County Hall
Walton Street
Aylesbury
Buckinghamshire
HP20 1UY

- (I23CC) It is an offence under S151 of the Highways Act 1980 for vehicles leaving the development site to carry mud onto the public highway. Facilities should therefore be provided and used on the development site for cleaning the wheels of vehicles before they leave the site.
- (I24CC) No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under S137 of the Highways Act 1980.
- (I25CC) The applicant is advised to contact the Highways Development Management delivery team to determine the extent of pre-condition surveys.
- (I26CC) The applicant is advised that adequate measures should be in place to ensure water is not carried out onto the highway. If water is carried out onto the highway during icy period, site inspectors will request salt is applied to affected areas.

Ecological Officer

Comments:

Ecological Impact Assessment: The Ecological Impact Assessment seems to be fairly comprehensive and covers all the areas of ecological interest which would be expected.

Of note is the fact that there are several bat roosts in the buildings to be demolished, there are slow worms using an area and badgers are common in the area. There is also an area of semi improved chalk grassland on site and Chairborough Local Nature reserve is adjacent to the site.

Section 5 is the assessment of effects, this section also contains basic recommendations for mitigation of the effects. The type and scale of the ecological impacts of the proposals means that there is plenty of scope to mitigate and compensate for the negative effects and there is also considerable scope for enhancement. The suggested mitigation, compensation and enhancement measures are relatively stingy for a scheme of this magnitude. I am concerned that the impact of more people using the LNR could be greater than envisaged and that the mitigation for this is insufficient and therefore there needs to be significantly more ecological enhancement than suggested. There also needs to be greater focus on the long term management of new ecological features and habitats which are created.

Recommendation: Details for mitigation, compensation and enhancement can be secured through conditions.

Conditions

1. A scheme to mitigate and compensation for the loss of features of ecological value on the site, and details which secure substantial ecological enhancement, shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development on the site. All works shall then proceed in accordance with the approved scheme with any amendments agreed in writing.

Reason: to ensure that the development achieves a net gain in biodiversity.

2. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of any phase of the development. The content of the LEMP shall include the following:

- i) Description and evaluation of features to be managed.
- ii) Ecological trends and constraints on site that might influence management.
- iii) Aims and objectives of management.
- iv) Appropriate management options for achieving aims and objectives.
- v) Prescriptions for management actions.
- vi) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- vii) Details of the body or organisation responsible for implementation of the plan.
- viii) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism by which the long-term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure appropriate protection and enhancement of biodiversity, to make appropriate provision for natural habitat within the approved development and to provide a reliable process for implementation and aftercare.

3. Prior to occupation, a "lighting design strategy for biodiversity" shall be submitted to and approved in writing by the local planning authority. The strategy shall:
 - a) identify those areas/features on site that are particularly sensitive for nocturnal species and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
 - b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) and detail how timing of lighting will be

controlled, so that it can be clearly demonstrated that areas to be lit will not disturb or prevent nocturnal species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: Many species active at night are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed and/or discouraged from using their breeding and resting places, established movement corridors or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation. Limiting negative impacts of light pollution

Control of Pollution Environmental Health

Issues: Air Quality from additional vehicle movements effecting the health of local residents in the nearby Air Quality Management Areas. Traffic noise from Chairborough Road.

With regards to air quality Wycombe District Council declared new Air Quality Management Areas on 22.12.17 that covers the main arterial roads into High Wycombe town centre, Marlow and the M40. A significant proportion of vehicle movements from the development are likely to pass through the High Wycombe Air Quality Management Area as the A40 London Road, A404 Marlow Hill and M40 are the nearest arterial roads to the development.

It has been identified that the proposed development intends to introduce 48 extra parking space, which also appear to be specifically allocated to the new property. As such the potential introduction of additional vehicles will negatively impact local air quality and its harmful health impacts upon local residents. As such the potential introduction of additional vehicles into the AQMA will negatively impact local air quality and its harmful health impacts upon local residents. Wycombe District Council has a duty to ensure that nitrogen dioxide levels from road traffic within the AQMA are reduced to safer levels in line with 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 main arterial roads into High Wycombe and Marlow town centres.

With this in mind Wycombe District Council now applies the following principle to all residential developments that are within the AQMA or that the majority of vehicle movements from the development will be by road through the AQMA- the active provision of 1 electric vehicle charging unit for each dedicated parking space and at least 1 charging point per 10 unallocated spaces. All other spaces should have appropriate cable provision to prepare for increased demand in future years. Due to the spaces appearing to be specifically allocated to the development, at least 48 parking space should be provided with an electric vehicle charging point.

Noise readings have been taken alongside Chairborough Road, and levels have shown that the site falls within an area exposed to traffic 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 Chairborough Road will need to include acoustic glazing and mechanical ventilation.

Objection, unless following conditions imposed;

Condition - Electric Vehicle Charging Points

Prior to the occupation of the development hereby permitted, 48 electric vehicle charging points must be installed. Thereafter the electric vehicle charging points must be maintained in full working order and, as such, a long-term management and maintenance plan shall be submitted in writing and approved by the Local Planning Authority.

Reason – to reduce the negative impact on the health of residents living within the Air Quality Management Area.

L07V Sound Insulation - Traffic Noise

A scheme to protect the proposed development from traffic noise from Chairborough Road shall be implemented before any part of the accommodation hereby approved is occupied, unless the Local Planning Authority otherwise agrees in writing. The scheme shall ensure the indoor ambient noise levels in living rooms and bedrooms meet the standards in BS8233:2014 for the appropriate time period. Unless otherwise agreed in writing with the Local Planning Authority it shall be assumed that the existing noise level at the façade of the proposed development is 72dB LAeq16 hour and 66dB LAeq, 8 hour. The scheme shall include mechanical ventilation to meet the requirements of the Noise Insulation Regulations 1975 as amended 1988.

Reason – To protect the occupants of the new development from noise disturbance

Construction/Demolition Noise

INFORMATIVE

The attention of the applicant is drawn to the requirements of section 60 of the control of pollution Act 1974 in respect of the minimisation of noise on construction and demolition sites. Application under Section 61 of the Act, for prior consent to the works, can be made to the environmental Services Division of the Council.

Community Housing

The application documents indicate a tenure mix of 115 homes for Affordable Rent (55 x 1 bed flats and 60 x 2 bed flats); 36 homes for Shared Ownership sale (17 x 1 bed flats and 19 x 2 bed flats); 2 homes for Discounted Market Rent; 10 homes for Market Rent and 31 homes for Outright Sale.

This provision of affordable homes is welcomed - I trust that a S.106 will be completed to secure the appropriate level of affordable housing.

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 I am in support.

Lead Local Flood Authority Buckinghamshire County Council

Buckinghamshire County Council as Lead Local Flood Authority (LLFA) has reviewed the information provided in the Flood Risk Assessment (ref. 11872, February 2019, Tully De'Ath Consultants) and Borehole Soakaway Assessment (ref. 29863-L02, October 2019, RSK).

Since my previous comments on 18th June 2019, the Wycombe District Council Local Plan has been adopted, on this basis the LLFA **objects** to the proposed development as it does not meet the following requirements set out in Policy DM39:

- Surface water run-off is managed as close to the source as possible; and
- Priority is given to SuDS which mimic and reflect natural drainage processes

Please note that I have identified other drainage matters within my response below that should also be addressed as part of any revisions to the drainage strategy.

Flood risk

The Flood Map for Surface Water (FMfSW) indicates that the southern development parcel has a high to low risk of surface water flooding. This means that in a given year there is between a 3.3% and 0.1% chance of surface water flooding on-site. By overlaying the FMfSW onto the Southern Site Proposed Site Plan (drawing no. SK.90.101) it appears that anticipated areas of flooding fall within the highway. Careful consideration to site levels should be taken so as to ensure that the existing surface water flood risk is not directed elsewhere and that the flow route is maintained through the site.

In relation to the northern parcel, areas of high surface water flood risk are limited to the existing road; post development this area of flooding lies with the extent of building N05. The anticipated

flood depth is approximately 150mm, it is anticipated that finished floor levels will prevent floodwater ingress. The extent of surface water flood risk for events up to the 1 in 1000 year return period increases across the site, however the anticipated flood depth remains at 150mm. The applicant should clarify the minimum finished floor levels for the proposed buildings having regard for the anticipated surface water flood depths.

The FRA states that the groundwater flood risk is low, the LLFA are in agreement with this statement.

Surface water drainage strategy

There are no public surface water sewers in the location of the proposals and it is not clear how the site currently drains. The FRA notes that the findings of the Ground Investigation Report (Ian Farmer Associates, 2014) suggests that the site is overlain by made ground to an approximate depth of 3.30m bgl, followed by a layer of Clay with Flints to a depth of 6m bgl and then Chalk strata is encountered to a depth of 14m bgl. It is understood that the upper layers of clay with flints and Chalk have low permeability, achieving infiltration rates. As requested previously, the applicant must provide a copy of the ground investigations report as part of the FRA.

Following my previous consultation response, the applicant has conducted further infiltration rate testing to demonstrate the feasibility of using deep borehole soakaways for discharging surface water runoff from the site. Results can be seen in the Borehole Soakaway Assessment (ref. 29863-L02, October 2019, RSK). Two tests were conducted in BH1 and a further three tests in BH2, the worst rate achieved was 1.25×10^{-3} m/s. As mentioned previously, the FRA highlights that within Borehole 4 (Ground Investigation Report, Ian Farmer Associates, 2014), there is a possible natural or man-induced infilled solution feature and it concludes that across the western part of the southern site there is a moderate risk for the presence of solution features. The Borehole Soakaway Assessment suggests that no soakaway should be located ideally within 10m of any building, structure or highway, and certainly no closer than 5m. I would advise that the development take a precautionary approach and no soakaway is located within 10m of any building, structure or highway. The achievability of this buffer zone should be demonstrated by the applicant, for instance by providing supporting drawings.

I cannot identify any amendments to the submitted Flood Risk Assessment following the additional infiltration rate testing and in light of my previous comments. Therefore the surface water runoff from the site is continuing to be managed using geo-cellular units prior to discharging to deep bore soakaways at an assumed rate of 3l/s. The scheme does not include any above ground sustainable drainage measures. The adopted Local Plan (Policy DM39) sets out that within sites, surface water runoff should be managed as close to the source as possible and using SuDS which mimic and reflect the natural drainage processes. The drainage scheme does not meet the aims of Policy DM39. The re-development of this site provides an ideal opportunity to incorporate multi-functional SuDS that not only manage water quantity but also seek to improve water quality, local biodiversity and amenity. With this in mind, the surface water drainage strategy should re-examine the feasibility of green and blue roofs, along with other source control SuDS such as rain gardens and bio-retention areas. An assessment of SuDS measures as listed in the CIRIA SuDS Manual should be provided, with justification for any exclusion. In addition, due to the nature of the development, I strongly recommend that the applicant considers incorporating active rainwater harvesting as water reuse is the highest method of surface water disposal.

It is noted that the FRA has discounted the use of permeable paving in parking areas due these areas being steeper than the recommended levels for permeable paving. I would recommend supporting evidence to demonstrate this is the case; this can take the form of a drawing indicating the areas of suitable and unsuitable levels.

In order to overcome the objection outlined above, the applicant must provide the following information:

- Demonstration that the drainage scheme is prioritising source control methods and above ground SuDS with an assessment of SuDS measures as listed in the CIRIA SuDS Manual, with justification for any exclusion.
- The applicant should clarify the minimum finished floor levels for the proposed buildings having

regard for the anticipated surface water flood depths.

- A copy of the ground investigations report (Ian Farmer Associates, 2014)
- Supporting evidence to demonstrate the areas where levels exceed the recommend fall for permeable paving
- Supporting drawings to demonstrate that a 10m buffer zone from soakaways to any building, structure or highway is achievable.

Waste Service

Waste services note the proposal for the erection of 188 new dwellings at the Castlefield Development Area, Chairborough Road. Waste is satisfied with the proposal, the bin stores are of a good sizes and clearly designated. Prior to any collections taking place an indemnity waiving liability over the road surface will have to be signed and completed by the land owner or leaseholder. Collections will take part in accordance with council policies.

The High Wycombe Society Planning Group

Comments: The High Wycombe Society supports this application.

Representations

A circular letter has been received signed by 140 local residents. It was received in relation to the drawings as originally submitted. Since receipt amendments have been made to the scheme. All blocks are now one storey lower and there are no balconies on the flat buildings.

The letter states:

- The over large blocks in Pettifer Way are now also proposed in Longland Way.
- Overdevelopment of the site
- Abrupt and detrimental change to the local environment
- Not truly representative of the original proposals:
 - Longland Way elevation not shown
 - New car parking spaces now take up more space
 - Road width (Longland Way) now narrower than previously proposed – potential to cause more accidents
 - Car parking spaces were to be under the buildings not in front
 - New buildings are now higher
 - Windows will face into back gardens
 - Loss of recreational space in Longland Way
 - Overloading of public transport
 - No provision to improve the transport system which is at breaking point.

A petition dated June 2019 agreeing with the letter has been received with 143 signatures.

Approximately 35 copies of a circular letter have also been received. The points raised include:

- The junction of Chiltern Avenue link road to Longland Way (Rear of 107 Chiltern Avenue) with a reduction in road width will become a dangerous pinch point
- The community need more green space – not high rise blocks and traffic
- The balconies should face into the development not out towards neighbours gardens
- The plan doesn't resolve safety issues outside the Jolly Bodger at the Chairborough Road/Longland Way junction.
- The entire road system will need to be looked at
- There are inadequate school places

1 comment has been received commenting to the proposal:

- Residents backing onto the site should be given vehicular rights to park in their rear gardens in order to relieve parking congestion in Chairborough Road.

In response to the amended drawings a further circular letter has been received signed by 28 people stating:

- The development comprising mainly flats would be out of character and keeping with neighbouring family houses.
- The reduction in road width on Longland Way at the junction rear of 107 Chiltern Avenue will become a dangerous pinch point.
- The area is desperate for more green space as promised but the site is dominated by tall blocks and more car exhaust fumes.
- The proposal conflicts with local Plan policies CP9, DM23, DM35.

One letter refers to inconvenience caused by the paths that have been closed around the site.