

APPENDIX A: 19/08031/FUL

Consultation Responses and Representations

Councillor Comments

Councillor David J Carroll – request that the application is called to committee if minded to approve because of the many local community concerns.

Councillor Steve Broadbent - request that the proposed development is put before planning committee, should you be minded to approve the application. The complexities of the site, the scale of the development and significantly high level of local interest and concern regarding the proposals, will need full consideration should the application progress through your assessment.

Additional comments on amended plans - This proposed development would remove green assets from the local area and yet, amongst all the documents provided by the developer, there is an absence of any comprehensive sustainability plan. Within the appropriate policies, on a local and national level, full, proactive and ambitious consideration of environmental and sustainability factors within the scheme design should be made throughout the planning process to ensure these matters are given due prominence.

Parish/Town Council Comments

Hughenden Parish Council - The Parish Council strongly objects to this application as 65 dwellings is an over-development of the site. There is a lack of infrastructure, narrow dangerous lanes, inadequate drainage which is already over-stretched and it is within an area where doctor's surgeries are overcrowded.

The Parish Council would also add that there is a lack of evidence of enough attention having been paid to the SSSI and AONB regulations.

Consultation Responses

Natural England

Comments: No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

Supplementary comments: The site is in the Chilterns AONB, and the number of homes has steadily increased through the Local Planning process from the draft plan's 40-50 to the application's 65. We are of the opinion that the site may be more appropriate for a smaller scale of development, delivered as a Rural Exceptions site as was previously proposed.

However, we accept that if the mitigation suggestions within section 5.6 of the Landscape and Visual Impact Appraisal (October 2019) are implemented, the impact on the AONB and its visual receptors is likely to offset many of the proposed adverse effects. We advise an appropriate planning condition to ensure this is implemented.

It should be noted that Naphill Common SSSI and Bradenham Woods, Park Wood & The Coppice SSSI are a part of the Chilterns Beechwoods Special Area of Conservation (SAC). We note that the Preliminary Ecological Appraisal notes that 'any minor increase in recreational use of the neighbouring SSSIs could be further reduced via provision of appropriate public open space within

the site as part of the development scheme. Ideally this should include the option of a circular route, appropriate for use by dog walkers'. If this is being suggested as mitigation to counteract the impact of the development on the Chilterns Beechwoods SAC, an appropriate assessment will need to be carried out under the Habitats Regulations. However, we see no evidence that this circular walk has been included within the final application.

The Chilterns AONB Planning Officer

Comments: Part objection raised on grounds of biodiversity / habitat loss in the absence of a clear programme of ecological enhancement to the green infrastructure network between Naphill Common and Courns Wood.

The CCB accepts the principle of development is established by the Local Plan and the November 2019 judgement not to quash this allocation. In our view the LPA will need greater detail and assurances on habitat connectivity. We would seek appropriate mitigation measures in the agreed section 106 agreement to deliver the policy requirement of biodiversity connectivity. To achieve this requires a reconsideration of the layout, to open up migration/connectivity corridors.

Crime Prevention Design Advisor

Comments: No objection. The design and layout appears to incorporate the general principles of crime prevention through environmental design. There is a good level of surveillance across the site, back to back gardens and appropriate defensive space between the public and private realm all of which should contribute to reducing the risk of crime and anti-social behaviour in the future.

Buckinghamshire Healthcare NHS Trust

Comments: The Trust is currently operating at full capacity in the provision of acute and planned healthcare. This development will create potentially long term impact on the Trusts ability to provide services as required due to the funding gap it creates. A financial contribution is sought to mitigate this impact.

Thames Water Utilities Ltd

Comments: No objection with regard to foul water sewerage network infrastructure capacity. The proposed site would be located within 15m of a Thame Water Sewerage Pumping Station. Given the function of the pumping station we recommend that any occupied premises should be located at least 15m away from the pumping station.

Lead Local Flood Authority

Comments: No objection subject to planning conditions relating to securing final detail of the surface water drainage scheme and its future maintenance.

Highway Authority

Comments: No objection subject to planning conditions and securing funding towards improvement of local bus stops via a S106 Agreement. Planning conditions are necessary relating to detail of disposal of surface water from the highway; detail of private estate road, laying out of new access, restriction on no other means of vehicle access, off-site highway works, visibility splays, provision of parking & turning space and a construction traffic management plan.

Archaeological Service

Comments: No objection subject to a planning condition to secure a scheme of archaeological investigation.

Arboricultural Officer

Comments: No objection subject to planning conditions. A number of matters previously raised have been improved and addressed. Tree canopy cover has now been revised and meets the 25% minimum required for both existing and new tree planting within this site.

Ecological Officer

Comments: No objection subject to planning conditions relating to ecological mitigation and enhancement strategy, construction and environmental management plan, landscape and ecology management plan and the securing of a biodiversity offsetting payment within a section 106 agreement.

Control of Pollution Environmental Health

Comments: No objection, subject to a condition requiring the installation of electric vehicle charging points.

Community Housing

Comments: It is noted that the application includes 30 affordable homes and that the affordable tenure mix is 24 dwellings for Affordable Rent and 6 dwellings for Shared Ownership. It is also noted that the application indicates that 9 of the affordable homes are to be M4(3) 'adaptable'. I trust you will ensure that these properties meet the required technical standards.

There is a need for affordable housing in the District, particularly affordable housing for rent and if the proposal meets all of the planning requirements, the affordable homes will help to meet the need.

Representations

Amenity Societies/Residents Associations

Naphill and Walters Ash Residents Association – strongly objects. The proposal represents major development in the AONB which would be contrary to national AONB policy and no exceptional circumstances have been identified to justify it. The plan would destroy a greenfield in the AONB. The amount of homes would not be in keeping with a rural Chilterns village, detrimental to the landscape, the environment and biodiversity. There are new vacant homes nearby. The Transport Statement is flawed and Clappins Lane is unsuitable as a feeder road for new housing. The access arrangement would be a hazard and the junction with Main Road has restricted visibility. Walters Ash is at its limit in relation to traffic and parking issues. The scheme would have inadequate parking which would be pushed onto surrounding roads and there is an absence of footpaths. Water and sewage are near the limit of their capacity and the new homes will overwhelm the system. Surface water will run down the valley and the proposed pond is not large enough to deal with surface water. The development will increase pollution and damage to beech trees & other organisms in the nearby Naphill Commons SAC & SSSI. Loss of view and amenity and loss of quiet and dark night hours. Local doctor's surgeries already cannot cope so this will suffer with even more patients.

Other Representations

A substantial number of comments have been received objecting to the proposal, summarised as follows:

- The land should not be removed from the Green Belt and should remain protected
- This should not be allowed in the AONB and would be contrary to planning policy. There are no exceptional circumstances to allow this

- No need for additional housing and other options should be explored before countryside is destroyed, such as brownfield land. There are plenty of vacant homes in the area
- There is no local employment
- Overdevelopment
- Damage to the environment & wildlife with loss of grassland, hedges and mature trees
- Local roads, especially Clappins Lane cannot support traffic that the new homes will bring
- Create congestion, health and safety hazards and increase air, noise and light pollution
- Insufficient parking provision. Parking is already problematic in the area
- Pedestrian access will become dangerous as there are no pavements or verges
- There will be extra pressures on already stretched public services such as schools, GP surgeries, hospitals
- Light pollution
- Air pollution will be damaging to local wildlife and the Special Area of Conservation
- Loss of quality of life for local residents. Destroying the peacefulness of the countryside, wildlife, views
- Loss of privacy
- Local sewerage and electricity supply is already at capacity
- Devalue property price

Comments have been received supporting the proposal:

- The local villages can cope with additional residents. The local school struggles to fill classes and to protect local amenities such as shops, business etc. population growth is needed
- The Green Belt should be protected but this field is isolated and sites in area that is already developed. The site does not act to separate Naphill and Walters Ash
- Associated work to ensure that pedestrian traffic can be safely managed will be needed to be built into any planning decision.