



South Buckinghamshire Area Planning Committee agenda

Date: Tuesday 22 December 2020

Time: 2.30 pm

Venue: Via Microsoft Teams

Membership:

T Egleton (Chairman), D Anthony, M Bradford, S Chhokar, B Gibbs, P Griffin, G Hollis, M Lewis, Dr W Matthews and R Reed

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South Buckinghamshire Area Planning Committee minutes

Minutes of the meeting of the South Buckinghamshire Area Planning Committee held on Tuesday 27 October 2020 via Microsoft Teams, commencing at 2.30 pm and concluding at 4.38 pm.

Members present

D Anthony, M Bradford, S Chhokar, T Egleton, P Griffin, G Hollis, M Lewis, Dr W Matthews and R Reed

Agenda Item

1 **Apologies for Absence**

Apologies had been received from Councillor B Gibbs.

2 **Declarations of Interest**

There were no declarations of interest.

3 **Minutes**

The minutes of the meeting held on 29 September 2020 were agreed as an accurate record

4 **PL/20/1685/FA - Land South of Rowley Lane, Wexham, Buckinghamshire**

Proposal: Residential development consisting of 5 no. dwellings with associated access and landscaping, following demolition of existing buildings associated with the livery and storage uses on site.

Notes

- The Case Officer proposed that the recommendation be changed to read 'delegate the application to the Director of Planning and Environment to GRANT planning permission subject to the conditions set out in this report and any others which he considers appropriate and the satisfactory prior completion of a legal agreement relating to mitigation of Burnham Beeches SAC. If the Legal Agreement cannot be completed, that the application be refused for such reasons as considers appropriate.'
- It was confirmed that the applicant had confirmed agreement to the pre-commencement conditions set out in the report. Two additional conditions were proposed by the Case Officer, firstly a requirement that all existing buildings be removed prior to commencement of the new dwellings.

Secondly, a requirement for all details of boundary treatments to be submitted prior to development.

- Speaking as the agent: Mr Simon Firkins

It was proposed by Councillor M Bradford, seconded by Councillor W Matthews and RESOLVED:

That planning permission be refused on the grounds that the increase in the number of dwellings would result in an intensity in the use of the site with a negative impact on the openness of the green belt , and that it doesn't meet the requirements to be an exception to inappropriate development set out in paragraph 145 of the NPPF.

5 PL/20/0671/OA - Land Adjacent To Limewood Gate, Poyle Lane, Burnham, Buckinghamshire, SL1 8LE

Proposal: Outline application for development of a single detached dwelling with all matters reserved.

Notes

- The Case Officer noted the applicant had submitted further information. However, this was submitted too late for consideration at this meeting. The application was to be considered as laid out in the Officer's report.
- Speaking as the local ward member: Councillor Paul Kelly
- Speaking as the agent: Mr John Brearley

It was proposed by Councillor T Egleton seconded by Councillor W Matthews and RESOLVED:

That planning permission be refused as recommended for the reasons laid out in the report.

6 PL/20/2186/FA - 18 Station Parade, Denham Green, Buckinghamshire, UB9 5ET

Proposal: Change of use to an interchangeable use as Thai massage (a Sui Generis use) and/or uses within Class A1 (shops)

Notes

- The Case officer noted a new application had been submitted for the application site for a change of use to dwellings. This new application was to be considered independently. It was noted that these applications cannot be implemented at the same time.
- Speaking as the agent: Mr Sammy Chan

It was proposed by Councillor S Chhokar seconded by Councillor W Matthews and RESOLVED:

That Conditional Permission be granted subject to the conditions set out in the report.

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Report to South Buckinghamshire Area Planning Committee

Application Number:	PL/20/1718/DE
Proposal:	Reserved matters approval pursuant to planning permission Ref 17/01763/OUT for Phases 1 and 2, comprising 147 dwellings, open space, landscaping, access within the site and car parking (matters of access within the site, appearance, landscaping, layout and scale to be considered).
Site Location:	Defence School of Languages, Wilton Park, Gorell Road, Beaconsfield, Buckinghamshire, HP9 2RP
Applicant:	Inland Homes Limited
Case Officer:	Mr Graham Mansfield
Ward affected:	Gerrards Cross
Parish Town Council:	Beaconsfield Town Council
Valid date:	24 July 2020
Determination date:	23 December 2020
Recommendation:	Defer and delegate the application to the Director of Planning and Environment to Approve reserved matters subject to the conditions set out in this report and the satisfactory completion of a Legal Agreement to secure a SAMMs payment for the Burnham Beeches Special Area of Conservation or to refuse if a satisfactory Legal Agreement cannot be completed for the appropriate reasons relating to the impacts on Burnham Beeches Special Area of Conservation.

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 Outline planning permission was granted for the Wilton Park site under application 17/01763/OUT for 304 new dwellings. The proposal is for the reserved matters for phases 1 and 2 of the overall development. The reserved matters include the scale and appearance of the 147 dwellings proposed under phases 1 and 2, together with the associated open space, landscaping, access within the site and car parking. It also allows for the land to enable the completion of the southern section of the Beaconsfield Relief Road.
- 1.2 The principle of the redevelopment of Wilton Park site for 304 new dwellings was approved at the outline stage and accords with the adopted South Bucks District Core Strategy (2011) and the Wilton Park Development Brief SPD (2015). In terms of benefits, the proposed development would facilitate the completion of the Beaconsfield Relief Road, would contribute to the housing supply and deliver 40 affordable units, as well as the local economy.
- 1.3 The proposed development would not have a detrimental impact on the character of the area or the surrounding landscape, adequate parking is provided, and the development would not have an adverse impact on the amenity of neighbouring properties. The proposal would preserve and not harm the designated heritage assets and retain and preserve a non designated heritage wall.
- 1.4 The proposed development would be of a high quality design in terms of architecture and public realm with the proposal resulting in an acceptable provision of landscaping and open spaces. The access arrangements would be suitable with consideration given to the permeability of the site for both pedestrian and cycle movements.
- 1.5 In addition, the scale of the proposal would have an acceptable impact on the Green Belt, whereby Phases 1 and 2 of the development on this previously developed site would not have a substantial impact on the openness of the Green Belt.
- 1.6 The details in respect of layout, scale, appearance, landscaping and internal access would accord with the policies of the Development Plan. The report in section 6 sets out the planning balance.
- 1.7 The application has been referred to Planning Committee following a call in from a Ward Member. The matters for consideration in this reserved matters application are layout, scale, appearance, landscaping and the access within the site, and is not considered to have wider strategic impact, therefore consideration by the Area Planning Committee is appropriate. In the interest of the wider public it is considered that the application would benefit from further public scrutiny.

- 1.8 It is recommended Committee defer and delegate the application for approval subject to satisfactory completion of a legal agreement and conditions as set out in section 8.

2.0 Description of Proposed Development

- 2.1 The application seeks the approval of the reserved matters of phases 1 and 2 of the outline permission approved under planning reference 17/01763/OUT. The reserved matters include the scale, appearance of 147 dwellings, landscaping and access within the site.
- 2.2 In terms of the location within the wider Wilton Park site, phase 1 and 2 includes the following land:
- Part of Minerva Way eastwards from the Old Town Roundabout into the Wilton Park site
 - Land adjacent to Maude Road which contains 40 houses known as Service Family Accommodation West, these will be demolished to provide land for the Southern section of the Relief Road
 - Land to the east of the retained service family accommodation on Dupre Crescent and south of Gorrell Road which formerly accommodated the MOD student accommodation, Indoor sports facility, shooting ranges and concrete bunker. This area will contain the proposed dwellinghouses as part of phases 1 and 2.

A site plan can viewed in Appendix B of this report.

- 2.3 Phases 1 and 2 of the overall Wilton Park development include the following elements:
- The southern section of the Beaconsfield Relief Road
 - Pedestrian and cycle access via Minerva Way
 - 147 dwellings, which consist of a mix of 1, 2, 3, 4 and 5 bedroom dwellings in the form of houses and apartments
 - 40 Affordable homes split into 11 affordable rent and 29 shared ownership.
 - Comprehensive landscaping scheme including the provision of open space, informal play and managed woodland
 - Clear and legible street hierarchy with an emphasis on permeability.
 - Priority given to pedestrians and cyclists with extensive use of shared surfaces across phases 1 and 2 of the development
 - Traditional architectural forms using high quality and local materials.
 - Contemporary character area within the former walled garden area

2.4 The closest residential properties to the application site are within the confines of the Wilton Park site itself, these being the two storey dwellings to the west also known as the retained SFA (Service Family Accommodation South).

2.5 The application is accompanied by the following documents:

Planning Statement

Design and Access Statement

Transport Statement

Visibility Splay and Vehicle tracking diagrams

Road Safety Audit

Drainage Strategy

Arboricultural Report and Tree Survey

Wall Condition Survey

Drainage Strategy

Ecology Assessment

Statement of Community Involvement

Connectivity Diagram

2.6 Amended plans were received during the course of the application which related to small details in terms of materials and in relation to estate road alignments and widths.

3.0 Relevant Planning History

The site has a lengthy planning history. The most recent planning permissions on the Wilton Park site are listed as follows:

- 3.1 14/01467/FUL - Demolition of existing residential and non-residential buildings. Construction of a new road from A40 Pyebush roundabout to the northern boundary of Wilton Park site to provide access to Wilton Park site and to form Phase 1 of the Beaconsfield Relief Road, with associated surface water drainage and landscaping. Conditional permission (This permission has been implemented with the part of the access closest to Pyebush roundabout having been completed).
- 3.2 16/01958/TEMP - Provision of a temporary security and information centre at the entrance to Wilton Park. Conditional permission. (implemented)
- 3.3 17/01054/FUL - Replacement ATC facility and parade ground. Conditional permission. (Not implemented).

- 3.4 17/01763/OUT - Outline Application for redevelopment of Wilton Park site comprising 350 dwellings (comprising 46 retained Service Family Accommodation dwellings and 304 new residential properties (Class C3); employment and community uses including new ATC facility (Classes A1, A3, B1, B2, D1 & D2); formal and informal public open space, including local park and sports pitches with changing facilities; new access road from A40 Pyebush Roundabout to form southern part of Beaconsfield Relief Road; network of footpaths and cycleways including alterations to Minerva Way; car parking; on-site access roads; and landscaping works. Conditional Permission
- 3.5 A number of conditions attached to outline planning permission 17/01763/OUT in relation to the phasing of the development, Ecology, Construction Environment Management Plan, lighting, Waste and Archaeology have since been approved.

4.0 Summary of Representations

- 4.1 Letters of objection have been received from 19 separate households regarding the application. A summary of consultation responses and representations made on the application can be viewed in Appendix A.

5.0 Policy Considerations and Evaluation

- National Planning Policy Framework (NPPF), February 2019.
- Planning Practice Guidance
- National Design Guidance, October 2019
- South Bucks Core Strategy Development Plan Document - Adopted February 2011
- South Bucks District Local Plan - Adopted March 1999 Consolidated September 2007 and February 2011;
- South Bucks District Local Plan Appendix 6 (Parking standards)
- South Bucks District Council Residential Design Guide Supplementary Planning Document (SPD) - Adopted October 2008
- Wilton Park Development Brief Supplementary Planning Document (SPD) – Adopted March 2015
- Chiltern and South Bucks Townscape Character Study 2017
- Burnham Beeches Special Area of Conservation (SAC) Strategic Access Management and Monitoring Strategy SPD Adopted November 2020

Principle of development and background to application

South Bucks Core Strategy Development Plan Document February 2011: CP1 Housing provision and delivery, CP 14 Wilton Park (Opportunity site)

- 5.1 As set out previously, the principle of the development has already been accepted by virtue of the outline permission granted under planning reference 17/01763/OUT following the completion of a legal agreement. The outline application dealt with the principle matters of the overall Wilton Park development including:
- Green Belt
 - Affordable Housing
 - Drainage
 - Highway considerations in relation to impacts of the development on the wider highway network and the subject of the Beaconsfield Relief Road
 - Ecology
 - Sports facilities
 - Planning contributions (i.e. education and Healthcare).
- 5.2 The granting of the outline permission (17/01763/OUT) secured a number of benefits to the local area including new homes on a previously developed site, of which 79 would be affordable (40 coming forward on the subject reserved matters application). It would also facilitate the completion of the Southern section of the Beaconsfield Relief Road. Other benefits include the provision of open space, sports pitches, new nursery, café and retail and contributions towards healthcare, education and community transport. The Section 106 Legal Agreement attached to the outline permission secured the above.
- 5.3 The purpose of the subject reserved matters application is to assess the finer details submitted in relation to design and appearance of phases 1 and 2 of the overall Wilton Park Development. This includes the layout, scale and appearance of the dwellings together with internal access, and landscaping.

Affordable Housing and Housing Mix

Core Strategy: CP 2: Housing type and size, CP 3: Affordable housing Core Policy and CP14 Wilton Park (Opportunity site)
Affordable Housing SPD July 2013

- 5.4 Under the approved outline permission a robust assessment of the affordable housing was carried out which resulted in 79 affordable units to be provided on site and financial contribution of £3.1 million. In addition, details in relation to

unit type and housing mix have already been established and set out in the completed section 106 agreement.

- 5.5 In regards to the subject reserved matters application for phases 1 and 2 40 affordable dwellings will be provided. The proposed 147 dwellings across phases 1 and 2 are broken down into the table below:

	Market	Affordable Rent	Shared Ownership	Total	Affordable Total
1 bed flat	2	4	6	12	10
2 bed flat	9	4	14	27	18
3 bed flat	1	0	0	1	0
2 bed house	6	3	9	18	12
3 bed house	56	0	0	56	0
4 bed house	30	0	0	30	0

- 5.6 This quantum of affordable housing would align with the requirements of the completed section 106 agreement in terms of Affordable Housing, and a satisfactory mix of units overall.
- 5.7 The Chiltern and South Bucks Interim Five year Housing Land Supply Calculation document published on 26 November 2020 shows that at 1 April 2020 South Bucks District has a 2.94 years supply. This calculation is derived from the new standard methodology against the local housing need and definition of deliverable sites set out in the NPPF and NPPG. In view of this it is acknowledged that policies for the supply of housing CP1, CP3 and CP14 are out of date although still attract some weight.
- 5.8 The proposed development would provide for 147 dwellings across these phases making a contribution to housing land supply and affordable housing provision to which significant weight should be given to both. Overall there would be a mix of types and sizes across the site as a whole which would accord with the development plan policies CP2,3 and 14, the provisions of the NPPF and is considered acceptable.

Impact on Green Belt

Core Strategy Policies: CP14 Wilton Park (Opportunity site)

Local Plan Saved Policies:

GB1 (Green Belt boundaries and the control over development in the Green Belt)

Supplementary Planning Guide: Wilton Park Development Brief SPD (2015)

- 5.9 The Wilton Park development site lies within the Metropolitan Open Green Belt where most development is inappropriate and there is a general presumption against such development. The principle of the Wilton Park development in terms of the impact on the Green Belt was considered under approved outline permission (17/01763/OUT). However, as the subject reserved matters application deals with the details of the buildings in terms of form, scale and layout it is considered necessary to assess the proposals for Phase 1 and 2 in terms of their impact on the Green Belt.
- 5.10 Paragraph 145 of the NPPF sets out that new buildings will be considered inappropriate, subject to a number of exceptions. This includes limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
- Not have a greater impact on the openness of the Green Belt than the existing development; or
 - Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the Local Planning Authority.
- 5.11 In granting outline planning permission 17/01763/OUT the Council considered that the principle of the proposed development would not result in substantial harm to the Green Belt in accordance with the second bullet point of Para. 145 of the NPPF (as set out above). It is the case that the proposed scheme would be meeting an identified affordable need in the South Bucks area. As set out previously across the whole site 79 on site affordable units would be provided, together with an off-site contribution of circa £3million. In the subject reserved matters application for Phases 1 and 2, and in accordance with the Section 106 agreement 40 on site units would be delivered.
- 5.12 In addition to the above, under the approved outline permission an illustrative masterplan and indicative heights plan were submitted which highlighted that the quantum of development which could be achieved across the site without having a greater impact on the Green Belt than the existing buildings on site. The aim of the masterplan was to provide an indication of how the development on site could be achieved in line with the requirements of the Wilton Park Development Brief (SPD) in terms of impacts on the Green Belt. Alongside the illustrative masterplan at the outline stage a land budget was produced which highlighted the amount of new footprint that could be accommodated within

the site when compared to the existing footprint of the MoD buildings on site. The land budget allowed for 21,111sqm of new build residential footprint across the Wilton Park Development

- 5.13 In terms of the land budget figures as set out above, the proposed development across Phases 1 and 2 would consist of a floor area of 9,772sqm of residential footprint. As such, 46% of the footprint indicated in the land budget would have been used and this would amount to 48% of the total 304 new build units being delivered on site. Therefore, officers consider that the proposed amount footprint for Phases 1 and 2 would not likely impact upon the deliverability of the future phases of the scheme in terms of Green Belt. However, impacts on Green Belt would need to be considered as part of the remaining four phases of the Wilton Park Development.
- 5.14 Within the subject application it is proposed to demolish the existing SFA houses to the north west corner of the site to accommodate the southern half of the link road. In terms of the proposed 147 dwellings as part of Phases 1 and 2, these would be located the south east corner of the site and largely confined to areas which are currently occupied by built form.
- 5.15 The majority of the proposed residential units would consist of 2-storey dwellinghouses, a number of 2.5 storey dwellings would be located towards the eastern end of phases 1 and 2. There would be six apartment buildings ranging in height from 2 storey to the part 3/part 4 storey building which would act as a gateway building to the site. Overall the building heights on the proposed development would align with those heights indicated on the indicative heights plan submitted with the outline application. Therefore, officers consider that the proposed development would remain acceptable in Green Belt terms and would not lead to substantial harm.
- 5.16 Also to note is the proposed density of the dwellings across phases 1 and 2. The majority of the dwellings as set out above would be 2 storey dwellings arranged in detached, semi-detached and terraced forms. The dwellings would also be interspersed with 6 apartment buildings. To the south east of the site, the dwellings would be single detached dwellings occupy larger plots. In terms of density this would equate to a medium density in the majority of the site (25-40 dwelling per hectare) and a low density to the south east of the site (10-25 dwelling per hectare), across the whole area for phases 1 and 2 this would equate to approx. 30 dwellings per hectare. Officers note that this would be a lower density than the same development area as presented at the outline stage. Noting this, officers consider that the density of development proposed as part of the reserved matters would be acceptable and would not result in significant impacts on the Green Belt. Notwithstanding, the observations regarding the density of the development, officers consider that it would be

reasonable to remove certain permitted development rights owing to the Green Belt location.

- 5.17 Taking into account the above, officers consider that the proposed development across Phases 1 and 2 would continue to align with the principles of the development in terms of Green Belt impacts. It is considered that the scale and form of the proposed 147 dwellings as part of Phases 1 and 2 would not result in substantial harm to the Green Belt. No objections are therefore raised in Green Belt terms having regard to the relevant sections of the NPPF, Core Policy 14 of the South Bucks District Core Strategy (2011) and the Wilton Park Development Brief SPD (2013) and thus this matter is afforded neutral weight in the planning balance.

Visual Impact – Built Form, Design, Landscaping and Trees

Core Strategy Policies: CP8 (Built and historic environment), CP9 (Natural environment)

Local Plan Saved Policies: EP3 (The use, design and layout of development)
EP4 (Landscaping)

- 5.18 South Bucks Core Strategy Policy 8 requires that all new development is of a high standard of design and makes a positive contribution to the character of the surrounding area. Development proposals will also be expected to adhere to Secure by Design principles. Local Plan Policy EP3 (Design and Layout of Development) requires that scale, layout, siting, design and external materials are compatible with the surrounding area and amenities within the site itself and adjoining sites. Poor designs that are out of scale and character with their surroundings will not be permitted.
- 5.19 Paragraph 127 point C of the NPPF states that planning decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Point E of paragraph 127 seeks to optimise the potential of a site to accommodate and an appropriate amount and mix of development.
- 5.20 More recently the National Design Guide (2019) has been published, the latter forms part of the Government's collection of planning practice guidance and should be read alongside the NPPF and the NPPG. These illustrates how well-designed places can be achieved, which is set out through ten key characteristics.
- 5.21 As part of the granted outline permission a condition was attached which required the applicant to submit details in relation to a Design Code for the reserved matters application. The design code sets out the proposed material

details that will be used for the subject phases and future phases of the Wilton Park development. The specific areas addressed in the design code consist of courtyards, building details including materials, eaves and roofing and servicing details which include flues, meter boxes and vents.

- 5.22 The design aspects of the application have been considered using Building for Life 12 (BfL12). BfL12 is recognised in the NPPF (Paragraph 127) as an assessment framework for considering the design aspects of a planning application and comprises of 12 key considerations against which a 'red', 'amber' or 'green' indicator is assigned. The more 'green' indicators a development secures, the better the quality will be. An 'amber' light highlights areas for improvement. One or more 'red' indicators highlights considerable weaknesses in the design quality of the proposals. The emerging design proposals were considered at the outline stage of the application. At this earlier stage, the application secured 8 'amber' and 4 'green' indicators. This was considered acceptable as the outline application lacked design detail that had been deferred to the Reserved Matters application. A detailed BfL12 review has been undertaken and this can be viewed within the Council's Urban Design Officer comments within the appendix. This review concludes that the scheme secures 12 'green' indicators and therefore offers a good standard of design quality.
- 5.23 Wilton Park consists of a predominately level site with a drop in gradient to the north east and south east. The site is self-contained and is heavily screened by existing vegetation both within and outside the site which limits views from neighbouring roads and footpaths beyond the site boundary. The western end of the red edge boundary which includes the access via Minerva Way abuts the Beaconsfield Old Town Conservation Area.
- 5.24 The layout of the development has been considered from a historic point of view. The street pattern for phases 1 and 2 takes on alignments of former pathways linked to the former 'White House' which was demolished under MoD ownership in the 1960's. The only physical historic structure that survives which is associated with 'White House' is the former walled garden enclosure. This structure will also be retained within the proposed development as suggested by the Council's historic buildings officer.
- 5.25 In addition to the above, the existing landscape has also informed the proposed layout of phases 1 and 2 with the retention of high grade trees which will form part of a number of the open spaces within the development. As a result of these influences, the proposed development will take on grid type pattern which also serves to increase both permeability and connections through the site.

- 5.26 In terms of scale and built form, the Green Belt impacts have already been considered in the report above. The proposed development across phases 1 and 2 would largely consist of two storey dwellings of differing typologies including terraces, semi, linked-detached and detached houses. The proposed plans indicate that the development would not appear cramped and that sufficient spacing between buildings would be maintained throughout the built form of the development.
- 5.27 Similarly, the massing and scale of the proposed dwellings are designed to respond to the general character of Beaconsfield. As highlighted previously the density of the development would vary between a low density (10 to 25 dwellings per hectare and a medium density (25 to 40 dwellings per hectare). The densities proposed would broadly align with the aims of the Wilton Park Development Brief SPD (2015) and would not be out of character in terms of the wider area of Beaconsfield.
- 5.28 Building heights across the development would be mainly 2 storey with the exception of three of the apartment blocks which would be either 3 storey or part 3 / 4 storey, with the 4 storey building providing a focal point for the development. The majority of the dwellings would have on-plot car parking served either by a car port or garage. Whilst the low density, larger dwellings to the eastern fringe would benefit from garages with ancillary space over. All the dwellings with private amenity space would have dedicated storage facilities for bins and bikes.
- 5.29 In terms of the overall character, phase 1 and 2 of the Wilton Park development is intended to consist of various character areas with a common theme of a garden village setting. For the subject application, the proposed architecture for phases 1 and 2 would be predominately in a Georgian Style with the exception of the area within the walled garden area which would have a character of its own, in a more contemporary style.
- 5.30 In terms of the Georgian vernacular, the building design and material details are considered to reflect local architectural features such as those within the old town of Beaconsfield. Furthermore, the characteristics of the dwellings to be brought forward as part of phases 1 and 2 would accord with the agreed Design Code as outlined previously.
- 5.31 The applicant has produced the material details for each dwelling across the phases and these are deemed to be of a sufficient standard to ensure a high quality development in terms of design and appearance. It has been recommended that a condition be attached to this permission to remove certain permitted development rights for extensions and alterations to the proposed dwellinghouses. Officers consider the condition necessary and reasonable in

order to control the appearance of any future alterations to the dwellings as part of this development. As highlighted previously, the specific design characteristics in terms of layout and architecture would warrant control to prevent any potential discordant additions to buildings.

- 5.32 In addition to the above, detailed plans have been submitted which sets out the hard surface details for the development in relation to the estate roads, paths and public spaces. It is considered that the proposed palette of ground surface materials would be appropriate with differing surfaces reflecting the hierarchy of the streets, parking areas and road junctions. The use of the surface materials has also been considered to ensure ease of accessibility for all road users. For example, the use textured paving, strips and studs to demarcate pedestrian paths and crossing points. This is explored further in the Highways section below.
- 5.33 Boundary treatments have also been considered as part of the reserved matters for phases 1 and 2. Boundary treatments would consist of a selection of walls, fencing, railings and gates and all would be in keeping with the character for the development and the specific architectural treatments across phase 1 and 2. In addition, the boundary treatment is considered to be appropriate in the context of the overall landscaping strategy and would ensure that there is a clear distinction between private and public spaces. Owing to the design of the development and the bespoke characteristics, officers consider it would be necessary to remove permitted development rights for boundary treatments. This would give the Council control of the design and prevent any potential incongruous boundary features in the future.
- 5.34 In terms of secured by design principles, it is noted that observations have been made by Thames Valley Police in relation to the parking court areas and lack of surveillance, these same observations were also made in relation to the approved outline scheme at the masterplan stage.
- 5.35 The proposed development has been designed to ensure that there is a high level of permeability throughout and this would ensure that there are no 'dead end' spaces. In addition, the development has been designed to ensure that car parking is mainly on plot to the side and rear of homes. The proposed development has been designed to ensure that rear parking courts are well overlooked with appropriate enclosures, lighting and good levels of natural surveillance opportunity. In a number of dwellings ancillary spaces have been provided above garage spaces which would provide additional surveillance to rear lanes and courtyard areas.
- 5.36 Comments from Thames Valley Police have also been raised in relation to lighting of parking courts. However, a comprehensive lighting scheme has been

submitted for phases 1 and 2 of the development which included the illumination of all estate roads and parking courts. In addition, the outline permission required the submission of a lighting design strategy as part of a condition. Officers note that this strategy has been approved by the Council prior to the submission of the subject application. Therefore, it is considered that matters surrounding lighting would be satisfactory.

- 5.37 In summary, officers consider that the design and visual impact of the development across phases 1 and 2 would be of a high standard when assessed against the building for life principles. It is noted that the Council's Urban Design officer is supportive of the scheme who notes that the current proposal sets out a strong benchmark in terms of design for future development phases. Overall, the proposal is considered to comply with the design policies set out in the NPPF, South Bucks District Cores Strategy (2011) and Local Plan (1999) and thus this matter is afforded neutral weight in the planning balance.

Heritage and Conservation

- 5.38 Under the approved outline permission it was considered that the re-development of Wilton Park could be accommodated without having a detrimental impact on designated heritage assets. However, an assessment would have to be carried out at the reserved matters stage when the details of the development were evident.
- 5.39 A Grade II listed building, Wheatsheaf Farm is located to the north west of the site. The closest buildings within Phase 2 would be some 250m from the buildings within Wheatsheaf Farm. Owing to the distance and the scale of the proposed buildings within phase 2, it is considered that there would not be any detrimental impacts on the designated heritage asset in question.
- 5.40 As highlighted previously in the report the application site lies to the east of the Beaconsfield Old Town Conservation Area. The built form within the Phases 1 and 2 of the development would be approx. 930 metres and therefore the proposed development is considered to maintain the integrity and appearance of the conservation area owing to the separation distance. As part of the proposed phases it is proposed to erect entrance piers on the entrance of Minerva Way. This would consist of two brick piers of approx. 2.3m in height. It is considered that the piers would be consistent with the other similar boundary treatments in the area, most notably the brick wall and piers surrounding the property 'Latchmoor' on the north east corner of the London End roundabout. Noting the characteristics of the immediate area it is considered that the proposed entrance piers would not have a detrimental impact on the Conservation Area.

- 5.41 Within the phase 1 and 2 application site is the remains of the walled garden which is associated with the former 18th Century Wilton Park mansion. This structure is considered to be a non-designated heritage asset. As previously highlighted the wall in question is to be retained as part of the development (in line with the heritage officers comments at the time of the outline permission).
- 5.42 The retention of the wall is noted and would align with Core Policy 8 of the South Bucks District Core Strategy 2011 which states that locally important heritage features and their setting also make a positive contribution to the creation of distinctive and sustainable places and will also be protected, conserved and enhanced where appropriate.
- 5.43 The Council's Heritage officer has raised no objection to the development. However, it is considered necessary to include a condition which would ensure the integrity of the retained wall which is regarded as a non-designated heritage asset. Overall, the proposal is considered that the proposal would preserve and not harm the setting of the conservation area and the setting of the listed buildings, retaining the non designated heritage asset to comply with the historic environment policies set out in the NPPF, South Bucks District Cores Strategy (2011) and Local Plan (1999) and the statutory duty under Planning (Listed Building and Conservation Areas) Act 1990 and thus this matter is afforded neutral weight in the planning balance.

Landscaping and Trees

- 5.44 Policy EP4 of the South Bucks District Local Plan sets out expectations in terms of landscaping for proposed developments. It seeks to ensure that developments contain appropriate hard and soft landscaping as well as taking into account existing planting and landscape features which may be important elements to the character of the site or wider site. In addition, policy EP4 also encourages the planting of appropriate additional trees and shrubs.
- 5.45 Phase 1 and 2 of the development would seek to integrate the proposed built form into the wider existing landscape features as well as providing landscaping enhancements. To the western edge of the site, the existing Minerva Way would be retained to provide a cycle and pedestrian route, this would then cross the southern section of the relief road, to be completed as part of phases 1 and 2.
- 5.46 The southern section of the relief road would also provide two roundabout inter-sections one to the north and one to the south serving Minerva Way and Gorell Road respectively. To the east of the relief road would be a series of bunds with extensive native tree planting and wildflower meadow planting, which would serve as a natural buffer between the road and the proposed

public park and sports pitches which are earmarked to come forward in phases 3 and 4.

- 5.47 In terms of the landscaping within the built form envelope, it is proposed to retain an element of the existing landscaping features. To the west of the built up area a buffer would be created between the Phase 1 development area and the Service Family Accommodation (SFA) on Dupre Crescent and Berwick Close. This area would include parking courts and part of a formal open space, this area would be supplemented with further planting.
- 5.48 The majority of the built form within Phases 1 and 2 of the development would be bound by roads that would follow the existing road pattern on site (i.e. Minerva Way and Gorrell Road). Within the built area the landscaping scheme would seek to retain the best quality landscape features which exist between the former MOD buildings, this would also include retaining the historic brick structure which once formed the walled garden of the Wilton Park mansion. The green spaces that would remain would serve as local green spaces for the proposed development and these are broken down in to the following areas; Formal Garden Area, Village Green, Natural Open Space with Informal Play Area, Pocket Parks and Ecological Corridor.
- 5.49 It is also noted that the woodland area to the south of Gorrell Road would be retained and would be a key landscape feature to complement the overall development and would provide essential amenity space. It is noted that under the approved outline a scheme a condition requires a woodland management plans to be submitted and approved prior to the occupation of a phase of development.
- 5.50 Each landscaped area would supplemented with new planting in the form of trees and shrubs. The landscaping scheme also includes planting on the main thoroughfares consisting of street trees and planting adjacent to the wall structure and parking courts. The Council's Landscape officer has reviewed the application and is satisfied with the landscaping scheme that has been presented. The development would lead to the loss of 126 trees to facilitate Phase 1 and 2 of the development and would consist of lower grade trees of 'u' and 'c'. Similarly, 89 young 'c' grade trees have been removed within the woodland area to facilitate the drainage scheme for the site. However, this would be balanced by the planting of 256 new trees. The Council's Tree officer has reviewed the details contained within the submitted arboricultural report and tree protection plans and has raised no objection to the proposals, subject to a condition that ensures works are carried out in accordance with the submitted documents.

5.51 Overall, officers consider that the proposed landscaping scheme would ensure a high quality landscaping scheme which would be acceptable in terms of visual amenity of the site and the wider area. As such, it is considered that the proposal would align with the aims of the Wilton Park Development Brief and would comply with policy EP4 of the South Bucks District Local Plan (2009) and thus this matter is afforded neutral weight in the planning balance.

Amenity of existing and future residents

Local Plan Saved Policies:

EP3 (The use, design and layout of development)

EP5 (Sunlight and daylight)

5.52 Local Plan policies EP3 and EP5 safeguard the amenities of existing and adjoining neighbouring properties and seeks to ensure that good standards of amenity are provided for future occupiers. The NPPF refers to the need to achieve well designed places, and that developments should achieve a high standard of amenity for future occupiers.

5.53 There are existing residential neighbours within the Wilton Park site and consist of two storey detached dwellinghouses which are known as the Service Family Accommodation (SFA). The closest property to the boundary of the phase 1 development is 34 Dupre Crescent. This property would be orientated at a right angle to the nearest proposed dwellings namely apartment building 'A' and plot 17 (two-storey dwellinghouse). Owing to the orientation and separation distance of approx. 18 metres, it is considered that no unacceptable impacts in terms of overshadowing, daylight, or outlook would result to the occupiers of no. 34 Dupre Crescent.

5.54 Nos 4 and 7 Berwick Close adjoin the application site further to the south, and similarly, are located at a right angle to the site boundary. The aforementioned dwellings would be sufficiently away from the built form within phase 1 of the proposed development and therefore it is considered that no unacceptable impacts in terms of residential amenities would occur. In addition, due to the relationship in terms separation and orientation between the existing and proposed built form, it is considered that no undue impacts would result in terms of overlooking or privacy.

5.55 Whilst it is noted that the South Bucks District Local Plan (1999) does not require specific standards in terms of amenity standards for future occupiers. Core Policy CP2 refers to the need for new homes to meet Lifetime Homes Standards, which has been superseded by the Building Regulations Part M requirements. In addition, the nationally described technical space standards refers to minimum

standards internal floor spaces for living accommodations across a range of occupancy levels.

- 5.56 The flatted dwellings would be incorporated into a series of apartment buildings which would be located throughout the phase 1 and 2 development and would consist of the following; Apartment Building A (units 1 – 12), Apartment B (units 40 – 45), Apartment Building C (units 68-71), Apartment Building D (units 86-94), Apartment Building E (units 134-137) and Apartment Building F (units 144-147).
- 5.57 All of the proposed flats would meet the minimum space standards as prescribed by the nationally described technical space standards. The layout and spacing around the apartment buildings would ensure that outlook and levels of daylight/sunlight would not be compromised for future occupiers. In addition, many of the proposed flats would benefit from dual aspect and secondary windows.
- 5.58 In terms of the proposed dwelling houses proposed across phases 1 and 2, these would either meet or exceed the national space standards. The proposed dwellings have been designed to ensure a good standard of amenity for future occupiers. Similar to the flats described previously, each dwelling would have an acceptable layout and would ensure future occupiers would receive a satisfactory living conditions in terms of outlook and daylight.
- 5.59 In addition to the above spacing between dwellings where appropriate would achieve between 19 and 21.0m in terms of back to back distances. Where this is not achieved, dwellings have been orientated at angles and first floor layouts have been arranged as such, that there would be no conflict in terms of overlooking, perceived overlooking or unacceptable impacts in relation to privacy.
- 5.60 Local Plan Policy H9 seeks provision of conveniently located, useable amenity space and Core Strategy Policy CP5 highlights that new residential development should be supported by adequate open space and recreation facilities, in terms of quantity, quality and accessibility. Each proposed dwellinghouse would have access to private amenity in the form of appropriately sized rear back gardens.
- 5.61 The apartment buildings would benefit from access to the public amenity space which has been developed as part of the overall landscape strategy for phases 1 and 2 of the Wilton Park Development. This would include; - Formal Garden (to the west of the site); Village Green to the north, Natural open space and informal play area in the north east corner, a series of pocket parks across phase 1 and 2 and the woodland to the south.
- 5.62 Officers consider that the comprehensive landscaping scheme would provide opportunities for general recreation, walking and play that would benefit future occupiers of the development. Overall, it is considered that the proposed

development would not lead to unacceptable impacts in terms of residential amenities and would provide a high quality development for future occupiers and thus this matter is afforded neutral weight in the planning balance.

Transport matters and parking

Core Strategy Policies:

CP7 (Accessibility and transport)

Local Plan Saved Policies:

TR5 (Access, highways work and traffic generation)

TR7 (Parking Provision)

- 5.63 As noted previously, many aspects of the highway considerations were dealt with at the outline stage of the development. Matters in relation to traffic movements arising from the development and the impacts on the local highway network have already been accepted in principle.
- 5.64 As part of Phases 1 and 2 of the development, the southern portion of the Beaconsfield Relief Road is intended to be completed. Conditions attached to the approved outline permission namely conditions 3 and 18 in relation to the phasing of infrastructure and tie in details of the relief road respectively required the applicant to submit details in respect of these elements. The details submitted as part of these conditions have been agreed ahead of the delivery of the relief road and notwithstanding this, the delivery of the relief road has also been secured in the section 106 agreement. Under the approved outline permission, the Council agreed that the trigger point for the delivery and public use of the relief road would be prior to the occupation of the 99th dwelling. The approved phasing plan shows the relief road is earmarked to be delivered as part of phases 1 and 2 by 2022.
- 5.65 A number of concerns have been raised regarding the impact of the Wilton Park development on the local highway network. Specific concerns have been raised in relation to the proposed signalised crossing on A355 Park Lane close to the London End roundabout. Whilst these concerns are noted, these issues were considered at the outline stage of the development, and are not for consideration at this reserved matters stage. The Highway Authority at the time were content that the impact of 98 dwellings in lieu of the delivery of the relief road would not lead to severe harm to the local transport network.
- 5.66 A number of objections received suggest that a condition should either be added to ensure that relief road is completed or the planning permission be revoked unless the relief road is built in full. Neither options would be possible in this

instance as in planning terms it is not possible to compel a development to be completed. Similarly, it is not possible to revoke the planning permission.

- 5.67 In addition to the concerns raised in relation to the non-completion of the relief road a number of consultation responses have indicated that the current application is untenable due to traffic pressures on Beaconsfield Old Town and the A355 as result of construction traffic on Wilton Park and construction traffic as a result of HS2.
- 5.68 As outlined previously, the current application is to consider the reserved matters in relation to the scale and appearance of the dwellings, internal access and landscaping for phases 1 and 2. As such, principle matters in relation to traffic generation have already been assessed and established under the approved outline permission for the site. Matters in relation to congestion and road capacity cannot be considered under the subject application. It also noted that issues in relation to construction traffic were addressed via a planning condition on the approved outline permission.
- 5.69 Similarly, and in accordance with the completed section 106 agreement the proposed pedestrian crossing on Park Lane is intended to be made available and in operation after the Relief Road is complete and opened to traffic. It is envisaged that once the Relief Road is in full operation, traffic on Park Lane would have reduced to a level that could cope with the addition of signalised crossing.
- 5.70 In terms of the estate roads which would serve the dwellings on phases 1 and 2 it should be noted that these are not intended to be adopted by Buckinghamshire Council. The proposed development across Phases 1 and 2 is intended to give priority to pedestrian and cyclist movement and to promote sustainable methods of transport. Gorell Road which runs to the north of the development would become a cycle street, whilst the other roads would be put into a hierarchy comprising of quiet streets and mews'. The cycle street would link into Minerva Way and plug into the wider transport network at the intersections with the relief road and the Old Town. A condition attached the approved outline permission requires the submission of connectivity routes to demonstrate how the development would link into the wider transport networks. These details have since been approved by the Council.
- 5.71 The design rationale behind the road layouts and surfaces is to ensure low speed vehicular movements around the development. The road surfaces would in the majority of the development comprise of shared spaces with some delineation for pedestrians as described in the character section above. In addition, the estate roads within the phase 1 and 2 area have been designed to avoid any dead ends or cul-de-sacs, this is to ensure maximum connectivity across the site.

- 5.72 In terms of junctions and visibility splays, these have also been designed to ensure that motor vehicle speeds are reduced throughout the development. Many of the junctions would also be raised with suitable hard surfacing materials to force lower vehicular speeds. A road safety audit and visual impairment user review have also been submitted to support the application and design rationale for the road and junction layouts.
- 5.73 The applicant has worked with Council officers during the course of the application to respond to some concerns from Highway officers in relation to carriageway widths, pedestrian crossing points and junction visibility. Amendments were submitted which included increasing carriageway widths to 4.8m, pushing back some of the buildings and parking spaces to allow greater visibility and amending the position of pedestrian footpaths. Highway officers are content with the amendments received. Whilst, some visibility splays remain just below the Highway standards officers would not be in a position to substantiate a reason for refusal given that the development is to remain private and would not be adopted by the Council.
- 5.74 As part of the amendments highlighted above, the applicant has also amended the tracking diagrams for large service vehicles (including waste). These have demonstrated that the development is able to function without any unacceptable impacts on road users. Due to the design of the development, the lack of dead ends would ensure limits on large vehicles reversing within the development.
- 5.75 In terms of servicing, the Council's waste team were also consulted as part of the amended plans. The widening of the estate roads as highlighted previously has alleviated earlier concerns and there are no principle objections to the development. Notwithstanding this, matters relating to access have been raised by the waste team, specifically in regards to potential blocking of roads by cars and damage to road surfaces by waste vehicles.
- 5.76 As part of the agreed Section 106 agreement the applicant is required to submit a management plan for the site. Part of the management plan would relate to how car parking would be managed on the estate roads in the event of unauthorised car parking. Therefore, there would be processes in place to ensure that the developments roads were clear for the purposes of servicing. In addition, the applicant would also be required to enter into an indemnity in the event of potential damage to infrastructure during waste collection. A Refuse Management Strategy would also be required through condition.
- 5.75 In terms of car parking for the phases 1 and 2 of the development most dwellings would have on plot spaces some of which would be garaged or in the

form of a car port. The remainder of the parking would be in parking courts to the rear of dwellings or on street is demarcated bays.

- 5.76 As highlighted previously most dwellings would benefit from on plot parking, the remainder would be allocated through parking courtyards and dedicated areas across the development. Visitor car parking spaces would also be provided as part of Phase 1 and 2 of the development.
- 5.77 The tables below indicate the required car parking spaces in line with the Council’s adopted standards and the number of spaces being provided as part of the proposal.

Dwelling type	No. of units	Spaces required in accordance with Council’s adopted parking standards	Number of spaces required in total for each dwelling type	Number of spaces provided for each dwelling type
1-bed flat	12	1	12	15
2-bed flat	27	2	54	52
3-bed flat	1	2	2	2
2-bed house	18	2	36	35
3-bed house	56	2	112	117
4 bed-house	30	3	90	93
5-bed house	3	3	9	12
Visitor Spaces				40
Total	147		315	366

- 5.78 Noting the figures above, the proposed parking quantum across the development would accord with the South Bucks District Local Plan (1999) parking standards. Officers also note that additional spaces would be provided on site for visitor parking.
- 5.79 Part of the design of the overall development is to encourage the use of sustainable transport methods. Each dwelling has been designed with access to secure bicycle storage. The apartment blocks would have integrated bike

storage, whilst the dwellings would have the provision of separate storage. Officer consider this arrangement to be acceptable.

- 5.80 Noting the above, it is considered that the proposal would not have an unacceptable impact on the surrounding Highway network or public footpaths in accordance with paragraph 109 of the NPPF and Policy TR7 of the South Bucks District Local Plan (1999) and thus this matter is afforded neutral weight in the planning balance.

Flooding and drainage

Core Strategy Policies:

CP13 (Environmental and resource management)

- 5.81 Flooding and drainage matters were considered as part of the approved outline permission for Wilton Park. Conditions were attached to the outline permission which required the applicant to submit further information in relation to the drainage strategy.
- 5.82 Notwithstanding the above, the applicant has submitted the proposed drainage strategy for phases 1 and 2 of the development. This has been reviewed by the Lead Local Flood Authority who have no objections to the scheme presented providing that the finer details are submitted in accordance with condition 11 attached to outline permission 17/01763/OUT.
- 5.83 Overall, no objection is raised. It is considered that the surface water methods presented would sufficiently contain any potential flood risk within the site and would therefore be in accordance with policy CP13 and paragraph 165 of the NPPF, thus this matter is afforded neutral weight in the planning balance.

Ecology & Impact on Burnham Beeches SAC

Core Strategy Policies:

CP9 (Natural environment)

CP13 (Environmental and resource management).

Burnham Beeches SAC SAMMS (SPD) (November 2020)

- 5.84 Core Strategy Policy CP9 seeks a net gain in biodiversity resource, maintaining existing ecological corridors. It also seeks the conservation, enhancement and net gain in local biodiversity resources within the Biodiversity Opportunity Areas and on other non-designated land maintaining existing ecological corridors and avoiding habitat fragmentation. The NPPF seeks to protect sites of biodiversity and to minimise impacts and provide net gains; para. 175 sets out criteria that should be considered in determining planning applications.

- 5.85 Matters relating to ecology on the site were considered as principle matter as part of the approved outline permission. A number of conditions in relation to ecology were attached to the outline permission including the submission of an environmental management plan. Officers note that these conditions have been subsequently approved by the Council. A further condition on the outline permission requires the submission of ecological enhancement details and these details are required to be submitted to the Council prior to the occupation of any part of the development.
- 5.86 Notwithstanding the above, the applicant has made the Council aware of further bat surveys which were carried out in May 2020. These surveys concluded that the presence of bat roosts within the buildings earmarked for demolition within the phase 1 area. However, the applicant has provided the Council with the relevant European Protected Species (EPS) licences issued from Natural England to enable works to proceed. In terms of the buildings within the phase 2 area, the necessary licences from Natural England are yet to be sought.
- 5.87 The new information as set out above is a material planning consideration for the development and therefore with the applicant obtaining the EPS licence, the Local Planning Authority has to have regard to Natural England's Three Tests before Natural England can issue such a licence.
- 5.88 The Three Tests are:
- A licence can be granted for the purposes of preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social and economic nature and beneficial consequences of primary importance for the environment;
 - The appropriate authority shall not grant a licence unless they are satisfied 'that there is no satisfactory alternative';
 - The appropriate authority shall not grant a licence unless they are satisfied 'that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.'
- 5.89 Having regard to the three tests above, it is the opinion of the Local Planning Authority that there is an overriding public interest in this development due to the fact that there are significant social and economic benefits to the development scheme including: 1) the delivery of a housing allocation and related contribution to housing supply; 2) the provision of affordable housing; and also 3) the economic benefits that the scheme would bring, not only in terms of the construction of the development, but also the contribution that future occupiers of the houses would make to the local economy. In addition, the development would facilitate the provision of transport infrastructure. The

site has been assessed as being appropriate for residential development where the adverse impacts are outweighed by the benefits to deliver the requirements of housing need in the area. Natural England recommend a proportionate approach is taken in considering the feasibility of alternative solutions relative to the likely harm. It is considered that the Council has considered alternative sites and given the recent withdrawal of the Chiltern and South Bucks Draft Local Plan process no satisfactory alternative has been identified. In terms of the conservation status of the protected species, mitigation and enhancement measures have already been sought by the Council in the form of planning conditions and these measures are due to be submitted and approved before the occupation of the development. In addition, it is also noted that the Council's Ecology officer has lifted their objection to the proposals, in light of the licence in place.

- 5.90 Noting the above, it is considered that the three tests can be satisfied.
- 5.91 It is noted that a number of representations have been made in relation to the impact of the scheme on Burnham Beeches Special Area of Conservation (SAC).
- 5.92 At the time of the outline planning permission a shadow Habitats Regulations Assessment (HRA), together with an Appropriate Assessment (AA) was adopted by the Council in consultation with Natural England. Based on these assessments it was concluded that the Wilton Park development would not have an adverse effect on the integrity of Burnham Beeches SAC in terms of air pollution or recreational disturbance (subject to measures highlighted in the shadow HRA).
- 5.93 Since the granting of the outline planning permission for Wilton Park there has been a change in circumstances surrounding recreational pressures on Burnham Beeches. The change of circumstances relates to updated information which has informed the Strategic Access Management and Monitoring Strategy (SAMMS) and the Council's recently adopted Burnham Beeches Special Area of Conservation SAMMS Supplementary Planning Document. The information specifically relates to the work carried out by Footprint Ecology in 2019 in relation to options for mitigation as a direct response of potential housing growth and visitor surveys.
- 5.94 In light of the new evidence relating to the recreation impact zone of influence, Natural England advise is that planning authorities must apply the requirements of Regulation 61 of The Conservation of Habitats and Species Regulations 2017 (as amended), to housing development within 5.6km of the SAC boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SAC.

- 5.95 Development in accordance with the new evidence would not be likely to have a significant effect on the SAC because it will provide, or make an appropriate contribution to, acceptable avoidance and mitigation measures. The planning authority can grant planning permission to such developments in accordance with the Regulations. The mitigation would be in the form of a financial contribution towards the Burnham Beeches Access Management Scheme, or any subsequent scheme which replaces it, and this would be secured by way of a legal agreement.
- 5.96 However, development proposals which are not in accordance with the new evidence would be likely to have a significant effect on the SAC, either alone or in combination with other plans and projects.
- 5.97 In this instance, an HRA undertaken by the Council concludes that the proposed development is likely to lead to significant effects on the SAC as a result of increasing recreational pressure, and that mitigation is required to address it. An Appropriate Assessment undertaken by the Councils for this application concludes that the Strategic Access Management and Monitoring Strategy (SAMMS) which has been agreed with Natural England is robust and capable of mitigating the likely significant effects of the proposal provided the proposal pays a financial contribution towards the Strategic Access Management and Monitoring Strategy and legal fees to the Council. However, a reduction on the final fee will be applicable as existing houses will be demolished as part of the phase 1 and 2 development. The mechanism of taking into account the demolition of the existing dwellings will be considered as part of the legal agreement. A copy of the Appropriate Assessment can be found at Appendix C.
- 5.98 Accordingly, the applicant has confirmed agreement to provide the necessary financial contribution towards the Burnham Beeches Access Management Scheme, or any subsequent scheme that replaces it, in accordance with the Burnham beeches Mitigation Strategy. The financial contribution would be secured by a legal agreement. This commitment will ensure that any adverse effects on the integrity of the Burnham Beeches SAC as a result of any additional recreational visits will be fully mitigated, thereby ensuring that no adverse effects on the integrity of the SAC will occur. It is therefore considered that with this commitment in place, the development will fully accord with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), as such no objections are raised.
- 5.99 Subject to the above, no objections are raised and the proposal would accord with policies CP9, CP13 and adopted SPD. This matter is afforded neutral weight in the planning balance.

Other Matters

- 5.100 At the centre of the NPPF is a presumption in favour of sustainable development, and to achieve this development shall mitigate and adapt to climate change, and support a reduction of carbon emissions.
- 5.101 Core Strategy Policy CP12 sets out sustainable energy requirements for new development, with all new major development expected to have regard to this policy. The policy seeks to ensure that new development is sustainable, and that it helps contribute towards national targets to reduce overall CO2 emissions. There is a requirement with all 'major' development for at least 10% of energy to come from decentralised and renewable or low-carbon sources, unless demonstrated that it is not viable or feasible to do so.
- 5.102 Matters relating to energy requirements were considered at the outline stage of the development. Consequently, a condition was attached to the outline permission which required the applicant to submit further details on energy demand. The energy details are required to be submitted and approved by the Local Planning Authority prior to construction works.
- 5.103 It is noted that the Council's Strategic Access officer has made some observations on the application. Some of the comments received have already been dealt with as part of the approved outline permission. For example public access to the open space is secured via the section 106 agreement.
- 5.104 In addition, it is noted that there is a desire from the access officer to provide public routes through Little Walk Wood to the north east of the site. However, these details are not being considered as part of phases 1 and 2 of the development. However, it would be possible to explore this as part of future phases of the Wilton Park development as they come forward.

6.0 Weighing and balancing of issues / Overall Assessment

- 6.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.
- 6.2 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,
 - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
 - c. Any other material considerations
- 6.3 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole
- 6.4 It is acknowledged that the council cannot demonstrate a 5 year supply in the South Bucks Area and paragraph 11(d) of the NPPF is engaged.
- 6.5 The principle of development has already been accepted at the outline stage. As set out above it is considered that the proposed development would accord with development plan policies. The proposal is considered to represent 'appropriate' development in the Green Belt, and will not result in substantial harm to the Green Belt. At the same time the site's proposed redevelopment will make effective and efficient use of previously developed land and bring back into use a longstanding vacant site that fails to contribute positively to the character of the area.
- 6.6 Housing delivery is a strategic aim of the Core Strategy. The proposed development would make a positive contribution to the Council's housing needs and supply, and provide a contribution to affordable housing within the local area. This housing provision, and the affordable housing provision both represent a significant benefit that weighs in favour of the proposal.
- 6.7 The delivery of the southern section of the Beaconsfield Relief Road is also considered as a positive benefit of the overall proposal in terms of local infrastructure and transport provision. The subject application would allow the applicant to begin works on site and deliver the completion and thus this matter is afforded significant weight.
- 6.8 Compliance with Core Strategy and Local Plan policies have been demonstrated in terms of visual impact, preserving residential amenities, parking and access, promoting sustainable transport, meeting the challenge of climate change and flooding, and conserving and enhancing the natural environment, however these

do not represent benefits of the scheme but rather demonstrate an absence of harm to which weight should be attributed neutrally.

- 6.9 In terms of applying paragraph 11 d of the NPPF it is concluded that there are no policies that protect areas or assets of particular importance, in this case green belt and heritage policies, that provide a clear reason for refusing the development proposed and the adverse effects of the proposal would not significantly and demonstrably outweigh the benefits.
- 6.10 Taking all of the above into account it is considered that the proposal would provide for a sustainable form of development that meets the requirements of the NPPF and relevant Development Plan policies.
- 6.11 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.
- 6.12 It is considered that a fair and reasonable balance would be struck between the interests of the community and the human rights of the individuals concerned in the event of planning permission being granted in this instance. The following recommendation is made having regard to the above and also to the content of the Human Rights Act 1998.

7.0 Working with the applicant / agent

- 7.1 In accordance with paragraph 38 of the NPPF (2019) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 7.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 3.3 In this instance the applicant was provided with pre-application advice and the applicant/agent was updated of any issues after the initial site visit. Amended plans were received during the course of the application that sought to address a number of design issues. Officers also worked with the applicant to allow the necessary highway design solutions to be submitted.

Recommendation: Defer and delegate the application to the Director of Planning and Environment to Approve reserved matters subject to the conditions set out in this report and the satisfactory completion of a Legal Agreement to secure a SAMMs payment for the Burnham Beeches Special Area of Conservation or to refuse if a satisfactory Legal Agreement cannot be completed for the appropriate reasons relating to the impacts on Burnham Beeches Special Area of Conservation.

Subject to the following conditions:-

1. The dwellings hereby permitted shall be constructed in accordance with the material schedule for Wilton Park Phase 1 plots 1-94 and Phase 2 plots 95-147 (dated 11/11/2020) as submitted as part of application, unless alternative materials are subsequently submitted and approved in writing by the Local Planning Authority.
Reason: To safeguard and enhance the visual amenities of the locality. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)
2. The boundary treatments for the development hereby approved shall be constructed in accordance with the details provided on plan numbers D2855-FAB-00-ZZ-DR-L-1105-PL03, D2855-FAB-00-ZZ-DR-L-1106-PL03, D2855-FAB-00-ZZ-DR-L-1107-PL02 & D2855-FAB-00-ZZ-DR-L-1108-PL03 as submitted as part of application, unless alternative materials are subsequently submitted and approved in writing by the Local Planning Authority.
Reason: To safeguard and enhance the visual amenities of the locality. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)
3. The Landscaping scheme for the development hereby approved shall be implemented in accordance with the details provided on plan numbers D2855-FAB-00-XX-DR-L-0010-PL01, D2855-FAB-00-ZZ-DR-L-1101 PL03, D2855-FAB-00-ZZ-DR-L-1102 PL03, D2855-FAB-00-ZZ-DR-L-1103 PL02 and D2855-FAB-00-ZZ-DR-L-1104 PL03 as submitted as part of the application, unless alternative details are subsequently submitted and approved in writing by the Local Planning Authority.
Reason: To safeguard and enhance the visual amenities of the locality. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)
4. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the development hereby permitted or the substantial completion of the development, whichever is the sooner. Any trees, hedgerows or shrubs forming part of the approved landscaping scheme which within a period of five years from the occupation or substantial completion of the development, whichever is the later, die, are removed or become seriously damaged or diseased shall be replaced in the next

planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation. (ST02)

Reason: To ensure a satisfactory and continuing standard of amenities are provided and maintained in connection with the development. (Policies EP3 and EP4 of the South Bucks District Local Plan (adopted March 1999) refer.)

5. The development shall be implemented in accordance with the arboricultural method statement submitted and approved as part of the planning application and under the supervision of a retained arboricultural specialist in order to ensure that the phasing of the development accords with the stages detailed in the method statement and that the correct materials and techniques are employed. (ST18)

Reason: To maintain the visual amenity of the area. (Policies EP4 and L10 of the South Bucks District Local Plan (adopted March 1999) refer.)

6. No construction works shall take place in a phase (Phase 1 or Phase 2), until details of the proposed finished floor levels for that phase, and of finished ground levels in relation to the surrounding dwellings, have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be implemented and retained in accordance with these approved details.

Reason: To ensure that construction is carried out at suitable levels having regard to the amenities of neighbouring properties. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)

7. Prior to first occupation of any of the buildings hereby approved a Refuse Collection Strategy shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Strategy shall be implemented for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority. The approved Refuse Collection Strategy shall be carried out for the lifetime of the development.

Reason: To ensure a resultant standard of amenity of the site.

8. Notwithstanding the provisions of Article 3 and Classes A, B & E of Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order, 1995 as amended (or any Order revoking and re-enacting that Order with or without modification) , no enlargement, improvement or other alteration (including the erection of a garage, stable, loosebox or coach-house within the curtilage) of or to the dwellinghouses subject of this permission, shall be carried out nor shall any further buildings or enclosures required for a purpose incidental to the enjoyment of any said dwellinghouses as such be constructed or placed on any part of the land covered by this permission.

Reason: The site is located within the Metropolitan Green Belt where strict control over development is necessary in order to maintain the openness of the Green Belt. In addition, the nature and density of the layout requires strict control over the form of any additional development which may be proposed in the interests of maintaining a satisfactory residential environment. (Policies GB1, EP3 and H9 of the South Bucks District Local Plan (adopted March 1999) refers.)

9. Notwithstanding the provisions of Article 3 and Class A of Part 2 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order, 2015 as amended, (or any Order revoking and re-enacting that Order with or without modification), no walls, fences, gates or other means of enclosure shall be constructed or erected beyond the forwardmost part of any wall of the dwellings hereby permitted which front onto a highway. (SD15)

Reason: To safeguard the visual amenities of the locality and to preserve the character of this development. (Policies EP3 and H9 of the South Bucks District Local Plan (adopted March 1999) refer.)

10. The scheme for parking, garaging and manoeuvring and the loading and unloading of vehicles shown on the submitted plans shall be laid out prior to the initial occupation of that phase 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. (Policy TR7 of the South Bucks District Local Plan (adopted March 1999) refers).

11. The garages and car ports hereby permitted shall not be used other than for the accommodation of private motor vehicles or for purposes incidental to the enjoyment of the dwellings; as such, and, in particular, shall not be used for any business purpose, nor converted into living accommodation without planning permission having first been obtained via the submission of a planning application to the Local Planning Authority. (SD02)

Reason: To accord with the terms of the submitted application, to safeguard the amenities of the area and to ensure continued compliance with the Local Planning Authority's adopted car parking standards in the interests of the free flow of traffic and conditions of safety on the neighbouring highway. (Policies EP3 and TR7 of the South Bucks District Local Plan (adopted March 1999) refer.)

12. Prior to the first occupation of the buildings hereby approved, a structural condition report and method statement in relation to the 'Existing Wall' as shown on plan number 6152/PL101-A and enclosing plots 111-129 shall be submitted to and

approved in writing by the Local Planning Authority. Details in the submitted documents shall include:

- Analysis of the significance of the wall
- A structural condition report, with proposals for stabilising and re-instating lost or damaged areas of the wall
- A method statement and specification for any structural works and repairs, including the method of repairs and materials to be used.

The development shall be completed in accordance with the approved details and retained thereafter.

Reason: To safeguard the character, appearance and interest of this non-designated heritage asset. (Core Policy 8 of the South Bucks District Core Strategy 2011 and Policy EP3 of the South Bucks District Local Plan 1999 refers).

13. The development to which this planning permission relates shall be undertaken solely in accordance with the approved plans [insert plan numbers].

Reason: To ensure that the development is carried out in accordance with the details considered by the Local Planning Authority.

INFORMATIVE(S)

1. Removal of any vegetation shall be undertaken outside of the bird nesting season (March to August inclusive). If this is not possible, then a suitability qualified ecologist shall check the areas concerned immediately prior to the commencement of clearance works to ensure no nesting or nest-building birds are present. If any nesting activity is confirmed, no clearance will be permitted within the area until the birds have fledged and the nest is considered inactive.
2. This permission shall not be deemed to confer any right to obstruct the public footpath crossing the site which shall remain open and available unless legally stopped up or diverted under Section 257 of the Town and Country Planning Act 1990, or temporarily closed by Traffic Regulation Order under Section 14 Road Traffic Regulation Act 1984.
3. Due to the close proximity of the site to existing residential properties, the applicants' attention is drawn to the Considerate Constructors Scheme initiative. This initiative encourages contractors and construction companies to adopt a considerate and respectful approach to construction works, so that neighbours are not unduly affected by noise, smells, operational hours, vehicles parking at the site or making deliveries, and general disruption caused by the works.

By signing up to the scheme, contractors and construction companies commit to being considerate and good neighbours, as well as being clean, respectful, safe, environmentally conscious, responsible and accountable. The Council highly recommends the Considerate Constructors Scheme as a way of avoiding problems and complaints from local residents and further information on how to participate can be found at www.ccscheme.org.uk. (SIN35)

4. It is an offence under S151 of the Highways Act 1980 (as amended) 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. (SIH23)
5. 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 (as amended). (SIH24)
6. The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, injure or kill a bat; intentionally, recklessly or deliberately disturb a roosting or hibernating bat; intentionally or recklessly obstruct access to a roost. Planning consent for a development does not provide a defence against prosecution under these acts. Buildings, other structures and trees may support bats and their roosts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England. If a bat or bat roost is encountered during works, advice should be sought from a suitably qualified ecologist.
7. The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: recklessly or deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against prosecution under these acts. Ponds, other water bodies and vegetation, such as grassland, scrub and woodland, and also brownfield sites, may support great crested newts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England. If a great crested newt is encountered during works, advice should be sought from a suitably qualified ecologist.

APPENDIX A: Consultation Responses and Representations

Town Council Comments

Beaconsfield Town Council: Objections

The Planning Committee strongly object to this planning application as it is untenable because the relief road that was built last year has not been opened and it would seem there is no intention by the developers to complete their side of the deal in the future. Beaconsfield is about to be subjected to a mass of construction traffic from HS2 that was supposed to travel down the relief road. Residents in the town and those living on London end and down the A355 are concerned about the noise, pollution and damage that up to 400 lorries a day, will do to their properties and health. This planning application is also contrary to the section 214 agreement. We strongly urge that a condition is placed for the completion of the relief road prior to any further houses being built.

Lead Local Flood Authority (SUDS) : No Objection

Buckinghamshire Council as the Lead Local Flood Authority (LLFA) has reviewed the information provided in the following documents:

- Drainage Strategy & SuDS Statement (ref. TRS/E4042/17650, July 2020, RCP)

Please note that the above report does not seek to discharge any planning conditions associated with drainage placed on the outline planning permission ref. 17/91763/OUT. The purpose of the above document is to demonstrate that a surface water drainage solution can be feasibly delivered to support the detailed layout.

The LLFA has **no objection** to the above proposals.

Surface water drainage

The surface water drainage scheme is to include permeable paving within parking bays and attenuation basin and geocellular tank to manage collect and attenuate surface water runoff this is then to be conveyed to a watercourse at a rate of 15l/s. I wish to highlight in my response to the outline planning application further work is needed to confirm the discharge rate for this phase. I wish to highlight that the Non-statutory technical standards for SuDS encourage previously developed sites to discharge as close as reasonably practical to the greenfield runoff rate. From the drawings contained in Appendix C, the location of this watercourse is not clear although this may be due to the poor quality of the images. There is also mention of re-profiling, please note that this may be subject to Land Drainage Consent and I would encourage the applicant to contact the LLFA for advice.

Following the initial ground investigations undertaken at outline design, the applicant has carried out testing in the location of Phase 1 and 2. This included infiltration rate testing and observations of groundwater levels. The Drainage Strategy & SuDS Statement reports that generally infiltration in this area of the site is poor and with most tests failing the BRE 365 criteria to calculate an infiltration rate. I am in general agreement that shallow soakaways are not likely to be suitable in this area with the exception of the area around SA22, 23 and 24 which yielded moderate rates, of 10 -5m/s. I would encourage that the suitability of infiltration-based SuDS in this area is explored in more detail through the discharge of conditions application. It is understood that a permeability test was conducted on an

existing deep borehole soakaway; the falling head test indicated an infiltration rate of 3l/s. The deep borehole soakaway will be used as an overflow in the drainage strategy. The ground investigations report highlights that groundwater is high in the location of Phase 1 and 2, with the highest level recorded in BH133 at 0.249m below ground level. I would advise that the groundwater records are overlain on the drainage strategy to inform the detailed design and highlight areas where mitigation measures may be required. In addition I support the recommendation of the ground investigations report that a monthly groundwater monitoring programme should be undertaken to assess seasonable fluctuations in groundwater levels.

The report states that the drainage system will be designed to attenuate up to the critical 1 in 100 year storm event plus a 40% allowance for climate change and 10% uplift for urban creep. These proposals are adequate.

I look forward to receiving the detailed drainage design as secured by Condition 11.

Urban Design Officer: No Objection

The Council's Urban Designer has been involved in advising the applicants as the Reserved Matters application has been progressed. The urban designer supports the application.

The design aspects of the application have been considered using Building for Life 12 (BfL12). BfL12 is recognised in the NPPF (Paragraph 127) as an assessment framework for considering the design aspects of a planning application and comprises of 12 key considerations against which a 'red', 'amber' or 'green' indicator is assigned. The more 'green' indicators a development secures, the better the quality will be. An 'amber' light highlights areas for improvement. One or more 'red' indicators highlights considerable weaknesses in the design quality of the proposals.

The 12 considerations are:

Integrating into the neighbourhood

- Connections
- Facilities and services
- Public transport
- Local housing needs

Creating a place

- Character
- Site and context
- Well defined streets and spaces
- Easy to find your way around

Street and home

- Streets for all
- Car parking
- Public and private spaces
- External storage and amenity

The emerging design proposals were considered at the outline stage of the application. At this earlier stage, the application secured 8 'amber' and 4 'green' indicators. This was considered acceptable as the outline application lacked design detail that had been deferred to the Reserved Matters application. The applicant was provided with detailed guidance to allow them to understand what was required to raise 'amber' indicators to 'green'.

Officers have worked with the applicant as the Reserved Matters application has been prepared offering detailed design advice. Through this process, detailed design issues have been identified and resolved to the satisfaction of officers.

A detailed BfL12 review has been undertaken. This review concludes that the scheme secures 12 'green' indicators and therefore offers a good standard of design quality.

Key design features are as follows:

Low speed street network

The proposals include the creation of a low speed network of streets that encourage walking and cycling as well as lower vehicle speeds and more considerate driving styles. Street design accords with the principles established in Manual for Streets that prioritises pedestrians and cyclists over motor vehicles. A management scheme is proposed to ensure that pedestrian and cycle movement is not frustrated by cars parked in unmarked parking spaces. Officers have also worked with the applicants to provide pedestrian and cyclist connections into and through future phases to encourage lower levels of car dependency for local trips from Wilton Park to Beaconsfield Old Town, Beaconsfield New Town and Beaconsfield Station.

Buildings and street edges

A traditional architectural approach has been adopted and the proposals feature high quality buildings, materials and details with thought afforded to proportions, the composition of elevations and the composition of buildings to create a co-ordinated street scene. In contrast, a more contemporary style has been adopted within the former walled garden to create a more visually distinct part of the development. Architectural details and features include balconies and terraces alongside larger windows and expressive brickwork. In all locations, particular attention has been afforded to boundary treatments to create clear and robust demarcations between public and private spaces. These range from low level planting and hedging to low boundary walls. Attention has been afforded to the relationship between buildings and the street, for instance by providing dual aspect buildings on street corners. Attention has also been afforded to placing and orientating buildings that respond to what a person will see as they move along a street and look down a street. As such, internal vistas have been well resolved throughout the development and the roofscape is considered to reflect the largely traditional aesthetic with high quality roofing materials proposed and chimney stacks of an appropriate position, scale and appearance. Whilst stacks are largely decorative, there is the potential for these to be used as functional stacks if residents choose to install log burners.

Apartment buildings have been designed to allow many ground floor apartments with their own front door, reducing the number of residents requiring use of communal corridors

whilst also enlivening the street and avoiding a widespread issue with new build apartment buildings that are large, singular building forms. Each of the apartment buildings is of a bespoke design with the largest of these creating a distinctive and memorable entrance to the development. Large balconies wrap the northern and western elevations providing residents with semi-private amenity spaces.

Car parking strategy

The applicant’s chosen architectural approach seeks to replicate the qualities of established settlements by creating a close relationship between the back of pavements and the facades of buildings. This necessitates a parking strategy where cars are parked to the side or rear of homes. Careful attention has been afforded to ensuring that car parking is sufficient (policy compliant) and well overlooked. Courtyards are high quality with boundary wall enclosures, lighting and good levels of natural surveillance opportunity. Option rooms were initially designed into spaces above garages to provide additional surveillance opportunities to rear lanes and courtyards, however these now offer an additional benefit of providing residents with the choice to use these spaces as home offices. Home offices are expected to become increasingly popular as the Covid-19 pandemic has fundamentally altered the places where people work.

Former walled garden

A particular improvement to the scheme since the submission of the outline application has been the approach to integrating the garden wall, retaining more of the wall within streets and other public spaces.

Design Code additions

Conditioned as part of the outline, the submitted code is acceptable.

Materials and details

Subject to agreement with the applicant. High quality materials such as stock bricks and slate tiles are required. The traditional aesthetic needs to be reinforced with traditional details such as wet bed verges and expressive eaves. The applicant has stated that these details will be used. The Council should not permit any downgrading of details such as the use of dry verge systems or plastic/boxed fascias to eaves.

Conclusion

It is considered that the proposals set a strong benchmark for future development phases. The application is supported.

Section and question	Comments	Indicator
Integrating into the neighbourhood		
1 Connections	Comments offered on the outline:	Was Amber now Green

	<p>The proposed scheme is generally well connected with its surroundings however a key challenge and opportunity exists to encourage modal shift. How do we ensure that as many residents as possible travelling to Beaconsfield station and town centre do so by bike (bearing in mind it is slightly beyond a walking distance most people would consider reasonable)? What happens in terms of off-site infrastructure is beyond the applicant’s control, therefore cycle infrastructure on the site in the form of a protected cycle way would give residents a good ‘nudge’ towards cycle usage.</p> <p>It is important to also consider how this development could help to address short but highly car dependent trips, in particular the school run. Might an idea be for the Management Company to extend its activities beyond the maintenance of proposed streets and spaces and operate a cycle bus? (Example: Louviers, France – cycle buses collect children from their homes. See bikebrampton.ca/2017/06/29/%E2%80%8Bthis-school-bus-lets-kids-bike-to-class-bicycling/).</p> <p>Internal connections are not completely clear, particularly along the eastern edge, eastern open spaces and streets defined as shared surfaces. This is important to ensure strong pedestrian and cycle connectivity and guard against cul-de-sacs that frustrate movement for people and refuse vehicles.</p> <p>December 2020: Connections within Phase 1 have been improved to create a well connected street and movement network. Cycle connectivity is stronger as a result of improvements to street design and establishing the foundations of safe, attractive and direct cycling connections from the site to Beaconsfield New Town and station.</p>	
2 Facilities and services	<p>Comments offered on the outline: Brownfield site adjacent to an existing settlement with a range of facilities and services including a station. The proposals include</p>	<p>Green (no change)</p>

	<p>employment and community uses alongside residential development.</p> <p>December 2020: No change.</p>	
3 Public transport	<p>Comments offered on the outline: The Transport Assessment and the Framework Travel Plan highlight issues associated with the lack of bus penetration into the site and the associated walking distances from homes to the nearest bus stop. It is perhaps more feasible and sustainable in the long term to identify the most common journeys (with shared destinations) that people will undertake (and will most probably undertake those by car) and identify interventions that will nudge people towards walking and cycling. These most common journeys are likely to be: Home to School Home to Beaconsfield station and town centre.</p> <p>December 2020: The applicant has concentrated design efforts on encouraging modal shift away from cars to cycles for short, local trips. This has been achieved through street design within Phase 1, identifying Minever Way as a key cycle route and a connection across the new by pass. The strength and appeal of the remainder of the route is now reliant on what happens between Wilton Park and the existing built up area. Strong foundations have been set for encouraging lower levels of car use for short local trips.</p>	Was Amber now Green
4 Local housing needs	<p>Comments offered on the outline: It is presumed that the proposed scheme would reflect local housing needs. Subject to confirmation it would be appropriate to assign a 'green' to this question.</p> <p>December 2020: No change.</p>	Was Green. Remains Green.
Creating a place		

<p>5 Character</p>	<p>Comments offered on the outline:</p> <p>The site sits beyond the town of Beaconsfield and as such there are a number of ways the development could create a place with a distinctive and memorable character.</p> <p>The purpose of this BfL question is to guard against ‘anywhere’ places that are not memorable or distinctive. To create places that are memorable and distinctive, local cues can be drawn upon – for instance in building and street arrangement, building layout, form, plots, details etc. However, memorable and distinctive places can be created through a new architectural response to a place drawing influences from a locality that may be more subtle or nuanced. The application materials set out the design thinking behind the scheme and clearly demonstrate that this is a bespoke solution for this site. This is not a developer imposing standard, generic house types on the site.</p> <p>The proposals involve creating a place that references traditional architectural styles with a series of focal buildings and spaces. The strength of some of these buildings such as the ‘re-creation’ of the former hall and the creation of strongly defined civic scaled spaces will help to create a place with a distinctive sense of character. This character could further be reinforced through the creation of a mixed use area either at the entrance to the development or within the first public square. The structural elements are therefore in place to create a memorable place and the Design Code layers on further detail. This will need to be reinforced as detailed design work progresses with the scope to strengthen the design intent through features such as non-standard street lighting columns. All this promises to come together to create a place that will be uniquely ‘Wilton’.</p> <p>It is suggested that the military function of the site is not forgotten. This could be perhaps captured through public art (perhaps specially commissioned bricks that are then incorporated</p>	<p>Was Amber now Green</p>
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	<p>within new buildings) that reference key names and events associated with Wilton Park. The Language School has been a key feature of the site's history something that could also be captured through specially commissioned bricks.</p> <p>The Design Code establishes a series of design 'rules' for buildings, streets and spaces. In some places, it is not clear what is and is not permitted. For instance, (see p.92 of the Design Code) – are GRP porches and door surrounds permitted? How should verges and eaves on buildings be detailed? How should utility boxes be integrated into building elevations? Are externally mounted flues and gas pipes permitted on principal elevations?</p> <p>Resolution: It is suggested that these matters are resolved as follows (subject to outline approval):</p> <ul style="list-style-type: none"> - First parcel designed in detail with a high quality and authentic traditionally styled dwellings. - Design qualities (that are not already captured in the submitted Design Code) coded in the form of a simple and concise set of 'building detail' design rules. - If the applicant supports the public art suggestion, how will this be secured - condition? <p>December 2020: During the course of meetings with the applicant considerable progress has been made. Whilst a traditional style has been adopted for most of Phase 1, a more contemporary approach has been adopted for the walled garden to recognise that the walled garden was a different part of the original estate.</p> <p>Buildings have been thoughtfully designed with particular attention afforded to street to building and building to building relationships. This is evident in the submitted street scenes and CGI's.</p>	
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	<p>The applicant is encouraged to pursue the public art suggestion by commissioning a batch a special bricks. Perhaps these bricks could feature words from languages taught in the Language School or capture other parts of the site's interesting history.</p> <p>A memorable place will be created.</p>	
<p>6 Site and context</p>	<p>Comments offered on the outline: The proposals are located on a brownfield site and within the green belt. The application material details how the proposals seek to respond to restrictions relating to the amount of floorspace created and site extents; with building heights restricted to minimise the development's impact on the wider area. References to the former estate are captured in ideas such as the 're-creation' of the former hall and reinstatement of the status of the original driveway (Minerva Way, see Design Code, p.17).</p> <p>Existing trees will be kept and incorporated into the development proposals where appropriate and proposals include retention of the imposing walls to the lost walled garden. The walled garden will be afforded a new identity as a focal space within the development.</p> <p>Site sections illustrate how level changes will be addressed. At any future reserved matters stage is will be important to consider level changes and the impact of any retaining structures on the quality of the street environment.</p> <p>December 2020: The qualities of the concept (outline) scheme remain. In contrast to the outline masterplan, more of the walled garden walls have been 'brought' into the public realm network. This is a particularly positive aspect of the detailed proposals.</p>	<p>Was Green. Remains Green.</p>
<p>7 Well defined streets and spaces</p>	<p>Comments offered on the outline: The street and block structure generally created a network of clearly defined streets and spaces. However, the eastern edge of the site requires</p>	<p>Was Amber now Green</p>

	<p>resolution where back gardens interface with areas of open space (please see comments offered in 'Public and private spaces' for further detail).</p> <p>It will be important to ensure that any larger scale buildings (illustrated on the masterplan) that could include apartments offer a positive relationship with the street. A common failing of apartment blocks is reliance on single (or limited) points of access. This can create a deadening effect at street level and create spaces around the edge of buildings with limited public or private value. The applicant is therefore encouraged to ensure that any ground floor apartments are afforded their own front door to the street.</p> <p>Resolution:</p> <ul style="list-style-type: none"> - Minor amendments to the masterplan re: building and plot orientation to eastern edge. - First parcel with apartment building designed in detail (responding to advice afforded here) - Design qualities coded in the form of a simple and concise set of apartment design rules. <p>December 2020: The submitted material demonstrates that the comments previously made have been addressed justifying the upgrade of this from an 'amber' to 'green'.</p>	
<p>8 Easy to find your way around</p>	<p>Comments offered on the outline: The scheme is compact and therefore will be easy to navigate with a simple building and street structure.</p> <p>The street structure as shown on p.10 of the Design Code may need to be revisited at any future reserved matters stage to ensure that there is seamless internal connectivity for pedestrians and cyclists. For instance, are shared surfaces proposed as private drives for specific residents only? Furthermore, the absence of single sided 'edge lanes' along the</p>	<p>Was Green. Remains Green.</p>

	<p>site's eastern boundary could frustrate pedestrian and cycle movement as well as the ease and efficiency of refuse collections.</p> <p>P.15 of the Design Code illustrates a series of defined character areas.</p> <p>December 2020: Single sides edge lanes have been replaced with streets that are open to all (pedestrians, cyclists and vehicles). Detailed designs have progressed for buildings and key spaces. The first phase included buildings such as the focal point 'campanile' building that will contribute towards creating a place where it is possible to create a 'mental map' of Wilton Park.</p>	
<p>Street and Home</p>		
<p>9 Streets for all</p>	<p>Comments offered on the outline: The Design Code provides details of street typologies and materials. The information provided conveys the design intent to create softer, less engineered streets in a way that is consistent with the principles and user hierarchy established in Manual for Streets.</p> <p>As detailed designs progress, it is expected that proposals will be refined. During the process of refinement, it is suggested that careful attention is afforded to the ease at which those with visual limitations will be able to navigate the street. For instance, some street typologies (Design Code p.59) only have a pavement one side of the street. It will also be important to guard against 'highways' creep, for instance overwide corner radii at junctions.</p> <p>Resolution: advisory NTA As detailed designs progress, ensure that streets are designed in accordance with Manual for Streets (and as such, design intent is not diluted). Speed control measures might be required (such as speed 'reminder' strips). It may also be possible to introduce 20mph speed limits and designations such as Quiet Lanes to</p>	<p>Was Amber now Green</p>

	<p>ensure that drivers recognise that the development is a low speed, pedestrian and cycle first environment.</p> <p>December 2020: The applicant appointed PJA Associates (Phil Jones) to progress detailed street design. Phil Jones co-authored Manual for Streets. A series of pedestrian and cycle friendly streets have been created that encourage low speeds and prioritise more vulnerable street users over motor vehicles. Considerable discussions have taken place with Highways colleagues. The applicant has also engaged Dr. Theakstone to advise on the design proposals. It will be important for Dr. Theakstone to audit the completed development to assess the effectiveness of street design and provide reassurance that the design approach is appropriate to future phases; particularly with respect to inclusive design and creating streets that are navigable for those with sight loss or other visual limitations.</p> <p>Whilst this is not a planning issue or a matter that the authority can require, it will be important for the ethos of the development (low speed, low traffic; active travel) to be communicated by the developers to potential purchasers.</p>	
<p>10 Car parking</p>	<p>Comments offered on the outline: A number of parking solutions are proposed included sunken parking and a parking deck. These approaches will help to integrate parking into the environment and reduce the impact of parked cars.</p> <p>A number of parking courtyards are proposed however limited information is provided relating to the design qualities of these within the Design Code. To ensure that residents use these spaces to park their cars (and avoid displaced parking within the street) requires careful attention at a future, more detailed design stage. An active Estate Management arrangement could guard against displaced parking (particularly ‘half on and half off’</p>	<p>Was. Amber now Green (subject to effective control/enforcement of car parking)</p>

	<p>pavement parking); however it will still be necessary to ensure that courtyards are attractive, lit, well overlooked and generously landscaped (hard and soft) spaces. It will also be important to ensure that homes served by rear courtyards are designed to allow rear access into properties (with accesses leading into a kitchen, utility or hallway as opposed to a living room). Alternatively ginnels should ensure that easy and direct access is provided between allocated spaces and individual front doors.</p> <p>Whilst the use of tandem parking can reduce the space between homes reinforcing a sense of street enclosure, it is unpopular with home owners. The use of tandem parking is discouraged and should be considered at any future Reserved Matters stage.</p> <p>Suggested resolution: It is suggested that these matters are resolved as follows (subject to outline approval):</p> <ul style="list-style-type: none"> - First parcel designed in detail with well-designed courtyards (responding to advice afforded here and best practice in courtyard design, e.g. Poundbury). - Design qualities coded in the form of a simple and concise set of courtyard design rules. <p>December 2020: The applicant has responded positively to the comments made. A Design Code has been submitted and has been accepted for the design of courtyards. This establishes key qualities that need to be in place for all courtyards such as high levels of natural surveillance, boundary types, lighting, hard and soft landscaping.</p> <p>A Scheme of Management is proposed to guard against displaced and anti-social car parking. For this to be effective, enforcement has to be active with a high risk of people being ticketed if they park in non-designated spaces. A scheme of management that appears to be effective is in operation at Trumpington Meadows, Cambridge.</p>	
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<p>11 Public and private spaces</p>	<p>Comments offered on the outline: The Design Code establishes simple and effective principles for the demarcation of public and private spaces. However, further consideration is required relating to the interface between rear gardens and areas of public open space along the site’s eastern boundary. Bearing in mind that people tend to want rear gardens heavily enclosed, it is desirable to see rear garden boundaries (of say, 1.8m close boarded fence) along this edge? It might be better to rework this part of the scheme and create outward facing perimeter blocks. An alternative solution would be to impose restrictions on certain plots allowing residents to only have low rear garden boundary treatments, such as (max) 1m high hedges with post/rail fencing.</p> <p>Suggested resolution: Revision of building orientation where necessary to address issues raised. Boundary Code.</p> <p>December 2020: The applicant has resolved the earlier concerns and considerable attention has been afforded to boundary details. It will be important to ensure that the boundary scheme as proposed is delivered. The council should not permit any future requests/applications to downgrade boundaries (i.e. walls to fences) or the removal of frontage boundary treatments (such as railing and/or dwarf walls).</p> <p>The street scenes illustrate where there will be level changes within the public realm. These are modest and none are shown to be so significant to require anti-fall barriers as required under Building Regulations. Street scenes, CGIs and elevations show front doors level with the pavement. As such there will be no steps/ramps up or down to front doors that can often appear if there are unexpected issues with levels during the build phase of the development. Steps/ramps up/down will degrade the quality</p>	<p>Was Amber now Green; subject to implementation of proposed boundary strategy.</p>

	of the street environment and materially change is character, quality, inclusive design qualities and appearance.	
12 External storage and amenity	<p>Comments offered on the outline: More detailed information is required to assess performance against this consideration however there is currently no information to suggest that waste and recycling storage has been considered. Where might residents store their bikes and bins close to their front doors? It is highly unlikely residents will drag and carry bins/crates to their back gardens. It is also unlikely that residents will choose to use bikes for shorter journeys if this requires them to retrieve a bike from a shed at the bottom of their gardens.</p> <p>Suggested resolution: It is suggested that these matters are resolved as follows (subject to outline approval):</p> <ul style="list-style-type: none"> - First parcel designed in detail resolving the issues highlighted. - Design qualities coded in the form of a simple and concise set of cycle and waste storage design rules. <p>December 2020: The applicant has addressed these concerns and provided a series of storage solutions.</p> <p>The applicant is encouraged to consider auditing the first phase once complete to determine whether the cycle and waste storage strategy is working as envisaged; and whether any changes are required. This audit should include post occupation research with residents.</p> <p>The Council will review Phase 1 once residents have moved in to consider how well waste and cycle storage solutions are working but also the car parking solutions; quality of implementation. Where Phase 1 succeeds, future Phases will be expected to replicate these qualities (or improve upon them). Likewise, where there are any areas for</p>	Was Amber now Green

	improvement, the opportunity should be taken to learn from these.	
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Landscape Officer: No objection

First Response

The landscape proposals shown with this application are acceptable.

Second Response

The landscape and planting proposals shown on amended application PL/20/1718/DE - Defence School Of Languages, Wilton Park, Gorell Road, Beaconsfield – are generally acceptable, but the amended Illustrative Masterplan drawing DR L 1100 PL02 omits the line of trees along the east side of the perimeter road on the eastern boundary, which are shown on version PL01 of the same drawing. These trees should be included.

I note comments from the Corporation of London concerning the impact on the Burnham Beeches SAC and similar comments from Natural England, which should be addressed.

I also note the comments from The Wildlife Trust which raises concerns about Biodiversity Net Gain. “The letter from Aspect Ecology states that the site will achieve biodiversity gains via a specific woodland management plan and new areas of habitat (ponds, orchard, swales and wildflower planting). However no details of these have been submitted with the application and they are not evident within the landscaping plans. I therefore have little confidence that they will achieve net gains for biodiversity. I recommend that an ecological enhancement plan, woodland management plan and a completed Defra metric are submitted to inform decision making for phases 1 and 2.”

I look forward to seeing further details and proposals to address the above points.

Tree Officer: No objection, subject to conditions

As you are aware there is one Tree Preservation Order (TPO) situated within the site which is known as no.6, 2014 and is a Woodland designation Order. An Area designated TPO is situated on the adjacent land south of Minerva Way which was made on the 13 January 1988. This type of Order only covers trees growing within the designated Area when the Order was made. Any trees that have been planted or naturally self-set after this date are not subject to this Order.

I have not revisited the site following our site visit in 2020 as outlined in paragraph 1.3 of the AIA/AMS by ACD (28 April 2020). I have also reviewed Tree Protection drawings INL22746-03D. I have no objection to the proposals of 126 trees as detailed in paragraph 1.7. If planning permission is permitted I recommend planning condition ST18.

Highways Authority: No Objection

You will be aware that a number of meetings have taken place between the applicant and the Council prior to the submission of this application in order to agree the general design principles of the site. During these meetings there were design elements that were agreed and elements where agreement was not reached. The applicant was advised of outstanding matters in an email dated 20th April 2020. As stated above, we originally received the

information of 7th August and discussions have since taken place with the applicant concerning a series of initial points that required addressing. Following those discussions, on the 10th November we received a set of amended plans to take into account those initial comments. I will comment below on the amended plans and also detail what has changed since the original submission.

Transport Statement

A Transport Statement (TS) dated July 2020 has been submitted in support of the application. Section 3 of the TS deals with the internal road layout and from paragraph 3.2.2 talks about the Cycle Streets that are proposed to run along the northern and eastern sides of Phases 1 and 2. In paragraph 3.2.5 it states:

“The cycle street around Wilton Park Phases 1 and 2 area has been agreed with BCC and SBDC to provide a carriageway of 4.5m, comprising a 1.5-metre-wide cycle lane in both directions and a 1.5-metre-wide central strip”.

The applicant has been advised previously that there are concerns over the use of a 4.5m carriageway as Figure 7.1 in Manual for Streets (MfS) shows that a minimum width of 4.8m is required to allow anything larger than two cars to pass. The use of a 4.5m wide carriageway has therefore not been agreed with the Council. Previously the applicant advised that along the eastern cycle street vehicles would be able to utilise the flush footway in order to pass another vehicle, however concerns were raised with regards to the potential impact on pedestrian safety that would result from vehicles having to do this. It was also advised that having a 2m flush footway adjacent to the eastern cycle street would give the impression of a 6.5m wide useable space for vehicles to travel along, which could encourage higher vehicles speeds.

Following the initial discussions, the applicant had now submitted plans, dated October 2020, showing the northern and eastern cycle street widened to achieve a carriageway width of 4.8m with a 125mm upstand and a 2m wide footway, for the majority, to allow for the safe passage of two vehicles and the protection of pedestrians, particularly vulnerable users, given these are the main arterial routes through the site.

The information shows raised junction treatments at the junctions along the eastern cycle street with changes in surface material also used on these raised junctions and on the pedestrian crossing points. It is agreed that these features will aid the control of vehicle speeds.

A further point I previously raised with regards to the carriageway/footway arrangement along the eastern side of the site is that the footway runs along the eastern side of the carriageway while the dwellings in this location are positioned along the western side of the carriageway. This will result in pedestrians, including wheelchair users, partially sighted people and children, stepping onto the live carriageway when leaving their property. This is a point that was also picked up in the Safety Audit.

As a result of this, the applicant has now relocated the footway that previously ran adjacent to the eastern side of the site to the western side of the carriageway with a 125mm upstand and a width of 2m. Therefore, I am now satisfied that this provides an appropriate

pedestrian provision which will protect them from vehicles on the cycle street, particularly for residents when exiting their properties. This also addresses previous concerns raised in the Safety Audit.

The internal road layout is proposed to comprise of what the applicant refers to as quiet streets and narrow streets. These will have a 4.5m or 3m wide carriageway with a 2m footway provision. They will be in the form of shared surface areas with no kerbed upstand, but a subtle delineator to aid in the definition of the pedestrian route. Even with the narrowest carriageway width of 3m on the narrow streets, it is recognised that there is a 2m wide footway provision, meaning that the overall width available is a minimum of 5m, which is considered adequate to act as a shared surface. In paragraph 3.2.11 the TS states “The use of a 3.0 metre carriageway on the narrow quiet streets is to ensure that a cyclist travelling along these roads will not be overtaken by a driver”. I am mindful that paragraph 7.2.3 of MfS states that “However, widths between 2.75 m and 3.25 m should be avoided in most cases, since they could result in drivers trying to squeeze past cyclists”. The minimum carriageway width proposed along the narrow streets should, in accordance with MfS, be avoided, however I note that there will also be a 2m allowance for pedestrians in addition to the 3m wide carriageway, resulting in additional space should a car decide that it needed to pass a bike.

It is noted that the surface material and colour of the carriageway and footway sections of the shared surface is proposed to be the same, however, to aid the passage of vulnerable users, the applicant was advised that the footway section should have a different surface treatment to the main carriageway. This will also aid in the control of vehicle speeds as it gives drivers the impression of a narrower carriageway, while still providing an over runnable surface to allow vehicles to pass.

In response to this point, the applicant has confirmed that a 25mm kerb will be used along the wider quiet streets and it is understood that tactile studs will be used to delineate the footway area along the narrower quiet streets in order to aid navigation by visually impaired people. I also understand that this takes into account the Council’s Urban Designer’s comments which advised that similar materials should be used across the street width to avoid unnecessary visual clutter. While it is considered that the use of a different surface treatment will aid the delineation of the footways, I am mindful of the improvements already proposed by the applicant and also that the considerations of the Council’s Urban Designer also need to be taken into account. I am also mindful that the site will remain private and will not be adopted as public highway and as such I will leave it to you to determine its suitability as part of your overall considerations for the site.

The lowest category of streets are described in the TS as mews and parking areas, which will serve small pockets of houses and will provide access to parking spaces, bin stores and cycle parking. It is stated that these will have a minimum carriageway width of 3m and no footway provision. I have previously advised that any street that is to act as a shared surface should achieve a minimum carriageway width of 4.8m, therefore locations within the site that are proposed to act as a shared surface should achieve this width. I will comment below on areas where the carriageway width was not sufficient for the intended purpose and whether these concerns have been addressed.

Towards the centre of the site there is a carriageway in a horseshoe type arrangement that appears to provide access to plots 111 to 129. The original plans show the full carriageway width along this section to be in the region of 4.5m, which is not sufficient to act as a shared surface and will not allow a car to pass something larger such as a delivery vehicle. There also appears to be driveways accessed from this carriageway and, due to the carriageway width available, I would question whether there is adequate space to the rear of the driveways to allow cars to manoeuvre into and out of them.

In the latest submissions the applicant stated that the width of the shared surface has been increased to 4.8m and tracking analysis has been submitted demonstrating the ability of vehicles to enter and egress the driveways in this section. Having assessed the recently submitted plans, I am satisfied that the width of the surface has been increased to 4.8m and is therefore adequate. However, when looking at the tracking analysis, there appears to be two occasions where vehicles overrun a hedge, when a vehicle is entering the driveway for plot 112 and when a vehicle egresses from plot 129. The overrunning shown does however appear to be associated with how the tracking was carried out and there does appear to be sufficient space clear of the parking spaces in order for them to be adequately accessed. As the site is not to be offered for adoption and is to remain private, it is ultimately the responsibility of the applicant to ensure that adequate space is being provided in order to access the driveway of properties.

The initial plans showed a carriageway link running between plots 40 to 46 and plots 60 to 65 which measures in the region of 3.9m in width with no footway provision. The link is approximately 65m in length. The width of this link shown on the original plan is not adequate to allow vehicles to pass and is not adequate to provide safe and suitable access for pedestrians. There are also driveways located along this link and I had concerns over how vehicles will be able to manoeuvre into and out of these driveways without relying on the driveways of the opposite plots. No tracking analysis was initially provided to demonstrate that these driveways can be adequately accessed. The width of this link and the access to the driveways has been raised with the applicant previously.

Within the recently submitted documents, the width of the above carriageway link was amended and tracking analysis was provided to demonstrate that vehicles were able to safely manoeuvre in this section. The middle section of this carriageway now measures a minimum of 5m in width for a distance of approximately 16m which would allow two vehicles to pass alongside pedestrians. Whilst a width of 4.8m for the entirety of this section would be more preferable, as the carriageway benefits from good forward visibility, a vehicle is able to wait in the wider section whilst another egresses. In addition, the submitted tracking has demonstrated that vehicles can safely manoeuvre into and out of the allocated driveways.

In paragraph 3.2.13 of the TS the applicant has quoted my concerns relating to a 4.5m carriageway width not being adequate to allow a car to pass anything larger than another car. In paragraph 3.2.14 of the TS the applicant states "The low number of car movements, coupled with the grid structure layout of the site, mean that conflicts of this nature described will be limited". I appreciate that in some cases where a carriageway has a width

less than 4.8m there is a dedicated footway area, which results in an adequate shared surface carriageway width. However, where this does not occur and there is a carriageway which is to act as a shared surface and the width does not achieve 4.8m, I do not consider it acceptable to simply say that vehicles movements will be low and occasions of conflict will be limited. This is a new site and unnecessary opportunities of conflict should not be designed into the scheme.

In response to the above concern, the applicant has now provided a minimum 4.8m wide shared surface throughout the site, with the exception of the carriageway between plots 40 to 46 and 60 to 65 which, as aforementioned, provides a central section of wider carriageway.

In terms of the horizontal alignment and junction treatment within the site it is noted that it has been designed in order to avoid cul-de-sacs to increase connectivity across the site. It is stated in the TS that minimal corner radii have been used at junctions to reduce the speed of vehicles as they move through them. Swept path analysis has been provided for the main junctions within the site and I will comment on that later in this response.

Junctions are to be provided without road markings and will therefore be uncontrolled. The TS states that this will increase driver uncertainty and lead to reduced speed. While this may be the case, if these junctions are to be uncontrolled then adequate visibility should be provided in order to avoid conflict and safe routes for pedestrians to navigate across the junctions must be provided.

In paragraph 3.3.5 of the TS the applicant has quoted a concern that I raised during pre-application discussions relating to the ability of pedestrians to safely negotiate the uncontrolled junctions. I will repeat the quote below for confirmation:

“I am also concerned with how pedestrians safely navigate these uncontrolled junctions.”

In response to this concern the applicant suggests that all residents are likely to use all of/most of the uncontrolled junctions within the site, depending upon the purpose of their trip. It is then suggested that as a result vehicle speeds are likely to be low with most vehicular and pedestrian traffic being local residents and therefore, they will know how to navigate these uncontrolled junctions. I am concerned that having to rely on people knowing the junctions is not good enough to guarantee peoples safety. It is already recognised that not all of these junctions benefit from an adequate level of visibility, and this coupled with the uncontrolled nature of the junctions and the ‘shared space’ environment also being adopted in these locations, I am concerned that not only could there be collisions between vehicles, there is an increased chance of vehicles coming into conflict with vulnerable road users such as the partially sighted or children.

Following the repeat of these concerns, the applicant has now proposed to demarcate a route across the junctions using raised tactile studs to help guide pedestrians. I am satisfied that the pedestrian routes on the junctions located adjacent to plots 95 and apartment block C are direct and enable good intervisibility between pedestrians and vehicles. I also note that the applicant has proposed improvements to the layout of the shared space junction adjacent to plots 77, 82, 100 and 103. The footway approaching the junction from the east has been moved from the southern edge of the carriageway to the northern edge

of the carriageway. This footway amendment has provided a more defined and direct route for pedestrians to cross the junction. The change to the footway alignment has also allowed for improved visibility from the northern approach to the junction. I note that visibility to the east of the southern approach and visibility to the west of the northern approach to the junction does not achieve the full level usually required for vehicle speeds of 20mph. I am however mindful of the measures and change in environment that the applicant is proposing both at the junction and on the approach to it, which will have a traffic calming effect on vehicle speeds. In relation to the visibility at this junction the applicant has also stated "In this situation, when visibility is restricted at urban junctions by buildings drivers will tend to nose out carefully until they can see oncoming traffic, as set out in the diagrams on page 80 of Manual for Streets 2."

While the changes to the junction offer an improvement in terms of pedestrian movement and a change in environment to make pedestrians and drivers more aware of the presence of the junction, it is noted that the proposed levels of visibility are below that which the Highway Authority would normally require for junctions on the public highway. However, as this site is to remain private and not to be offered for adoption, this is something that we feel we are not, as a Highway Authority, able to pursue. I assume that this is something that you will take into consideration in your assessment of the application.

Visually Impaired User Review

In order to address concerns raised regarding the use of the internal roads by visually impaired users the applicant has commissioned an Audit by Dr Dianne-Dominique Theakstone, who is registered blind and uses both a Guide Dog and long cane for mobility. She also has a research and teaching background in Housing Studies, especially Universal Design.

Dr Dianne-Dominique Theakstone has used a tactile model of the development to gain an overall impression of the housing development layout. She has stated that she found streets tended to lie in grid formations and the crossings are all straight (not angled). I am concerned that not all movements through the more complex junctions have been considered as there are, for example, movements through the cross-roads junction towards the south east of the site which certainly appear at an angle, with the same applying to the cross-roads junction to the north of that junction.

A further point raised by the Audit states that "...a few streets appear rather narrow and the guidance sets out that pavements should have ample space for two people walking abreast...". I had also raised concerns regarding the width of some carriageways within the site that are intended to be used as shared surfaces, most of which have been covered previously within this response. The Audit covers a number of other points and concludes with the following recommendations:

- Use edgings 4 inch or more to demarcate planting beds especially positioned on the inner shore-line;
- Use blister surfaces on all street corners to signal crossing points;
- Use Guidance surface to assist safe passage for people with sight loss around share space car-parking, across the smaller plaza/green space and the North-East corner through the landscaped area;
- Maximise colour contrasts to delineate pedestrian/road boundaries, crossing points, bollards and property entrances;
- Consider edging pathways with luminescent materials;
- Consider the choice of plants to provide sensory indications as to location; and
- During the walkthrough stage of the Wilton Park development, invite representatives from a local disabled persons Access Panel or equivalent organisation to gather users' views.

It was initially unclear whether and where the applicant has taken these recommendations into account. Therefore, a response to this Audit was requested from the applicant to clearly show what has been done to incorporate these recommendations into the design. In response to this, the applicant has provided a list of measures which were taken following the audit, which are as follows:

- Raised edgings have been provided along the outer edge of carriageways at planting beds to provide a continuous feature which may be detected by cane users
- Blister tactile paving has been incorporated at all crossing points, with the direction of the studs aligned with the direction of the crossing
- Strips of guidance paving have been used in locations where it is necessary to provide additional tactile wayfinding information to assist visually impaired people to find crossing points.
- Raised studs have been included to define crossings over the junction squares. All the crossings are now direct.
- A flush, 25mm or 125mm kerb, depending on location, with a strong tonal contrast has been used at the interface between footways and carriageways

It is considered that the measures confirmed above address the points raised in the Audit and will aid the passage of pedestrians and in particular, visually impaired users, around the site.

Road Safety Audit

A Road Safety Audit (RSA) Stage 1 was carried out by TMS on behalf of the applicant and is presented in a report dated 19th February 2020. This report and the Designers Response, dated February 2020, were submitted as part of the pre-application discussions and comments from myself were provided. While the RSA submitted as part of the application information is the same as the RSA previously submitted at pre-app, the Designers Response now submitted is dated May 2020. I will therefore provide comments on the RSA and the updated Designers Response below.

Cycle Street around perimeter of site – The RSA has highlighted a risk of collisions if vehicle speeds are higher than 20mph. This is because the alignment of the cycle streets will be relatively straight over long lengths leading to higher speeds and risks of collisions at junctions and with vulnerable users such as cyclists and pedestrians. The RSA recommends that the alignment of the street should be interrupted by either introducing lateral shifts in the street or introducing speed control measures.

This issue is something that I have also picked up and have discussed with the applicant at pre-app stage. Through pre-app discussions it has been agreed to provide further traffic calming measures in the form of raised tables and surface changes at junctions. These measures are detailed further in the submitted TS and I have also given more detailed comments on this earlier in this response. A further issue relating to the cycle streets that has been picked up in the RSA is the lack of crossing points for pedestrians. The RSA recommends that crossing points, such as courtesy crossings using contrasting coloured and/or textured surfacing should be provided at regular intervals along the cycle streets. The Designers Response agrees with this and raised crossing points using alternative materials have been incorporated into the design. In my pre-app response I requested confirmation on the height of these crossings as they could start to resemble traditional ‘speed humps’. The applicant has confirmed that the height will be consistent with the height on the existing kerb line (125mm) and the design will be in keeping with the design of the overall site. This would apply to both the northern and eastern cycle streets as they both now benefit from kerbed upstands.

Cycle Street along eastern perimeter of site – The RSA has highlighted that the footway is shown along the eastern side of the cycle street although the development is situated on the western side. Pedestrians would therefore have to cross the carriageway to use the footway or they would have to walk within the carriageway. The RSA recommendation is that the footway should be provided on the western side (development side) of the cycle street. This is an issue that I had also identified and raised with the applicant at pre-app stage. In response to this, the applicant has now relocated the footway on the eastern cycle street to the western side of the carriageway as requested.

Quite Street and Narrow Street – The RSA has questioned the provision of the delineated footways along the quiet and narrow streets stating that it diverges away from the principle of creating shared space areas and may give drivers the impression that they have greater priority over other users such as pedestrians and cyclists. The RSA recommends that that the delineation should be removed.

I understand what the RSA has recommended with regards to this issue, however I also understand what the applicant is trying to achieve by using the delineation. The quiet and narrow streets have been designed to reduce vehicle speeds and the Designers Response has confirmed that the shared space areas will be created from the same material to promote the shared space principle. The delineation is provided to support the most vulnerable road users and to help residents teach simple highway code principles to minors. I consider that the use of delineation in this development is acceptable in the places that it is shown.

Piazza areas within development – The RSA raises concerns that the piazza areas could encourage unregulated parking within these areas, which could be hazardous to pedestrians, especially the visually impaired. The RSA recommends that measures to restrict parking in the piazza areas should be provided. The Designers Response states that street furniture will be provided to make it difficult for vehicles to park within the piazzas. The applicant has also stated that the site will be subject to a parking management strategy that will be enforced by the private management company.

I have previously raised the question about whether a plan had been provided to show where the street furniture would be positioned and how it would work to discourage parking as one had not been provided. The applicant has stated that the position of the street furniture will be determined during the detailed design stage. The applicant has also stated that an exclusion plan has been provided that shows where street furniture will have to go to avoid the swept path of large vehicles.

Parking within development – The RSA raises concerns regarding unregulated parking within the development with people being tempted to park outside their properties rather than their designated parking spaces. This could lead to hazards to cyclists and pedestrians and obstruct the route for large vehicles. The RSA has recommended that an enforceable parking management strategy should be developed to deter haphazard and unregulated parking within the development and on the shared surface streets. The applicant has confirmed that the site will be subject to a parking management strategy that will be enforced by a private management company. An ANPR system will be used to record vehicles entering the site to enable inappropriate vehicles to be moved on. The use of a private management company to enforce the parking strategy is likely to reduce the occurrences of haphazard parking within the site.

Swept path of large vehicles, such as refuse lorries – The RSA raises concerns that the swept path of large vehicles will pass close to building lines and parking bays, especially along the narrow quiet streets. Concerns have been raised in relation to vehicles striking buildings, overrunning into private gardens or colliding with parked vehicles. Concern is also raised in relation to the safety of pedestrians and cyclists if these larger vehicles have to reverse if their route is too tortuous. The RSA recommends that alignments should be adjusted where necessary to enable the larger vehicles to negotiate the development comfortably.

The Designers Response states that the masterplan has been developed to remove the need for refuse vehicles to reverse. The layout has been tracked using an 11.2m refuse vehicle and discussions have been held with the Council's Waste Officers, who have not raised any concerns with the layout. I note that the Waste Officers may not consider the safety issues relating to the tracking of the large vehicles through the site, and this is something that I will comment on later in this response.

Navigation by visually impaired pedestrians – The RSA has raised concerns that shared areas can be difficult and hazardous to negotiate by visually impaired pedestrians if there are no navigation aids or clues provided within the design. The RSA recommends that groups representing the blind and visually impaired are consulted as part of the scheme design.

The Designers Response stated that a semi-protected navigable route for visually impaired pedestrians will be provided. A delineated line is to be used with strategically placed street furniture on one side and the line formed by the frontages of the properties on the other to provide visually impaired persons with options to identify the main pedestrian route.

I note that a visually impaired audit of the site has been carried out and I have covered this earlier in my response. I raised a number of questions previously with the audit that the applicant has aimed to address.

Visibility

Section 4 of the submitted TS deals with the visibility requirements of the site. It is noted that the speed limit within the site is intended to be 20mph and in accordance with current MfS guidance, the required Stopping Sight Distance (SSD) from this speed is 25m. It is also noted that the design of the more internal streets within the site is likely to result in vehicle speeds that are below 20mph.

Drawing number 04333-TR-0015-P2 shows various visibility splays throughout the site. These splays are based on an 'x' distance measurement of 2m; however, the guidance normally recommends an 'x' distance of 2.4m to allow the driver of a car adequate visibility along both directions of the main arm of a junction. Paragraph 4.2.1 of the TS includes the following quote from MfS2:

"A minimum X distance of 2m may be considered in some slow-speed situations when flows on the minor are low, but using this value will mean that the front of some vehicles will protrude slightly into the running carriageway of the major arm, and many drivers will tend to cautiously nose out into traffic."

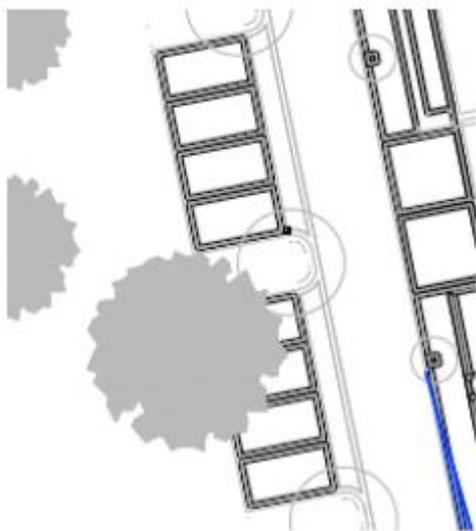
The applicant states that as the approach to the internal layout is to keep traffic speeds and volumes low, it is appropriate to use an 'x' distance of 2m across the masterplan for Phases 1 and 2. It is further stated in paragraph 4.2.2 that "...the two metre 'x' distance will also act as an additional traffic calming feature...".

While using a 2m 'x' distance may be appropriate on the more internal narrow and quiet streets, I have previously advised the applicant during pre-app discussions that a 2.4m 'x' distance would be more appropriate on the arterial routes around the site, due to the higher vehicles speeds and the higher vehicle flows. I am not in agreement that a reduced 'x' distance should be used as a traffic calming feature to slow vehicle speeds on the main arm of the junction. The driver on the main arm of the junction will not be aware that a vehicle trying to pull out of the minor arm has reduced visibility and will carry on regardless. As the driver on the minor arm edges out in order to see it may be too late for the driver on the main arm to avoid a collision. Visibility standards are set for safety reasons and reducing them will unnecessarily increase the chances of collision. Reducing the 'x' distance of the visibility splay should not therefore be used as a traffic calming measure, there are more appropriate design measures that can be taken to control the speed of vehicles on the main arm of a junction that do not involve decreasing a safety standard.

Within the submitted amended plans, dated October 2020, visibility splays of 2.4m x 25m have now been shown on the northern and eastern cycle streets alone. All other junctions within the development show visibility splays measured with an 'x' distance of 2m.

The applicant states that the 'y' distance of the visibility splays is based on the SSD of 25m, which is commensurate with the proposed 20mph speed limit. The drawing shows that the 'y' distance has been measured along the delineated roadside edge and assumed position of a vehicle at junction squares. Paragraph 4.2.4 of the TS states that "There are two locations where the y distances are not achieved. Both locations are on the approach to junction squares. Not providing the full visibility splay in these locations will force drivers to approach the junction squares with more caution, providing a benefit to those residents walking and cycling in the area". While I do not necessarily agree with what the applicant is stating here, I am mindful of the type of streets, the environment where these visibility splays are being proposed and the likely low speeds of vehicles as they approach the junctions. As stated previously in this response, while the visibility splays at some of the junctions may not achieve a standard that the Highway Authority would recommend on the public highway, the site is to remain in private ownership and as such we do not feel that this is something, as a Highway Authority, we are able to pursue.

Extract 1:



Parking spaces positioned adjacent to the perimeter roads, like those in the extract above, did not previously benefit from adequate visibility due to the margin to the front of the spaces not being wide enough to allow a car to pull forward to see along the carriageway without the visibility being restricted by the cars parked in the adjacent spaces.

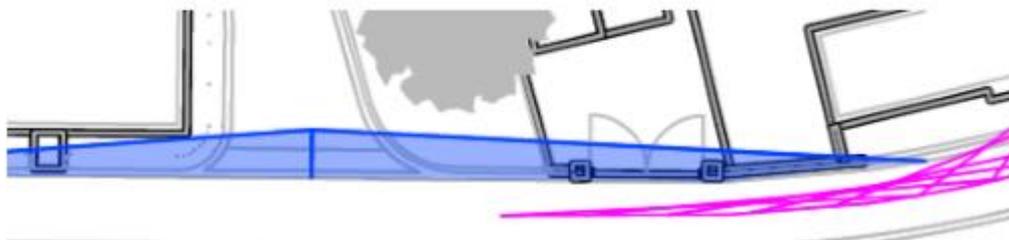
The most recent plans now show the parking spaces moved further back from the edge of the carriageway with one set of spaces being realigned so they are now in a parallel arrangement. These amendments have resulted in improved visibility splays being available from these spaces.

Extract 2:



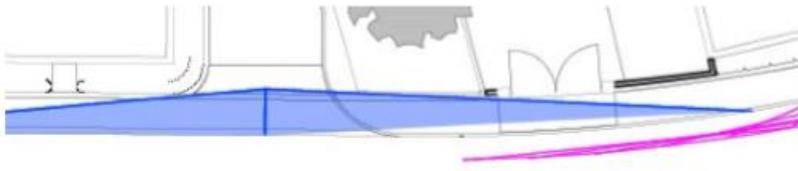
Extract 2 above shows an access between two buildings. The buildings were previously right on the edge of the carriageway, therefore the visibility at this junction was greatly restricted by the buildings. The need to assess visibility at this junction has been raised previously with the applicant, however no assessment appears to have taken place. It is evident on the revised plans that these buildings have been moved back from the carriageway edge and while there remains not assessment of the visibility at this junction in the submitted information I have measured the visibility on the latest plans and I can confirm that the amendments have improved visibility at this junction.

Extract 3:

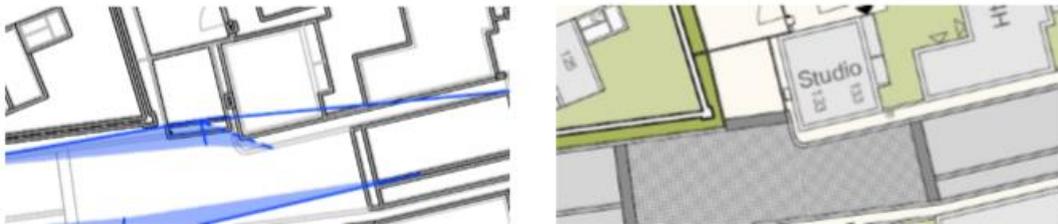


The visibility splay in the extract above initially passed over the parking area of the property to the east of the junction. As a result, I questioned how the splay can be guaranteed in this direction as it would not be possible to ensure that the area within the splay would remain clear from obstruction. However, the footway in this location has been relocated to the north of the carriageway, as shown in the extract below, and as a result has addressed this visibility issue.

Extract 4:



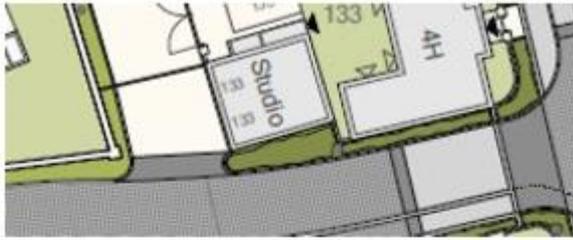
Extract 5:



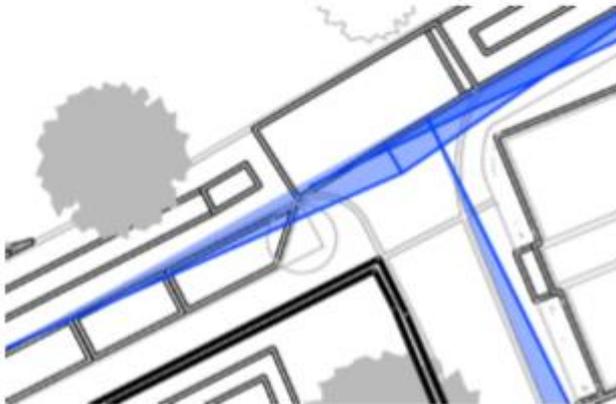
In order to make the visibility issues shown in the Extract 5 above (which is taken from the original information) clearer I have also included an extract from the Masterplan. It is clear to see from the extract above that the visibility from the northern arm of this junction was severely restricted by the building to the east. In addition, the building to the east of the junction is shown to be a Studio, and the information submitted with the application suggests that the studios have garages beneath them. The positions of the number '133' on the extract above would appear to show where the parking spaces are within the garage. This suggested that they are accessed from the main carriageway to the south and if this the case then there will be very little visibility for vehicles exiting the garages. In addition to the visibility along the main carriageway being restricted, there would have been very little intervisibility between a vehicle turning to the east out of this arm of the junction and a vehicle exiting the garages.

Following these concerns, the applicant has now rotated the position of the Studio which has improved the level of available visibility at this junction, achieving a 'y' distance of approximately 18m. In addition, the rotation has now meant that vehicles within the garage exit out onto the quieter street and not onto the main carriageway which is a safety improvement. The amendments are confirmed by the extract below.

Extract 6:

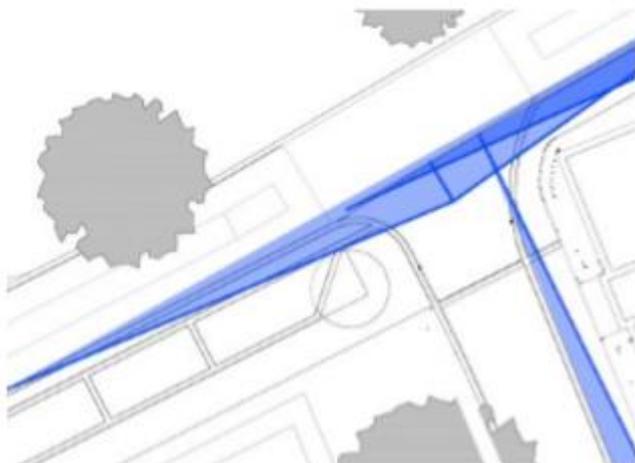


Extract 7:



The visibility splay to the south west of the junction shown in the extract above (which is taken from the original information) passes through the parking spaces. It was therefore likely that the splay will be obstructed by cars parked in the spaces and cannot therefore be guaranteed. However, within the amended plans, these parking bays have now been set further back from the carriageway edge. As a result, full 2.4m x 25m visibility splays can be achieved in both directions from this junction without obstruction. This is confirmed by the extract below.

Extract 8:



In relation to forward visibility the applicant has stated that in most locations across the site, forward visibility achieves the necessary 25m based on the SSD for vehicles travelling at 20mph. The applicant also states that there are a few locations where a reduced SSD of 17m is used to act as a traffic calming feature. I do not necessarily have an issue with the reduced

forward visibility within the site (provided that there is adequate carriageway width for vehicles to pass) as in these locations the vehicles approaching from both directions will be aware of the restricted forward visibility and will drive accordingly. This type of situation is different from where the visibility from priority junctions within the site is restricted as only the vehicle on the minor arm of the junction will be aware of the restricted visibility, which creates a greater safety issue.

On-Site Management

Section 5 of the TS deals with on-site management and confirms that the internal roads will not be offered for adoption but will be controlled and maintained by a management company. This section also states that on first occupation new residents will be provided with a welcome pack that informs them of the onsite parking arrangement, the internal road layout, shared space design as well as other supporting information. While the use of these welcome packs is supported by the Council, they should not be used as a justification for the use of substandard visibility splays within the site.

Parking Provision

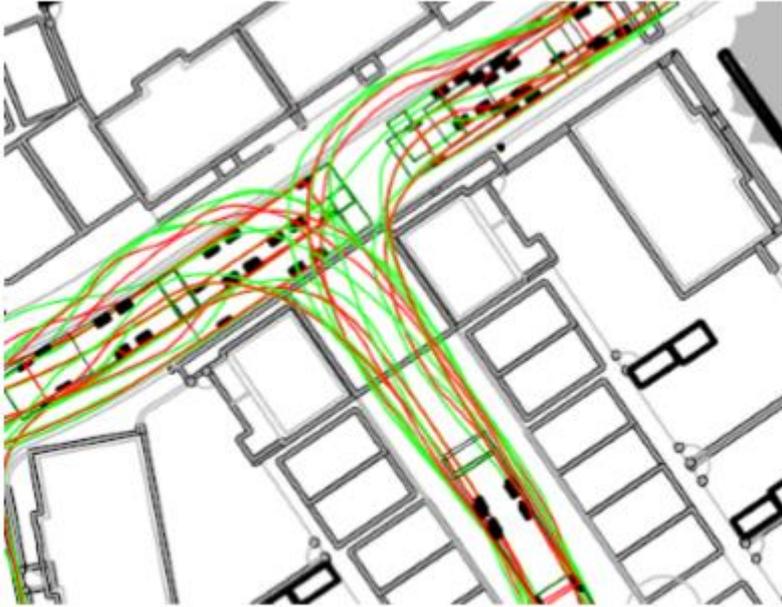
Section 6 looks at the car parking within the site. The applicant states that the proposed car parking spaces, garages and carports meet the size requirements set out in the Draft Local Plan, however it is understood that the Local Plan has now been withdrawn. The applicant also states that the parking provision is in line with the Interim Parking Standards. I assume that you will consider the adequacy of the proposed parking provision.

Refuse Access Strategy

Section 8 of the TS covers the refuse access strategy and confirms that the site has been developed to allow the refuse vehicles to manoeuvre across the site and serve each property without the need for refuse collection points. In order to keep the carriageway widths to a minimum it is proposed to allow the refuse vehicles to overrun the footways where necessary. While this may not cause any issues if it only occurs over short distances of the footway, if it transpires that significant lengths of footway are required in order to allow the refuse vehicles to turn through a junction then this has the potential to put vulnerable users of the footway areas at unnecessary risk of conflict.

I understand that the Council's Waste Team have been consulted separately on the proposals and will provide their own consultation response. However, in order to confirm my comments from a highway safety point of view, I have reviewed the swept paths of a 11.2m refuse vehicle shown on drawing numbers 04333-TR-0022-P5 and 04333-TR-0017-P10, submitted July 2020, and 04333-TR-0022-P7 and 04333 TR 0017 P12, submitted October 2020. I will provide comments on them below

Extract 9:



There are locations within the site where the swept path of larger vehicles passes very close to buildings which leave very little margin for error in order to avoid conflict. The example shown in Extract 9 above is also of one of the junctions where the applicant was requested to assess the visibility. As confirmed earlier in this response, the applicant has positioned the buildings either side of the access further back away from the carriageway edge, which has not only improved visibility but has improved the manoeuvring space for vehicles turning through the junction.

Extract 10:



The extract above shows the 90-degree bend towards the south east corner of the site that was submitted as part of the original information. It is clear from the swept path that the refuse vehicle encroaches onto a significant length of the footway in order to carry out the turn. Any vulnerable users present on the footway when the larger vehicles carry out this manoeuvre may be forced onto the gardens of properties in order to avoid conflict, which is not acceptable from a safety point of view.

The footway in this location has now been relocated to the opposite side of the carriageway and is not subject to overrunning from larger vehicles, as demonstrated by the revised tracking in the extract below. Therefore, I am satisfied that this concern has been addressed.

Extract 11:



Extract 12:



Extract 12 above, which is taken from the original information, shows the swept path of the refuse vehicle around the 90-degree bend to the north east of the site. It is evident that two vehicles are not able to pass along this section of carriageway. This is an issue that has been raised a number of times with the applicant at pre-app stage, however the issue is still evident in the initial application information. The applicant has previously suggested that there is adequate forward visibility for vehicles to see each other and give way at locations before the bend where it may be possible for vehicles to pass. However, as can be seen from the extract above, there is a significant length of carriageway of approximately 85m, around a 90-degree bend, between places where it may be possible for vehicles to pass. In reality it is likely that a vehicle is going to have to reverse to a suitable passing location, which not something that a vehicle should be required to do in a new development.

The revised plans submitted by the applicant now show the provision of an over-runnable strip on the inside of the 90-degree bend. The additional area of hardstanding appears to allow for additional space should a vehicle need to wait for the refuse vehicle to pass. The over runnable area is shown in the extract below.

Extract 13:



Off Site Highway Works

The applicant has submitted an Offsite Highway Works Delivery Programme, in the form of a Technical Note (TN) which sets out the stage at which each element must be delivered, the stage at which a Highway Works Agreement for each individual part of the Offsite Highway Works must be entered into with the Council and the estimated cost for each element of the works.

It is noted that the consideration and approval of the Offsite Highway Works Delivery Plan is linked to the S106 Agreement for the outline permission. I will therefore not consider it as part of this reserved matters application.

Mindful of the above, the revised information submitted by the applicant has addressed many of the issues that were initially raised. There are a few issues that are not totally resolved; however the revised information does show an improvement to what was originally submitted and the site is to remain in private ownership and will not be public highway. Therefore, on balance, we feel it is not something, as a Highway Authority, we are able to pursue. I trust that you will take the points raised in this letter into consideration in the overall balance when considering this application.

I trust that these comments have been of some assistance.

Strategic Access Officer: No Objection

The local rights of way network is illustrated in Plan 1. Public Forest Estate land (beige shading) indicates 'open access' land. I also enclose a more detailed plan of the legally recorded route of Footpath BEA/17/1 in Plan 2. A number of the application plans mark a

connecting route through this Woodland Area, likely to be the existing walked desire line trodden on the ground. It runs south-west to north-east and cuts off the right-angle bend north-east of the sewage works.

Discussions with the applicant in February 2018 confirmed land north-east of the site, which might link residents to Seer Green train station, was in 3rd party ownership and could not be achieved. Similarly, land to the south-east could not connect walkers or cyclists to Sandy Bottom Lodge at the junction of Potkiln Lane and Oxford Road (A40). The Indicative Masterplan (Extract 1) indicates green arrows - 'Links To Wider Countryside' - in these directions, but I presume this remains unachievable. If land falls outside the applicant's control it seems sensible to remove the green arrows or annotate them as 'possible future connections' to avoid any misunderstanding. The green arrow pointing east connects with Footpath CSP/28/4.

Additionally, the green arrow pointing north-east links into the open access land at Little Walk Wood and towards, but not connecting with, the open access land at Wheatsheaf Wood. A public pedestrian route, secured in perpetuity from the development at least to Little Walk Wood for open air recreation by new and existing residents, would be of great public benefit and support Local Plan policies aiming to promote healthier lifestyles. More information is requested in terms of creating a new pedestrian link across the site boundary into Little Walk Wood. In any plan revisions the arrow should be shortened, as I presume land towards Wheatsheaf Wood remains in 3rd party ownership.

I would envisage the rights of way network, situated generally south of the site, to be largely used by new residents only for recreation. I would therefore not seek surface improvements to benefit sustainable transport. That said, Footpath BEA/15/2, illustrated on p.27 of the Design & Access Statement, linking Ronald Road, Beaconsfield with Beaconsfield Golf Club and Seer Green, was widened and surfaced with 3m-wide bitumen as part of the link road improvements and could connect walkers and cyclists from the development towards the train station and town centre.

Footpath BEA/17/1 (Plan 3) and the Landscape Strategy Plan for the Woodland Area (Extract 2, from p.80 Design & Access Statement), are shown below. It would seem useful to formally align Footpath BEA/17/1 with the de facto, desire line footpath annotated as part of the landscape proposals. While the east and west red edges of the Woodland Area boundary connect to the public footpath, the routes in between are separate. A formal diversion would be useful to align the two in order to provide more certainty to the public. Moreover, I'm uncertain if any additional woodland planting is intended on Footpath BEA/17/1 as indicated in Extract 2, north and south of the sewage access road. More information is requested.

P.41 of the Design & Access Statement illustrates a more detailed layout of existing and proposed permissive paths. These will benefit existing and new residents and complement existing networks, so it would be useful to secure access in perpetuity along these routes on land within the applicant's control. This could be achieved by planning condition or Section 106 Agreement.

Archaeology Officer: No Objection

The Buckinghamshire Council Archaeological Service noted the above proposal on the weekly lists. We maintain the local Historic Environment Record and provide expert advice

on archaeology and related matters. Archaeological evaluation has been undertaken in these areas and we have no objection to Phases 1 and 2 to commencing.

Natural England – 1st Response: Holding Objection

OBJECTION - FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES - DEVELOPMENT WITHIN 5.6 KILOMETRES OF BURNHAM BEECHES SPECIAL AREA OF CONSERVATION (SAC)

WITHIN 5.6 KILOMETRES

Between 500 metres to 5.6km from Burnham Beeches SAC, a Habitats Regulations Assessment is required to determine Likely Significant Effect. Mitigation measures will be necessary to rule out adverse effects on integrity. This should be in line with emerging Local Plan Policy DM NP3, which requires proposals to;

1. Make financial contributions towards the Burnham Beeches Access Management Scheme, or any subsequent scheme which replaces this; and
2. Demonstrate that no adverse impacts on the SAC will arise as a result of additional visitors to the SAC from the development. Mitigation will need to be determined in agreement with Natural England.

A site visit was conducted on 16 September 2020 by Natural England to assess the suitability of the green space on site to function as "SANG" for mitigation to the development. This proposal is that this would be in lieu of a SAMM contribution. As it currently stands Natural England cannot accept the green space in lieu of a SAMM contribution. We require more details regarding SANG layout and habitat creation before mitigation can be agreed, and the applicant is aware of that. If that information is forthcoming, then Natural England are willing to consider the concept of using the green space as mitigation. However we are cannot be certain as it currently stands that it will be sufficient as mitigation, but moreover be used as biodiversity net gain. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. Please re-consult Natural England once this information has been obtained.

Natural England – 2nd Response – Objection withdrawn

Following receipt of an email from Graham Mansfield dated 07/12/2020 confirming financial contributions towards Strategic Access Management and Monitoring (SAMM) strategy have been secured in a legal agreement for the 147 dwellings proposed in Phases 1 and 2 of the development. Natural England is satisfied that the specific issues we have raised in previous correspondence relating to this development have been resolved.

We therefore consider that there will be no significant adverse impacts on designated site(s) and withdraw our objection.

We look forward to agreeing a solution for the future phases of the development.

Waste Officers: No objection, subject to condition on refuse collection strategy

Has the road width been increased to a minimum 4.8m? It is difficult to tell

It's still incredibly tight to negotiate some of the junctions. For instance, upon entering the site, the RCV turns left, then takes the first right, passing very closely to the buildings either side. There still doesn't appear to be much room for safe manoeuvre

There are cases (highlighted in attached but not limited to) where the tracking makes contact with street furniture / buildings or, in some cases to the east of the development, leaves the site.

In the southernmost part of the plan, vehicles pass within close proximity to established tree line. This could pose a safety hazard for height clearance

The vehicle is required to turn over the integrated path/road. What reassurances are in place to ensure this passage is uninterrupted. Did we receive any update to satisfy that vehicles would not be parked on the approach roads, at the risk of blocking access on collection day.

The vehicle is required to turn over the integrated path which seems to have utilities built into the ground. The developer should be aware of the risk this poses to damaging these utilities. We would require an indemnity to indemnify us over any potential damage to driving over these structures.

Historic Buildings Officer: No Objection – Subject to condition

With regard to the historic garden walls, I noted in my comments dated 19.3.2019, on the previous application, that;

'Some historic structures still survive including statuary and an 18th century walled garden. The walled garden is considered to be a building of local interest; a non-designated heritage asset'

It is therefore surprising that there is no Heritage Statement submitted with this application. A photographic survey of the wall has been submitted but there is no plans showing where the photographs were taken and no proposals for the repair and reinstatement of the wall. This 18th century large brick walled garden has previously been identified as a 'non-designated heritage asset'; it has important evidential, historic, aesthetic and communal value, and its repair and future survival should be ensured as part of this new development. Further analysis and detailed proposals for its repair and reinstatement should be submitted as part of this application and/ or conditioned and a further condition should be added to ensure the walls are repaired/ reinstated prior to the use of the new houses. The following documents should be submitted and approved by the historic buildings officer;

- A heritage statement / analysis of the significance of the walls shall be submitted, and
- A structural condition report, with proposals for stabilising and reinstating significant lost/ damaged areas of the wall, and
- A method statement and specification for any structural works and repairs/ reinstatement shall be submitted for approval, and

- Sample panels showing the materials and method of repairs shall be agreed in writing.

Ecology Officer – 1st Response: Objection

Further (up-to-date) information is required to enable an assessment of the impact of the proposed development on bats. Updated bat surveys have been conducted on the site in May 2020 and confirmed the presence of maternity roosts and hibernation roosts of common and soprano pipistrelle. The original assessments of the suitability of existing buildings for roosting bats ('moderate' or 'low' suitability) would suggest the presence of such roosts unlikely and therefore the original impact assessment must be revisited. The results of the bat activity/roost characterisation surveys and full details of appropriate and proportionate mitigation must be provided prior to determination.

The information must also provide up-to-date details of bat roost assessments of any trees to be lost (that contain potential roost features), or of retained trees that will be isolated from areas of suitable bat commuting/foraging habitat as a result of the proposed development.

Works must not proceed until the LPA has received confirmation that an EPS licence (for both bats and great crested newts) has been secured and a copy of the licence provided.

The application is supported by the following documents relating to Ecology:

- Ecology Cover Letter (Aspect Ecology, May 2020)
- Ecological Appraisal (Aspect Ecology, August 2017) including Appendices 1-9

Summary:

- The site was originally surveyed by Aspect Ecology in 2014 and 2016 to inform Outline Planning application (previous surveys were conducted by Entec in 2009/2010). Faunal surveys were not updated in 2016 (as agreed with Bucks CC Ecologist).
- Update walkover survey conducted in 2020 by Aspect Ecology.
- No statutory nature conservation designations on site, but Chiltern Beechwoods SAC approximately 3km south. Habitat Regulations Assessment completed in 2019 concluded no adverse effect on Chiltern Beechwoods or Burnham Beeches SAC.
- Design of development progressed to ensure that, where possible, only habitats of low/negligible value will be lost, with habitats of elevated value retained.
- Detailed lighting scheme and Management Plan provided to ensure no adverse impacts on retained Ancient Semi-Natural Woodland and to maximise value of the woodland for the future. Veteran trees also scattered throughout site (all are to be retained).
- Small populations of great crested newt and reptiles (grass snake, slow worm and common lizard) within the wider site. 2009/2010 Entec surveys confirmed small population of GCN in Pond 4 and medium population in Pond 5. European Protected Species licence required for GCN.
- Maternity and hibernation roosts for common and soprano pipistrelle present (updated bat survey work completed in May 2020) as confirmed in cover letter, but no report provided.

- Ecological enhancements proposed within green infrastructure (new ponds, an orchard, and extensive swathes of wildflower planting) and for species, including new opportunities for bats, small mammals, birds and insects.
- ‘Significant opportunities’ for biodiversity gains proposed.
- Recommendations were made for:
 - Construction safeguards
 - Drainage safeguards
 - Design of Public Open Space
 - Tree/Woodland Protection (including offsite Ancient Woodland)
 - Lighting restrictions to minimise impacts on nocturnal wildlife.
 - Mitigation measures for protected species (nesting birds, great crested newt, reptiles, bats)
 - Ecological enhancement
 - Ecology-led habitat management
 - Landscape planting
 - Wildflower planting
 - New ponds
 - Orchard planting

Condition 6 of 17/01763/OUT which requires the provision of a Scheme of Ecological Enhancements was discharged in February 2020 (PL/20/0354/CONDA & PL/20/0354/CONDA). An Ecological Mitigation and Enhancement Plan (Aspect Ecology Ltd) was submitted in support of this discharge for both Phase 1 and Phase 2. These documents included a Biodiversity Impact Assessment which quantified ecological net gains for the Outline application site.

Condition 7 of 17/01763/OUT which requires the provision of a Construction Environmental Management Plan (CEMP) was discharged in February 2020 (PL/20/0358/CONDA).

Condition 8 of 17/01763/OUT which requires the provision of a Landscape and Ecological Management Plan (LEMP) was discharged in February 2020 (PL/20/0459/CONDA).

Condition 9 of 17/01763/OUT which requires the provision of a Lighting Design Strategy for Biodiversity was discharged in February 2020 (PL/20/0462/CONDA).

Condition 10 of 17/01763/OUT requires the provision of a Woodland Management Plan prior to occupation of any phase of the development).

Comments:

- The results of updated bat surveys undertaken in May 2020 must be submitted for approval with details of proposed mitigation and enhancement measures for bats and confirmation of whether the proposed development will require a European Protected Species licence in order to proceed lawfully. The bat survey report must include details of surveys undertaken of trees with bat roost potential to be removed and/or isolated by the proposed development (i.e. those retained but to be isolated from other areas of suitable bat commuting/foraging habitat).

- All works must proceed in accordance with the approved details of the EMEP, CEMP, LEMP and Biodiversity Lighting Design Strategy. Any changes to any of the above documents must be agreed in writing with the local planning authority.
- Please see Natural England response in relation to Burnham Beeches SAC issues.

Ecology Officer – 2nd Response: No Objection

The applicant has provided a copy of the Natural England European Protected Species licence (bats) for the site which confirms the species and roosts that will be impacted by the proposed works and details of appropriate and proportionate mitigation that are secured under the licence. Therefore, comments in relation to further information in relation to bats (09/12/2020) are considered resolved.

Works must not proceed until the LPA has received confirmation that an EPS licence (great crested newts) has been secured and a copy of the licence provided.

The application is supported by the following documents relating to Ecology:

- Ecology Cover Letter (Aspect Ecology, May 2020)
- Ecological Appraisal (Aspect Ecology, August 2017) including Appendices 1-9

Summary:

- The site was originally surveyed by Aspect Ecology in 2014 and 2016 to inform Outline Planning application (previous surveys were conducted by Entec in 2009/2010). Faunal surveys were not updated in 2016 (as agreed with Bucks CC Ecologist).
- Update walkover survey conducted in 2020 by Aspect Ecology.
- No statutory nature conservation designations on site, but Chiltern Beechwoods SAC approximately 3km south. Habitat Regulations Assessment completed in 2019 concluded no adverse effect on Chiltern Beechwoods or Burnham Beeches SAC.
- Design of development progressed to ensure that, where possible, only habitats of low/negligible value will be lost, with habitats of elevated value retained.
- Detailed lighting scheme and Management Plan provided to ensure no adverse impacts on retained Ancient Semi-Natural Woodland and to maximise value of the woodland for the future. Veteran trees also scattered throughout site (all are to be retained).
- Small populations of great crested newt and reptiles (grass snake, slow worm and common lizard) within the wider site. 2009/2010 Entec surveys confirmed small population of GCN in Pond 4 and medium population in Pond 5. European Protected Species licence required for GCN.
- Maternity and hibernation roosts for common and soprano pipistrelle present (updated bat survey work completed in May 2020) as confirmed in cover letter, but no report provided.
- Ecological enhancements proposed within green infrastructure (new ponds, an orchard, and extensive swathes of wildflower planting) and for species, including new opportunities for bats, small mammals, birds and insects.
- 'Significant opportunities' for biodiversity gains proposed.
- Recommendations were made for:
- Construction safeguards

- Drainage safeguards
- Design of Public Open Space
- Tree/Woodland Protection (including offsite Ancient Woodland)
- Lighting restrictions to minimise impacts on nocturnal wildlife.
- Mitigation measures for protected species (nesting birds, great crested newt, reptiles, bats)
- Ecological enhancement
- Ecology-led habitat management
- Landscape planting
- Wildflower planting
- New ponds
- Orchard planting

Condition 6 of 17/01763/OUT which requires the provision of a Scheme of Ecological Enhancements was discharged in February 2020 (PL/20/0354/CONDA & PL/20/0354/CONDA). An Ecological Mitigation and Enhancement Plan (Aspect Ecology Ltd) was submitted in support of this discharge for both Phase 1 and Phase 2. These documents included a Biodiversity Impact Assessment which quantified ecological net gains for the Outline application site.

Condition 7 of 17/01763/OUT which requires the provision of a Construction Environmental Management Plan (CEMP) was discharged in February 2020 (PL/20/0358/CONDA). A Construction Environmental Management Plan (WDE Consulting Ltd) was submitted in support of this discharge for both Phase 1 and Phase 2. The CEMP provides the framework to manage the potential environmental effects during the implementation of the planning consent 17/01763/OUT.

Condition 8 of 17/01763/OUT which requires the provision of a Landscape and Ecological Management Plan (LEMP) was discharged in February 2020 (PL/20/0459/CONDA). Landscape and Ecological Management Plans for both Phase 1 and 2 (Aspect Ecology Ltd) were submitted in support of this discharge. These documents provide details of the protection and mitigation measures to be implemented in order to safeguard faunal species during the proposed works within Phase 1 & 2 of the development, in addition to enhancements to be provided for biodiversity.

Condition 9 of 17/01763/OUT which requires the provision of a Lighting Design Strategy for Biodiversity was discharged in February 2020 (PL/20/0462/CONDA). The Lighting Design was developed using data from four bat activity surveys conducted in September 2014 (outside the bat maternity period) which confirmed low levels of bat activity across the site, mainly associated with the boundary habitats. However, bat roost characterisation surveys in May 2020 confirmed the presence of three common pipistrelle maternity roosts on site (within existing buildings), as well as day and hibernation roosts for common and soprano pipistrelle which would indicate there must be important flight corridors for bats within the built environment and a higher level of bat activity than previously assessed at the time of the outline application. The details of the lighting plan may need to be revised to ensure that compensatory roost provision (bat boxes in trees, pole-mounted bat boxes, bat boxes to be integrated into the new buildings and associated flight paths are not illuminated to maximise the chances of continued use of the site by bats (and other nocturnal wildlife).

Condition 10 of 17/01763/OUT requires the provision of a Woodland Management Plan prior to occupation of any phase of the development).

Condition 10 of 17/01763/OUT requires the provision of a Woodland Management Plan prior to occupation of any phase of the development).

Comments:

- The applicant has provided a copy of the Natural England European Protected Species licence (bats) for the site which confirms the species and roosts that will be impacted by the proposed works and details of appropriate and proportionate mitigation that are secured under the licence. Therefore, comments in relation to further information in relation to bats (09/12/2020) are considered resolved.
- All works must proceed in accordance with the approved details of the EMEP, CEMP, LEMP and Biodiversity Lighting Design Strategy (see above comments). Any changes to any of the above documents must be agreed in writing with the local planning authority.
- Please see Natural England response in relation to Burnham Beeches SAC issues.

Great crested newts

The proposals involve development within 250m of ponds where great crested newts are present. The ecological information provided confirms the development will require a European Protected Species from Natural England to proceed lawfully.

Works must not proceed until the LPA has received confirmation that an EPS licence (great crested newts) has been secured and a copy of the licence provided.

Forestry Commission: No Objection – Standing advice applies

Thames Valley Police: Objection

Thank you for consulting with me again on the above planning application. Having reviewed the submitted documentation I have concerns that some aspects could be problematic in terms of crime and anti-social behaviour (asb). The majority of which relates to parking areas, lack of surveillance, lighting and physical security, therefore I am unable to support the current application. This position could be addressed with suitable amendments to the submitted plans and additional supporting documentation. 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. To this aim I ask that suitable amendments are made to the following areas and that these are approved prior to planning permission being granted.

Parking

There are numerous areas around the development with courtyard and rear courtyard parking both of which can be problematic in terms of crime and anti-social behaviour. Several of these parking areas lack natural surveillance and ownership. If unrestricted access can be gained then these areas can provide a secluded area for those intent on crime and anti-social behaviour. Some of these parking areas have been designed as 'through routes' preventing them from being effectively secured with an access gate. These 'through routes'

could bring a high level of activity to an area with limited surveillance attractive to offenders, whilst providing them with a legitimate excuse to be found in an area which should be private. Furthermore rear parking exposes the vulnerable rear boundaries to unauthorised entry. Side and rear boundaries are the point of entry for the majority of domestic burglaries. Where possible rear parking should be avoided however the presence of surveillance and lighting can help to mitigate some of the risks. The following areas of concern are highlighted.

- Rear Parking for plots 1- 14 This area appears to be excessively permeable, accessible from either side creating a through route with no surveillance from the surrounding plots. Apt A could provide surveillance however no active rooms are present on the elevation overseeing the parking. Plot 22 has a single ground level active room however this will not provide surveillance into the parking area. There are no neighbouring plots with visibility down through this area with further parking positioned directly opposite the entrances either side. This provides easy access to 18 parked vehicles with no capable guardians able to provide surveillance to them from the dwellings they serve. Furthermore this area provides access to the vulnerable side and rear elevations.

- Rear Parking behind plot 65

This appears to be a 'through route'. Whilst it is noted that there are windows in the studio rooms of plots 65 and 47 these are not active rooms and are likely to be occupied over a very limited period of time, if at all. Plot 67 does provide some surveillance however this is likely to be partially obscured by parked vehicles due to its positioning. There is a green located next to the parking for plot 67 and I would have significant concerns that this could attract ASB and provides easy access to the rear boundary treatments of the plots behind. With such a limited level of surveillance and high number of parked vehicles, green amenity space should not be located in this area. Plot 67 could be repositioned such that it can see down and through this parking area, maximising surveillance which will allow the green amenity area to also be amended. I do not understand the purpose of the area marked 'chauffer' on the illustrative plan. This appears to provide parking for plot 66 which I have been unable to locate. Parking should be visible from the dwellings they serve as a minimum however plot 66 doesn't appear to be connected to this area.

- Visitor Parking

There is limited surveillance provided to the visitor parking area opposite plot 26 and 36. In the absence of visitors particularly overnight this has the potential to remain empty and due to the parking arrangement more secluded than the parking located opposite plot 25 therefore this area could attract ASB activities. Visitor Parking is located directly in front of plot 102 with their parking located outside of Plot 101. In reality plot 102 is likely to use this visitor space and whilst this may seem trivial parking issues are often catalyst for escalating neighbourhood disagreements and produce a high volume of calls to the police.

- On street parking plots 91 – 94

These are located away from the dwellings they serve and relies entirely on plots 85 and 84 to safeguard another plots parked vehicles. The parking spaces are close to the public realm and out of sight of the dwellings they serve. Once again this is unlikely to function well with some residents of APT D given onsite parking and others not. The onsite parking is likely to

become 'first come first served' with the potential for parking disputes or vehicles being parked inappropriately by owners to have them closer to their homes. Lighting of unadopted parking areas The maintenance of lighting is problematic in unadopted areas, with electrical feeds generally connected to an individual property and thereby passing control of its future operation to a single dwelling. Previous developments have struggled to maintain a suitable level of lighting specifically within un-adopted parking courts, lighting that should be present to deter crime and asb. A poor lighting scheme however should not be the solution to this problem. I note from the lighting submissions unadopted areas will require a private connection and I ask that the applicant confirms how this lighting will be maintained and managed over time to ensure that a good lighting scheme remains present. Exposed rear boundaries Plots 131 to 133 are particularly vulnerable to crime and anti-social behaviour due to the number of elevations that are exposed to the public realm making it easy to survey and access a property for the purpose of crime. I have significant concerns regarding the rear access route behind these plots which has an inappropriate level of surveillance. Furthermore it appears to be promoted as a 'through route' with the footpath located at the side of plot 130 from the amenity space connecting to this area. Only plot 131 appears to provide any surveillance however this is directed towards the entrance, Plot 125 has a blank side elevation and provides no surveillance. If active surveillance can not be provided to this area then this access route should be removed. This could be achieved by easing the density with access to parking from the front elevation and providing back to back garden boundaries.

Communal Dwellings

- Access control and visitor entry systems

I have been unable to find any details relating to the proposed access controls and visitor entry systems provided to the communal dwellings. All systems are not equal and as a minimum audio and visual communication should be provided with no trades button or timed release present which fundamentally undermine any security provided. Communal entrance doors should meet the minimum requirements of PAS24:2016 Ref. Section 27 Access Controls and additional security requirements for buildings containing multiple dwellings or bedrooms – Home 2019 Secured by Design

- Postal services I have been unable to find any details relating to the provisions for postal services for the communal dwellings. Whilst the floor plans show lobby areas and suggests the intention to site postal services within this area within this area (APT F) others appear to have no obvious postal facilities (APT D). Postal services can undermine the physical security provided if the intention is to allow access to the private communal corridors for through the door deliveries and I ask that further confirmation is provided. Ref. Section 32 – Homes 2019 – Secured By Design

- Bin and cycle storage for communal dwellings From the floor plans provided several of the bin and cycle storage areas are secured with double doors. Double doors are inherently difficult to secure relying on them to be closed in the correct order to lock the active leaf into the passive leaf. Due to the size of the communal dwellings it would seem feasible for these to be replaced with a single leaf door allowing for self-closing hinges and locks to be fitted. I ask that further confirmation is provided regarding the physical security of these

areas. Pin code locks are not appropriate or sufficiently secure and fob activated access controls should be provided.

I hope you find my comments helpful in deciding this application.

Cadent Gas: No Objection

To confirm that Cadent Gas have no objection to the proposed planning application at Wilton Park Beaconsfield as the HP gas pipeline in the vicinity will not be affected.

Public Consultation Responses

19 letters were received and the contents are summarised as follows:

Green Belt

- Application will destroy Green Belt
- Increased density and heights are unacceptable in Green Belt terms
- Proposal will not preserve the openness of the Green Belt
- Proposed blocks of flats detract from the openness of the Green Belt

Built Form

- Plan goes beyond the original brief and will see more buildings and higher buildings
- Number of units proposed will change the character of the area

Transport and Highways

- Impact of the proposed Park Lane/London End signalised crossing on traffic – specifically HS2 traffic.
- New Crossing too near the junction and will cause congestion
- Applicant has not completed the relief road and section 106 should be replaced with an obligation that requires the applicant to finish the works.
- Proposal will result in increased traffic and congestion
- Traffic solutions proposed are not sustainable
- The relief road needs to be completed before development begins.
- HGV lorries are forced through the old town because the relief road remains incomplete
- Pedestrian safety implications of proposed crossing
- Inland homes have no intention of completing the relief road within 4 years
- No traffic modelling has been completed which includes HS2 traffic
- Consideration should be given to when the Park Lane crossing is made operational
- Lack of off street parking for the development

Natural Environment

- Impact of the development on Burnham Beeches
- Impact on wildlife and air quality
- How are the open spaces to be made publically available and maintained

Historic Environment

- Proposed development will impact on the historic village of Old Beaconsfield

Infrastructure

- Proposal needs to cater for Medical and Educational services
- Access to public transport is limited
- No affordable housing

Other

- Since outline has been granted, material considerations have happened which bring the original decision into question
- Issues regarding the section 278 not being completed or enforced
- Issues regarding the sale to Bewley Homes and this impacting on the commitment to complete the relief road
- Council should revisit the original application.

Beaconsfield Society (Summary) – 2 letters received

- Delays to relief road result in untenable application
- HS2 Construction HGVs will be impacting on the Old Town
- Combination of traffic levels from HS2, Wilton Park Construction and Occupancy render the application untenable
- Traffic modelling required to take into account HS2 traffic
- Selling off part of development to Bewley Homes will not trigger the delivery of the Relief Road
- Material changes in circumstances since outline application was granted: HS2 Traffic, S278 already in existence requiring completion of relief road, sale of part of development to Bewley homes
- Inadequate number of parking spaces for visitors and residents
- Commitments in former to planning statements to commit to the completion of the relief road
- Outline application should be modified or revoked
- Affordable housing units are no larger than 2 bed
- SANGS must be provided on site and in perpetuity
- Kerbless roads are a concern
- Due to the private nature of roads how will public enter the woodland and eco areas
- The clocktower on the gateway should be reduced due to impact on openness of the Green Belt
- Concerns regarding the provision of public space and the access to it, together with inadequate parking provision
- Roads are too narrow. Concerns for deliveries and refuse
- Development is too dense and gardens too small
- Parking courtyards encourage crime
- Insufficient parking
- Reference to modifications and enquiries of previous permissions.

Chiltern Society (Summary)

- Concerns regarding the non-completion of the southern section of the relief road.
- HS2 traffic will lead to congestion and impacts in terms air pollution and noise.
- Controlled traffic light on Park Lane welcomed, but early resolution of relief road required.
- Plans for landscaping, recreation and woodland management welcomed, ongoing management and access for the public is required.

Berks, Bucks and Oxon Wildlife Trusts (Summary)

- Impact on Burnham Beeches
- Reference to the evidence regarding recreation pressure
- Appropriate Assessment required for reserved matters
- Impact on bats
- Recommends ecological enhancement plan, Woodland Management plan and Defra metric are completed to inform decision

City of London Corporation (Summary)

- Application site is within the 500m to 5.6km zone
- Concerns regarding impact on Burnham Beeches in terms of recreation pressure
- Impacts on soil erosion, dog fouling, litter, light, noise and air pollution
- Financial contribution is required to mitigate impact of development
- Green space proposed as part of development is not sufficient size or quality to act as an appropriate mitigation measure.

Response to representations

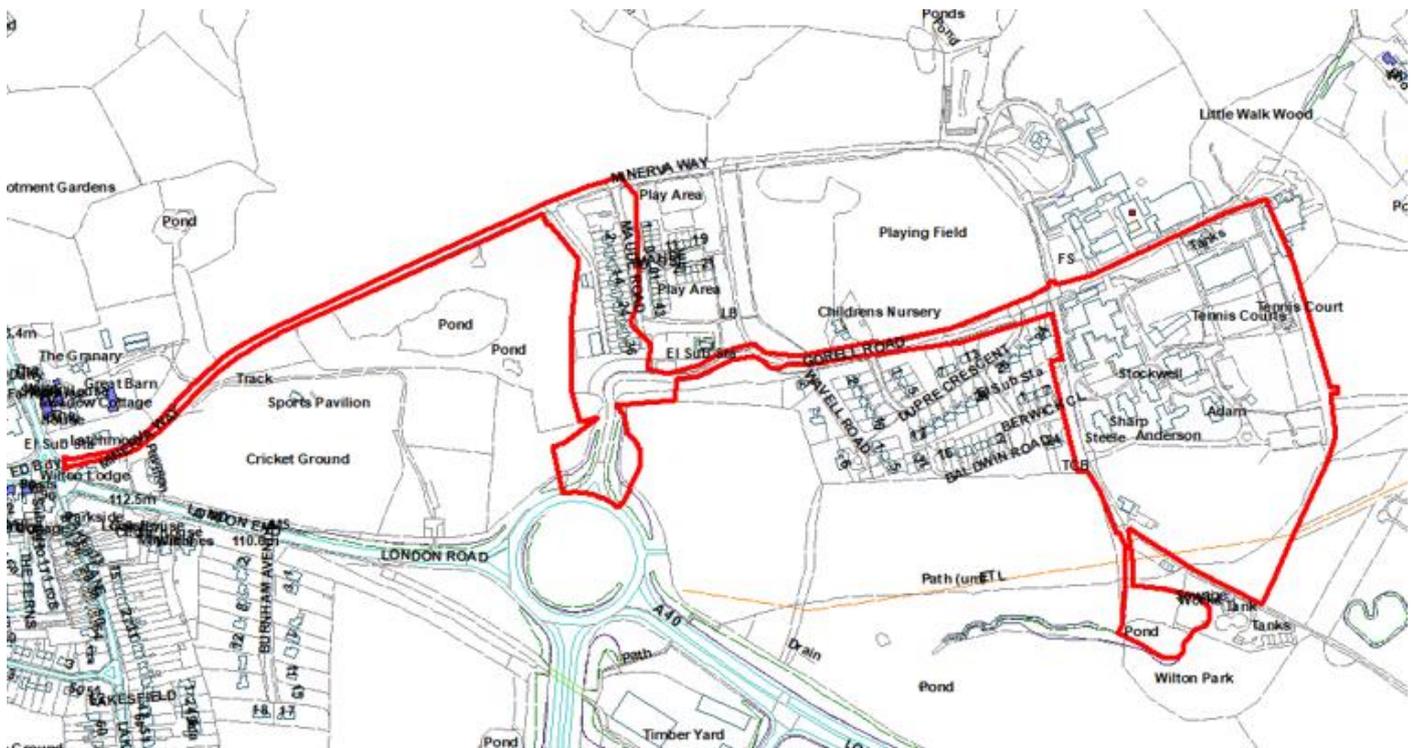
Green Belt

- Issues relating to impact on Green Belt were mostly dealt with under the outline planning application.
- The current MOD was considered as Previously Developed Land and therefore the replacement buildings need to ensure that there is no substantial harm to the Green Belt.
- Masterplan, Density and Height plans were submitted under 17/01763/OUT.
- In addition, a land budget was produced in conjunction with the above. The development in phases 1 and 2 would have an approx. footprint of 9,772 sqm of an overall land budget of 21,111sqm for new residential foot print.

Relief Road

- The delivery of the relief road is tied to the legal agreement which was completed as part of the outline application for the site.
- Section 278 on previous application only related to the roundabout works.

APPENDIX B: Site Location Plan



Do not scale – this map is indicative only

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APPENDIX C: Appropriate Assessment

Application Ref. PL/20/1718/DE

Proposal: Reserved matters approval pursuant to planning permission Ref 17/01763/OUT for Phases 1 and 2, comprising 147 dwellings, open space, landscaping, access within the site and car parking (matters of access within the site, appearance, landscaping, layout and scale to be considered).

Summary

Buckinghamshire Council, as Local Planning Authority, has carried out a Habitats Regulations Assessment (HRA) for net new homes in proximity to the Burnham Beeches Special Area of Conservation (BB SAC)ⁱ. The HRA screened in recreational disturbance from net new homes as having a likely significant effect on the integrity of the conservation purposes of the BB SAC. The HRA sets out what development is likely to have significant effects on the integrity of the conservation objectives of the BB SAC. It concluded that any net new homes within 500 metres of the boundary BB SAC should be avoided. It also concluded that any net new homes between 500 metres and 5.6 kilometres of the BB SAC need to be mitigated. The conclusions of this HRA can help inform the individual Appropriate Assessments of Planning Applications and Permitted Development.

Informing individual Appropriate Assessment of Planning Applications and Permitted Development

Evidence from the Council's Consultants Footprint Ecologyⁱⁱ has concluded that likely significant effects on the integrity of the BB SAC from recreational disturbance would derive from a net increase in new homes within a linear distance of 5.6 kilometres from the boundary of the BB SAC. The disturbance is from additional human and dog presence.

Using this evidence, Buckinghamshire Council's HRA determined that the likely significant effects within a 500 metre linear distance of the BB SAC boundary zone were so likely to harm the integrity of the conservation purposes of the BB SAC that net new homes should be avoided as it would not be possible to mitigate the impacts from the recreational disturbance. It also determined that net new homes within a linear distance between 500 metres and 5.6 kilometres of the BB SAC's boundary would need to be mitigated.

The HRA concluded that Planning Applications and Permitted Development, which provide for a net increase in new homes within the 500 metres to 5.6 kilometres zone would have a significant likely effect on the conservation features of the BB SAC and that such applications and permitted development can only be permitted if the applicant enters into a legal agreement with Buckinghamshire Council, as Local Planning Authority, to pay towards Buckinghamshire Council's Strategic Access Management and Monitoring Strategy.

Natural England (NE), the Government's conservation advisor, agreed with the findings in the HRA.

Appropriate Assessment of Planning Application reference number PL/20/1718/DE

1. The Conservation of Habitats and Species Regulations (2017)

In accordance with Regulation 63 of The Conservation of Habitats and Species Regulations (2017), a competent authority (in this case Buckinghamshire Council), before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

- a. is likely to have a significant effect on a European site...(either alone or in combination with other plans or projects), and
- b. is not directly connected with or necessary to the management of that site

must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.

A person applying for any such consent, permission or other authorisation must provide such information as Buckinghamshire Council may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

Buckinghamshire Council must, for the purposes of the assessment, consult the Conservation Body, NE, and have regard to any representations made by that body. It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate. In the light of the conclusions of the assessment, and subject to Regulation 64 (Considerations of overriding public interest), Buckinghamshire Council may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

In considering whether a plan or project will adversely affect the integrity of the site, Buckinghamshire Council must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.

2. Stages 1-3 Screening for Likely Significant Effects

Buckinghamshire Council accepts that this proposal is a 'plan or project' which is not directly connected with or necessary to the management of the Burnham Beeches Special Area of Conservation (BB SAC). The potential likely significant effects on the integrity of the BB SAC is from recreational disturbance. A net increase in homes is likely to result in additional visits to the BB SAC with consequential erosion and pollution within the BB SAC.

At this stage Buckinghamshire Council cannot rule out the likely significance effects on the BB SAC (alone or in combination with other plans or projects) because the proposal could undermine the Conservation Objectives of the SAC. This is because the proposal lies

between 500 metres and 5.6 kilometres of the boundary of the BB SAC and represents a net increase in homes within this zone which will lead to an increase in local population and a likely increase in recreational disturbance within the SAC.

As the likely significance effect cannot be ruled out at this stage an Appropriate Assessment must be undertaken.

3. Stage 4 Appropriate Assessment

500 metres or more to 5.6 kilometres

Based on the information proposed by the applicant, Buckinghamshire Council must decide whether or not an adverse effect on site integrity (alone or in combination with other plans or projects) can be ruled out. Mitigation may be able to be provided so that the proposal can reduce adverse effects.

The Council considers that the Strategic Access Management and Monitoring Strategy (SAMMS) which has been agreed with Natural England is robust and capable of mitigating the likely significant effects of the proposal over 500 metres and up to 5.6 kilometres provided the proposal pays a contribution towards the Strategic Access Management and Monitoring Strategy and legal fees to the Council.

a. Fees and Mitigation

For this proposal the following apply:

- Buckinghamshire Council List of Fees and Charges (Fees)
- Strategic Access Management and Monitoring Strategy (SAMMS)

If paid, the project as proposed would not adversely affect the integrity of the BB SAC.

Legal Fees

To cover Buckinghamshire Council's reasonable legal costs and disbursements incurred in connection with the Unilateral Undertaking and the Council's Monitoring Fee.

The monitoring fee is £541.02 and the legal costs will be determined on a case by case basis.

Strategic Access Management and Monitoring Strategy Contribution

The development will be required to make a contribution towards the SAMMS. SAMMS includes projects for visitor access management, monitoring and education measures on the BB SAC to mitigate the effects of new development on it.

A contribution to the SAMMS of £2,023.87 is required for each net home.

4. Conclusion

An Appropriate Assessment has been carried out for this development in accordance with the Habitats Regulations 2017. Without mitigation measures the Appropriate Assessment

concludes that the development is likely to have a significant effect upon the integrity of the SAC with the result that the Council would be required to refuse this planning application.

Buckinghamshire Council considers, following consultation with NE, that the above measures will prevent a likely adverse effect on the integrity of the BB SAC. Pursuant to Article 6(3) of the Habitats Directive (Council Directive 92/43/EEC) and Regulation 63(5) of the Conservation of Habitats and Species Regulations (2017), and permission may be granted subject to any other planning considerations.

Provided that the applicant has entered in to a Unilateral Undertaking to secure legal and SAMMS fees the planning application will be in accordance with the SAC mitigation requirements.

ⁱ <https://www.chiltern.gov.uk/article/10331/Chiltern-and-South-Bucks-Local-Plan-Submission-Documents>

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