



# **BE2 Hollands Farm Development Brief - Supplementary Planning Document (SPD)**

## **Consultation Statement**

**August 2021**



# Consultation Statement for the Hollands Farm Development Brief - Supplementary Planning Document (SPD)

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## **1. Introduction**

- 1.1.** This consultation statement sets out the work involved in preparing the Hollands Farm Development Brief (Supplementary Planning Document) and how the Council has involved the community and various stakeholders in its preparation.
- 1.2.** In line with Regulation 12 of the Town and Country Planning (Local Planning) (England) 2012 regulations and with Wycombe Revised Statement of Community Involvement (July 2018). This statement provides details of:
  - a. the persons the local planning authority consulted when preparing the Development Brief;
  - b. a summary of the main issues raised by those persons; and
  - c. how those issues have been addressed in the Development Brief.
- 1.3.** The Council consulted formally on the draft Development Brief during January and February 2021. More than 460 people responded to the consultation either directly by email or through Your Voice Bucks. The Council has considered all the responses and, where appropriate, has updated the Brief to respond to these.
- 1.4.** Early in the process, the Council established a Liaison Group of local stakeholders, which created the opportunity to gather local issues and insights. The draft Development Brief that we consulted on had therefore already worked through a wide range of local issues and addressed these where possible within the scope of the Brief.
- 1.5.** Many of the points raised through the consultation were not appropriate to being addressed by the Development Brief. They had either been exhaustively debated as part of the Local Plan process and subsequent legal challenge, or sought a level of detail that would be worked out through the process of considering planning applications for this allocation (the development management process).
- 1.6.** Main points which the Brief has been revised to respond to include:
  - Recognition of the unlisted Barn within the allocation, and its treatment within development
  - The requirement for trial trenching, as recommended by the Sustainability Appraisal report
  - Greater precision in setting out the analysis of transport access and movement
  - The addition of typical walking times between the development and the village centre / railway station
  - Recasting the SWOT as a Constraints and Opportunities analysis, and linking this to climate change actions
  - Greater precision on the treatment of heritage assets and their settings, especially in relation to redesign of junctions

- Greater precision in the role of the Principal Route and recognising to what extent a route via Princes Road can deliver two-way bus operation
- Recognition of the multiple land ownerships and how to manage the submission of multiple applications to deliver comprehensive infrastructure
- The potential role of the Parish Council for long-term maintenance of open and green space
- Staged funding and delivery of Little Marlow Lakes Country Park mitigations

**1.7.** Further detail on the consultation feedback and the Council's response is set out below.

**1.8.** Since the consultation on the draft Development Brief, this consultation statement has been updated to reflect the feedback received and how this has been taken into account into the final version of Development Brief. The final consultation statement is published alongside the Hollands Farm Development Brief (SPD) for adoption.

## **2. Development Brief preparation and early stakeholder and community engagement**

**2.1.** In August 2019, the Wycombe District Local Plan (WDLP) was adopted. Policy BE2 Hollands Farm sets out development requirements for the site. The Draft Hollands Farm Development Brief adds further detail to policy BE2 for how the site should be developed. Preparation of the WDLP including policy BE2 (Hollands Farm), involved extensive public consultation in its own right.

**2.2.** For the Development Brief a liaison group was set up. This commenced at the start of the Development Brief process in August 2019. The aim of the liaison group has been to provide a forum for the discussion of issues relating to development at Hollands Farm. The liaison group has played a central role in providing local information and scrutinising the production of the Development Brief.

**2.3.** The liaison group comprises representatives from:

- Local Ward Members
- Wooburn and Bourne End Parish Councillors
- Hedsor Parish Meeting
- Local residents
- Wooburn and Bourne End Neighbourhood Planning Working Group

- 2.4.** The liaison group has met four times prior to the publication of the draft Development Brief.
- 2.5.** The first liaison group meeting was held on the 7<sup>th</sup> October 2019. The purpose of this meeting was to scope out the key issues for the site. These can be summarised as follows:
- a. Road Infrastructure and Wider Connectivity:
    - Impact on traffic volumes congestion for surrounding roads and junctions
    - Safety and capacity issues at Ferry Lane/Hedsor Road junction and at Heavens Lea/ Hedsor Hill
    - Road safety due to speeding, parking on pavements/verges obstructing visibility for road users and pedestrians
    - Width of the proposed principal route through the site, capacity for a diverted bus route and location of bus stops
    - Connecting new roads into the site
    - Access onto Heavens Lea
    - Impact on existing footpaths and expanding the existing footpath and cycleway network
    - Car parking provision
  - b. Services and Facilities:
    - Where to locate a new primary school
    - Community wishes for a local convenience shop and new health care facilities
  - c. Environment and Landscape:
    - Separating the development from the Hawks Hill area;
    - The need to protect visual aspects up the hillsides;
    - Risk of more fluvial flooding as a result of building near the River Thames and River Wye; and
    - Surface water flooding at the southern end of the site, along Heavens Lea and Hedsor Road as a result of run-off from nearby higher ground.
  - d. Heritage and Conservation:
    - Impact on the Hedsor and Riversdale Conservation Area and nearby listed buildings; and
    - Recognition that houses to the south of Hedsor Road are part of Hedsor Parish forming part of a different character area.
  - e. Nature and Open Space:

- Provision of appropriate open space and play facilities.
- 2.6.** The scoping exercise as well as requirements set out in policy BE2 of the WDLP helped shape the vision for the site, objectives of the Development Brief, and the content of the Development Brief.
- 2.7.** Between October 2019 and March 2020 a series of meetings took place between Highways Development Management, local members and parish councillors for Wooburn and Bourne End Parish Council to discuss highway matters concerning access to the site and roads and junctions adjoining or nearby to the site. Meetings took place on the following dates:
- 18th October 2019
  - 30th October 2019
  - 27th January 2020
  - 17th February 2020
- 2.8.** On the 5<sup>th</sup> March 2020, a second liaison group meeting was held to share the vision and objectives for the site. A series of options was also presented. These options considered routes for the link road and bus route, the location of the primary school, development principles for dealing with heritage and conservation issues and options for green spaces and buffers. The full options are available to view on the Hollands Farm website.
- 2.9.** Between March and October 2020 officers from Development Management, Urban Design, Landscape, Ecology, Heritage and Highways were involved in developing the options and understanding how the different issues could be addressed.
- 2.10.** During this time there was a slight delay in progressing the Development Brief due to a legal challenge to withdraw the recently adopted Wycombe District Local Plan and specifically in relation to policy BE2 – Hollands Farm. In July 2020 the High Court dismissed the legal challenge, and in November the Court of Appeal refused an application to appeal against the High Court’s decision. The judgment stated that the decision is final and cannot be reviewed or appealed. Following this judgement, progress on the draft Hollands Farm Development Brief commenced again.
- 2.11.** On the 21<sup>st</sup> October 2020, a third liaison group meeting was called, where the draft Development Brief was presented.
- a. The liaison group were also invited to make written comments following the meeting. A number of comments were made which the Council responded directly to. See Appendix A for full details.
  - b. A large number of highway concerns remained. Many of the issues are details beyond the scope of the Development Brief and will be dealt with at the planning application stage through the Transport Assessment.



c. An issues log was set up at the start of the Development Brief process and was amended throughout the development of the draft brief. Appendix B sets out the final Issues Log for the draft Development Brief, summarised below:

- Access from Princes Road and Hedsor Road and how to deal with the restricted road widths
- Access from Millboard Road and how this can / should be integrated into the development
- Junction improvements surrounding the site, including Cores End roundabout and Hedsor Road / Ferry Lane
- Delivery of wider footpath/cycle links to the town centre/ train station and former orchard
- Separation of new development and Hedsor Road Conservation Area
- Location and type of green space and green buffers

**2.12.** The fourth and final liaison group meeting was held on the 3rd November 2020 to give an opportunity for liaison group members to discuss comments on the draft Development Brief, which had been presented a couple of weeks beforehand.

**2.13.** All the liaison group meetings were well attended. The agendas, information packs and notes of the each of the liaison group meetings are available to view on the Council website [here](#):

**2.14.** Issues within the scope of the Development Brief have been addressed following wider public consultation on the draft Development Brief.

**2.15.** Section 3 below sets out in more detail who we consulted on the draft proposals for the SPD and how we did this.

### **3. Who and how we consulted when preparing the Development Brief**

**3.1.** Public consultation took place from 6 January to 17 February 2021. This period was during a lockdown phase of the Covid-19 pandemic and so usual face-to-face events were not possible. The regulations in force at that time relieved the Council of the duty to place paper copies of documents at the usual deposit points. These would have been closed to the public then in any case.

**3.2.** However, we used a wide range of other methods to ensure that the public and stakeholders were aware of the consultation and had access to a range of ways of responding.

**3.3.** We used these consultation methods:

- Letters sent to all adjoining and nearby dwellings (over 700 households)
- Press Notice
- Facebook
- Twitter

- Local members bulletin
- Planning Bulletin
- Online survey set up on 'Your Voice Bucks'
- Hollands Farm webpage setting out background documents

**3.4. We contacted these external consultees:**

- Environment Agency
- Natural England
- Heritage England
- Little Marlow Lakes Country Park Partnership
- Thames Water
- Little Marlow Parish Council
- Cookham Parish Council
- Royal Borough of Windsor and Maidenhead (RBWM)
- Keep Bourne End Green Community Action Group
- Hollands Farm Liaison Group

**3.5. We contacted these internal consultees:**

- Lead Local Flood Authority
- Highways
- Public Rights of Way Officer
- Education
- Green Infrastructure
- Conservation and Heritage officer
- Development Management

#### 4. Summary of the main issues raised by stakeholders during the preparation of the Development Brief and how those issues have been addressed

4.1. This section sets out the main issues raised through the consultation and the Council's response to those.

4.2. 381 people submitted comments through Your Voice Bucks and another 81 submitted comments by email or hard copy. The high number of comments demonstrates the ongoing concerns of local residents about growth here. At this stage, what matters is whether those comments raise valid planning points which need addressing, rather than the overall volume.

4.3. A considerable number of the issues raised were not appropriate to being addressed by the Development Brief. They had either been exhaustively debated as part of the Local Plan process and subsequent legal challenge, or are seeking a level of detail that will be worked out through the process of considering planning applications for this allocation (the development management process).

#### 4.4. Community engagement and general points

##### a. Points raised include:

- Inadequate public engagement – lack of public workshops pre-Covid; inappropriate representation on the Liaison Group; letter drop should have gone wider; timing of consultation and brief development not comparable to similar projects; timing of publication of materials disadvantaged the community.

**Response:** The Liaison Group served to represent local residents and businesses, as evident from its membership (see section 2.2), and met with the Council and Site Promoters at several key stages during the preparation of the Draft Development Brief; this included one workshop session. This input raised a comprehensive range of issues and helped shape and focus the Brief during its development. A full public consultation on the Draft Development Brief was undertaken in January/February 2021.

- Neighbouring parishes should have been more closely engaged, including those within the Royal Borough of Windsor and Maidenhead

**Response:** The development brief is picking up the detail of how the site will be developed. Cookham Parish Council was directly invited to comment on the consultation.

- Language in the brief should be more prescriptive – use 'must' or 'will' rather than 'should'.

**Response:** The Development Brief has been prepared as a Supplementary Planning Document (SPD). The effect of using prescriptive language such as 'must' or 'will' would be to introduce new policy requirements over and

above those set out in the local development plan. This is unlawful for an SPD.

- The land in the north east of the allocation is not available for development.  
**Response:** the Development Framework identifies this land as part of the landscape buffer, so lack of development here does not impede the delivery of the allocation or the objectives of the Brief.

#### 4.5. Matters settled by the Examination in Public / by the Courts

##### a. Points raised include:

- Reduce the housing requirement here to reflect falling population projections.
- No sound basis for a capacity assessment of 321-467 homes – the maximum exceeds the growth target for Bourne End / Wooburn set out in policy CP4 of the Local Plan. Having a 5-year land supply means we don't need to deliver so many homes here.

##### b. Council response

The changes in population projections don't change the allocation of the site or the housing requirement – once the housing requirement is set in the Local Plan it can't be changed unless the Plan is reviewed. The issue of whether the right population and household projections were used in arriving at the Local Plan housing target was considered by the independent planning inspector who examined the Local Plan and was a key issue considered in the High Court Challenge so this point has been thoroughly debated. Whilst those projections have come down in recent years, the Government has decided to run with higher housing figures to boost the supply of housing nationally.

The 800 figure for Bourne End is not an "up to" figure in the Local Plan (Policy CP4) but part of a "broad distribution" of housing numbers across different places in the Plan area – so the Council cannot put a lid on development where development is acceptable in principle (e.g. because it is allocated in the Local Plan or is in accordance with Local Plan policies), even if the 800 figure is exceeded. Development of the site contributes towards meeting the Council's 5-year housing land supply requirement.

#### 4.6. Site analysis

##### a. Points raised include:

- The SWOT analysis does not assist in defining a strategy for development of this allocation.
- The Council must provide a detailed assessment of all local character areas across the villages to ensure the development responds in a holistic way.

b. Council response

The SWOT analysis has been re-cast as a consideration of Constraints and Opportunities, which aims to give a clearer analysis. It is also more succinct and less repetitive than the previous SWOT.

A detailed character assessment would not be a proportionate exercise for this Brief. Understanding of surrounding character will be built into the assessments made as part of the development management process.

**4.7. Landscape Character and place-making**

a. Points raised include:

- Landscape buffer should be at least 15m deep
- Landscape buffers are too deep, depth is not justified
- Insufficient separation between development and existing buildings, especially where Hawks Hill properties extend west into the site (The Dell to Samarra).
- Area of Attractive Landscape (AAL) omitted from the policies map.
- Visual impact from St Nicholas Church, Hedsor Park and Cliveden.

b. Council response

There is a natural tension between providing a degree of separation between existing and new developments alongside making efficient use of the land available within the allocation. The development brief indicates 20 metres as a guide and might be considered an average width. However, it is not prescriptive and the scale of landscape buffers will respond to individual circumstances and objectives across the site.

The Development Framework indicates a lower density for development below Hawks Hill, and detailed planning of this area could configure plots to achieve greater separation between buildings.

AALs no longer exist in policy – this policy was deleted when the Wycombe District Local Plan was adopted. The policy is superseded by CP9, CP10, and DM32.

Detailed visual impact assessment and mitigation will be required in the course of considering any applications here (see Development Brief, 7.4.1 (g))

**4.8. Urban design**

a. Points raised include:

- Proposed numbers of homes is too high, development is too dense and not consistent with surrounding area. Lower numbers would ameliorate issues with the impact of development.

- Proposed building heights are too high – 2.5 to 3 storeys is out of character with the context, giving issues of overlooking.
- Be more explicit about housing densities in different areas of the allocation.
- Bridgestone Drive / Hellyer Way overlook the site, they don't back onto it.
- There should be a buffer zone between the end of Bridgestone Drive and the principal route to provide separation and minimise impact of the new link on Bridgestone Drive residents.
- Need for greater separation between Hedsor Parish and Bourne End / Wooburn.
- There should be good footpaths, cycleways and play areas
- Crime prevention principles should be incorporated at the very earliest stage.
- Green buffers provided to back and sides of private gardens could facilitate criminal entry.

b. Council response

The range of densities considered across the allocation compares reasonably with similar new developments. Having a lower density would be an inefficient use of land and lead to more development being needed elsewhere.

Specific housing densities across the site are a matter for detailed consideration at the development management stage. The Brief needs to provide some flexibility to achieve optimum outcomes in terms of place-making.

Overlooking will be a matter for detailed planning consideration. Heights of up to 2.5 – 3 storeys will generally be in locations away from existing houses.

Some houses on Bridgestone Drive / Hellyer Way do overlook the development. But largely, most houses back onto it. New housing is expected to provide a buffer between existing residents here and the new principal route.

The whole of the allocated site lies within the parish of Wooburn and Bourne End. Hedsor Parish Boundary runs along Hedsor Road with built development to both sides of the road.

The brief sets out requirements for footpaths, cycleways and play areas.

Crime prevention principles are largely a matter for detailed consideration during the development management process. Certain principles such as placing housing back-to-back, including with existing houses, are an objective of the Brief.

Today, the back and sides of private gardens overlook open farmland, without the particular benefit of defensive planting or oversight from neighbouring properties or the public realm. New green buffers present scope for improving the situation.

#### **4.9. Conservation and heritage**

a. Points raised include:

- Proposed density will adversely affect the significance of heritage assets
- Insufficient buffer to setting of heritage assets.
- The development brief does not acknowledge the presence of a non-listed heritage asset (Hollands Farm Barn) within the allocation.
- The Sustainability Appraisal recommends that trial trenching take place before development happens.

b. Council response:

The density and proximity of development to heritage assets, and the potential impacts arising, will be considered at the planning application stage, to comply with policy BE2 1(b), to have special regard to the conservation of nearby Heritage Assets and their settings.

The barn is now included in the Brief, as is the recommendation for trial trenching.

#### **4.10. Access and Transport movement**

a. Points raised include:

- Development will generate a very significant traffic increase on already congested roads. There is a need for a detailed Transport Forecasting Assessment, to include the cumulative impact from all proposed developments in the wider area, and evaluate the effects of the principal route on the wider highway network. Emergency vehicles will get caught in queues and delays.
- There must be detailed assessment of all access routes:
  - Roads towards Cliveden etc. are very narrow and not fit for current traffic.
  - Millboard Road is privately owned, and there would be conflicts with commercial traffic and HGVs. Access from Millboard Rd is unacceptable and it would compromise the business function of the business park.
  - Delivery of Millboard Road access is critical to making the site accessible.

- Wessex Road should have been given more detailed consideration as a possible access, in the same way as Millboard Road.
- The Hedsor Road / Ferry Road junction needs redesign to make it safer, so take this opportunity. Engage with the community on design of junctions.
- The principal route is undeliverable for two-way operation because Princes Road is too narrow – the Council should consider compulsory purchase here.
- The roundabout at Princes Road would be non-standard, and cause loss of Local Green Space. Improvements here should extend to widening Cores End Road to make it safe for pedestrians.
- Safe access onto Hedsor Road needs third-party land, which would cause damage to heritage assets. Traffic will back up within the site.
- Cookham Bridge is a bottleneck for traffic and requires cooperation with the Royal Borough of Windsor and Maidenhead. Overall traffic should be reduced through sustainable travel options.
- Make Furlong Road one-way.
- Development is too far away from the village centre – isochrones in figure 4.15 are misleading – will lead to greater car use.
- Rights of Way (footpaths) should not be diverted, and their existing width retained at the site accesses from Princes Road and the entrance to Hollands Farm.

b. Council response

Planning applications here will have to prepare a detailed transport assessment which takes into account other planned development. The Council as Highway Authority will need to be satisfied that the development will successfully mitigate the traffic impacts of development. The proposed development will contribute to local road infrastructure to aid the movement of current and predicted traffic flows. A detailed assessment of all access routes will happen in the course of considering any planning applications here.

Development cannot be made to solve pre-existing issues, though it should avoid exacerbating these.

There is a public right of way onto and along Millboard Road for pedestrians, to which footpaths within the site could connect. Any potential vehicular access to/from Millboard Road would be secondary to the primary vehicular access points from Princes Road and Hedsor Road. The merits and practicality of such a vehicular connection will be considered in further detail at a planning application stage.



Additional accesses like Millboard Road would improve site permeability and provide a choice of routes for traffic to disperse. However, the site could still function well without this access and it is not a policy requirement.

Fuller consideration was given to Millboard Road as a potential alternative in the north, recognising that access from Princes Road presents some difficulties. The role of Wessex Road would have been as an alternative access to the Hollands Farm access onto Hedsor Road. This latter presents fewer issues than access from Wessex Road and creates the potential to improve safety at the junction of Hedsor Road with Ferry lane.

Policy DM2, Transport Requirements of Development Sites, sets out a range of sustainable travel criteria that sites must meet. Policy BE2 requires a redirected bus service and enhanced footpath and cycle links. Section 6 of the Brief sets out more detail on these transport requirements.

As a rule, it is a good principle to preserve a choice of routes (including two-way working) where possible. Making Furlong road one-way could have side-effects which might advantage some users, but disadvantage others. There are also issues with one-way roads which can create 'race-track' behaviour in drivers which would be a safety issue.

Detailed transport assessment of any proposals will show what junctions will need attention. If so, any re-design will need to meet today's safety standards so that people can see ahead in time.

Princes Road may not be able to deliver a two-way bus route in its entirety but can be upgraded to carry other classes of traffic in two directions.

A detailed design for a new roundabout is not contained in the Development Brief, but this type of junction is preferred in this location. Loss of green space, and any compensation for this, will be addressed as part of a planning application. Widening Cores End Road is not within the scope of the Brief, and new pedestrian options will be available elsewhere.

We acknowledge that mitigation will be needed as part of design of the access onto Hedsor Road. Detailed traffic management will be considered at the planning application stage.

The isochrones have been removed from the figure, and replaced in the text with typical walking times as estimated by Google (12-15 minutes).

Some slight diversions may be needed to support good place-making; the minimum width for any footpath must be at least 2 metres.

#### **4.11. Green and Blue infrastructure**

##### **a. Points raised include:**

- Lack of green space provision – lack of certainty over orchard access.

- Development must prioritise deficiency of green space in Bourne End / Wooburn.
- Need green open space with trees.
- Little Marlow Lakes Country Park (LMLCP) is not a suitable alternative green space – too far away / poor quality.
- The use of the Former Orchard as Public Open Space could make a contribution to the mitigation of effects on Burnham Beeches.

b. Council response

Substantial areas of green space are proposed within the Development Framework. It is not the place of the site allocation to address local deficiencies. However, strategic open spaces will aim to incorporate public recreational facilities that are most lacking in the local area. Substantial areas of formal and informal green space, including tree planting, are a requirement of the Development Brief and indicated in the Development Framework. Policy DM34 sets out a number of requirements for delivering Green Infrastructure and Biodiversity, including a tree canopy cover requirement of 25% of the site area. The Council's [Canopy Cover SPD](#) sets out how this can be achieved.

The orchard lies outside the allocation area but its delivery remains an objective by negotiation with the landowner. However, it would not be appropriate to rely on the delivery of access to the Orchard for the mitigation of recreational impact on the Burnham Beeches Special Area of Conservation (SAC). The Little Marlow Lakes Country Park (LMLCP) has been found in the Local Plan HRA (including Appropriate Assessment) to be a suitable location for mitigation measures to address any recreational impact from Hollands Farm on the SAC.

The issue is not about identifying a suitable alternative green space for the Hollands Farm site – i.e. we are not expecting to under-deliver green space on Hollands Farm. The LMLCP presents the opportunity to mitigate the impact of visitor pressure from the Hollands Farm development on Burnham Beeches SAC by creating an alternative to that SAC, thus easing recreational pressure there. The HRA for Hollands Farm SPD sets out a menu of measures which will improve access to and within the LMLCP.

**4.12. Ecology**

a. Points raised include:

- Concern about destruction of the environment, overall loss of wildlife and biodiversity and a net reduction in biodiversity in the immediate area.
- Provide further detail on biodiversity net gain – should be a minimum of 10%.

- Developers should protect hedgerows and green infrastructure during construction.
- Natural England agrees that LMLCP is suitable for mitigation of Burnham Beeches but recommends consideration of waterbodies on site, grasslands with the boundary; clarity about the 'wildlife area' what it includes and what enhancement could be provided.

b. Council response

The majority of the allocation area today is a mixture of arable fields and improved grassland, which are by their nature species-poor. The Brief not only sets out a framework which aims to maximise the preservation of existing trees and hedgerows, which are a richer source of wildlife, but also adds landscape buffers and open spaces which can be managed for net gain, and provide connectivity with existing green infrastructure. Even domestic gardens tend to support greater biodiversity than intensively-managed farmland.

Developments will be required to provide a net gain in bio-diversity as a result of adopted Local Plan policy. Once new legislation is passed proposals will have to deliver more, and this will be set out in a supplementary planning document the Council is looking to adopt by the end of the year.

Protection of existing trees and hedgerows is often picked up as a condition of planning consent.

The Appropriate Assessment(AA) has been amended (AA para 4.21) to reflect input from Natural England, recognising that, while they are not a SAC issue for the AA to address, opportunities for better wildlife management could be developed further.

**4.13.** Flood risk and sustainable drainage systems

a. Points raised include:

- Concerns about flood risk from Thames and / or Wye.
- The BE2 allocation lies within Flood zones 1 and 2, the majority in zone 2.
- The majority of the site lies within source protection zones 2 and 3.
- Early engagement on river crossings and development within 10m of a main river is needed.
- Development will exacerbate surface water run-off from Harvest Hill.
- School site includes an area of surface water flooding.

b. Council response

The majority of the site lies in fluvial Flood Zone 1 not Flood Zone 2. The Sequential Test has been passed as part of the site being allocated in the

Local Plan. A sequential approach within the site will be followed and any proposal will need to be accompanied by a site-specific flood risk assessment to demonstrate how the proposals deal with flood risk from all sources.

Any application here will also need to:

- Comply with policy DM38 Water quality and supply in relation to Source Protection Zones protection.
- Show how it meets the requirements of policy DM15 “Protection and Enhancement of Rivers and Streams Corridors”.
- Demonstrate that surface water runoff from the proposed development will be safely contained on-site up to the 1 in 100-year category, plus an allowance for climate change storm event so that flood risk is not increased elsewhere.

Education facilities are classed as “more vulnerable” uses (as is housing). This part of the site is in Fluvial Flood Zone 1. There are surface and groundwater flood risks but careful flood management can mitigate these. Any proposal for a school here will need to be accompanied by a site-specific flood risk assessment and mitigate flood risk from all sources. The site may be configured so that school buildings are located away from areas of surface water flood risk.

#### **4.14. Services and amenities**

##### **a. Points raised include:**

- Impacts on neighbourhood not addressed, especially roads, healthcare, parking, and supporting the village centre.
- Overall lack of public amenities and facilities to support the development, including car parking.
- Increased pressure on parking at the shops.
- Little Marlow Waste Water Treatment Works can't cope with current demands – infrastructure upgrades should be secured by condition before any planning application is considered.
- School location too close to Millboard Road – issues with noise and traffic.
- The Brief needs to provide assurances on the delivery of BE3, Health facilities in Bourne End and Wooburn.

##### **b. Council response:**

The infrastructure impacts of development were worked through as part of the Local Plan process, supported by the Infrastructure Delivery Plan, which informs the infrastructure requirements set out in policy BE2. These will be further developed through the development management process and negotiation of planning obligations.

Walking and cycling measures aim to minimise local car use for short trips.

Thames Water have identified the water network capacity in this area is unlikely to be able to support the demand anticipated from the Hollands Farm development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developers are encouraged to work with Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.

The school location is not fixed but is indicated in what is presently understood to be the most advantageous position. All potential locations have a mix of advantages and disadvantages. The present location is likely to have the fewest problems with traffic and is well located for walking to from within the site and via existing connections to the surrounding neighbourhoods.

The Council cannot require health providers to deliver a facility here. Section 6.9.3 of the Brief sets out how development here might facilitate the delivery of a new health centre.

#### **4.15. Noise, Vibration and Air Quality**

##### **a. Points raised include:**

- Noise pollution from extra traffic in the surrounding countryside.
- Air pollution from increased traffic, no mitigation measures proposed.
- There should be an assessment of current and anticipated noise and air pollution levels and possible solutions.

##### **b. Council response:**

The preferred route through the site is expected to help to reduce traffic currently using some of the nearby country lanes to avoid congestion in and around Bourne End.

Establishing walkable and pedestrian-friendly development is a key objective of the Development Brief, minimising the need to drive within the local area. Levels of harmful emissions at Bourne End do not exceed National Air Quality Objectives and have been falling for several years now as technology improves. With the increasing shift to electric vehicles, this trend is expected to accelerate. Consequently, any air quality impacts are likely to be very local and short-term.

Noise and air quality impacts will be considered as part of a planning application and dealt with accordingly. The Council's [Air Quality SPD](#) sets out how planning applications should measure and mitigate air quality impacts.

#### **4.16.** Climate change and sustainability

##### a. Points raised include:

- No detailed information on how houses will be eco-friendly – should have solar panels – highest possible standards to minimise CO<sub>2</sub> emissions.
- There should be electric vehicle (EV) charging points.
- Need tree planting to offset carbon emissions.

##### b. Council response

Eco-friendly housing is matter for a planning application and/or building control. Policy DM33 sets out how developments should integrate renewable technologies.

The Council's [Air Quality SPD](#) sets out requirements for the provision of EV charging points in new developments. This will be addressed as part of a planning application.

Tree planting is a principle incorporated into the Development Brief and will be further detailed in a planning application. See also references above to DM34 and tree canopy cover.

#### **4.17.** Character areas

##### a. Points raised include:

- Figures 6.1, 6.2, 6.3 show boundaries that are too hard-edged and 'fixed' looking.

##### b. Council response

These figures illustrate some of the principles of site layout and the potential relationships between different elements of a development; they do not prescribe fixed boundaries.

#### **4.18.** Delivery

##### a. Points raised include:

- The Brief should require planning applications to be full and not outline.
- The Brief should make reference to how comprehensive development can be achieved through the submission of separate applications for different parts of the allocation.
- The requirement for detailed phasing and infrastructure delivery plans is premature / unjustified.
- Buffer zones should be transferred to the Parish Council for long-term stewardship.

- Infrastructure delivery should take account of s106 contributions from running track development at Little Marlow.
- Funding / delivery of all Little Marlow Lakes Country Park (LMLCP) mitigations prior to development is unreasonable.
- Changes to LMLCP cannot be imposed by third-parties. Impacts on access, amenity and capacity together with changes to Rights of Way should be addressed to the landowners.
- It is premature and prescriptive to set out LCMP mitigations. Further development should be in consultation with LMLCP partnership and local nature conservation interests.
- Delivery of policies has been watered down in respect of bus routes, width of Princes Road and enhanced foot / cycle links which are dependent on third-party access agreements. These should be requirements and delivery ensured.

b. Council response

The Council will seek detailed information when it deems it necessary to ensure comprehensive delivery of the site allocation. There are limited circumstances under which the Council can require a full planning application instead of an outline.

The Brief has been updated to recognise and manage a scenario where separate applications are submitted.

Delivery of the preferred route is especially critical to the delivery and timing of development across the site as a whole, along with the principles of other key infrastructure (e.g. drainage/SuDS and open space) for which a plan is required.

Open/green space management will be determined as part of a planning application. The Brief has been updated to recognise Parish Council stewardship as a management option.

The running track contributions are planned to go towards signage works for the LMLCP.

The Appropriate Assessment for the development brief has been reviewed. The mitigation measures will need to be delivered in a timely manner, giving certainty that the proposals will not adversely affect the SAC. The precise timing of funding and delivery will be agreed as part of the planning applications.

Developers will need to engage at the earliest stage with LMLCP landowners to secure agreements as necessary for the final mitigation package to be successfully delivered. One of the landowners is Buckinghamshire Council.

The Appropriate Assessment for the development brief demonstrates that with an indicative package of mitigation measures, no adverse effect will occur at Burnham Beeches in relation to recreational impacts. The AA does not prescribe the final mitigations. This will be through the planning application process, in agreement with the Council and Natural England, and during which stakeholders such as the LMLCP partnership and local nature conservation interests can have their say.

The Council cannot require bus operators to provide services, however, development here will be able to facilitate the re-direction of at least one existing service. We are anticipating foot and cycle links onto both Millboard Road and Bridgestone Drive.



## 5. Appendix A: Liaison Group Comments on the Draft Hollands Farm Development Brief (pre public consultation)

### 6. Table A1: Wooburn & Bourne End Parish Council Comments

Issue	Buckinghamshire Council Response
<p>There are a number of issues which we appreciate are not the responsibility of the Developer and therefore are not an explicit condition of the Development Brief but we feel are critical to the success of the development. These are Highways issues that are in the hands of Buckinghamshire Council's Highways Department and need to be addressed urgently. We feel there should be an agreed action plan around them before any planning application could be considered for the site. We have explained these issues where they arise and they are indicated in bold. We would like your assurance that these will be escalated as a matter of urgency in Buckinghamshire Council to ensure they are considered in parallel with the period of consultation on the Development Brief.</p>	<p>The role of the Development Brief is to consider the impact of the site, existing issues cannot be directly addressed through the Development Brief, although it is helpful to be made aware of them which we now have in a detailed issues log. It will be for the planning application stage to consider the site's impact upon the immediate and surrounding area. Anything that is not as a direct result of the development will need to be addressed through a separate process, e.g. this could be through a Neighbourhood Development Plan or your local Community Board.</p>
<p>Second paragraph. Please insert the words "Wooburn and Bourne End Parish Council's" so that the second sentence reads:</p> <p>To help inform this Development Brief, the Council set up a Local Liaison Group in August 2019. Representatives from the local area included local ward and district councillors and community representatives of Wooburn and Bourne End Parish Council's Neighbourhood Planning Group.</p>	<p>Accept recommended changes.</p>
<p>Third paragraph – we will have met four times before this goes for wider consultation.</p>	<p>Update prior to public consultation to include 4th November meeting.</p>

Issue	Buckinghamshire Council Response
<p>2.1. Community Key Issues</p> <p>We believe the following key issues should also be included:</p> <p>2.1.1. Road Infrastructure and Wider Connectivity</p> <ul style="list-style-type: none"> <li>· road safety: speeding, parking on pavements/verges obstructing visibility and push chairs. These are common problems throughout the Parish and need to be designed out so that they are not problems in this development and should therefore be mentioned in the brief</li> <li>· Concern of residents to ensure no access from Heavens Lea at any time before, during or after the Development begins and ends. We feel this should be mentioned because at planning application stage there may be a request for temporary access from Heavens Lea and this might slip through. We have another example in the Parish where temporary access was granted and 13 years on it is still accessed.</li> </ul>	<p>Accept recommended changes to be added to chapter.</p>
<p>2.1.3 Environment and Landscape</p> <p>Please add:</p> <ul style="list-style-type: none"> <li>· Protect visual aspects up the hillsides</li> </ul>	<p>Accept additional wording.</p>
<p>Section 4.2 Settlement Character</p> <p>4.2.1 Context: second sentence delete “market town” as this is incorrect. We are a collection of settlements – we have never been a market town.</p>	<p>Apologies, market town is incorrect. Market town to be removed. Bourne End to be referred to as a large settlement as identified by the Settlement Hierarchy supporting the Local Plan allocation.</p>

Issue	Buckinghamshire Council Response
<p>Figures 4.2.4 to 4.2.7 – while we appreciate the photos show something of the character of Bourne End, they are very misleading as they show no traffic or any of the parking issues we feel are critical to resolving through good design. We attach some photos from our draft NDP which show these issues. We suggest the photos currently in the brief are deleted as they don't really add anything or if they are to be included that examples of parking issues are also included to support some of the requests we make to include design and layout actions on parking and traffic flow. We attach such examples at the end of this letter.</p>	<p>The purpose of the photos is to show the different character areas rather than the parking and congestion issues. Photos provided by the parish council will be included as an appendix to show this issue.</p>
<p>Section 4.4 Access, Transport and Movement  4.4.1. Vehicular – please delete “and at Heavens Lea”. The road may border the site but it is not a potential access point having been ruled out by Highways Department already and is against both Hawks Hill and Hedsor Road residents’ wishes.</p>	<p>Whilst we understand your concerns this section is purely factual, i.e. what is existing. It is correct to say the site adjoins Hawks Hill here as the road abuts the site. Section 6 for the development framework makes it clear why this option for access is not suitable.</p>
<p>Section 4.5 Green &amp; Blue infrastructure  Fourth paragraph (p32) references policy DM13 – this policy is missing from your list on page 9 and should therefore be added to the list of policies that apply.</p>	<p>Agree, add DM13 to policies section.</p>
<p>4.8. Services and Amenities  We note Fig 4.8.2 shows the sewerage on the site. We are concerned that these sewers and those that they connect with have the capacity to deal with the additional dwellings. Policy DM38 is clear that Developers are required to demonstrate “how they will be</p>	<p>Thames Water were consulted on as part of the Local Plan examination, where the site and number of dwellings were made communicated to them. They responded at the publication stage where it was identified ‘The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient</p>

Issue	Buckinghamshire Council Response
<p>served by adequate infrastructure capacity in terms of water supply, foul drainage.....”. We would like to understand what studies have taken place to provide assurance on this matter particularly as anecdotally during times of flooding eg 2014, sewage backed up in some houses along the western side of Hedsor Road. There are questions on how many houses this sewer currently serves, what an additional 467 dwellings represents as an increase and how that might affect this sewer and the main sewer that it connects with.</p>	<p>capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered’.</p> <p>It is for the developers to work with Thames Water to ensure sufficient capacity is provided. This level of information will inform the planning application stage and be required by planning condition. It is not something we have details about at this stage.</p>
<p>4.10 SWOT</p> <p>4.10.1 Strengths</p> <p>(4.8) states comprehensive range of essential retail, health and community facilities:</p> <p>The “health” element is not a strength and should be listed under weaknesses. Health provision is not adequately served today in Bourne End with Orchard Surgery often closed one to two days a week and the Hawthornden and Pound merged surgeries having only part time doctors and having difficulty attracting new Doctors to the area. Some three years on the CCG still have not identified a site for a new medical facility.</p>	<p>This point is recognising there are healthcare facilities, however we appreciate that these facilities are in need of modernisation and as such it is difficult to attract GP’s, leaving a shortage in service provision. A new healthcare facility to be added to the opportunity section.</p>
<p>4.10.2 Opportunities</p> <p>(4.4.) Vehicle Access points: the wording is weak. Please replace with “ Millboard Road is a potential major vehicular access point, in addition there are minor access points through Bridgestone Drive and Wessex Road.”</p>	<p>If Millboard Road is delivered as part of the development, this should only be a secondary access point. This is because the introduction of an access to the site via Millboard Road may undermine or completely remove the advantages of having a north/south road through the site and encourage more traffic and consequent congestion through Bourne End. The modelling work carried out for the Local Plan allocation showed</p>

Issue	Buckinghamshire Council Response
<p>We feel strongly that this is critical to the success of the site and Buckinghamshire Council must address the adoption of Millboard Road before any planning application can be considered.</p>	<p>by taking traffic off of Cores End Road at Princes Road/Cores End roundabout, congestion would be reduced through the town centre. If Millboard Road is used as an access point then traffic will need to continue along Cores End Road before turning off onto Millboard Road, therefore reducing the benefits of the link road. The three roads referred to here (Bridgestone Drive, Millboard Road and Wessex Road) would only be suitable for as secondary access points.</p>
<p>4.10.3 Weaknesses (4.4) Constrained vehicular entrances to site both north and south. Please add “and a dangerous junction Hedsor Road/Ferry Lane”.</p>	<p>Development Brief to include the need to mitigate the highway impacts, which will include road safety issues at the Hedsor Road/Ferry Lane junction.</p>
<p>Fig 4.11.1 only shows junction design impact at Hedsor Road. The junction at Hedsor Road /Ferry Lane is also critical to the success of this development.</p> <p>Again we feel the Hollands Farm exit onto Hedsor Road, the Hedsor Road/Ferry Lane junction needs to be addressed by Buckinghamshire Council as a priority to set out their expectations and possible options.</p>	<p>Figure 4.11.1 to be updated to include the wider Hedsor Road /Ferry Lane junction.</p>
<p>4.10.4 Threats (4.3) Loss of perceived separation – there will be an actual loss of separation. Please insert “actual and perceived”.</p>	<p>For consistency the Development Brief takes the wording set out in the Local Plan policy. BE2 1c) ‘Maintain a sense of separation between Harvest Hill and the new development site’.</p>
<p>Parking: We are concerned that improper parking on roads, verges, pavements is a threat to traffic flow, obstruction, vehicle and pedestrian safety and should be included under threats.</p>	<p>The Development Brief will be updated in the community issues section to acknowledge that surrounding the site this is an issue and therefore</p>

<b>Issue</b>	<b>Buckinghamshire Council Response</b>
Please therefore insert new (4.10) improper parking on roads, verges, pavements is a threat to traffic flow, obstruction, vehicle and pedestrian safety.	careful design and parking standards will need to make sure these issues don't arise within the site.
A SWOT question – should the Development Brief have a table mapping back where each SWOT element is addressed.	It would be difficult to do this given the number of SWOT elements and also each element may be addressed in a several ways so this is likely to be difficult to link together.
<p>5.2 Development Objectives</p> <p>5.2.1. Objective 1</p> <p>b) elsewhere the term “actual and perceived” has been used and for consistency it would be appropriate for these words to replace “physical and visual”.</p>	The aim of the objective here is to create a physical separation so that there is a perceived gap between the development and Hawks Hill/ Harvest Hill as in line with the policy wording.
5.2.1 h) we note that you are following the table in DM16 but are interested to know how many residents are envisaged for the 467 dwellings.	We have applied 2.5 people as an average per household. This is based on the latest Housing and Economic Development Needs Assessment evidence.
<p>5.2.5 Objective 5</p> <p>We think there should be an objective in respect of parking otherwise it will happen indiscriminately on roads, pavements and verges. Please insert a new paragraph:</p> <p>“f. Ensure the layout and landscaping provide sufficient convenient parking to deter parking on pavements and verges”.</p>	Accept additional wording to objective 5.
6.0 Development Framework	To be amended to figure 4.1.4.

Issue	Buckinghamshire Council Response
Section 6.1.1, page 49 – reference made to Figure 4.1. but it does not exist although figures 4.1.1. to 4.1.4 do exist.	
<p>6.2 Conservation and Heritage</p> <p>6.2.1 Cores End Roundabout.</p> <p>While Princes Road will be part of the roundabout it has width and parking issues and there should be a section in 6.2. dealing with Princes Road issues.</p>	<p>Further detail in section 6.3 will be added to the Development Brief to clarify the road width issue, it will be for the planning application stage to determine how this will be best dealt with.</p>
<p>6.2.3 Hedsor Road/Principal Route Junction</p> <p>Second paragraph “A T-junction is preferable....” We consider that road safety is the priority and should determine what is preferable. This junction is listed as a threat. In addition there is a lack of guidance/expectation in respect of Hedsor Road/Ferry Lane junction and traffic on Upper Hedsor Road. With increased traffic from the site turning left and right at a junction where vehicles are rarely complying with 20mph speed limit will force people to take risks when exiting the development.</p>	<p>Wording now identifies the design is dependent on a requisite junction analysis, a T-junction is preferable over a roundabout option as this is less intrusive from a conversation area perspective.</p> <p>In respects to Hedsor Road/Ferry Lane junction the Development Brief requires mitigation improvements for this, it will be for the transport assessment and planning application stage to determine exactly what this is (see section6.3.8).</p>
<p>While the Development Brief is not the place to solve the problem – this requires guidance from Highways Department on possible solutions to the road safety risks the issues should be properly identified by them and the best options including compulsory purchase of part of adjacent field. They should not be constrained in identifying options that would make a real difference to traffic flow not only now but for the future.</p>	<p>Suggested wording to be included in the Development Brief. In terms of CPO of the adjacent field this is not an option as it is not a requirement of the site specific policy in the local plan as such there are no special circumstances that would justify development in the green belt.</p>

Issue	Buckinghamshire Council Response
<p>We would suggest you replace the words with: “Options for the site exit at Hedsor Road should be identified that assist traffic flow and minimise the risk of pedestrian and vehicular accidents”.</p>	
<p>We also consider that there should be words added in respect of the Hedsor Road/Ferry Lane junction which is currently a very dangerous junction with a recent fatality and frequent accidents.</p> <p>“Traffic leaving the site turning right will quickly reach the Hedsor Road/Ferry Lane junction which must be redesigned to assist traffic flow and minimise the risk of pedestrian and vehicular accidents”.</p>	<p>Development Brief to include the suggested wording.</p>
<p>6.3 Access and Connectivity</p> <p>6.3.3 Cycling – typo “(with pedestrians nor vehicles)” should be “not”?</p>	<p>Amend to ‘not’</p>
<p>6.3.5 Servicing - we are concerned to ensure the prevention of bottlenecks arising from parking on roads, pavements, verges and would like to see that as a design priority. It is only mentioned in 6.7 as being discouraged along the principal route but it is a problem around the Parish in many of the side of streets.</p>	<p>Additional wording now include in section 6.3.7 ‘Parking for new residential areas should follow the Buckinghamshire Countywide Parking Guidance (2015) and ensure careful designed to discourage parking on roads, pavements and verges which are not intended for this purpose.’</p> <p>Note it is not for the development to solve existing problems in the Parish.</p>
<p>6.3.7 Parking – only mentions parking will be discouraged along the principal route. Even though it says parking should follow BC’s Parking Guidance I think it needs to set out a design expectation early on that the design will anticipate where parking might occur</p>	<p>This detail is set out in the Bucks Parking Guidance document. Development Brief action to review whether anything specific for Hollands Farm needs to be identified.</p>



Issue	Buckinghamshire Council Response
not only on the principal route but on other roads, pavements and verges and design in prevention measures.	
6.3.8 Off site junction improvements Please add Millboard Road.	Include (subject to deliverability of Millboard Road).
6.3.10 Off site contributions Please can you raise up through the Organization that Highways department should be made aware of the projected CIL funds that will arise from the Development so that there is a discussion at the highest level of how funds could be allocated for Highways improvements which are necessary to make this development successful. The development presents many opportunities to improve traffic flow around the site and to address safety issues using CIL monies generated from the development. The Parish Council would like to be party to discussions on how the road system around the site can be improved.	Millboard Road is not requirement and does not fit with the wider transport strategy for the site therefore the Council would not look to spend CIL monies on adopting Millboard Road. How CIL receipts are used and prioritised across the Council are part of the wider capital programme, it is not just a highway matter.  However the parish council will be entitled to 15% or 25% of the CIL monies (depending if a NDP is adopted at the time planning permission is received). This money could be used to help fund pedestrian/cycle access to Millboard Road.
6.4. Green and Blue infrastructure 6.4.2. Sets out the allocation of Open Space and the calculator. We are interested to know the number of residents that 467 dwellings is estimated to generate.	See above, 2.5 persons per household.
We note parking will be provided to serve the football and MUGA pitches. Please can you advise how much parking is envisaged and how it has been determined.	Development Brief action point to clarify. Parking provision will need to adhere to the standards for a D2 Leisure use within Zone 2 set out in Bucks Parking Standards.

Issue	Buckinghamshire Council Response
	Specifically, this would equate to the respective floor spaces of the MUGA and pitches and consequently require one parking space per 26m <sup>2</sup> .
While we understand the point about changing rooms we did not see anything about Toilet facilities – what is envisaged? The players may arrive dressed to play, but their vehicles are not equipped with toilet facilities.	Development Brief action point to clarify this isn't a requirement.
6.7 Services and Amenities 6.7.3 Utilities –what are the risks for existing properties in the area. Given the high groundwater and topography of whole Hedsor Road area is any pumping capacity being considered?	This point is too detailed for the Development Brief, this detail will be at the planning application stage. Sustainable Urban Drainage Systems will take into consideration where there are high ground water levels and how these will be accommodated.
7.2 Onsite Infrastructure We note the point about adoption of strategic open space. We would like to discuss what is involved as Wooburn and Bourne End Parish Council may be willing to adopt subject to a case being made to the Council for approval.	When we reach this stage we will engage with the Parish Council to discuss it. Currently the management of the Strategic Open Space is to be determined – this will be at the planning application stage and covered in the S106 legal agreement.
<b>Further comments from WBE PC</b>	
While, we do appreciate that the Development Brief has taken on board many of the critical points that have been raised in previous meetings, we do wish to re-iterate our concern that while the Developer is responsible for what happens in the development site, there will be significant road traffic and safety impacts in the road network bordering the site. We are particularly concerned that	The policy requirement and preferred route for the link Road is Princes Road to Hedsor Road. This is what has been modelled for the Local Plan allocation. Millboard Road is not required for the site and therefore the Council will not CPO the road. However should the developers acquire the road, this could be used for a secondary road option and BC could

<b>Issue</b>	<b>Buckinghamshire Council Response</b>
<p>Highways are hiding behind their policy to await a planning application before undertaking any work on what mitigations on the surrounding road system would be necessary for a site of this size (467 dwellings).</p> <p>We are all appalled that no-one has discussed the adoption of Millboard Road which in every conversation gets downgraded in importance and which we see as critical for the success of the development.</p>	<p>adopt it, this would need to be brought up to standard at the cost of the developers.</p> <p>However if the developers do bring it forward as a secondary access road, it is heavily forewarned that the use of Millboard Road as part of the access strategy for the Hollands Farm development could actually prove to be detrimental to traffic flow within the centre of Bourne End based upon the modelling data commissioned by the council to support the site's inclusion within the Wycombe Local Plan. Specifically, the use of a north/south Link Road through development mitigated the development's traffic impact and general conditions by addressing congestion outside the confines of the site.</p>
<p>The development should generate some £3 to £4 million in CIL funds and there are real problems to solve in access to and from the site in Princess Road, Hedsor Road and Millboard Road and we feel strongly that traffic movements and concepts in principle should be identified ahead of the receipt of a planning application so that it is clear who will pay for what and this is set out in the Development Brief, We urge your team to open a dialogue with Highways department to get them to act now and also within Buckinghamshire Council on how the CIL funds generated by the development could be used by Highways to improve the road system around the site as part of the mitigations.</p>	<p>As identified above, the road is not requirement and does not fit with the wider transport strategy for the site therefore the Council would not look to spend CIL monies on adopting Millboard Road. How CIL receipts are used and prioritised across the Council are part of the wider capital programme, it is not just a highway matter.</p> <p>However the parish council will be entitled to 15% or 25% of the CIL monies (depending if a NDP is adopted at the time planning permission is received). This money could be used to help fund pedestrian/cycle access to Millboard Road.</p>
<p>Bucks website has not been updated to include all of the different meeting notes for Hollands Farm. Please kindly update asap. Thank you.</p>	<p>This has now been updated.</p>

<b>Issue</b>	<b>Buckinghamshire Council Response</b>
<p>Photos in fig 4.2.4 to 4.2.7 are empty of traffic and provide a misleading impression of Bourne End. We have separately sent you a batch of emails which show the character of the area and traffic. Please can you include some of these photos. I believe Cllr Appleyard may also send some photos.</p>	<p>The purpose of the photos is to show the different character areas rather than the parking and congestion issues. Photos provided by the parish council will be included as an appendix to show this issue.</p>
<p>DB: Adoption of green spaces - the Parish Council is interested (subject to Council meeting approval) in taking responsibility for the open spaces. However we do need to understand what this would entail particularly regarding sports pitches and what that would involve. Please can you provide information on this so that we can consider it.</p>	<p>Should the developers choose to go down this route, we will engage with you on this matter. This level of detail will be identified at the planning application stage.</p>
<p>SA: Little Marlow Country Park does not envisage toilets. We suggest this be addressed.</p>	<p>I presume you are referring to the Appropriate Assessment and not the Sustainability Appraisal. Toilets were considered at part of the mitigation strategy but the professional judgement of Aecom did not identify this as a necessary requirement. I will forward on your comments to Aecom for further consideration.</p>
<p>SA: The Thames path is a potential pedestrian and cycle path to the Country Park and this should be included in the assessment</p>	<p>This is inferred through Option K, providing a link to the recreation ground which then provides a route to Camden Place, linking to the Thames Path. This could be made clearer as also identified in the Appropriate Assessment. This comment will be forwarded onto Aecom for consideration.</p>

## 7. Table A2: Hedsor Parish Meeting Comments

Issue	Buckinghamshire Council Response
<p>1. Site location</p> <p>It is concerning to note that there is no mention within the Development Brief that the southern part of the site, i.e. Hedsor Road, is a Parish boundary and none of the maps are marked up as such. I would request that this is amended in the consultation documents so that it is not misleading for those that do not know the area well and could assume the site directly affects those living in Wooburn and Bourne End Parish only.</p> <p>Further, on all maps, please can I question why the site itself is marked up 'Bourne end' when the centre of Bourne End village, with all shopping amenities is over a mile away? The site is on the edge of a Parish boundary line and I believe it is misleading to not show this as such.</p>	<p>Parish boundaries have not been identified on any of the plans. Development Brief to identifies that houses to the south of Hedsor Road fall within Hedsor Road parish. The site is referred to within the Bourne End area as identified by the Settlement Hierarchy Report used to inform the Local Plan.</p>
<p>Further, on all maps, please can I question why the site itself is marked up 'Bourne end' when the centre of Bourne End village, with all shopping amenities is over a mile away? The site is on the edge of a Parish boundary line and I believe it is misleading to not show this as such.</p>	<p>The site is referred to within the Bourne End area as identified by the Settlement Hierarchy Report used to inform the Local Plan.</p>
<p>2. Environment and Landscape – separation of Parish boundary</p> <p>As part of the above, within 2.1.3. we would request there is proper recognition and acknowledgement of the interests of the Parish of Hedsor so that preservation of the integrity and distinctiveness of the Parish is preserved.</p>	<p>The Development Brief doesn't specifically refer to parish boundaries, however recognition that the houses south of Hedsor Road are within the Hedsor Hamlet (Tier 6 of the Settlement Hierarchy) can be made.</p>

Issue	Buckinghamshire Council Response
<p>As mentioned several times within the Liaison meetings held during 2019 and 2020, we would request:</p> <p>suitable separation of the Parish awarded to the houses on the North side of Hedsor Road who, to all extent and purposes, have long felt part of the settlement known as Hedsor, due to their semi-rural location on the Parish boundary.</p>	<p>This point is addressed through buffer requirements, see section 6.2.2.</p>
<p>By 'suitable separation' we would request landscaping or 'substantial planted buffer', of a similar nature to that awarded to Hawks Hill and Harvest Hill.</p>	<p>Current wording at 6.2.2 identifies: 'incorporate a substantial landscape buffer by way of extended gardens to some existing houses and generous plots to new houses... minimum with of 20m of landscape buffer should be provided'. This is more specific than the requirements for Hawks Hill/Harvest Hill.</p>
<p>3. Landscape Character</p> <p>4.1.1 states that there are no landscape designations apply to the site surroundings, however the area from Ferry Lane Into Hedsor Parish via Hedsor Hill and Hedsor park through to Wash Hill is designated AAL (Area of Attractive Landscape). There are also fields/islands within the Hedsor Wharf estate, less than 500m away from the South of the development, that have significant archaeological importance.</p>	<p>There are no longer any designated AALs in our area and the old policy that previously covered them in the 2004 local plan has been deleted from the new local plan and is replaced by policy DM32, which aims to ensure the special landscape characteristics of any site in the area are properly considered.</p>
<p>4. Settlement Character</p> <p>4.2.1 Please note that Hedsor Road to the South is not an 'extension' to Bourne End. It is an old settlement closer to Hedsor Parish, with worker cottages that used to house the staff of Hedsor House and nearby Hedsor Wharf. It is still semi-rural in nature. Houses on the</p>	<p>Development Brief to be amended to draw this distinction out.</p>

Issue	Buckinghamshire Council Response
<p>North side of the road are technically part of Wooburn and Bourne End Parish because the Parish boundary runs down the centre of Hedsor Road. However, the village character comes from being on the edge of two Parishes and the Southern side of the road is in Hedsor Parish.</p>	
<p>5. Visibility</p> <p>4.1.5 does not consider vista's from historic St. Nicholas Church, GII listed Hedsor Park and National Trust property of Cliveden. Careful screening will be needed as there will be much additional night-time lighting in the area because of the development.</p> <p>We believe views from the valley and towards the hills surrounding the Thames Valley should be open and unimpeded by new buildings and, where at all possible, the open landscape in the vicinity of the development site must be preserved even more strongly than before the development.</p>	<p>The Development Brief acknowledges these points of historic interests in chapter 4.3 Historic Context. Further work is needed to clarify whether long distance views of these building are seen to and from the site. A site visit will be carried out to clarify this.</p>
<p>6. Character Area – Hedsor Road</p> <p>4.2.6 please note that some of the Hedsor Road properties to the eastern end do not just have 'very short' rear gardens, in some case they have no gardens at all, with kitchen and/or bathroom windows directly backing the development – please revise to avoid misleading anyone.</p>	<p>Development Brief to be amended accordingly.</p>
<p>7. Access to the site – vehicular and pedestrian</p> <p>4.4.1 there is no mention of the principal route to the site via Cookham Bridge to the South West, together with its limited</p>	<p>Development Brief to include point about Cookham bridge to the south west. Traffic modelling would have considered traffic flows into the area.</p>

Issue	Buckinghamshire Council Response
capacity and weight restriction. Traffic data has not yet been shared, but we expect traffic density from this direction will show it is significant enough to be highlighted as a 'principal route', not just for access into, but also out of the development.	
4.4.1 there is no mention that Hedsor Road (to the South) and Harvest Hill/Hedsor Hill (to the East and South East) have weight restrictions of 7T	Development Brief to include this.
4.4.3 there is no 'potential to link into the site' from HED/2/1	Paragraph 4.4.3 is referring to the existing PRow within the site from Princes Road and Hedsor Road. See figure 4.4.1.
<p>8. Flooding</p> <p>4.7.2 there is no mention of the severe surface water flooding that occurs at the Southern end of the site, along Heavens Lea and Hedsor Road, as a result of run-off from up hill, despite this subject being raised numerous times at Liaison meetings.</p>	The Development Brief shows the latest published data. Surface water flood issues to be added to section 2.1 community identified issues.
<p>9. Noise, Vibration and Air Quality</p> <p>When referencing queuing vehicles in 4.9, Hedsor Road requires a special mention, as the road is often gridlocked during peak times during the week and also during the weekend.</p>	Development Brief to include congestion on Hedsor Road.
The location of the site also deserves a special mention here, as the tranquility of the local area will be severely impacted by noise (certainly whilst it is being built, but also afterwards) due to its close vicinity to the River Thames and immediately neighbouring hill-side; sound carries on water and bounces back from the hills.	The vicinity of the Thames to be noted in this section.



Issue	Buckinghamshire Council Response
<p>10. Strengths (4.10.1)</p> <p>- 4.10.1 – incorrect. AAL designation of nearby Hedsor Parish needs to be considered.</p>	<p>There are no longer any designated AALs in our area and the old policy that previously covered them in the 2004 local plan has been deleted from the new local plan and is replaced by policy DM32, which aims to ensure the special landscape characteristics of any site in the area are properly considered.</p>
<p>- 4.10.4 – we cannot see how the vehicular connection to a single-lane, often grid-locked Hedsor Road in the South can be listed as a strength?!</p>	<p>The point being made here is that there is existing access which allows for a link road.</p>
<p>4.10.7 – the majority of the site experiences substantial water run-off from up-hill, where further development is planned.</p>	<p>Clarify that it is fluvial flood zone 1 Issue of surface water flooding to be included with chapter 2.1, community issues section.</p>
<p>4.10.8 – the comprehensive range of essential retail facilities will be a considerable walk from the development and offer extremely limited car-parking facilities.</p>	<p>The strength here is that they are nearby, some of them are within walking distance.</p>
<p>11. Opportunities (4.10.2)</p> <p>- 4.4 – We understand there is no opportunity to connect to the public right of way to the South of Hedsor Road via the Garibaldi pub.</p>	<p>A letter from the Garibaldi pub has now been received. Whilst we believe this is a missed opportunity for enhancing connectivity, the footpath link will be removed from the Development Brief framework.</p>
<p>12. Weaknesses (4.10.3)</p> <p>- Please add the weakness of reduced separation between Hedsor Parish and Wooburn and Bourne End Parish.</p>	<p>Development Brief to include.</p>

Issue	Buckinghamshire Council Response
<p>- Please add the weakness of the Hedsor Road junction. The developer is responsible for mitigating impact and if safety/capacity issues, however we understand it will be difficult to improve this junction without removing land opposite from green belt.. which we understand cannot take place until the next green belt review.</p>	<p>Mitigation of this junction will be a requirement at the planning application stage. Safety/capacity issues to be added to section 2.1 'community identified issues'.</p>
<p>- please add the weakness of the junction of Heavens Lea and Hedsor Hill. It is a dangerous blind junction with fast flowing traffic.</p>	<p>Development Brief to add the unsuitability of increased traffic to these roads.</p>
<p>- please add the weakness of nearby country roads unsuitable for the speed and frequency of modern traffic, such as Hawks Hill, Kiln Lane, Harvest Hill, Widmoor, Hedsor Lane, Sheepcote Lane and Heathfield Lane. Hedsor Parish will not benefit from any CIL funding, however their roadways will be considerably impacted.</p>	<p>Development Brief to add the unsuitability of increased traffic to these roads.</p>

## 9. Table A3: Individual Comments

Issue	Buckinghamshire Council Response
<p>Is there to be a consultation on the brief and then another public consultation on the applicant's specific proposals before the application is submitted?</p>	<p>Yes – The Development Brief will have a formal public consultation. Once this has taken place the developers will start on their planning application process. As part of this they are required to carry out community engagement on their planning application proposal. This is different to the Development Brief as the developers will lead this process rather than the Council.</p>
<p>I note that in Fig 3.1. on P.1 the school is sited in top corner near the church when on all other diagrams it is sited near Millboard Road - can this be rectified/noted.</p>	<p>This is correct as it is an extract from the Local Plan indicative diagram which originally showed the location here. Further work has resulted in an alternative location which is shown on figure 6.1 – Development Framework.</p>
<p>A Doctors surgery is desperately needed as the one we have at present would be completely unable to cope with another 1,000 plus residents - they can hardly cope now.</p>	<p>This has been noted in the issues section. Within the SWOT analysis the provision of new healthcare facility will also be identified as an opportunity. However I must emphasis currently we have not been made aware that an option to put a new health care facility within Hollands is being pursued.</p>
<p>I would sincerely hope that the Council will look to adopting Millboard Road for an entrance to be made by the developers for the school - this will prevent even more congestion.</p>	<p>If Millboard Road is delivered as part of the development this must be by the developers and should only be a secondary access point. This is because the introduction of an access to the site via Millboard Road may erode or completely remove the advantages of having a north/south road through the site and encourages more traffic and consequent congestion through Bourne End. The modelling work carried out for the Local Plan allocation showed by taking traffic off of Cores End Road at Princes Road/Cores End roundabout, congestion would be reduced through Cores End Road towards the town centre. If Millboard Road is</p>

Issue	Buckinghamshire Council Response
	used as an access point then traffic will need to continue along Cores End Road before turning off onto Millboard Road, therefore reducing the benefits of the link road. The Millboard Road isn't a policy requirement for the development, however should the developers deliver it, the Development Brief is supportive of this as a secondary access route and the Council can adopt it.
No mention is made of how the entrance at Princes Road can be widened to accommodate two-way traffic e.g. buses delivery vehicles, waste carts etc?	This level of detail will be set out in the Transport Assessment as part of the planning application. We do not have that level of detail available yet. Further wording will be acknowledged that this is an issue and potential options how this could be overcome.
A bit of screening along the length of Princes Road as now would be good to be kept.	This level of detail is also too detailed for the Development Brief as it will depend on the precise location of the link road and width requirements. This will all be set out as part of the planning application.
Would argue against the highest density being at the north west corner of the site because of the flooding in Cores End Road and the cul de sac part of Princes Road, part of this area I note from one of the diagrams is in flood zone 2 with the river Wye flowing along these roads too.	Within the site itself there is no flood risk on Princes Road cul de sac (please see figure 4.7.1.) This area is considered best placed to have higher density development given its proximity to the centre of Bourne End where local shops and public transport, including the train station are nearest located.
On page 43 what does the pink dotted line on the diagram labelled 'residential amenity actually mean?	This is recognising there are existing dwellings here that back onto the site and therefore will be affected by the development. E.g. their outlook/visual amenity.
Last but not least, how are the residents of Princes Road going to get in and out of their properties (particularly the cul de sac end) and how would waste be collected and emergency vehicles get to the	This detail will be set out in the Transport Assessment, this is not something available now. When the developers carry out their

<b>Issue</b>	<b>Buckinghamshire Council Response</b>
residents whilst the proposed new link road is constructed - has anyone even considered this quandary?	consultation on the planning proposal this would be a good opportunity to ask them.

## 10. Appendix B – Hollands Farm Development Brief Issues Log

### 11. Table B1: Placemaking

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>Policy BE2 requirements:</p> <ol style="list-style-type: none"> <li>1. Placemaking               <ol style="list-style-type: none"> <li>a) Adopt a landscape-led positive approach to design and layout to limit its impact on the landscape;</li> <li>b) Have special regard to the conservation of nearby Heritage Assets and their settings, including the Hedsor Road and Riversdale Conservation Area;</li> <li>c) Maintain a sense of separation between Harvest Hill and the new development site;</li> <li>d) Ensure satisfactory relationship to the industrial buildings at Millboard Road</li> </ol> </li> </ol>			

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	Employment Area on the western boundary.			
1.1	What are the opportunities and constraints for a landscape-led positive approach to design and layout to limit impacts on landscape?	BC		<p>The development should provide a cohesive landscape framework that draws upon and connects with the surrounding landscape, while also supporting Green Infrastructure.</p> <p>Existing features such as mature trees and hedgerows provide mostly opportunities for the landscape framework, such as structure and focal points.</p> <p>Views of the Conservation Area should benefit from trees and open spaces that act as a buffer and/or provide a sense of separation from neighbouring development.</p>
1.2	How should the landscape impact on the density? Should there be character areas?	BC		<p>Areas of greater sensitivity should have less density, including the hillside of Hawks Hill and Harvest Hill. The Development Brief will need to distinguish where the buffer for Hawks Hill and Harvest Hill should be located and therefore to what extent development should go up the hillside.</p> <p>Density should increase towards the town centre. Character areas to be identified when site layout is known.</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
1.3	How to minimise the impact of the development on Hellyer Way and the end of Bridgestone Drive houses in terms of their outlook and views?	PC	Important to maintain separation for the local residents.	The existing layout of Hellyer Way and Bridgestone Drive would benefit from an enclosed block layout. This will enable existing backs of gardens face to face onto new backs of gardens, providing 'private space' rather than overlooking of public areas. Minimum space standards between houses will be required as set out in the BC Design Guidance SPD.
1.4	What should the relationship be between the development and Upper Hedsor Road as this is located next to the conservation area. Is the proposed tree belt the best way to preserve the setting given the different relationships of buildings to the site?	BC		Design options have been progressed to consider mitigation for the impact of development on setting of conservation area and along the backs of houses on Upper Hedsor Road, taking into account opportunities to better reveal significance of historic environment.  These options include a private tree belt within residential gardens. How the boundary is treated will vary depending on the length of the existing back gardens from properties on Hedsor Road.
1.5	How should the Cores End road junction improvements mitigate impacts on the setting of United Reformed Church listed building?	BC		The Cores End junction should be designed to be sympathetic to the listed building. It should not be over engineered. It should be designed to accommodate the movement of motor vehicles but also meet the needs of pedestrians, cyclists and public transport users, so that growth in these modes of travel is encouraged. The design should



No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>have minimal impact on the existing trees located at Brookbank (also a Green Space designation).</p> <p>AVCD/BCC's Highway Protocol for Conservation Areas, should be used to ensure a sympathetic approach is design.</p>
1.6	How should the impact of the access road onto the Hedsor Road conservation area and the listed buildings be mitigated?	BC		<p>The highway junction show be designed to have the least impact on the Conservation Area, its setting and the settings of listed buildings. A T-junction is preferable over a roundabout option as this is less intrusive. Precise detail of junction to be identified through the planning application stage rather than Development Brief.</p>
1.7	How should the boundary with the Farm house (South Fields?) be treated to mitigate impacts on the conservation area?	BC		<p>Detailed point which is dependent on the outcome of issue 1.6.</p>
1.8	How to provide the sense of separation between Harvest Hill and the new development? To what extent should development go up the hillside and what form should the development should take?	PC	<p>Would like a gap all the way around the eastern edge.</p>	<p>Separation should be provided between the development and Hawks Hill. Tree planting on the upper slope is supported as it would provide visual separation whilst contributing towards policy requirement of 25% tree canopy coverage. Extent of separation still to be determined at planning application stage.</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
1.9	How should we mitigate the visual and other impacts on the development of the industrial buildings on Millboard Road and Wessex Road?	BC		<p>One potential option is to locate the school to the east of the industrial estate, this would then have a secondary benefit of providing a buffer between the industrial estate and new residential areas.</p> <p>The use of open space (as identified in the indicative diagram for the Local Plan) should also be used to provide mitigation.</p>

## 12. Table B2: Transport / Connectivity

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>Policy BE2 requirements:</p> <p>2. Transport</p> <p>a) Provide a link road through the site linking to the Cores End Road roundabout and Ferry Lane;</p> <p>b) Provide a redirected bus service and enhanced provision through the site;</p>			

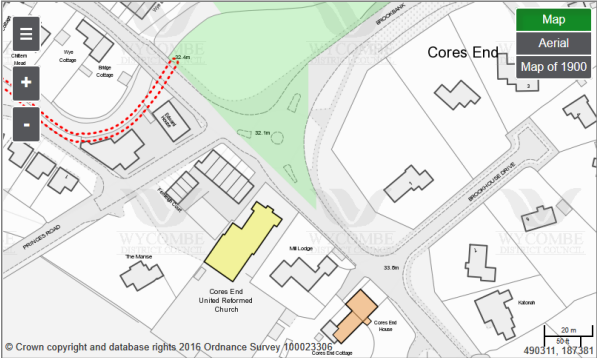
No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>c) Provide contributions to off-site highway improvements as required by the Highway Authority;</p> <p>d) Provide and enhance footpath and cycle links to the village centre.</p>			
2.1	<p>What should be the scope of the Development Brief in terms of detailed transport requirements for onsite?</p> <p>Factors to consider - What type of road do we want the link road to be? What should be the design speed?</p>	All	<p>The aims should be to ensure safe low speeds through the development to ensure uninterrupted two-way traffic flow and safe access.</p> <p>Would like to identify off-site improvements, including what junction improvements.</p>	<p>Development Brief should identify the preferred location of the link road.</p> <p>The link road should be residential in nature. The Wycombe Local Plan Sites Traffic Modelling (June 2017, Jacobs) modelled the road at 30mph and tested a length of 1.3km. This allows for some bends in the layout, rather than 1 continuous straight road. Residential properties should front the road.</p> <p>Specific details for junction improvements will and can only be dealt with through the planning application process via the Transport Assessment. This will not be available for the Development Brief stage.</p>
2.2	Access from Princes Road is too narrow for a two-way bus route.	PC	Access needs to provide proper two-way movement. Properties should	<p>BCC response</p> <p>The Local Plan does not mention CPO. It has, however, been pointed out that the arrangement of</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>be compulsory purchased to provide proper and safe access.</p> <p>We strongly feel that the first preference is to make the road wide enough for two buses to pass each other and of course other public vehicles e.g refuse trucks and HGVs. A one way bus service would be highly inconvenient for residents.</p> <p>If there is sufficient space for 6.5m carriageway then this must be the preferred option and perhaps have a footpath on one side of the road only. 6.5 carriageway should be for the entire link road to avoid pinch points.</p> <p>BC principle should state: ‘Accommodate two way traffic including buses and goods vehicles.’</p>	<p>2 x 2m footways and a 5.5m carriageway would be unsuitable for two-way bus flow (it is anticipated that a bus route will be taken through the development).</p> <p>BCC Passenger Transport have identified a one-way bus service would be their preference (based upon the routeing of the service to be diverted). The bus route should be located through a north south link to maximise fair box revenue but also to minimise delays. This would allow for Princes Road to be 5.5 or 6m wide instead of 6.5m wide.</p> <p>Whilst it is not envisaged that the north/south road through the development will be prohibit any specific traffic, the amount of HGV traffic is expected to be materially insignificant given the weight limit on the Cookham bridge and the restrictive width and geometry of Hedsor Road (east/west section) and its junctions with Hedsor Hill &amp; Heavens Lea. Nonetheless, general guidance states that simultaneous two-way flows can be achieved for such vehicles in the event that they do pass each other on a 5.5m-wide carriageway. Nonetheless, and primarily in consideration of the differing drive height and wing mirror position for buses when compared to HGV’s, it should be noted that bus operators and the council will not permit universal</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>bus traversal over new roads with less than 6.5m in width.</p> <p>Issues of width aside, the advantages to a one-way bus route equate to a reduction of bus traffic over the Cores End bridge over the River Wye and the use of Furlong Road in order for the service to 'loop back' on itself.</p> <p>Furthermore it reduces the walking distance to stops for residents living in the south of the Hollands Farm site and for those living on Hedsor Road and the A4094 (between its junction with Ferry Lane and Bourne End railway station).</p> <p>In theory there is space for 6.5 but this would result in a reduction for the footpaths which would not be desirable and beyond the reduction recommended by national guidance, thus potentially resulting in a threat to pedestrian safety and convenience of use.</p> <p>BC comments on CPO</p> <p>CPO would give more scope for increasing the road width, but Highways Development Management can only look at the proposals as presented but can object if we believe that the development will have a non-mitigatable impact upon highway safety, convenience of use or network</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>capacity. Furthermore, if CPO did come into play, it would be to facilitate development and therefore not a process that the Highway Authority would commission in which be involved.</p> <p>That aside, and in a scenario where Millboard Road was offered for adoption as highway, the council could facilitate this process. Although there are several options, potentially the most expeditious and cost-effective to the council would be via a Section 228 process (Highways Act 1980), whereby the owner brings the road up to adoptable standards or provides evidence that it already meets them. Once this has been achieved or demonstrated, the section of road required can be adopted in as little as 28 days.</p> <p>However, a significant caveat to this is that the introduction of an access to the site via Millboard Road may erode or completely remove the advantages of having a north/south road through the site and encourages more traffic and consequent congestion through Bourne End.</p> <p>BCC suggested wording for Development Brief: The Link Road will need to be designed to be an attractive route linking Cores End Road/Town Lane</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>to Ferry Lane and Cookham Bridge which shall take into account the following principles:</p> <ol style="list-style-type: none"> <li>1. Accommodate two-way traffic in accordance with national guidance</li> <li>2. Accommodate the diversion of an existing bus route</li> <li>3. Provide safe and attractive pedestrian and cycle facilities</li> <li>4. Limit the number of access points onto the Link Road to reduce delay</li> </ol>
2.3	How should Cores End roundabout be dealt with in the Development Brief?	PC	<p>Core End roundabout needs to be realigned/redesigned as it is currently unsafe for cars accessing Princes Road. The Brookbank Green Space should be considered in the roundabout design.</p> <p>The bridge over the Wye at this roundabout is too narrow and moving of the pedestrian walkways to the outer sides of the bridge may be a way to widen the road at this point.</p>	<p>BC suggested wording for Development Brief:</p> <p>Cores End Roundabout will need to be assessed in terms of capacity and safety and appropriately designed in order to accommodate the Link Road and development. This could be in the form of a realigned roundabout that facilitates better entry and exit from Princes Road.</p> <p>Other BC comments:</p> <p>There is a large amount of highway verge/open space here to implement a larger roundabout that facilitates better entry/exit from Princes Road. However the grassed verge to the north of the roundabout is a Green Space designation</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>The bridge should form part of the re-engineered roundabout to remove the footpaths from the inside of the bridge to make it wider and replace them on the outside of the bridge.</p> <p>The current roundabout arrangement is dangerous. If conservation takes priority and the roundabout is not re-engineered then the Development should not be allowed to proceed. A re-engineered roundabout could be positioned to be further from heritage assets - Cores End Church and Cores End House. See My Map.</p>	<p>'Brookbank'. Any development in this area of land will be contrary to DM12, however exceptional circumstances are relevant for a departure from policy.</p>  <p>It is not envisaged that the site will intensify the passage of larger vehicles over the Wye bridge. It is expected that the development will actually reduce these instances by diverting an existing bus route through the site. Therefore the widening of the bridge/removal of footways is not a mitigation element attached to the Hollands Farm site.</p>
2.4	How should the road system around the site be dealt with?	PC	Impact of the site should be considered in conjunction with Slate Meadow.	The County Wide and Local Plan Transport modelling have considered the impacts collectively from all local plan allocation sites including Slate Meadow



No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>Highways should still consider the opportunities to improve the road system and develop their own plan and seek a budget for it otherwise the opportunity is lost and the Villagers will suffer the consequences of the two developments.</p> <p>Access and egress onto Ferry Lane should be considered now.</p>	<p>and Hollands Farm. This concluded the need for a link road through the site. No other mitigation measures are identified in BE2 other than the junction improvement as shown on the policies map.</p> <p>The full transport modelling reports are available of the <a href="#">Local Plan evidence page</a>. This level of detail is sufficient for the Development Brief process. Details on specific mitigation requirements for junction improvements will be part of the Transport Assessment for the planning application process.</p> <p>This site will (and can only) be judged on mitigating its own impact. Any improvements to the network from existing or anticipated future background traffic growth are not and cannot be part of the highway/transport considerations for the Hollands Farm site.</p>
2.5	How should bus laybys be accommodated? Separate lane or within the road?	PC	<p>Would like off street laybys (to prevent congestion). Parking should be designed to ensure uninterrupted traffic flow. The school, shop and bus laybys should be located together.</p> <p>Restate the need for a 2 way bus service.</p>	<p>The Development Brief should set out the principles for the location of the bus stops. The precise location will be for the planning application to determine.</p> <p>BC suggested wording for Development Brief:</p> <p>The provision of a bus lay-by on the Link Road should be considered to accommodate lay over</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>Lay over requirements to remove existing conflicts around the station. Are welcomed and will need follow up with the bus operators. As currently two buses often layover at the same time at the bus station the bus layby needs to be large enough to accommodate two buses at once.</p>	<p>requirements to remove existing conflicts around the station.</p> <p>Bus stop locations within the development should be considered in relation to land uses within the site and comply with national guidance in terms of walking distances.</p>
2.6	<p>How should Millboard Road be treated in the Development Brief? Should there be vehicular access? Pedestrian access? Cycle route?</p>	Dev./BC	<p>Would like both access points Millboard Road and Princes Road to be used for vehicular and pedestrian access.</p> <p>The option of a one-way flow should be considered.</p> <p>Should also consider a roundabout at end Millboard road and improved roundabout at Cores End. Car parking spaces on Millboard Road will be displaced, they should be reprovided for. Millboard Road could be the entry point for the new school.</p> <p>Link Road Options: 1, 2 &amp; 3 do not address the reality that all three</p>	<p>The preferred route for the link Road is Princes Road to Hedsor Road. This is what has been modelled for the Local Plan allocation. Millboard Road is not required for the site, however should the developers acquire the road, this could be used for a secondary road option and BC could adopt it but this would need to be brought up to standard at the cost of the developers.</p> <p>BC response:</p> <p>The design of the link road would have to be sufficient to protect highway safety but also to facilitate the road as a thoroughfare, as permeability between the A4094 and Ferry Lane was identified as a necessary function through the Jacobs modelling.</p> <p>Again, it is heavily forewarned that the use of Millboard Road as part of the access strategy for the</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>access/egress points will carry similar traffic loads.</p> <p>Vehicles travelling from the Wooburn direction on route to the bridge at Cookham will all access the site via the roundabout at Princes Road and exit at upper Hedsor Road and then onto Ferry Lane. Those taking/returning from the opposite direction from the bridge heading towards Wooburn and beyond will take the reverse route. Vehicles accessing the site from the direction of Bourne for school or visiting purposes will do so from Millboard Road as will those leaving the site to go towards Bourne End and beyond.</p> <p>All three routes should be of the same size and specification as this will prevent pinch points and congestion.</p> <p>Millboard Road - There is no mention of the junction Millboard Road/Cores End Road which will need redesign and most likely a mini</p>	<p>Hollands Farm development could actually prove to be detrimental to traffic flow within the centre of Bourne End based upon the modelling data commissioned by the council to support the site's inclusion within the Wycombe Local Plan. Specifically, the use of a north/south Link Road through development mitigated the development's traffic impact and general conditions by addressing congestion outside the confines of the site.</p> <p>Car parking</p> <p>If access is proposed using Millboard Road then the impact of displaced parking will need to be assessed. There are two possibilities in which on-street parking on Millboard Road can be addressed in order to keep it parking-free (once in receipt of parking surveys that demonstrate when it occurs and the likely reasons); one way would be to also adopt the generous verge on the eastern side of Millboard Road (between its junction with Bridgestone Drive and where it meets the development site) and require the developer to install a parking layby. The other option would be to include waiting restrictions (probably double-yellow lines), with the potential of the development</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>roundabout. The Development Brief should identify the requirements.</p> <p>Car parking Millboard Road - Experience throughout the County shows Double yellow lines do not work for school drop off without enforcement.</p>	<p>including a small car park within the site to deal with the resultant displacement.</p> <p>Existing car parking issues are an enforcement matter and thus largely outside the highway/transport considerations for this site.</p>
2.7	<p>What offsite highway improvements will be required? Anymore junction improvements than those 4 required by the policy?</p>	PC/ALL	<p>We feel strongly that specific details for junction improvements should be sorted before planning application and should be both part of Planning Agreements with Highways and with the developer ahead of any planning application.</p> <p>All junctions around the development should be assessed. Queried a one-way system.</p> <p>Consideration should be given to all routes through Bourne End to alleviate bottle necks and traffic backing up due parking and left or right turns off main roads.</p> <p>Main and mini roundabouts should be considered wherever there is a</p>	<p>DM2 - Transport Requirements of New Developments requires several junction improvements. This detail will be for the planning application stage rather than the Development Brief.</p> <p>BCC response:</p> <p>This would form part of the junction analyses contained within the Transport Assessment, but anything secured could only occur as a result of mitigation works. Only appropriate forms of junction management will be deployed in reflection of the flows through them occurring as a result of the Hollands Farm development.</p> <p>BCC suggested Development Brief wording:</p> <p>The Link Road will provide an alternative route between Core End Road and Hedsor Road. In order to reinforce the desired traffic route, improvements</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>busy junction and potential to cause tailbacks e.g:-</p> <p>The Junction(s) of Furlong Road and Cores End Road, Furlong Road and Station Road, Marlow Road and Blind Lane, Upper Hedsor Road and Ferry Lane.</p> <p>Parking on the bend in Cores End Road just past the Catholic Church should be removed. Risk and bottleneck.</p> <p>Millboard Road/Cores End Road needs to be included under list of junctions to be assessed for capacity. There needs to be proactive action with respect to the owners of the Millboard Industrial Site.</p> <p>Furlong Road/ Cores End Road - This junction bifurcates and has a left turn to Bourne End which is dangerous as some traffic turns right here despite vision being blocked by the brow of the hill. There is an opportunity to remove</p>	<p>to Furlong should be considered to reduce vehicle speeds/journey times.</p> <p>The following junctions (although not necessarily limited to) will need to be assessed in terms of capacity and safety and where appropriate mitigation identified in order to accommodate the Link Road and development:</p> <ul style="list-style-type: none"> <li>• Furlong Road/Cores End Road</li> <li>• Furlong Road/Station Road</li> <li>• Marlow Road/Blind Lane</li> <li>• Upper Hedsor Road/Ferry Lane</li> <li>• Any others deemed necessary where they feature significant distribution as a result of the implementation of the development.</li> </ul> <p>Parking to be reviewed at the following locations as part of the access strategy:</p> <ul style="list-style-type: none"> <li>• Princes Road</li> <li>• A4094</li> <li>• Kiln Lane</li> <li>• Any other locations yet to be identified</li> </ul>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>the dangerous access towards Bourne End and at the same time take the opportunity to create parking from existing road and some of the green space.</p> <p>Upper Hedsor Road from the site entrance to the Ferry Lane junction - Many cars park on the verges and on the road side and, with some reengineering of the verges, it may be possible to have formalised parking to accommodate the actual parking need and enable double yellow lines on a section of road that will see continuous traffic from both directions.</p>	
2.8	How to provide a PRow/cycle link to the train station and village centre?	PC	Would like a cycle/footpath provided directly to the train station (through the Millboard Road industrial estate and recreation ground).	<p>The council is supportive for the creation of this link, however there are a number of deliverability issues that make this difficult:</p> <p>Access is through third party land, this requires the wiliness of the landowner, there may also be safety implications. Any route is likely to require a new footbridge over the river Rye, which is costly and the</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>Environment Agency may not support it due to safety implications.</p> <p>The exact location of the footpath link is still to be determined. A lesser constrained route would be through Millboard Road, where there is an existing PRow. This presents an opportunity for a cycle path.</p> <p>BCC response:</p> <p>Millboard Industrial Estate is private, as is the southern section of Millboard Road that serves it, any use of it would only be through agreement or land acquisition, which may or may not occur through the course of time or compilation of the Development Brief.</p> <p>BC Development Brief proposed wording:</p> <p>The development should consider opportunities to improve pedestrian/cycle safety on Cores End Road to encourage sustainable modes of travel to Bourne End and the train station. This could include speed reducing features and footway improvements.</p>
2.9	Should a footpath/cycle route be provided through Bridgestone drive?	Dev./BC		There is already an existing link although not a PRow. Millboard Road likely to be more accessible as Bridgestone Drive located further to the north of

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				the site. However it might not be suitable to encourage more pedestrians.
2.10	What constraints does the PRoW place on the development?	Dev./BC		The locations of the existing PRoW creates a triangulation of block sizes as it crosses through the site from the corner of Millboard Road Employment Area up to Bridgestone Drive. It is likely the footpath will need to have a small diversion to create an 'S' shape, allowing regular block sizes, which is a more efficient use of land. The location of the PRoW is largely dependent on the location of the link road and school and therefore any diversion is still to be determined.
2.12	What does the Development Brief need to say about the Hedsor Road junction in terms of layout safety and design?	Ward Member	<p>Should close the end of the road from Hollands Farm access onto Hedsor Road to Ferry Lane (making it a dead end) and create a new roundabout where the new spur joins Ferry Lane would be a safer design and create a more efficient traffic flow.</p> <p>Hedsor Road is rat run to via Cliveden to Slough and joins Ferry Lane at a right angle junction. Traffic is always backed up and there have</p>	<p>BCC response:</p> <p>The arrangement, alignment, visibility, etc. was taken into account when the high-level DM comments were supplied to BC when looking to include Hollands Farm as a Local Plan site. No specific options for this junction have been tabled or discussed.</p> <p>It is doubtful that the development will impact upon this junction in terms of safety or capacity due to the fact that they are providing a link road which provides an alternative route to Cores End, but junction analysis will form part of the pre-application</p>



No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
			<p>been several accidents on the bend at the junction because of its layout.</p> <p>Cookham bridge - Walking is a recreational pursuit and walking to Cookham and along the Cookham river to the railways bridge and back through Bourne End should be an option. Cookham Bridge could be made two way if the footpaths were removed from the inside of the bridge and placed on the outside of the bridge. Highways have yet to talk to their colleagues in Berks and this should occur ASAP to discuss what is both desirable and possible.</p>	<p>process either alongside or after the Development Brief has been adopted. Therefore nothing in terms of changes to this junction have yet been ruled out.</p> <p>Hedsor/Road Ferry Lane Junction to be assessed in terms of capacity, safety and placemaking in view of its location within the HR&amp;RC. Where appropriate mitigation identified in order to accommodate the Link Road and development.</p> <p>The Local Plan countywide modelling identified the bridge on Ferry Lane as a key highway constraint.</p> <p>The signals over the bridge need to be assessed in terms of capacity and where appropriate mitigation identified in order to accommodate the Link Road and development. Given the heritage asset nature of the site, it is highly unlikely that improvements to the bridge itself would be a viable option.</p> <p>The developer would be required to submit an analysis of peak hour operation of the shuttle working signals across the bridge, which will demonstrate the current situation and a future year both with and without the impact of the full occupation of the development. From this we will be able to differentiate the vehicular impact of the development against what would occur in the future at the bridge if the development were not to</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				exist. In terms of pedestrian access, and given that residents from the development are more likely to walk between the site and the rest of Bourne End to reach local shops and services, there is likely to be no justification for the development to improve non-motorised facilities at the Grade II listed Cookham bridge.

### 13. Table B3: Community Facilities

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	Policy BE2 requirements: 4. Other a) Provision of a 1 form entry primary school			
3.1	What is the land take for a 1 form entry primary school?  Where should the school be located? taking to account the character of the site required and access issue to the school.	PC/All	Access should be from Millboard Road, prevent traffic building up on main roads. Current location would form a pinch point and increase safety risks.	Confirmed land take to be 1.1 hectares + 0.3 for drop off / collection area.  Three options for the school have been identified. The preferred option sets out in the development is to the east of Millboard Road employment area.  BCC proposed Development Brief wording:

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>Could the school playing fields have dual use?</p> <p>Should the school be an extension to the existing school in Bourne End?</p> <p>Could the existing school be closed to allow for a new 2 form entry school?</p>		<p>It would seem sensible to have the school and the shop close to the access from Millboard Road into the field where bus stops and parking lay-bys could be built into the design and thereby create a better hub for the site.</p>	<p>The location of the school should be considered as part of the masterplan to ensure that school pick up/drop off does not impact on the operation of the Link Road. This school should preferably be located off a secondary road rather than a primary road.</p>

**14. Table B4: Green Infrastructure and Environment**

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>Policy BE2 requirements:</p> <p>3. Green Infrastructure &amp; Environmental</p> <p>a) Provide on-site high quality open space;</p> <p>b) Provide S106 contributions to mitigate recreational impacts at Burnham Beeches SAC;</p>			

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>c) Maintain north south connectivity for Public Rights of Way through the site;</p> <p>d) Protect and enhance the biodiversity and green infrastructure value of the former orchard in accordance with Policy DM34, providing public access and ongoing management as part of the overall development. Buildings within this area will not be acceptable;</p>			
4.1	<p>How much open space and what type is required?</p> <p>What type of open space is required?</p> <p>Where is the most appropriate location for this?</p>	BC		<p>Policy DM16 of the Delivery and Site Allocations document identifies open space requirements based on population. For Hollands Farm a total of 5.19 ha of open space is required. Of this, 3.85 is strategic open space and 1.34ha is local open space.</p> <p>The following assessment has been identified from Community Services (BC)- This is the latest information available completed in 2017 as part of the Local Plan evidence, it is currently under review so may change.</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>Only a small part of the very top of the site lies within the relevant distances for existing LEAP or NEAP areas as set out on the Open Space Framework, and there are very basic Teen facilities in the locality.</p> <p>There are various sporting facilities locally, including a Junior Sports club, Tennis Club and Cricket Club. The Sports Facility Strategy identifies various areas of improvement within the ward.</p> <p>Requirements:</p> <p>Play Equipment:</p> <p>A combined NEAP and LEAP for the prospective residents:</p> <ul style="list-style-type: none"> <li>• built to the 6 acre standard (Fields in Trust)</li> <li>• sympathetic to the environment and surroundings, using natural materials</li> <li>• providing equipment for children of all ages</li> <li>• located towards the residential boundary.</li> </ul> <p>A teen area is also required either improve the teen area at Wakeman Road using an off-site contribution, or construct a new facility on the development site.</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p><b>Public Outdoor Sport:</b> There are a number of sporting facilities near to the site. Under the 2015- 2020 Sports Facility Strategy the lack of MUGA provision in the Flackwell Heath, Bourne End and Wooburn Green sub area is highlighted, along with a deficiency in tennis courts and youth football pitches. 1 MUGA and 2 junior sports pitches should be provided.</p> <p>It is assumed that changing rooms will not be required at this site as tennis players and youth footballers generally arrive ready to play.</p> <p>Allotments:</p> <p>There is good allotment provision locally, the size of the allotment requirement is 0.27ha. This should be provided on site unless suitable provision expanding a nearby allocation is identified.</p>
4.2	Need to secure S106 contributions to mitigate recreational impacts at Burnham Beeches SAC by enhancing Little Marlow Gravel Pits.	BC		Hollands Farm is within the 500m buffer of a Special Area of Conservation for Burnham Beeches. To mitigate the recreational impacts the development will have on Burnham Beeches due to increased pressure from visitor numbers, there is a requirement for S106 contributions for Little Marlow Lakes Country Park.

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<p>BC has put together a proposal for requirements to help improve the attractiveness of the country park. S106 requirements are summarised into the following:</p> <ul style="list-style-type: none"> <li>• New and improved footpaths + cycle ways</li> <li>• Signage (walking and cycling routes and information about the environment)</li> <li>• Car parking facilities</li> </ul> <p>Full details can be viewed in the draft Hollands Farm Appropriate Assessment.</p>
4.3	What biodiversity and green infrastructure opportunities are there?	BC		<p>These may include:</p> <ul style="list-style-type: none"> <li>• Retention and enhancement of existing hedgerows within the site / at its perimeter;</li> <li>• Incorporation of TPO trees within wider green spaces;</li> <li>• Provision of footpaths and cycleways following existing and new green corridors and linking existing/new green spaces;</li> <li>• Including native plant species throughout;</li> </ul>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				<ul style="list-style-type: none"> <li>• Incorporating a range of Sustainable Drainage (SuDS) features throughout the site, designed to include biodiversity benefits</li> <li>• Ensuring existing and new GI links to wider GI networks beyond the site boundary.</li> </ul>
4.4	How does access to the Orchard affect the development site? e.g. routes for footpaths.	Dev./BC		The layout of Hollands Farm should be designed to ensure a Public Right of Way linking from Hollands Farm through the Orchard and also ensure that public access of the wider orchard area can be achieved.
4.5	What will the Development Brief say about the Orchard, if at all?	BC		The Development Brief will identify how public access and ongoing management of the site will be delivered either through all landowners working together, or BC assisting by the use of available statutory powers. The policy requirements identifies no development should take place on the Orchard site.
4.6	How well will north south PRoW connectivity be maintained by the site?	BC		A north south Public Right of Way must be maintained through the site. A small diversion to the existing PRoW is suggested to make the best use of block layout and build on the existing green infrastructure. The Development Brief provides an



No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				indicative framework, this will be finalised at the planning application stage.

### 15. Table B5: Flooding

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
	<p>Policy BE2 requirements:</p> <p>3. Green Infrastructure / Environment</p> <p><b>e)</b> Avoid areas of fluvial flood risk where possible;</p> <p><b>f)</b> Provide appropriate SuDS across the site.</p>			
5.1	Where are the areas of fluvial flood risk? What proposals should be made for them?			<p>The latest flood data identifies areas of flood zone 2 and 3 in the south west corner of the site along Hedsor Road.</p> <p>No residential development should take place in this location. See <a href="#">Environment Agency updated flood map</a>. (copy provided)</p>

No.	Issue	Who identified the issue	Parish Council View (where known)	Buckinghamshire Council Response + Development Brief Implications
				The planning application will need to be supported with a flood risk assessment.
5.2	How should areas of surface and ground water flooding be dealt with?			<p>Advice from Lead Flood Authority:</p> <p>SuDS should not be located in areas at risk of surface water (or fluvial flooding). SuDS in areas of high groundwater are possible but careful consideration will need to be given to the design, for instance how capacity will be maintained during high groundwater periods.</p>
5.3	<p>Would the requirements of SUDs place any requirements on the development?</p> <p>What are the opportunities to reduce flood risk? (See SFRA Level 2)</p>	PC/All	Keen not to have SUDs within the open space, open space needs to be useable.	<p>Advice from Lead Flood Authority:</p> <p>Source control SuDS should be prioritised, this will assist with incorporating SuDS into the landscape across the site. The preference is for above ground SuDS which provide multifunctional benefits such as tree pits, bioretention areas and swales.</p> <p>The Development Brief will identify broad locations and types of sites. It will be for the planning application to provide more specific detail through the Surface Water Strategy.</p>

## 16. Appendix C: Sustainability Appraisal: issues and responses raised by the consultation

Summary of comment	Response
Keep Bourne End Green (KBEG)	
A rise in overall site density also raises concern over the validity of assessments undertaken in the Sustainability Appraisal (the “SA”) which has tested sustainable density options and a significant rise in density to meet the indicative supply could see a future proposal divorced from, and unsupported by, the SA work.	The SA has assessed the varying options for density on site that were explored in the draft Development Brief. Any proposed changes to site density in the final Brief will be reflected in the finalised SA Report.
Theme 1: Connectivity and movement We welcome the SA test, though consider that the principal routes assessment does not assess Route B + Route C combined.	It was determined that both Routes A and C will be required in any subsequent proposal, the options seek to explore the relative merits and constraints of an additional principal route (Route C).
Principal routes assessment does not consider the alternative for no link road (which we understand is contrary to Policy BE2, but nevertheless there might be justification given the insurmountable weaknesses and threats identified at Princes Road and confirmation required from an updated traffic forecasting model. We consider this comparable to Theme 2 (Locating the new primary school) assessed option E which assessed the merits for an off-site location in spite of school provision forming part of the policy designation	An alternative to provide a principal route off-site is not determined as a viable option to meet on-site development needs. This is in comparison to the location of the new primary school, which has the potential to serve on-site residents if located within suitable distance of the site.
The preferred approach for sub-theme 1a is wrong in its consideration that Option A or B are suitable for bus traffic. The DDB is clear of its assessment at Princes Road that the required road with of 6.5m cannot be achieved and that two-way bus traffic is not feasible. Possible mitigation might be a “technical solution” which could result in some traffic control to allow buses to pass but would unlikely provide no such advantage to HGV or other wide vehicles (such as tractors and other farm equipment which frequently use the local highways – more so now that this site deletes the existing farm), and the solution	The preferred approach is not determined by the SA, and this comment has been referred to the Council for consideration in finalising the Brief.

<p>is not identified by the DDB but rather kicked down the line to the planning application which the site promoters have already confirmed will not be dealt with in the outline application, so a less than optimum solution is likely to result. The SA assessment should be reviewed in light of the plain fact that Princes Road is not suitable for two-way bus traffic.</p>	
<p>It is confusing why the preferred approach for Sub-theme 1b rejects Wessex Road because being outside of developer ownership and therefore having deliverability issues are the exact same scenario which applies to Millboard Road (also outside of developer ownership and has deliverability issues) which also applies to preferred approach for sub-theme 1a, Option B). Further, both are industrial roads which suffer frequent HGV vehicular movements and have valid safety issues. The criticism levelled at Wessex Road equally applies to Millboard Road and further SA assessment is required to delineate in this regard.</p>	<p>The preferred approach is not determined by the SA, and this comment has been referred to the Council for consideration in finalising the Brief. The SA will consider any new options arising or changes to the finalised Brief.</p>
<p>The same confusion is directed at sub-theme 1c preferred options which propose active travel over land outside the developer ownership, such as Options I and K which not only would require access to the Wessex Road industrial area (previously dismissed in sub-theme 1b due to deliverability issues) but also somehow cross to the River Wye through private residential gardens or private industrial sites.</p>	<p>The options outside of the site are not highways or local roads, but footpath/ cycle path extensions which largely seek to connect with existing Public Rights of Way. Options A to M fall within the development boundary of the site.</p>
<p>The SA must also be reviewed having consideration that the Transport Assessment walk analysis shows very little of the site falls within 800m of the railways station or village centre, further away.</p>	<p>The SA Report has been updated to reflect the most recent evidence in terms of analysis of distances, there is no specific reference to exact walking distances.</p>
<p>Part 2 narrative on transport and traffic largely is supported with the exception that it entirely overlooks the access issues identified at Princes Road and Hedsor Road and the summary [9.60] that “the addition of 500 homes in this area is still considered likely to affect local roads to some degree and minor long-term negative effects are anticipated in this respect.”</p>	<p>Noted. The updated SA Report has sought to ensure access issues have been duly considered.</p>

<p>Theme 3: Open space boundary treatment</p> <p>It is unclear whether any landscape assessment or visual impact assessments have been undertaken for the location of new strategic open space and whether the options have been test in the SA.</p>	<p>No separate landscape or visual impact assessment has been undertaken to inform the SA. Options for the location of new strategic open space have been assessed under sub-theme 3a.</p>
<p>We question the summary conclusion that delivery of new open space is considered to support “minor long-term positive effects in relation to community well being (for both existing and new communities), biodiversity, climate change, natural resources, landscape and historic environment.”</p>	<p>Noted.</p>
<p>Theme 4: Housing density</p> <p>18.10 The theme starts with an erred statement. It states [SA pg.21 (and pg.xviii)] that “Whilst the level of growth at the site is set through the WDLP ...”, but this is misleading which misrepresents the matter of fact as explained in the following paragraphs:</p> <p>18.11 Housing delivery is detailed by Policy CP4, which at (2)(b)(iii) sets the growth target for Bourne End and Wooburn. CP4 (4) and DM21 work in concert to confirm housing supply will be delivered through existing completions and commitments, site allocations set in the LP and Neighbourhood Development Plans, and through windfall development.</p>	<p>In line with comments further on, the sentence has been amended to reflect that the indicative capacity of the site is set out through the WDLP. As the Development Brief does not seek to correct or change the level of growth anticipated at the site, and thereby introduce new policy requirements, this has not been assessed through its accompanying SA. Furthermore, the role of the site in contributing to meeting housing needs for the district has been assessed through the SA accompanying the WDLP.</p>
<p>In this instance, Hollands Farm was released from the Green Belt and allocated for residential development as it was envisaged to make a contribution to the District’s housing supply since, at that time, the Council could not identify alternative sources of supply for Bourne End and Wooburn.</p>	
<p>The small text for Policy BE2 (summarised in Table 20 [LP pg.261]) merely indicates a planning officer’s assessment for the indicative housing supply [LP 5.4.17], which has already been mentioned, contrasts with the Council’s GBSA and UCDR summary. The policy does not provide any commitment to any level of housing delivery as matters can and do arise which go to alter the initial indicative supply assessment. This is a well understood concept. For example, the small text makes explicit reference to “a number of</p>	

<p>issues and constraints that will need to be taken into account” which could impact the amount of supply.</p>	
<p>The site allocation confirms the Council has assessed the Hollands Farm site as being suitable for development, though having regard to some of the “issues and constraints” there is plainly doubt over the suitability of Princes Road for two-way traffic which impacts deliverability of the link road (a matter which must be soundly addressed before the Development Brief is adopted). Moreover, as demonstrated above, other sources of supply have come forward which changes the circumstances and the contribution required to the District’s housing supply.</p>	<p>Noted. The comment will be considered by the Council in finalising the Development Brief. Any proposed changes will be considered through the updated SA Report.</p>
<p>The first sentence of SA Theme 4 should therefore be re-written to “Whilst the level of growth at Bourne End and Wooburn is set through the WDLP ...”.</p>	<p>In line with previous comments, the sentence has been amended to reflect that the indicative capacity of the site is set out through the WDLP.</p>
<p>The SA states three density options are assessed:</p> <ul style="list-style-type: none"> <li>• Higher density 35 dph +</li> <li>• Medium density 25 – 30 dph</li> <li>• Lower density &lt; 20 dph</li> </ul>	<p>The wording of the SA Report has been updated to better reflect the recognition that different development densities across the site seek to reduce impacts on the character of the surrounding area.</p>
<p>Further SA assessment is revealed in Part 2 narrative on landscape, which considers [SA 9.41] the “low-density rural housing in the east and denser village development in the north. It is recognised that development will ultimately merge these varying character areas.”.</p>	
<p>In terms of housing density, plain reading of the narrative’s phrase “merging these varying character areas” conjures the form of average gradient from the low-density area at Hawks Hill (1 dph average) across to Bourne End (20 dph average). It does not infer an atypical increase in density (40 dph) between the two.</p>	
<p>It is alarming the SA concedes a landscape-led approach will result in coalescence given the specific objectives in policy designation is to “maintain a sense of separation” which the DDB echoes to “provide a physical and visual separation between Hawks Hill, Hedsor Road and the new development”.</p>	

<p><b>Conclusions</b></p> <p>18.20 In terms of Climate Change it is frankly absurd that the SA concludes minor long-term positive effects are anticipated for the site. There is so much we could write to underline why this is a crass conclusion but will resist devoting the next 20-pages to the topic. Rather we will summarise that the DDB embraces no commitment for a low carbon development to meet the sustainable homes targets, that tarring and hard surfacing will inevitably contribute to existing surface water and ground water flooding issues, that increase car journeys will add to noise and pollution, that the SA ranks tree planting at the buffers as least desirable option (in spite of the Natural England scoping response), that the local area is already above recommended air quality levels.</p>	<p>These assumptions derive from understanding the evolution of the baseline with or without the Development Brief, in which development at the site is set by the strategic parameters of the WDLP rather than the Development Brief. The additional provisions of the Brief are thus considered for the potential to support minor positive effects (particularly through additional detailed guidance to address known flood risk constraints on-site). No significant deviations from the baseline, where the site is already allocated through the WLDP, are anticipated.</p>
<p><b>Church land</b></p> <p>The Policy BE2 red line map site area applied in the SA is invalid as it includes land belonging to Cores End United Reform Church which is not a deliverable component of the site (a matter previously raised during LP Examination but ignored). This adversely impacts upon the SA which assessments have been undertaken against a different site area. The Council must update the Sustainability Appraisal from AECOM (authors of the SA Report) accordingly with all assessments reviewed after excluding land owned by the United Reform Church which does not form part of the development site.</p>	<p>Any changes to the site boundary in the finalised Development Brief will be reflected in the accompanying SA Report.</p>
<p><b>Catesby Estates pre-application consultation</b></p> <p>The red line map published by Catesby Estates in its flyer to local residents shows an altered site boundary. KBEG has measured this area which removes around 1.5 ha from the west side of the site area illustrated in Policy BE2 and the Development Brief. This loss of this area not only impacts the proposed development framework, but also adversely</p>	<p>Any changes to the site boundary in the finalised Development Brief will be reflected in the accompanying SA Report.</p>

<p>impacts upon the SA which assessments have been undertaken against a different site area.</p> <p>The Council must update the Sustainability Appraisal from AECOM (authors of the SA Report) accordingly with all assessments reviewed after making corrections to reflect the modified extent of the development site now proposed by Catesby Estates.</p>	
Resident	
<p>Figure 6.5 shows three options. I am not sure what the intent is. As this is a DDB, are these the options that Buckinghamshire Council are informing the developer they can use, or providing an option to the respondents to vote on?</p>	<p>These are options that have been identified and appraised through the SA process to inform the development of the Development Brief.</p>
<p>Under Section 4.9's heading "Hedsor Road and Riversdale Conservation Area" it would be appropriate to add a new paragraph recognising this inevitable damage to the heart of this Conservation Area. Words may be similar to those below:</p> <p>Additional DB section 4.9 paragraph needed "4.9.x Junction improvements intended within the Conservation Area will damage the setting of many Heritage Assets. Layout and a minimum footprint size will be important in having special regard to their setting."</p> <p>Please be reminded that the open space on the corner of Ferry Lane and Hedsor Road also forms part of the Conservation Area and Green Belt. The harm to these junctions (currently considered off-site) needs to be recognised, and brought into the adopted Brief along with firm proposals to minimise damage done to these Heritage assets.</p>	<p>Noted, the SA explores the highlighted issues associated with the conservation area.</p>
<p>I strongly agree with and support the above SA's recommendation and conclusion, for trial trenching. This must be brought forward into the Development Brief prior to adoption, the focus being the Western side of the site closest to the Wye, and the Northern and Southern edges of the site, that have been longest inhabited.</p> <p>2) Section 4.10 neglects the finding of a Mesolithic Flint Pick only 150 m from the Sothern site entrance onto Hedsor Road, under what is now the garden centre. See box below</p> <p>3) Section 4.10 fails to inform the DB that the southern part of the site (following the footprint of the Conservation Area) is an Archaeological Notification Area, as seen below from your (Buckinghamshire Council) website.</p>	<p>Noted. The finalised SA Report has been updated to include the Conservation Area as an area important for archaeology.</p>



<p>The land is previously undisturbed with the exception of ploughing and the laying of some past foul sewers (DDB Figure 4.26). This combined with the land's proximity to the rivers Wye and Thames demonstrate that the SA had good reason to highlight the need to establish that the items of Archaeological need greater attention than seen within the DDB</p>	
<p>Regarding the proposed two junctions within Hedsor Road, these will both be within one of your (Buckinghamshire Council) Archaeological Notification Area's. Both the Council and Highways, in planning the junction changes should be made aware of. BC website extracts below – junctions highlighted.</p>	<p>Please see previous response.</p>
<p>Part 2 – Heritage and conservation Two recommendations are made within the assessment as follows:</p> <ul style="list-style-type: none"> <li>• To better secure positive effects in relation to archaeology, it is recommended that the observed need for trial trenching prior to development is further established as a development principle to ensure this is carried through to development proposals.</li> <li>• It is considered that opportunities to identify the links between on-site mitigation measures/ efficiency initiatives and wider Council aims in relation to climate change mitigation and climate resilience are missed in 'part one' of the draft Brief (the contextual analysis). It is recommended that additional context is provided to better secure the responsive on-site measures required.</li> </ul>	<p>Noted. Any updates made to the Development Brief will be reflected through a revised SA Report.</p>
<p>Within the summary findings I strongly support the security the first bullet point affords in order to "better secure positive effects in relation to archaeology" by means of trial trenching prior to development. This recommendation should be brought forward into the Development Brief as a requirement. As regards bullet point two, on-site mitigation measures in relation to climate change mitigation need adding to the Development Brief prior to adoption.</p>	
<p>Para 9.38 &amp; 9.39 However, I strongly disagree with the statement under the heading Historic environment: "the addition of just under 500 homes in this location is considered likely to result in residual minor long-term negative effects on the setting of designated heritage assets."</p>	<p>Noted. Residual minor negative effects are identified within the SA Report in relation to the historic environment.</p>

<p>Even if it were the case for the houses within the Conservation Area, this would definitely not be the case for the offsite Heritage Assets – namely the junction improvements. The Sustainability Appraisal needs to be expanded to include the impact of off-site repercussions for these junctions within the heritage settings.</p>	
<p>Para 10.2 I strongly disagree with the conclusion point 10.2. As there is an absence of a Traffic and Access assessment, how can this statement be made? In particular with regard to the required junction improvements when reading “and minimises development impacts on sensitive heritage settings“. The damage will only be known once the revised Junctions are known. It is already becoming clear that the heart of the Conservation Area around the two Junctions of Hedsor road will have to be very large and thus destructive to not only the Conservation Area (including the settings of Listed Buildings) but will also require the use of further Greenbelt land outside of BE2.</p>	<p>The SA has been informed by the available evidence. Should the Council produce further traffic and access assessments, these will be considered in the revised SA Report.</p>
<p>Extract from: Sustainability Appraisal - Scoping response Historic England - Edward Winter, Historic Environment Planning Adviser Historic England strongly advises that the conservation and archaeological advisers to Buckinghamshire Council are closely involved throughout the preparation of the SA/SEA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment.</p>	<p>Noted, with thanks.</p>
<p>The Council should remind the authors of the Sustainability Appraisal that there has been prior contact with Historic England regarding the site. This was during WDC LP Matter hearings in 2018. (I believe KBEG Matter 5 - Hedsor and Riversdale Conservation Area}</p>	

Within appendix B of this response is a copy of a letter I received from Historic England's Martin Small (Principal Adviser, Planning Group). This later covers issues regarding the Conservation Area and the proposed development BE2. You should excuse Martin's inaccurate orientation when he makes mention of the walls to the south – the walls are to the north and west at the junction.

Extract from: Historic England letter (21018) regarding The Conservation Area – underline added

In conclusion, I consider that it would be possible to have some form of new development on the proposed site without unacceptable (to us) impacts on the special interest, character and appearance of the Hedsor Road and Riversdale Conservation Area, but only if clause b) of Policy BE2 was to be genuinely and fully satisfied.

With the benefit of a tour of the area and my consideration of the Hedsor and Riversdale Conservation Area Appraisal, however, I now consider that to ensure that clause b) is fully satisfied, the Policy, supporting text and illustrative layout should ideally be amended as follows:

- clause b) of Policy BE2 reworded as “Not have an adverse impact on the setting or otherwise on the special interest, character and/or appearance of the Hedsor Road and Riversdale Bourne End and Wooburn Conservation Area”;
- the new development only to be to the north of the existing hedgerow along the northern boundary of the fields immediately behind the properties on the north side of Hedsor Road (with the retention and strengthening of the hedgerow) so as to maintain a greater open area between the Conservation Area and the new development. This should be shown on the illustrative layout. (But if the indicative development was to be kept as shown in the illustrative layout, the tree belt between the Conservation Area and the new development indicated on the layout should be a specific requirement in Policy BE2, to give its provision actual force); and
- any works to the junction of Hedsor Road and Ferry Lane not to entail the removal of any the significant wall to the south of the junction.

From the above letter Buckinghamshire Council can see, that this is an extensive buffer, in order to “Not have an adverse impact on the Conservation Area.”

However, the Local Plan was adopted with the phrase “Have special regard to” which is somewhat weaker than “Not have an adverse impact on”  
That said, it shows that in order to not cause harm to the Conservation Area, the buffer would need to be in the order of 120m, far greater than the 20m proposed by the DDB.  
The Council should reassess the buffer width, a reduction in unnecessarily high housing numbers would allow for some increased buffer size.

Any buffer amendments will be considered in the final SA Report.