

## **APPENDIX A: Consultation responses and Representations**

### Councillor Comments

#### **Cllr Jackson Ng (Beaconsfield Ward)**

It is my view that this planning application will benefit from wider discussions and scrutiny - and I wish to call it in.

#### **Cllr Alison Wheelhouse (Beaconsfield Ward)**

This application warrants discussion by planning committee therefore I would like to call it in.

I am confirming my call-in request on the grounds that this application merits scrutiny by the planning committee and a call-in is in the public interest. Also, please could you put the applicant's Financial Viability Assessment on the portal as this does not appear with their Affordable Housing Statement? And allow the public the full 21 days to comment on that document once it has been uploaded? Many thanks.

#### **Cllr Mason (Beaconsfield Town Council)**

I wish to object to this outline planning application for the following reasons:

- 1) The applicant is looking to develop housing on Green Belt land which goes against the National Planning Policy Framework (NPPF) desire to prevent urban sprawl; prevent neighbouring towns merging into one another; safeguard the countryside from encroachment; assist in urban regeneration by encouraging the recycling of derelict and other urban land. The Council should protect the Green Belt and therefore dismiss this application out of hand.
- 2) The applicant is seeking to 'justify' its application based on "very special circumstances" and uses a range of arguments to suggest that this site could deliver more houses, affordable houses, self-build properties, a community hub space, a junior school and, perversely, a green space within what is already Green Belt land. The applicant relies heavily on out-of-date data provided within the Local Plan (1999), Core Strategy (2011) and the failed Chiltern & Sth. Bucks Local Plan (2020) to support its arguments. The recently formed Buckinghamshire Council must be able to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development before approving any development on Green Belt land. The Council undertook a call for Brownfield Sites (which closed on 22nd March 2021) as part of preparation work for its new Local Plan but has not yet published its findings as to how much housing need can be met through Brownfield development nor what the total housing need now is. The Council has a duty to its residents to determine the need and then how much of this need can be met through Brownfield development BEFORE it can release any Green Belt land for development.
- 3) The Planning Inspectorate Report on the Examination of the Vale of Aylesbury Local Plan 2013- 2033 dated 19th August 2021 clearly states (paragraphs 83-84) that the NPPF "does not advise that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in its

local authority area. Yet, apart from combining the Aylesbury Vale local authority area with those of Wycombe, Chiltern and South Buckinghamshire, that is what the evidence base for VALP effectively does by using local authority boundaries as a surrogate "best fit" Housing Market Area for the collection of data and for calculating Objectively Assessed Needs. Housing Market Areas do not have finite boundaries; they are best conceived as zones of influence which both overlap and change over time and according to the geographic scale of market being considered so that, for example, it is sometimes possible to discern several local housing market areas within a larger regional housing market area". For this reason alone, the Council should reject this application because it fails to correctly address the 'housing need' because the Buckinghamshire Council itself has yet to establish what its housing need is, and how this housing need can be met by development on Brownfield and other non- Green Belt sites across its larger regional housing market area(s).

4) The applicant recognises the sites proximity of about 3km to the Burnham Beeches SAC and of about 0.66km to the Chiltern AONB. I don't believe that the applicant has correctly addressed the potential impact on these sites if this development were to proceed, and further work would be required before I believe the Council could contemplate approving such an application. Again, therefore, the Council should reject this application.

5) The applicant admits (paragraph 7.7.8 of its Planning Statement) that "no traffic surveys have been undertaken at this stage". Whilst accepting the difficulty that the Covid pandemic has caused, The South Bucks Local Plan (1999) clearly states within Policy TR5 "Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the strategic highway network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road by others". It is also noted that the applicant states within paragraph 3.2.5 that there will be "three accesses from the Eastern Relief Rd" yet in paragraph 7.7.9 states "Two accesses will be taken from the Eastern Relief Rd". On what basis is the applicant's assertion made about vehicle movements per minute during peak hours? Is it based on two or three access points to the Eastern Relief Rd. The Council should reject this application purely on the basis that it fails to meet Local Plan Policy TR5 need to give assurance of "free flow on the network".

6) The applicant has not provided any evidence, such as a viability statement, to show whether this site could actually deliver the 'more houses, affordable houses, self-build properties, a community hub space, a junior school and a green space', yet it is using these 'very special circumstances' to justify this application being approved. This is another reason why the Council should reject this application.

On the basis of the above, I strongly suggest that this outline Planning Application is rejected.

**Cllr Colette Browne (Beaconsfield Town Council)**

Please accept my rejection: P to application PL/21/3151/OA for UP TO 450 dwellings on Greenbelt Whilst I am in favour of affordable homes being build in the area I ask you reject this application for the following reasons.

The Site is located within the Green Belt. It is approx. 3km to the Burnham Beeches SAC and 0.66km to the Chiltern AONB. It is and should be rejected because it does not meet the National Planning Policy Framework criteria to build on Greenbelt. The NPPF states:

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. I ask that you reject this application as no case has been made of "very special circumstances". Indeed little case has been made at all

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless there is potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.

Greenbelt is to prevent urban sprawl and safeguard the countryside. It is explicit. Building up to 450 homes on Greenbelt is in direct conflict to the NPPF.

Further, Buckinghamshire Council called for Brownfield Sites (closure on 22nd March 2021) as part of the Local Plan. The result of that call must be published and examined before you as a council may determine "very exceptional circumstances" and consider building on Greenbelt. Most of the provisions in this application are reserved (to be decided after approval). Currently this application, if approved, could result in 100's of million pound houses which are not required locally (currently there are 900+ homes for sale in Beaconsfield 23/9/2021 and the surrounding area) and affordable provision being build off site. We don't know. That is another reason why I ask that this application is rejected.

No provision or even reports into sewerage provision and no contribution to infrastructure are stated as firm fact, all left as matters to be reserved. Again I ask that you reject this matter as it cannot currently be considered without a full application being submitted and scrutinised in detail by both the elected councillors and qualified personal of Buckinghamshire County council. The following Relevant Buckinghamshire Policies are also reasons to ask that you reject this application.

Core Policy 1 - Housing Provision and Delivery. Buckinghamshire Aylesbury Vale Local Plan has been approved by the Inspector and adopted. This proposes between 27,000 and 30,100 homes. Therefore we do not need, as a council, to build these homes on Greenbelt as an exceptional circumstance. When a Local Plan has been adopted we will be clearer as to what our needs are. Until then we as a council are duty bound by the NPPF.

Policy GB1 - Greenbelt Boundaries and the control over development in the Greenbelt says Within the Greenbelt, planning permission will not be granted for development which includes essential facilities for outdoor sport, recreation or leisure if it adversely affects the

character or amenities of the Green Belt. The offer of sports pitches in the application is as follows:

The land was suitable for playing pitch use, provision can be delivered within this area without impacting on the Greenbelt subject to no floodlighting being provided (policy R8) and car parking being provided within the proposed local centre. Therefore This will not provide essential facilities as a floodlight free sports pitch in Beaconsfield is not currently required. (The Beaconsfield Town Council Open spaces committee agreed that Wooburn Green have pitches available to play on, with one pitch free and available on any Saturday as of the 9<sup>th</sup> September 2021). It would seem this application cherry picks the part of the planning policy it believes to suit their agenda. Either the planning policy for Greenbelt applies or it doesn't. The developers suggests we ignore NPPF and build 450 homes in Greenbelt, but goes on to say, "we can't provide floodlights on sports pitches as planning policy says we can't put floodlights in Greenbelt."

This application does not meet the objective and policy of GB1

#### Core Policy 3 Affordable Housing

This application offers UP TO 450 homes. Up to 40% affordable. Again the on specifics of this application make it unviable as an offer in any circumstance with everything "matters reserved".

The developer could build, according to the permission sought, 6 £10 million homes and 4 shared housing affordable flats. On Greenbelt. If the application removed the words can, may, could and replaced with "will" it would be clearer hat the application is.

CP 3 says At least 40% of all dwellings in schemes of 5 units and above (gross) should be affordable, unless it is clearly demonstrated that this is not economically viable. Please reject this application as it is not sufficient to allow this proposal. Please reject as the viability of affordable housing is stated by the developer as unconfirmed.

Policy L10 - Proposals Involving Felling or other Works affecting Trees Covered By a Tree Preservation Order. Replacement planting may be required for any felling consent granted.

I say: Please reject this application as it we don't need to cut down and replace trees if we reject this proposal.

Policy EP3 - The Use, Design and Layout of Development will only be permitted where its scale, layout, siting, height, design, external materials and use are compatible with the character and amenities of the site itself, adjoining development and the locality in general. I say: Please reject this application as it does not meet the policy of EP3.

Policy H9 - Residential Layout and Design. 'Proposals involving the development of land for residential purposes will only be permitted where:- ...'

Please reject this application as it does not meet the compatibility & character threshold of the surrounding area in terms of density, layout, design, height, scale, form and materials of a Historic Old town of Beaconsfield.

The application would adversely affect the character or amenities of nearby properties and the locality in general, creating a historic Old town squashed between two new towns with little or no regard for the businesses and parking of the old town.

Policy TR4 - Provision for those with Special Needs - Please reject this application as there is no mention of a special needs in this application

Policy TRS - Accesses, Highway Works and Traffic Generation

Please reject this application as no surveys have been performed. It could exacerbate the situation on a highway where the operational capacity has already been exceeded; and traffic movements the provision of transport infrastructure, would have an adverse effect on the amenities of nearby businesses. The effect of 900 or more new people living there, meaning 900 or more new cars on the road, trying to park in the old town, which is already full to capacity. The character of the locality of Old Beaconsfield will be adversely affected as will the local businesses with the real prospect of 2 hour parking having to be introduced. This application could adversely affect the local restaurants and inns which currently benefit of the character of the town which includes residents enjoying visits for leisurely trade.

Policy TR7 Parking Provision

Please reject this application as it cannot and does not offer to positively affect the already lack of parking in Beaconsfield Old and new towns. No mention is made how this Bucks council policy will be facilitated.

Spatial Strategy aims to protect the Greenbelt. The CS does not propose to release any land from the Green Belt for development as the District's housing need can be accommodated without the release of Greenbelt land.

Core Policy 13 Environmental and Resource Management. 'The Council will seek to ensure the prudent and sustainable management of the District's environmental resources by:...'

Reject this plan as it does not promote best practice in sustainable design and construction. All new development must be water efficient and incorporate Sustainable Drainage.

Please reject this application as it admits the developer has not yet sought to facilitate or accommodate sewerage and has not provided the costs of doing so. The council have a duty to not have the liability of significant and unnecessary bills (which we the residents ultimately pay for) which cannot or may not be met by the developer. Guarantees of essential works need to offered in any and all application and not left to reserved matters. In accordance to Policy 13.

Core Policy 1 - Housing Provision and Delivery. Buckinghamshire Aylesbury vale Local Plan has been approved by the Inspector and adopted in the next week. This proposes between 27,000 and 30,100 homes. 10% of the National Need. We do not need more homes in the area of Buckinghamshire until a new post pandemic housing need is qualified and justified. The government have announced a new housing policy (including numbers) is to be announced. The Local Plan which includes Beaconsfield is yet to be adopted.

Core Policy 2 - Housing Type and Size. A proportion of the new dwellings on sites of 5 units or more must be to the full Lifetime Homes standard. Please reject this application as this is not mentioned in the proposal

CSP 5 - Renewable energy - Please reject this application as there is no guarantee of compliance to this policy in the outline submission.

Core Policy 6 - Local Infrastructure Needs Please reject this application as there is no mention of exactly what is being proposed in terms of finance or outline provision regarding the impact of the traffic from an additional 450 homes. The "road to nowhere" is an example, as it lies still unfinished.

Core Policy 7 Accessibility and Transport. Please reject this application as it does not mention anything other than cycle lanes within the development! It does not comply with his core policy of

- Supporting the greater use of rail services.
- Ensuring that the impact of new development on the road network is minimised and mitigated through the use of 'mobility management' measures such as Travel Plans, parking charges and car parking levels.

Core Policy 8 - Built And Historic Environment. Please reject this application as it is not proven to be designed to help tackle the causes of, and be resilient to the effects of, climate change.

Core Policy 9 - Natural Environment Please reject this application as it would harm the landscape character and it's importance.

The reason for this request is so that the residents most affected by this application would know who they are? I do believe transparency and communication are key to every application. Savills UK please take a few moments and supply the road names on your location map for all to see. Both attached to this application and on any digital media promoting this application. Thank You

My first comment on this application before I read all supplied documents is to request that Savills UK communicate with the residents of Beaconsfield in a fully transparent and respectful way. While Savills UK are in no way legally obliged to do so, I ask that Buckinghamshire Council request they attach to this application a location map which shows major street names. The reason for this request is so that the residents most affected by this application would know who they are? I do believe transparency and communication are key to every application. Savills UK please take a few moments and supply the road names on your location map for all to see. Both attached to this application and on any digital media promoting this application. Thank You.

#### **Cllr Pike (Beaconsfield Town Council)**

The settled area of Beaconsfield contains little green space and residents naturally look to the surrounding green belt as an important amenity for the local community. There are no

exceptional circumstances which would justify any consideration to releasing green belt land associated with this outline application.

**Cllr Essery (Beaconsfield Town Council)**

I strongly object to this outline application. I will maintain my objection to building on this area of our town's Greenbelt and will be endorsing my objections through ongoing discussions with the planning committee and through the town council meeting. The town will not be able to cope with over 900 extra residents, doctors, dentists, parking, the huge increase in traffic, senior schools, extra pressure on the towns sewerage system to name a few areas that will be strongly affected if this went ahead. Brown field sites need to be used. The addition request of adding cycle lanes in the Old Town along the A40 would reduce an already very busy and crowded road and I would therefore also question the safety of this for cyclists

**Cllr Kanwal Toor (Beaconsfield Town Council)**

I am a mother, a local councillor and a resident of Beaconsfield for many years. The environmental impact of building unplanned developments can have far reaching consequences on our eco system.

While I understand that building affordable housing and meeting our housing needs is of importance, I do not fully agree that the only way forward is having to compromise on our green belt.

**Cllr Alex Dunlop (Beaconsfield Town Council)**

I strongly object to this application, Beaconsfield is already having 300 plus properties built at Wilton Park on Green Belt. There is no reason to add to these builds. In my view, the infrastructure and road congestion will be severely compromised.

**Cllr Anita Cranmer (Beaconsfield Ward, Beaconsfield Town Council)**

This is green belt land and despite what is claimed there are no special circumstances existing to justify the application. I therefore object. Arguments about housing needs, affordable and other, schools provision. community enhancement are not relevant and are not special circumstances. I object on the stance of no special circumstances existing to justify the application

**Cllr Owen (Beaconsfield Town Council)**

This is Green Belt, there are no special circumstances, rejects arguments put forward.

**Cllr Shaw (Beaconsfield Town Council)**

I wish to object to this outline planning application on the basis that the applicant is looking to develop on Green Belt land. Green belt land is important to our community and our countryside, and it prevents urban sprawl. The application seeks to ignore local and national regulations and evidentially is in breach of NPPF.

I request that this application is rejected to protect our town, it's community and our Green Belt.

**Cllr Saunders (Beaconsfield Town Council)**

Objects on grounds of Green Belt. No circumstances to justify.

As a resident for more than 50 years in Beaconsfield, I object most strongly to the proposal to build on this section of Green Belt land.

The policy of our Town Council, (of which I am a member and Chairman of the Community and Safety Committee, and a former Mayor ) is not to allow any building on Green Belt land, other than in exceptional circumstances.

In this instance there are no such circumstance.

The supposed justification for Change of Use from Agriculture to Housing is predicated on projected housing demand in South Bucks by the former District Council, which has not only been withdrawn, but discredited. Government Ministers have made errors previously, (for example the Local Government Act 1974). Buckinghamshire Council is yet decide on the number and location of new dwellins that will be required in the County during the next 15 years. It would be premature to approve this application, especially as we have identified brown field sites which, if innovtively re-developed, will be sufficient to meet demand up to 2030.

Furthermore, our ifrastrucure is already overloaded. Additionally, .to build on agricultural land is not only short-sighted, but also a travesty of Land management. Everyone with any intelligence sees the long term need for more food and the economic and environment requirement to reduce imports, especially in view of the adverse effect on the Balance of Payments. (It is perhaps unfashionable to raise today, but nonetheless of very real concern to HM Treasury, and essential in the fight against inflationary pressures.)

If despite my objections, you are minded to allow a change of use, please make it conditional on it being used for a mélange of parkland, open air theatre, sports fields, or for an arboretum, which would be much more beneficial for the physical and mental health and the general well-being of our communities.

**Joy Morrissey MP**

I am writing to raise my grave concerns at the proposed new development, referenced above, in Beaconsfield. I believe a development of this scale and in this location is completely unacceptable.

The site that is being proposed is beautiful, open Green Belt land, that is hugely valued by local residents. This is exactly the kind of place that makes people want to live in our area to begin with and without which, the quality of life of local people will be substantially impacted. There is absolutely no need for this pristine site to be desecrated forever. The whole point of Green Belt is to protect sites like this one, if Buckinghamshire Council fails to do so, it will send a clear message to developers that other such sites are worth targeting.

I am particularly concerned that part of the site includes and impacts on ancient woodland. This really is a genuinely irreplaceable resource and one that I think we would be foolish to allow to be taken from the local community. I note from the letter submitted by the Forestry Commission that they have significant concerns, emphasising as they do that "ancient woodlands are irreplaceable". Anything that negatively impacts ancient woodland like this should be considered vandalism of our heritage.

The area in which this proposed development is sited already struggles with very high volumes of traffic, that the local roads are unable to handle. I often see, from my office window in Beaconsfield, traffic backing up from vehicle travelling towards the motorway and into the new town. The addition of new homes to the area should not be contemplated without making provision for the extra traffic volume. As this site is located away from the vital resources in the new town, there would also need to be additional parking provision.

This increased level of traffic would not only impact on the flow of vehicles but also on the air quality of the area. Adding new vehicles will cause problems in and of itself but when this is compounded by the stationary traffic engendered by the increased congestion, I fear that we will have to look at the safety of air quality in the area with a view to imposing an Air Quality Management Area in Beaconsfield.

I hope that this application will be rejected as the obviously unnecessary incursion into the Green Belt that is so clearly is.

### Parish / Town Council Comments

#### **Beaconsfield Town Council**

This is an outline application which proposes a development of 450 new homes to be built to the east of Beaconsfield on Green Belt land. The site is approximately 3km from the Burnham Beeches SAC and 0.66km from the Chiltern AONB.

This application does not meet the National Planning Policy Framework (NPPF) criteria of 'very special circumstances' which might allow building on Greenbelt. Local planning authorities must ensure that "substantial weight is given to any harm to the Green Belt and 'very special circumstances will not exist unless the potential harm to the Greenbelt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".

The NPPF continues in paragraph 149. "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt". None of the exceptions noted in paragraph 149 are relevant here. Greenbelt is designed to prevent urban sprawl and safeguard the countryside. It is explicit. Building up to 450 homes on Greenbelt is in direct conflict to the NPPF. The Buckinghamshire Council call for Brownfield Sites (closure on 22nd March 2021) forms a part of the exploration for the new Local Plan. This will include

Beaconsfield and is yet to be agreed and adopted. As a result, the real housing need for the area has yet to be determined. Without such a determination, the case cannot be made for development on the Green Belt. It is also noted that the provisions in this application are reserved. Beaconsfield Town Council do not therefore have explicit nor specific detail of what is proposed

As a consequence of the above Beaconsfield Town Council strongly request that this application be rejected.

On behalf of Beaconsfield Town Council

A copy of our agreed town council policy ( if agreed ) regarding Greenbelt is also attached. N.B. The attached appendix notes other local planning policies where we believe that this application would fail.

#### APPENDIX

#### RE BEACONSFIELD TOWN COUNCIL RESPONSE TO PLANNING APPLICATION PL/21/3151/OA

This application does not contain any conditional commitment or guarantees which would suggest to us that this application would also fail against many other local planning policies:

- 1 Spatial Strategy - This strategy aims to protect the Greenbelt and clearly this application fails to do so.
- 2 Core Policy 3. Affordable Housing: This application offers up to 450 homes with up to 40% being 'affordable'. The viability of affordable housing is stated in this application by the developer as unconfirmed.
- 3 Core Policy 6. Local Infrastructure Needs. There is no mention of any financial provision is being offered for infrastructure regarding the impact of the traffic from an additional 450 homes.
- 4 Core Policy 7. Accessibility and Transport. This application does not mention anything other than cycle lanes within the proposed development. Under this policy, any development should support the greater use of rail services and ensure that the impact of new development on the road network is minimised and mitigated through the use of 'mobility management' measures such as travel plans, parking charges and car parking levels. This application does not address these issues in any meaningful way.
- 5 Core Policy 9. Natural Environment. We believe this application would harm the landscape, character, and its importance.
- 6 Core Policy 13. Environmental and Resource Management. This application does not promote best practice through any meaningful or sustainable design and construction. All new development must be water efficient and incorporate Sustainable Drainage. Any reports are absent. The developer has not yet sought to facilitate or accommodate sewerage and has not provided the costs of doing so. The council has a duty to avoid significant and unnecessary bills) which may not be met by the developer. Guarantees of essential works should be made at the initial stage of application, not left to reserved matters review.
- 7 Policy EP3 -This application does not include any proposals to ensure compatibility with the historic market town of Old Beaconsfield and the Greenbelt.
- 8 Policy H9 - Residential Layout and Design. This application does not address any area of compatibility & character threshold of the surrounding area in terms of density, layout, design, height, scale, form and materials of the Historic Old Town of Beaconsfield. The application would adversely affect the character or amenities of nearby properties and

the locality in general, with little or no regard for the residents, businesses, traffic and parking.

9 Policy TR5 - Accesses, Highway Works and Traffic Generation. This application has failed to consider the requirements needed under this Policy.

10 Policy TR7 - Parking Provision. This application does not offer to positively impact the existing parking problems across Beaconsfield Old and New towns.

### Consultation Responses

#### **Burnham Beeches Estate**

I provide a response on behalf of the City of London Corporation as the neighbouring landowner of Burnham Beeches, designated as SSSI, NNR and SAC.

On 26 November 2020 Buckinghamshire Council formally adopted the Burnham Beeches Special Area of Conservation Strategic Access Management and Monitoring Strategy Supplementary Planning Document. This document was prepared to support the implementation of policies in the South Bucks Core Strategy 2011 and the Chiltern Core Strategy 2011. It outlines an avoidance and mitigation strategy in relation to the impact of recreation pressure on Burnham Beeches as a consequence of net new homes within 5.6km of Burnham Beeches SAC.

The application site is within 5.6km of the boundary of BB, but further than 500m, and will add an

additional 500 dwellings. In this distance zone, the mitigation strategy proposes developer contributions to mitigate for the impact of additional visitors which have the potential to adversely

affect the protected features on the SAC through:

- Contributing general wear and tear
- Causing soil erosion/compaction which has negative impacts on tree health and alters the natural vegetation.
- Increases the amount of nitrogen through dog fouling/urine and chemicals from dog medication, causing stress to the trees and changing the natural vegetation.
- Increased disturbance to wildlife and higher chance of introduction of pests and diseases.
- Increased amounts of litter and an increased fire risk.
- Increased risk of removal and disturbance of wood, leaf litter and fungi.

The developer suggests in the non-technical summary and the environment statement that mitigation will be provided in the form of both incorporating public open space into the development and making contributions to Strategic Access Management and Mitigation work at Burnham Beeches. However, there appears to be little detail. We require further information to ensure that the mitigation proposed is sufficient to prevent harm to the SAC

and confirmation that this is acceptable to both Natural England and Buckinghamshire Council and will be fully implemented.

We would also like to see further consideration of the potential impacts of traffic on Burnham Beeches SAC. Increased traffic on the A355, for example by residents of Beeches Park heading south to work, pushes more traffic on to the smaller roads within the SAC, causing direct erosion of the nature reserve as well as associated issues such as raising levels of pollutants associated with vehicle traffic. We feel that these impacts need further study.

### **Beaconsfield Society**

We write in respect of the above planning application. DLP Planning Ltd has been instructed by our clients, The Beaconsfield Society, to outline their objections to the proposed scheme, which seeks to develop land to the east of Beaconsfield for up to 450 dwellings, a mixed-use local centre, land for a two form entry primary school and pre-school, public open space and associated infrastructure. Please note that this letter should be read in conjunction with further representations submitted separately by The Beaconsfield Society.

#### a) Decision-taking in accordance with the Development Plan and the Principle of Development

A development plan for Buckinghamshire has not yet been prepared, although this is required to be in place by April 2025. The current development plan that applies to the application site is therefore the South Bucks Core Strategy (2011) together with the [saved](#) policies in the South Bucks Local Plan (1999).

Paragraph 219 (Annex 1) of the National Planning Policy Framework (NPPF) states: *“... existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”*

Therefore, the policies contained within the South Bucks Core Strategy (2011) and Local Plan (1999) should not automatically be considered out-of-date.

Policy GB1 (Green Belt boundaries and the control over development in the Green Belt) in the Local Plan (1999) in particular states that within the Green Belt, planning permission will not be granted for development other than for the change of use of existing buildings or land or certain types of development (as set out in the policy). This policy remains in accordance with the paragraph 149 of the NPPF which states that *“a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt”*.

The exceptions listed in both the NPPF (paragraph 149) and Local Plan Policy GB1 are consistent with one another and do not include large scale residential developments. The applicant themselves acknowledges in paragraph 5.2.1 of their Planning Statement that *“due to the Site’s location within the Green Belt, the proposals constitute inappropriate development”*. The proposed development is therefore contrary to Policy GB1 and paragraph 149 of the NPPF.

The spatial strategy set out in Policy CS1 of the Core Strategy (2011) “aims to protect the Chilterns AONB and Green Belt by focusing new development between 2006 and 2026 on land within existing settlements not covered by those designations .... Some redevelopment and infilling is planned for identified development sites in the Green Belt. Very little development is intended elsewhere. Whilst the neighbouring Wilton Park site is allocated as an “Opportunity Site’ within Core Strategy Policy CS14 (due to its status as a “Major Developed Site in the Green Belt’), the Beeches Park application site is not allocated. The application site is an unallocated greenfield site located within the Green Belt and as such its development would be contrary to Policy CS1 of the Core Strategy.

The application site is greenfield land within the Green Belt and as such the potential harm to the Green Belt by reason of inappropriateness of the proposed development would be significant. The proposed development is therefore contrary to paragraph 147 of the NPPF which states that Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstance. We present further consideration of whether very special circumstances have been demonstrated in the context of this application below.

In their Planning Statement, the applicant relies heavily on the sites proposed allocation within the Draft Chiltern and South Bucks Local Plan 2036 (Site Allocation Policy SP BP9 – Land East of Beaconsfield) as justification for why the principle of development is acceptable, stating in paragraph 5.1.1:

*“Given that the adopted LP and CS both pre-date the NPPF, the policies within the CSB LP [Chiltern and South Bucks Local Plan] are considered to represent the Council’s most recent position on planning policy and their objectives for development”.*

As noted above, paragraph 219 of the NPPF states that policies should not be automatically considered out-of-date simply because they pre-date the NPPF. Policies GB1 and CS1 in particular still align with the objectives of the NPPF to protect land designated as Green Belt. In addition, the Draft Chiltern and South Bucks Local Plan 2036 was never examined as it was withdrawn following Inspectors initial conclusions that the Duty to Cooperate had not been met. Therefore the policies contained within the Draft Chiltern and South Bucks Local Plan 2036 hold no material weight in planning decision-making terms. Notwithstanding this, the application site covers a much smaller area than draft site allocation SP BP9 which the Draft Local Plan intended would be delivered as part of a wider strategic allocation, together with necessary infrastructure and Suitable Alternative Natural Greenspace (SANG) to mitigate the impacts of the development, much of which is not proposed to be delivered at the application site.

Since the formation of the new Buckinghamshire Unitary Authority in April 2020, the planning area across which a new Local Plan will be prepared has been extended to incorporate the four former authorities of Chiltern, South Bucks, Wycombe and Aylesbury Vale. Therefore the future direction of strategic planning for the Buckinghamshire Authority is likely to be significantly different to that presented under the withdrawn Draft Chiltern and South Bucks Local Plan, not least because the land supply position of this planning area is likely to be different (see our comments on Housing Land Supply Position in section (c)

below) and there are areas of Buckinghamshire that are not subject to the same Green Belt protections. This will therefore reshape the overarching spatial strategy from that previously presented in the Draft Chiltern and South Bucks Local Plan. The applicants claim that the principle of development on this site aligns with Buckinghamshire Council's "most recent position on planning policy and their objectives for development" is not substantiated as the proposed development is contrary to the spatial strategy set out in the adopted development plan.

b) Justification for Green Belt land release and demonstration of 'Very Special Circumstances'

The application site is located within the Green Belt, which is afforded one of the highest levels of protection under both the NPPF and the adopted development plan. Paragraph 147 of the NPPF states:

*"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."* (emphasis added)

Paragraph 148 goes on to state that:

*"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'*

In determining this application it is therefore necessary to consider whether there is sufficient evidence to demonstrate that these very special circumstances have been met and that the harm to the Green Belt (or any other harm) is outweighed by other considerations.

In their Planning Statement, the applicant sets out details of the review of Green Belt boundaries that was undertaken to inform the now withdrawn Draft Chiltern and South Bucks Local Plan as evidence that harm to the Green Belt resulting from the removal of the application site would be very limited (paragraph 5.4.8). However, the assessment of impacts on the Green Belt that the applicant refers to was undertaken in the context of justifying the alteration of Green Belt boundaries which paragraph 140 of the NPPF states should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans rather than through the application decision-making process. Paragraph 148 states that in application decision-making, harm to the Green Belt should be assessed in relation to the 'potential harm' by reason of inappropriateness'. This is a different consideration which the applicant has failed to demonstrate.

The Planning Statement goes on to state that whilst the proposals will have localised impacts on the openness of the Green Belt in this location, this needs to be considered in the context that it was established by CBC and SBDC that the land needed to be removed from the Green Belt in its local plan evidence base (paragraph 5.4.8). The proposal to remove the application site from the Green Belt in the draft Local Plan evidence base was derived from the context of strategic plan-making as opposed to site specific decision-taking and the justification for the removal of land from the Green Belt will be different in

each context. Furthermore, the Draft Chiltern and South Bucks Local Plan was withdrawn prior to examination, therefore the evidence contained within it has been neither scrutinised nor thoroughly tested.

The applicant has therefore failed to demonstrate the potential harm to the Green Belt of this proposed development by reason of inappropriateness. The applicant states that harm to the Green Belt will be 'very limited', however this is based on evidence used to justify the exceptional circumstances for strategic plan-making (which has not been tested at examination) rather than the harm caused by large-scale inappropriate development within the Green Belt at an individual site basis.

As stated in NPPF paragraph 146, 'local planning authorities should ensure that substantial weight is given to any harm to the Green Belt'. Notwithstanding our objection to the 'very limited' level of harm the applicant has claimed would be caused by the development, the fact that the applicant acknowledges some level of harm (no matter how limited) should hold significant weight in the determination of the application.

In considering whether 'very special circumstances' exist, paragraph 146 of the NPPF requires applicants to demonstrate that any harm resulting from the proposal 'is clearly outweighed by other considerations' (emphasis added). At paragraph 5.12.2 of their Planning Statement, the applicant states 'The limited harm to the Green Belt that is generated by these proposals is outweighed by the extensive and multiple VSCs that have been outlined above. In summary, these other considerations set out by the applicant include:

- Acute housing need
- Acute affordable housing need
- Self-build and custom build homes
- Sustainability
- Local centre and community needs

With respect to the need for housing and affordable housing, we consider each of these points in further detail in sections (c) and (d) below.

With respect to the provision of self-build and custom build homes, we are not aware of any planning appeal examples in which the provision of this type of housing has been deemed by Planning Inspectors to be a consideration worthy of demonstrating the 'very special circumstances' needed to justify removal of land from the Green Belt. The applicant notes there are 98 applications that have been approved for inclusion on Parts 1 and 2 of the Council's Self-Build and Custom Housebuilding Register, however according to the Council's website "*.... the area only has a duty to grant permission for enough suitable serviced plots of land to meet the demand of entries on Part 1 of the Register*". The Council's website states that Part 1 of the Register contains just 30 applications. This level of need is not significant and could be delivered elsewhere in the District without requiring the use of Green Belt land.

In respect of sustainability, the applicants Planning Statement sets out how the proposed development meets the sustainability and energy requirements of relevant Core Strategy and Local Plan policies, as well as the three overarching sustainability objectives of the

planning system as outlined in NPPF paragraph 8 (economic, social and environmental). These are policies against which all applications for development are assessed as part of the decision-making process. An application's compliance with sustainability objectives is not considered to be a significant consideration that outweighs the harm to the Green Belt (including potential environmental harm) caused by the development itself. Again, we are not aware of any planning appeal examples in which an application's compliance with sustainability policies has been deemed by Planning Inspectors to be a consideration worthy of demonstrating the very special circumstances needed to justify removal of land from the Green Belt. In fact, adherence to policies in themselves must be regarded as normal rather than very special circumstances.

With respect to the local centre and other community facilities that are proposed as part of the new development, as set out in section 5.11 of the applicant's Planning Statement, these facilities (or financial contributions towards provision of these facilities) are only identified as being required where there is a limited spare capacity in the local area (as in the case of nurseries, primary school and secondary school places) or where there is a good level of existing provision in the local area but additional provision is required to support the new population within the proposed development (as in the case of the proposed community centre, open space and sports pitches). The new local centre and other contributions towards community facilities proposed will therefore only be sufficient to mitigate the impact of the proposed development by providing for the needs of the incoming population rather than meeting the needs of other nearby residents. These mitigation measures do not in themselves meet the very special circumstances necessary to justify the removal of land from the Green Belt. Again, we are not aware of any planning appeal examples in which an application's inclusion of facilities necessary to mitigate the impacts of the proposed development has been deemed by Planning Inspectors to be a consideration worthy of demonstrating the very special circumstances needed to justify removal of land from the Green Belt. The scheme is not proposing to deliver a new school for example where the educational benefits might extend beyond meeting the needs of development itself.

#### c) Housing Need and Housing Land Supply Position

The applicant identifies acute housing need as a 'very special circumstance' that should be a material consideration in justifying the removal of land from the Green Belt. In section 5.7.3 of their Planning Statement, the applicant refers to the Chiltern and South Bucks 5YHLS Calculation document (September 2020) which states that South Bucks has a 2.94 years supply of housing land for the period 2020 to 2025, and states that *'Therefore the Council cannot demonstrate a 5YHLS [five year housing land supply]'*.

In respect of calculating local housing need for newly formed or reorganised authorities, Paragraph 2a-039-20201216 of the PPG states that:

*"For plan-making, the new/re-organised local authority should use a local housing need for the new/merged authority area, which is at least is the sum of the local housing need of all the predecessor local authorities. Once a re-organised authority has adopted strategic housing policies covering the whole of its area, this will be used to determine the housing requirement, and the cap should then be applied on these policies."*

For calculating the 5 year land supply position the PPG (Paragraph: 025 Reference ID: 68-025- 20190722) states:

*“Where a newly formed local planning authority is covered by strategic housing requirement policies adopted by predecessor authorities, these policies can continue to be used as the housing requirement for calculating the 5 year housing land supply in the areas they apply where these are less than 5 years old, or they are older but have been reviewed within the last 5 years and found not to need updating.*

*Where strategic housing requirement policies, covering the predecessor authority area, are older than 5 years and require updating, local housing need should be used, where this is available. Where the data required to calculate local housing need is not available an alternative approach will have to be used*

*In this case therefore it would appear that as the Core Strategy is more than 5 years old then the Standard Method is used for the whole of the new administrative area.”*

As Buckinghamshire Council is now the local planning authority for this area, according to the PPG the local housing need for this area may be calculated as the sum of the local housing need of all the predecessor authorities. If such an approach is taken, the local housing need and indicative five year housing land supply (based on most recently published deliverable housing supply figures) for Buckinghamshire Council can be calculated as follows:

**Table 1. Buckinghamshire Five Year Housing Land Supply – Indicative Calculation**

Area Name	Base Five Year Housing Requirement (2021 – 2026) (Standard Method)	Buffer based on HDT 2020	Five Year Housing Requirement incl. buffer (2021 – 2026)	Deliverable Supply (most recently published)	Source of Supply
Aylesbury Vale	7,080	5%	7,434	8,114	Published Five Year Supply – base date April 2020 (September 2020)
Chiltern	1,747.2	20%	2,097	1,507	Published Chiltern and South Bucks Interim Five-Year Housing Land Supply Calculation – base date April 2020 (September 2020)
South Bucks	2,160	20%	2,592	1,329	
Wycombe	3,821.5	5%	4,013	4,778	Published Five Year Housing Land Supply update – base date April 2020 (March 2021)
<b>Buckinghamshire</b>	<b>14,809</b>		<b>16,135</b>	<b>15,728</b>	

The housing requirement for Buckinghamshire (based on the sum of its constituent predecessor authorities’ requirements) is therefore 16,135 for the period April 2021 to April 2026, or 3,227 per year. The most recently published supply figures for each authority (all of which have base dates of April 2020) identify a total deliverable five year supply across the four predecessor authorities of 15,728.

On the basis of the above assessment, the potential shortfall in deliverable land is not as severe when measured across Buckinghamshire as a whole as it is when measured in South Bucks, therefore there is a strong argument that Green Belt release should be considered at plan-making stage rather than application stage (thus reducing the extent to which very special circumstances exist to support these proposals). This should be a significant material consideration in assessing the need for development in the Green Belt in the case of this application as it fails to demonstrate that ‘very special circumstances exist to justify the release of land from the Green Belt, as the housing need in the local planning area cannot be described as ‘acute’. The level of shortfall is not so severe when calculated at the scale of Buckinghamshire as a whole and there are opportunities within the next round of plan-making in Buckinghamshire to direct growth beyond the Green Belt, therefore it is not imperative to release the application site from the Green Belt at this stage.

**d) The Housing Delivery Test(HDT)**

Paragraph 5.7.4 of the applicants Planning Statement references the Housing Delivery Test (HDT) 2020 results for South Bucks which reports a figure of 64%, and that “Therefore, a presumption applies.

This most recent Housing Delivery Test was calculated and applied to the geography of South Bucks. In respect of how the Housing Delivery Test is applied to newly-established unitary authorities (as in the case of Buckinghamshire), a recent Written Ministerial Statement (6th September 2021) confirms that:

*“...from the 2021 measurement, in order to support new unitary authorities, they will be able to choose to use their former authority boundaries or their new unitary boundaries for the purpose of the measurement until the fifth anniversary of the authority’s existence. We will be updating planning guidance to reflect this. In such cases, unitary authorities will still be expected to deliver housing in line with their identified need’.*

The unitary authority of Buckinghamshire comprises the former authorities of Aylesbury Vale, Chiltern, South Bucks and Wycombe. Combining the requirement and supply figures used in the

2020 HDT measurement for the result:

Area Name	Total number of homes required	Total number of homes delivered	Housing Delivery Test: 2020 measurement	Housing Delivery Test: 2020 consequence
Aylesbury Vale	3,807	4,887	128%	None
Chiltern	868	773	89%	Action plan
South Bucks	1,137	725	64%	Presumption
Wycombe	1,496	1,858	124%	None
<b>Buckinghamshire</b>	<b>7,308</b>	<b>8,243</b>	<b>113%</b>	<b>None</b>

Based on the figures submitted for the 2020 HDT, Buckinghamshire as a whole exceeds its housing requirement and therefore based on the geography of the unitary authority the presumption in favour of sustainable development would no longer be engaged. Whilst the 2021 HDT figures have not yet been published, the above calculation suggests that based on current figures, housing delivery in Buckinghamshire exceeds current requirements. The

forecast 2021 HDT is therefore a material consideration in the determination of the application as it demonstrates that the housing delivery across the current local planning authority area exceeds requirements and therefore it is questionable whether paragraph 11(d) of the NPPF should be engaged.

e) Affordable housing provision

In paragraph 5.8.1 of their Planning Statement, the applicant states ‘This application will seek to deliver a policy compliant amount of affordable housing’ (emphasis added). The applicants Affordable Housing Statement at paragraph 5.2 reiterates that ‘The Applicant is committed to provide a policy compliant 40% affordable housing on site, subject to any viability issue’ (emphasis added). The applicant’s commitment to affordable housing is stated as being subject to viability assessment and therefore may be subject to change. Indeed, paragraph 4.7 of the applicant’s Affordable Housing Statement acknowledges that reducing affordable housing delivery on the site is likely due to issues of viability, stating:

*“SBDC also has a very low affordable housing threshold of 5 units. Even with this low threshold and increased affordable housing policy, the delivery of affordable housing is very low. This indicates viability pressures. It is more common to see viability submissions when the affordable housing percentage is set at high levels such as this.”*

At present therefore the applicants have identified that they will be running a viability test on the proposal to determine the level of affordable housing to be provided. As such it is inappropriate to claim substantial weight to the provision of an affordable housing benefit when the scale or indeed the likelihood of any affordable housing being delivered is unknown at this time.

It also needs to be acknowledged that in the context of the recently adopted Vale of Aylesbury Local Plan (VALP) Policy H1, which seeks 25% affordable housing on qualifying development sites, there is a Memorandum of Understanding (MOU) that the unmet need in the former Bucks Districts (estimated at 5,725) will be accommodated by the plan. The MOU states:

<i>“Authority Unmet Housing Need (MOU)</i>	
<i>Chiltern and South Bucks (2014- 33)</i>	<i>5,725</i>
<i>Wycombe (2013-33)</i>	<i>2,275</i>
<i>Total to be included in Vale of Aylesbury Local Plan 8,000</i>	

*(e) Affordable housing - The Councils agreed that the affordable housing need within the HMA would first fall to be met within each corresponding plan area, subject to land availability. The VALP in delivering the unmet housing needs from other parts of the Bucks HMA will be securing a proportion of affordable housing in line with affordable housing policies in the VALP. It is further agreed that the level of affordable housing expected to be secured as part of the overall unmet housing need should contribute to meeting the relevant affordable housing needs of Wycombe and Chiltern and South Bucks, and that Aylesbury Vale District Council, working with Wycombe, Chiltern and South Bucks district councils, will enter into joint working arrangements that will aim to allow residents to have access to an appropriate*

*element of affordable housing to be provided within housing developments in Aylesbury Vale District.”*

The claimed benefit therefore needs to be assessed in this context and at the present time the scale of the benefit, or indeed if the benefit is to be delivered at all, is unknown. As such, little weight may be attributed to this benefit.

On the basis of our comments in sections (b) to (e) above, the applicant has failed to demonstrate that there are very special circumstances that outweigh the harm that will be caused to the Green Belt as a result of inappropriate development.

#### f) Impact on Burnham Beeches SAC

In respect of the applications potential impact on the Burnham Beeches SAC, the site falls within the 5.6km ‘zone of influence’ and is therefore expected to have a likely significant impact on the Burnham Beeches SAC due to increased recreational pressure; an impact that is acknowledged by the applicant in paragraph 7.3.14 of their Planning Statement.

Within the Planning Statement, the applicant commits to contributing £2,023.87 per dwelling in accordance with the requirements set out in the Burnham Beeches SPD, as well as delivering long, medium and short walking routes on-site for new residents to use to reduce the potential recreational impact on Burnham Beeches SAC and other designated sites in proximity of the Site (Planning Statement, paragraph 7.3.14).

The applicant also makes reference to the Statement of Common Ground signed with South Bucks and Chiltern District Councils in relation to the SAC as part of the Draft Chiltern and South Bucks Local Plan.

The Environment Statement submitted with the application determines that an assessment of the potential impacts of the proposed development and other committed developments upon the Burnham Beeches SAC is not required due to the fact that the proposed development site SP BP9 that was identified in the (now withdrawn) Local Plan was determined to have no adverse effect on the integrity of the SAC. However, this Local Plan was never examined and the context regarding other committed developments is likely to have progressed since the HRA was undertaken on the withdrawn Local Plan. The potential impacts of the proposed development on air quality in the vicinity of the SAC should therefore be assessed. The proposed development is contrary to Core Policy 9 (Natural Environment) in the South Bucks Core Strategy (2011) which states that *“The conservation and enhancement of Burnham Beeches SAC, and its surrounding supporting biodiversity resources, will be achieved through restricting the amount of development in close proximity to the site, and ensuring that development causes no adverse effect on the integrity of the SAC”*.

Policy NP3 of the (now withdrawn) Chiltern and South Bucks Local Plan stated that:

*“Major residential developments that would result in a net increase in homes located between 400 metres and 5.6 kilometres from the Burnham Beeches SAC will be required to:*

- 1. make financial contributions towards the Burnham Beeches Access Management Scheme, or any subsequent scheme which replaces this; and*

2. *demonstrate that no adverse impacts on the SAC will arise as a result of additional visitors to the SAC from the development. This might require the provision of bespoke mitigation, such as Suitable Alternative Natural Greenspace, as part of the development in order to offset visitor pressure to the SAC. Such mitigation will need to be determined in agreement with Natural England.*

Similarly, Policy SP BP9 (Land East of Beaconsfield) of the (now withdrawn) Chiltern and South Bucks Local Plan identified site-specific requirements that would form part of the planning applications for the site, including:

*“suitable alternative natural greenspace for recreation to mitigate the potential disturbance from the additional recreational impacts on the Burnham Beeches Special Area of Conservation;”*

While these policies have no weight, the evidence behind them and the impacts that they were drafted to address are still material considerations in the determination of this application. In particular the impact of additional recreational pressure is still relevant. Currently, the application proposals do not identify any specific areas of land as suitable alternative natural greenspace (SANG) to mitigate the potential impacts on the Burnham Beeches SAC. In terms of land within the application site that could potentially represent SANG provision, the proposals are estimated to provide 6.06ha of natural / semi-natural greenspace (Planning Statement, p.54). However, this is not explicitly identified as SANG and it is unclear whether this would meet the guidelines for the creation of SANG as set out by Natural England (“Site Quality Checklist for an Individual SANG”, Natural England, 2008).

Natural England identify a number of ‘must haves’ for SANG, some of which the current proposal simply does not deliver. These include:

- It should be possible to complete a circular walk of 2.3-2.5km around the SANGs.
- SANGs must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.

In respect of a minimum size for a SANG, this would be calculated at a standard of 8 hectares per 1,000 population. So the minimum size for the proposed development would be 8.64 hectares (8 x 450 x 2.4 (ONS Families and households in the UK: 2020)).

Whilst the Council states in the Statement of Representations to the Burnham Beeches SPD that the Statement of Common Ground that was signed between Chiltern and South Bucks Councils, Natural England and City of London in March 2020 negates the need for SANG, this is not clear, particularly as the Habitats Regulations Assessment for the withdrawn Local Plan states that The measures in Policy DM NP3 Burnham Beeches SAC and the development of the AMS will ensure that future recreational pressures are managed (HRA, para 8.6.1) and this includes a requirement for SANG provision. The application is therefore contrary to Core Policy 9 (Natural Environment) in the South Bucks Core Strategy (2011) due to the lack of SANG provision within the proposed development and failure to fully mitigate the impacts of the development upon the Burnham Beeches SAC.

#### g) Access and highways mitigation

Policy TR5 (Accesses, Highway Works and Traffic Generation) in the Local Plan (1999) states that:

*“Development will only be permitted where:*

- a) The proposal complies with the standards of the relevant Highway Authority; and*
- b) The operational capacity of the highway would not be exceeded, or where the proposal would not exacerbate the situation on a highway where the operational capacity had already been exceeded; and*
- c) Traffic movements, or the provision of transport infrastructure, would not have an adverse*
- d) effect on the amenities of nearby properties on the use, quality or character of the locality in general”*

The Eastern Relief Road has been partially constructed down to the south eastern boundary of the site where it meets the Wilton Park development. The Eastern Relief Road is designed to relieve traffic congestion at the London End roundabout by connecting Pyebush Roundabout and Amersham Road. Inland Homes are required to deliver the remaining section of the Eastern Relief Road as part of the outline consent for the Wilton Park development (prior to the occupation of the 99th dwelling), however the Eastern Relief Road has not yet been completed.

Paragraph 7.7.17 of the applicant's Planning Statement identifies four junctions that are forecast to require mitigation if the Eastern Relief Road is not developed. The applicant has not committed to deliver this mitigation if the Eastern Relief Road is not completed. The application is therefore contrary to Policy TR5 as it fails to demonstrate that the operational capacity of the highway would not be exceeded or exacerbated.

In respect of public transport, section 7 of the applicants Transport Assessment identifies a number of improvements that should potentially be addressed as part of the development proposals (emphasis added) including the provision of pedestrian crossings over Minerva Way, tactile paving and cycle lanes along London Road. However, there is no confirmation within the application that these requirements will be addressed or whether they would be equivalent in terms of the level of benefit and their feasibility / viability when compared with the comprehensive criteria set out to justify the proposed allocation of site SP BP9 in the withdrawn Chiltern and South Bucks Local Plan (which was itself the subject of objections). The application is therefore contrary to Policy TR5 and Core Policy 7 of the Core Strategy (2011) as it fails to ensure a safe and sustainable transport network and that new development is situated in locations that are accessible by public transport, walking and cycling.

#### h) Conclusion

It is acknowledged that while the applicant might claim that the lack of a five year land supply renders the development plan policies out of date, this is nevertheless a Green Belt site and as such the "tilted balance" in paragraph 11 of the Framework does not apply.

The proposal is however contrary to the Framework and in particular with the policies on the protection of the Green Belt.

On the basis of the above the applicant has failed to demonstrate that there are very special circumstances that outweigh the harm that will be caused to the Green Belt as a result of inappropriate development.

We trust you will take the concerns set out in this letter into account when assessing this application. We would be grateful if you could confirm receipt of this letter and keep us informed of your decision in due course.

**Beaconsfield Society** – Planning Team

Overleaf:

This is a highly speculative application for a huge development of 450 homes on Green Belt farming land (which includes Best Most Versatile farming land) above a Principal Aquifer "of high sensitivity." The tilted balance is denied for reasons set out in this objection letter.

### **Green Belt**

- The site is Green Belt.
- The scheme is contrary to Local Plan policy GB1.
- The scheme is contrary to NPPF Para. 147.
- The scheme is inappropriate development in the Green Belt and harmful to the Green Belt, and the harm is not outweighed by other considerations.
- Very special circumstances do not exist for this scheme, as detailed in this objection letter.  
The site strongly performs the 5 Green Belt functions as described below.
- It strongly performs Green Belt purpose 1. It forms the clearly defined boundary of the built up edge of the town, thereby preventing urban sprawl.
- It strongly performs Green Belt purpose 2. It prevents coalescence with the neighbouring village of Seer Green. It would remove the town's last tract of Green Belt between the built up edge of the town and the private Golf Club where Seer Green adjoins.
- It strongly performs Green Belt purpose 3. It assists in preventing encroachment into the countryside. This Green Belt site also strengthens the strategic purposes of the Chilterns Wedge Strategic Zone and open countryside towards Seer Green and GX. Its function includes preventing highly speculative applications like this scheme where no exceptional circumstances exist and the tilted balance does not apply due to Bucks Housing Delivery test running at c 113%, well over 75%.
- It strongly performs Green Belt purpose 4. It preserves the historic setting of the town. Beaconsfield Old Town Conservation Area lies just to the south and west; Chilterns AONB lies c. 0.66km to the north; historic allotments which were farmed for over 100 years and passed down through the generations adjoin this site. This scheme would harm the historic link between Beaconsfield and the former Wilton Park historic estate land where the historic 18<sup>th</sup> century mansion and its park grounds were sited. It would harm the heritage significance of the listed buildings at Wilton Park Farm and the Conservation Area by the urbanisation of their settings.
- It assists in urban regeneration by encouraging development in urban settings. Recent applications in the town have included: 27 flat scheme at Horseshoe Crescent; 33 flat scheme on Maxwell Road; multiple flat schemes on Gregories Road, Penn Road and Station Road; 16 flats on Warwick Road; Wilton Park which will be a discrete 350 home estate with homes of all sizes and tenures on the former MOD site, including 79 affordable housing units.
- The cumulative impact of the neighbouring 350 home Wilton Park scheme and this scheme is entirely unsustainable.

- Wilton Park is a discrete scheme hidden from public view and which is being developed according to the Wilton Park SPD on previously developed MOD land. In contrast, this scheme is not previously developed land but open Green Belt with no masterplan or SPD.
- The scheme would destroy the far reaching views across the Green Belt from the homes along the town's built up boundary on the A355.
- The scheme would destroy far reaching views across the Green Belt from the public footpath which crosses the site.
- The scheme would destroy views across the ANOB and open countryside Green Belt from as far away as the elevated village of Coleshill. The applicant acknowledges that there is a "HIGH" potential for visibility of the scheme from the railway, Amersham Road (houses would be facing each other rather than farmland), the relief road, public rights of way, public footpaths, Longbottom Road (where the homes are elevated), Hodgemoor Woods, Browns Wood, the Chilterns AONB, the village of Coleshill, the surrounding Green Belt and the Conservation Area. The applicant's CSA Environmental report confirms this.
- There would be no mitigation of the lost relationship with the AONB; this Green Belt land lies within the setting of the AONB.
- NPPF Para. 11 (d) and Footnote 7 should be engaged and deny this application because: this Green Belt land is an asset of particular importance (Green Belt land is listed as such an asset in Footnote 7) and therefore there is clear reason to refuse this application (Para. 11(d)(i)); as evidenced in this objection letter the adverse impacts of this scheme would significantly and demonstrably outweigh any benefits (Para. 11(d)(ii)); the Bucks Housing Delivery Test indicates that delivery of housing is c.113% which is substantially higher than the 75% required to deny the tilted balance.
- The policies quoted by the applicant in the withdrawn local plan have been withdrawn; they do not exist.
- The Council's evidence base in preparation of the (withdrawn) CSB local plan did not consistently support the strategy it selected (and which it then abandoned). Alternatives were rejected without good reason, the Council failed to give reasons for selection where the evidence had changed. Positive effects were re-assessed differently. The environmental report was constricted in its scope so that it prevented the testing of reasonable alternatives. Changes to the withdrawn local plan's evidence base were ignored. This site was always an extremely poor spatial fit, far too big and with a huge negative cumulative impact when considered with Wilton Park. Failure to give reasons for selected development strategy is central to any case for whether exceptional circumstances have been demonstrated for green belt release and the case for release of this green belt release was never made.
- This application is entirely premature and an attempt to avoid the scrutiny of the new Bucks Local Plan process which has started with a Call for Brown Field Sites.
- No SANGs are included in this application. There would be significant adverse impact on Burnham Beeches SAC and SSSI. The City of London have objected.
- Natural England and Sport England have not approved this application.
- The June 2019 Sustainability Appraisal to the withdrawn Local plan listed multiple adverse effects associated with potential development of the site.

- Michelle Bolger's Landscape Assessment commented that the potential development of this site would result in the second highest and most harmful level identified within the Sustainability Appraisal of the withdrawn local plan. The large area, its undeveloped nature, its role in separating Beaconsfield from Seer Green are cited in the Sustainability Appraisal's explanation for the level of impact identified.
- Significant landscape and visual harm would ensue if this scheme were passed.
- The rural character of the landscape would be changed, as would the countryside setting of existing trees and woods.
- Some of the nearby woods are open access and this site is important in the preservation of their countryside setting. Walk Wood, Wheatsheaf Wood and Birchland Wood are publicly accessible as Open Access Land.
- Listed Wheatsheaf Farm and its setting would be adversely impacted.
- Loss of attractive views from the public rights of way network would ensue. The network of woodlands dotting the Green Belt is part of a wider network including woodland within the Chilterns AONB, just c600m north of the site. The wooded landscape is particularly noticeable when walking through the landscape of this site on the public right of way; it is part of its treasured character.
- The site was included in a number of evidence base studies which identified specific constraints to development and areas which are "sensitive" to development. Both the CSB Capacity Assessment and Historic Landscape Study identified broad tracts of land which are sensitive to change. The Capacity Assessment identified the site as having a medium/high landscape sensitivity and a medium/high wider landscape sensitivity. A355 Park Lane is described as a sensitive settlement edge within the Capacity Assessment Appraisal.
- Rural character would be destroyed and replaced by urban character.
- The last meaningful connection between the town and the surrounding countryside would be severed.
- Harm would be suffered by important habitats such as badgers, bats and great crested newts.
- Loss of attractive mature roadside hedgerows along the A355. The combination of this vegetation and the A355 create a strong barrier edge of the town.
- The Green Belt Appraisal Nov 2017 found key landscape constraints and identified a need to protect:

- The robust tree belt/hedgerow adjacent Park Lane (A355), the landscape setting of the Listed Buildings of Wilton Park Farm, surviving landscape features of the 18th century historic landscape of the Wilton Park estate, as well as retaining an open landscape character for Minerva Way as well as an open landscape setting for the Conservation Area.
  - The tree belt and small woodland copses which dissect the site as well as retaining an open landscape character for Minerva Way.
  - The existing trees and woodlands throughout the site, the setting of the adjacent woodlands to the east and historic landscape features including the old driveways to the site of the now demolished Wilton House.
  - The undeveloped setting around the Grade II listed Building Wheatsheath Farm.
  - The Ancient and semi natural woodland ... and its existing natural landscape character.
  - The strong link with the existing woodland, individual trees and ponds together.
- CSB Stage 2 Green Belt Assessment of the Strategic Role of the Metropolitan Green Belt in CSB March 2018 describes:  
The description goes on to state that '*A broad swathe of open countryside, which is relatively free of development, stretches from Gerrards Cross / Chalfont St Peter to the south, northwards to the east of Beaconsfield and west of Amersham, towards Great Missenden / Prestwood. The preservation of this rural setting contributes to the setting and special character of historic towns within the Chilterns Wedge*'. (emphasis added)  
  
The Strategic GB Assessment finds that the Chilterns Wedge plays a 'strong' role in meeting Green Belt Purpose 1, 3 and 4, and that it plays a 'very strong' role in meeting Purpose 2.
- The former Bucks County Council was highly critical of the approach taken by CSB in the withdrawn local plan:

BCC raised concerns regarding CSBCDC's approach to the removal of green belt land in their representations on the Green Belt Preferred Options.<sup>40</sup> BCC considered that 'there is no clear comprehensive and coherent picture of what is proposed by the Councils' and that in at least one instance (Option 3) 'the approach appears to undermine the robustness of the process for identifying areas for removal from the Green Belt'.<sup>41</sup>

BCC also considered that sufficient land exists within the housing market area (HMA) to deliver the required growth without Green Belt removal: 'There is clearly sufficient land outside the Green Belt which is suitable for development within the HMA to meet the objectively assessed needs of the HMA. As such, there are no exceptional circumstances for altering all of the Green Belt boundaries identified within the preferred options document or the wider HMA for the purpose of meeting the housing requirement. Given this situation, a lack of land to meet development needs within the plan area cannot be used as justification for exceptional circumstances which require the alteration of Green Belt boundaries'.<sup>42</sup> (emphasis added)

- Noise and light pollution would also ensue, harmful to protected species both on site and those who use the site for foraging grounds.
- The existing Local Plan remarks that Beaconsfield has a "special historic character and setting which needs to be preserved by the Green Belt:

3.11 Some towns have a special historic character and setting which needs to be preserved by the Green Belt. Beaconsfield, Burnham and Iwer are but three examples where the historic cores of these towns lie immediately adjacent to open and undeveloped land in the Green Belt. Many places in the Green Belt also comprise Conservation Areas, and Green Belt restrictions prevent further development which would damage the special

- The scheme also breaches Core Policy 8:

**Core Policy 8: Built and Historic Environment**  
The protection and, where appropriate, enhancement of the District's historic environment is of paramount importance. In particular, nationally designated historic assets and their settings, for example Scheduled Ancient Monuments and Grade I, II\* and II listed buildings, will have the highest level of protection.

Locally important heritage features and their settings also make an important contribution to the creation of distinctive and sustainable places and will also be protected, conserved and enhanced where appropriate. The protection and where appropriate enhancement of historic landscapes (including archaeological sites, Historic Parks and Gardens and Ancient Woodlands) and townscapes, especially those that make a particular contribution to local character and distinctiveness, will be informed by evidence, for example, characterisation studies such as the Bucks Historic Landscape Characterisation Study.

- Note that Core Policy 14 recognises that the Wilton Park development of the former MOD site will "reduce the impact of the site on the openness of the Green Belt" and remove the tower block, whereas this application will destroy it (extract from Core Policy 14 re Wilton Park):

3.6.8 Redevelopment of the site will present an opportunity to remove the disused tower block, deliver local environmental improvements and reduce the impact of the site on the openness of the Green Belt. The Council accepts the general principle of retaining the same overall quantum of floorspace through any redevelopment scheme, but will need to be satisfied that the height, massing and distribution of the proposed development has no greater impact (and preferably a lesser impact) than existing development on the openness of the Green Belt.

- Sterilisation of minerals on site due to rendering them inaccessible.
- Art. 13 Notice has not been uploaded on the planning portal and this should be rectified.
- The ARUP report/plan shows the Beeches Park area as 'strong' performing green belt (dark green) and the cover page is the document where this can be found:

The Buckinghamshire Authorities  
**Buckinghamshire Green Belt  
Assessment**  
Annex Report 1D - General Area  
Assessment Pro-formas

242368-4-05

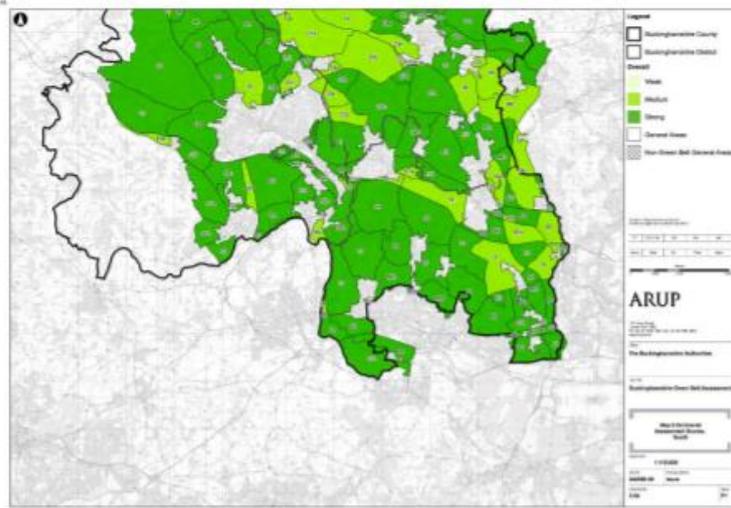
Issue 1 | 7 March 2016

This report takes into account the particular  
instructions and requirements of our client.  
It is not intended for use should we be relied  
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### **Aquifers**

The applicant's own Environmental Statement (Para.10.4.10 onwards) says that the site is within the Mid-Chilterns Chalk Ground-water Operational Catchment Area. This is a Drinking Water Protected Area. Part of the site is also within the Radlett Tertiaries Groundwater Operational Catchment Area and which is also a Drinking Water Protected Area. Both groundwater bodies were given "poor" status in 2019. The whole site is underlain by Source Protection Zone III Designation. The site sits above a Principal Aquifer, and Secondary Aquifers. The Principal Aquifer is of high sensitivity and the impact of this scheme is considered to be of major adverse significance. This coupled with the fact that water supply and sewerage system is under stress make this scheme completely unsustainable. See extracts below from the applicant's Environmental Statement.

10.4.10 The northern portion of the Assessment Area is located within the Mid-Chilterns Chalk groundwater operational catchment according to EA data. This has been assessed under the WFD as groundwater body GB40601G601200 and had a poor status in 2019. The Mid-Chilterns Chalk catchment is a Drinking Water Protected Area.

10.4.11 The southern portion of the Assessment Area is located within the Radlett Tertiaries groundwater operational catchment (GB40602G602800). This catchment was also given a poor status in 2019 and is also a Drinking Water Protected Area.

10.4.12 The Assessment is entirely underlain by the Source Protection Zone II designation.

Environmental Statement  
Beches Park, Beaconsfield

10.10

10.5.17 The increased vehicular presence as a result of the Proposed Development may also reduce the quality of runoff towards the downstream habitats within the Chilterns AONB. This is deemed to be a **major adverse** effect as a result of a moderate magnitude effect on a high sensitivity receptor.

#### Groundwater

10.5.18 There is the potential for water of a lower quality to leave the Assessment Area as a result of increased vehicular presence and the possibility of increased pollutants, emissions and fuel spills. This may lead to reduced quality of local groundwater. The moderate magnitude effect on the high sensitivity underlying Principal aquifer is considered to be of **major adverse** significance. The moderate magnitude effect on the medium sensitivity groundwater management catchment is of **moderate adverse** significance.

#### **Adverse effects on the mitigation schemes implemented for the relief road required by application CC/65/16**

- **This scheme of development will completely undermine the full package of mitigation agreed and employed to mitigate the relief road under planning application CC/65/16.**
- Following the Jacobs Environmental Statement, Sept 2016, mitigation was included in the granting of consent for the relief road. This mitigation included management of surface water flows including allowance for climate change, including a series of drainage ponds to manage discharge of drainage water to try to reduce impact on flood risk. The drainage design included new friendly kerbs to facilitate species movement as great crested newts are present on site. **4 agricultural access points were included to avoid severance of agricultural land.** The proposed scheme would completely undermine this mitigation and adversely impact the great crested newt habitats, corridors, flood risk, surface water flows, climate change measures, and remove agricultural land previously protected by mitigation.
- The relief road was expressed to bring environmental benefits as set out in the Jacobs report (extract below), including landscape and visual improvements by moving traffic further away; noise and vibration improvements by moving traffic further away; and improvements in travel times; all these benefits would be removed by this scheme. Extract from Jacobs report on relief road application CC/65/16:

- **Road Drainage and the Water Environment:** potential effects on surface water flooding, groundwater and water abstractions.

**Potential Beneficial Environmental Effects**

The assessment has also identified some potential environmental benefits from the Proposed Scheme:

- **Landscape and Visual:** effects on residential properties and businesses as a result of permanently moving traffic from the existing A355 and on to the Proposed Scheme further away from these receptors;
- **Noise and Vibration:** effects on properties on the existing A355 (including junction with A40 and Minerva Way, Aylesbury End and Windsor End) as a result of permanently moving traffic away from the existing A355 and onto the Proposed Scheme;
- **All Travellers:** effects on traffic journey times including improved bus journey times and improvements in cycleway access once the Proposed Scheme is operational, and

- Mitigation was also to include landscape and ecological planting; bat hopovers; specific habitat for reptiles and amphibians; noise barriers; drainage ponds; 4 new agricultural accesses to enable continuance of farming activities; new hedgerow; woodland planting; grass verges; grassland and wild flowers. Extract from Jacobs report on relief road application CC/65/16:

**Mitigation**

In addition to the embedded mitigation within the Proposed Scheme design, described in Table A, additional mitigation measures have been identified for the project in response to the potential environmental effects identified in the EIA. A summary of these additional mitigation measures and how they will reduce the potential effects is provided in Table B.

Relevant environmental topic	Additional mitigation measure	Objective
Cultural Heritage	A programme of archaeological trial trenching comprising a sample of the scheme footprint including the compound area is proposed to be undertaken pre-construction. The trenches will measure 25m in length and 1.80m in width.	To reduce effects on known archaeology and to identify potential for unknown archaeology.
Landscape and Ecology	A programme of landscape and ecological planting to create a linear length of vegetation alongside the Proposed Scheme.	To reduce long term adverse effects, promoting habitat connectivity for ecological purposes, for screening and landscape integration, for landscape and visual purposes.
Ecology	Incorporation of bat 'hop-overs' (heavy standard tree planting) and specific habitat for reptiles and amphibians.	To reduce adverse effects on habitat connectivity.
Noise	The use of noise barriers along the eastern side of the Proposed Scheme to reduce potential noise effects. This is proposed to be approximately 350m in length and 2m high.	To reduce noise effects.
Ecology & landscape	Construction of drainage ponds to avoid excavation within root protection areas of trees in ancient woodland.	To reduce direct effects on ancient woodland.

- Four new agricultural accesses, two from the new carriageway (forming a single access), one from the roundabout and one from the existing A355 and an agricultural access on Footpath BEA/15/2.

- Noise attenuation fencing (barriers) of up to 2m high and approximately 350m in length;
- Landscape planting alongside the new road carriageway incorporating a range of plant and habitat types including:
  - Grass verge with standard and feathered trees for landscape integration, screening and habitat connectivity;
  - New hedgerow with trees for landscape integration;
  - Scattered trees and scrub on embankment for landscape integration and ecological mitigation;
  - Strategic woodland planting and heavy standard trees to provide "top-over" mitigation for bats;
  - General woodland planting mix to provide mitigation for the golf course; and
  - Seeded verges and native grassland and wildflower mix.
- Reinstatement of agricultural land was another mitigating factor required by the relief road application, extract from Jacobs report on relief road application CC/65/16:

**2.6.9 Reinstatement**

The land affected is mainly agricultural land. It is intended that the 3.5ha of land which is to be used temporarily and reinstated after construction will fit into the prevailing topography. The land will be reinstated using material excavated in order allow the continuation of agricultural use on the land.

- Installation of stock proof fencing, a full landscape and ecology mitigation plan and 5 year maintenance plan was required mitigation for the relief road. All this would be swept aside by this proposal. Extract from Jacobs report on the relief road application CC/65/16:

**2.7.3 Fencing**

Final fencing will be standard stock proof agricultural fencing.

**2.7.5 Ecology and Landscape**

The landscape mitigation plan (Figure 7.5) and ecology mitigation plan (Figure 8.1), contained in Appendix 7B and 9G respectively, show the permanent features to be included with the Proposed Scheme and how they have been integrated into the existing landscape, to mitigate landscape and ecological impacts. A five year maintenance plan will be completed as part of project to fully establish these areas. This will be specified in the landscape contract for the Proposed Scheme following determination of the planning application.

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- The relief road application CC/65/16 required landscape and visual mitigation to key landscape receptors comprising Green Belt within Landscape Character 22.1 including open farmland, mature woodland, individual trees and hedges, recreational resources. 43 mature trees were lost to the relief road including 20 within a TPO area. 15 years after the opening of the relief road landscape mitigation will be effective, with longer term maturation. Residents accepted the relief road on the basis of this mitigation remaining in place. Extract from the Jacobs report to relief road application CC/65/16:

## 7. Landscape and Visual

### Key Points

This chapter presents the results of an assessment of the likely significant effects of the Proposed Scheme on landscape and visual receptors.

### Landscape

Key landscape receptors comprise components of the South Bucks Green Belt within Landscape Character Area 22.1 Mixed Use Terrace, including 5.877ha of open arable farmland, mature woodland, individual trees and hedges and recreational resources. Construction works will give rise to significant adverse effects (of moderate adverse or greater) for all aspects of the physical landscape, except for waterbodies. Notable long term effects include the loss of an estimated 43 mature trees including 20 within an area of woodland protected by a Tree Preservation Order. By the 'design year', (15 years after opening) landscape mitigation will be effective in reducing effects below a significant level for all landscape receptors except agricultural land and woodland, which will remain at a moderate adverse level of significance. With longer term maturation of the landscape mitigation scheme there will be a gradual improvement in the beneficial effects, particularly for new woodland areas, hedges and individual trees.

The Jacobs report stated that the relief road mitigation would decrease adverse effects with landscape mitigation features of value and importance for wildlife to achieve a landscape setting which would not compromise the openness of the Green Belt. The relief road was sold to the town on this basis and was specifically designed and incorporated mitigation to ensure protection of the openness of the Green Belt as shown in this extract from the Jacobs report:

	Very Large Adverse	Large Adverse	Moderate Adverse	Slight Adverse	Neutral	Slight Beneficial	Moderate Beneficial
Construction (WITHOUT mitigation)	2	(2*)	45	107	0	0	0
Opening Year (prior to establishment of mitigation planting)	2	(2*)	18	73	30	33	0
Design Year (mitigation planting established)	0	1	(19*)	4	22	70	40

Key to table: (\*) = 1 no. receptor with unknown number of individual properties (R18).

Table 7.19 : Quantified summary of significance of effect on all visual receptors

As illustrated in the summary table above, there will be a general reduction in the degree of adverse significance of effect once construction works are completed with 30 receptors restored to a **Neutral** significance of effect and 33 enjoying a **Slight Beneficial** significance of effect.

By the Design Year, after establishment of Landscape and Visual mitigation, there will be a further decrease of adverse effects and increase in beneficial effects, with 22 receptors experiencing a return to **Neutral**, 70 receptors experiencing a **Slight Beneficial** and 40 experiencing a **Moderate Beneficial** significance of effect.

The landscape mitigation proposals also provide features of value and importance for wildlife to ensure connectivity with existing landscape features and habitats through the inclusion of suitable native species hedge and tree planting, native grassland and wetlands.

The mitigation design responds to Core Policies 8 & 9 in providing a landscape scheme which is in keeping with the existing landscape character, the setting of the Chilterns AONB and nearby built and historic features (i.e., The Mount and former Wilton Park parkland and woodland). The design seeks to achieve a landscape setting

for the road which will not compromise the existing open character of the Green Belt (Policy GB1). Construction works affecting trees within TPO/CC/7306 will be kept to the minimum possible (Policy L10), with replacement to compensate for any losses by the planting of new woodland of similar species composition.

- Planting, connectivity, essential habitats, and woodland mitigation were also included and this extract from the Jacobs report to the relief road application CC/65/16 describes these items of mitigation which are in place. The proposed scheme would entirely negate the mitigation:

.....

#### Woodland, Trees and Hedgerows

Besides good design and working practices to minimise any adverse impacts on existing woodland, trees or hedges, the mitigation design will provide the following elements to ensure compensatory planting for losses due to site clearance, integration with the local landscape character and provision of essential habitats and connectivity. Woodland and tree planting also plays a significant role in mitigation of visual effects:

- A new woodland tree belt south of the new road in the central section will compensate for losses to the existing tree belt and provide essential screening and connectivity between existing and new features; it will comprise similar species to the existing tree belt.
- Further native woodland blocks within the central section will provide landscape integration and screening functions;
- A woodland block north of the proposed retention basin (balancing pond) will form part of the structural landscape planting and provide essential screening of the elevated section of the road in views from footpath BEA/16/1.
- Scattered trees on the embankment, and cutting slopes and the broad verges of the east arm of the Proposed Scheme will help to integrate the new road by establishing a parkland style setting reinforcing

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#### A355 Improvements - Eastern Relief Road Environmental Statement

**JACOBS**

and reflecting its former character and compensating for the loss of a number of mature Lime trees at the site in with the new Wilton Park roundabout. Scattered trees will provide enhanced screening and softening of views from footpaths and residential receptors and support the ecological mitigation strategy;

- Planting of small groups of larger trees (as heavy standard nursery stock) at strategic locations on verge areas and within hedgerows will provide compensation for trees lost along the existing A355 and essential ecological mitigation for bats in the form of high level 'hop-overs' (to assist bats in crossing the Proposed Scheme and avoiding fatal collisions with traffic); and
- Planting of native hedgerows with intermittent 'standard' and 'feathered' trees will be used along the Proposed Scheme boundary in the northern section to compensate for hedgerow losses along the existing A355 and ensure an appropriate fit with local landscape character; these will also support the ecological mitigation strategy for a range of species.

There will be a net gain in the number of trees, area of woodland and length of hedgerows provided compared to quantities lost, as summarised in Table 7.20, Comparative losses and gains of landscape features, above.

- Conditions imposed in the planning consent for the relief road (CC/65/16) would be completely negated. Extract of conditions:

22. The development hereby permitted shall not be carried out unless and until i) agreement has been secured to deliver access arrangements for 15 years; and ii) a 'Landscape and Biodiversity Aftercare, Management and Monitoring Plan', allowing for a five year aftercare period, five year monitoring of mitigation (great crested newts and bats), and a further ten year period for landscape management. This will also include an updated biodiversity calculation to demonstrate net gain for the final scheme design. This will be submitted to, and agreed in writing by the County Planning Authority; and iii) the approved scheme shall thereafter be implemented in accordance with the approved details for a period of 15 years from the completion of the landscape and ecological works as required by conditions 20 and 21.

Reason: To conserve and enhance the natural environment and in the interests of the visual amenities of the local area and to comply with Policy EP3 and EP4 of the South Bucks District Local Plan 1999 and Core Policy 8 of the South Bucks Core Strategy 2011.

## Landscape

- This site is Green Belt and strongly fulfils the 5 purposes of Green Belt.
- This site also lies within the setting of Chilterns AONB, lying just 600 metres to the south of the AONB.
- This site is also c. 3km north of the internationally protected Burnham Beeches Special Area of Conservation and SSSI. This scheme would cause significant adverse impact on the SAC due to impact of additional visitor numbers and also air pollution, including NO<sub>2</sub>.
- No SANGS (suitable alternative natural greenspace) is being provided in required mitigation for damage to the SAC. A monetary payment will not be able to mitigate the physical damage that this scheme will cause to the SAC, which would already be impacted by the 350 home scheme at Wilton Park. At some point, enough is enough, and that saturation point has been reached. The cumulative impact development is having has reached saturation point in this area.
- Michelle Bolger's Expert Landscape report (extract below) shows that the site also lies within the setting of the historic Old Town Conservation Area with its many listed buildings. The Conservation Area would be adversely impacted by increased visitor and resident numbers accessing the area and trying (and often failing) to park.
- The site has attractive rural views and the view from Amersham Road across the fields to the Golf Club is one of calm, peaceful, rural tranquillity.
- A hugely popular right of way crosses the site and gives views out over the rural scene, being a quiet pocket enjoyed by the town's residents. This was an essential route for exercise and a rural escape, including during Covid-19 lockdowns. It is highly valued especially as a haven for walkers and features in our popular series of "Enjoy Beaconsfield" maps.
- There are many flats in the town and many people without gardens who truly appreciate this area for exercise and as a haven of tranquillity.
- There are visually distinctive tree belts across the site.
- There are visually distinctive hedgerows bordering the site.
- The site adjoins areas described as having "medium/high sensitivity."
- The site adjoins ancient woodland. Indeed the additional site on more Green Belt land, which the applicant designates for football pitches, adjoins ancient woodland.
- There are priority habitats within the site, including great crested newts and bats.
- This Green Belt site strongly fulfils its function to separate Beaconsfield from Seer Green and prevent coalescence. Currently, the remaining gap between Beaconsfield and Seer Green is 1,000m north of the railway and 1,600m south of the railway from the Old Town to Longbottom Lane
- The application fails to mention that it would close the gap between these 2 settlements.
- The applicant's Planning statement says that football pitches (which would take additional Green Belt land outside the red line of the site) "do not require planning permission and are an acceptable use within Green Belt" but they would require parking and a zebra crossing, further urbanising the scheme. The proposed pitches are only junior pitches and Wilton Park is already providing pitches.

- This scheme would presumably be a private scheme with limited access for residents as no highways agreements are proposed.
- The South Bucks Landscape Assessment October 2011 includes the site within LCA 22.1 and its key characteristics are: mosaic of woodland, farmland and parkland; small pockets of ancient woodland and associated flora and fauna; the hedgerow network which provides visual unity and a wildlife corridor, connecting habitats; peaceful and tranquil pockets; open long views over arable fields. This is a treasured and important landscape for all these reasons.
- Unlike other parts of LCA 22.1, this section has escaped the M40 and large scale mineral extraction and motorway services area which the town has lost its other Green Belt to to the south, on the other side of the motorway. The town has already lost landscape and Green Belt to the south and the remainder must now be protected. The town has played its part and its now time to protect what we have left.
- The scheme is contrary to the strategy and vision set by the Landscape Assessment 2011 for LCA22.1 as it would not conserve and protect the mosaic of woodland, open farmland and parkland or maintain the remaining areas of tranquillity.
- The Wilton Park site development will be localised around the former MOD site and will function as a discrete development distinct from Beaconsfield. Wilton Park has the potential to be less noticeable once its 350 home scheme takes shape, with the removal of the tower block. The area will become more rural and the discrete Wilton Park scheme should not be used as a reason for further Green Belt release.
- The Golf Club and woodland burial site located in Pitland Wood add to the wooded character of the area. A scheduled monument (bowl barrow "The Mount") is within the golf course and adds to the rural setting of the site.
- Para. 6.4.2 of the Planning statement says "density will be as high as circa 70 dwellings per hectare" which is entirely out of character in this area and would adversely impact neighbouring pockets of Green Belt.
- The land is currently agricultural land, a mixture of Grade 3a (about a quarter of the site is Best Most Versatile agricultural land) and Grade 3b. Agricultural land of this grade is amongst the best in the country. The land is currently 24ha of arable farmland.
- There are veteran trees on site and TPOs.
- The Mount is a "Bowl Barrow" Scheduled Monument of "high value" located c 200m to the east of the site. It is a burial chamber of a type built in the Neolithic/early Bronze Ages. The Jacobs report references this:

'The Mount' (BCC HER: MBC533), a Bowl Barrow, is a Scheduled Monument located approximately 200m to the east of the study area. The asset was included due to its proximity to the Proposed Scheme. The asset is 700m to the North West of Asset 34 and because of its status as a Scheduled Monument it has been assessed as of high value.

Bowl barrows are roughly hemispherical mounds of prehistoric date comprising turf, soil, and redeposited bedrock, covering one or more burials contained within wooden or stone structures. In general, bowl barrows seem to concentrate on the higher ground, for example the upper parts of hill-slopes. The peak of bowl barrow construction was during the late Neolithic and early Bronze Age (2400 to 1500 BC).

#### Medium Value

A Possible Bowl Barrow (Asset 34) is described in the Buckinghamshire HER (BCC HER) as an 'extractive pit east of Hyde Farm'. The geophysical survey revealed a clear circular anomaly corresponding to the site of Asset 34, which has been interpreted as soil-filled ditch, probably defining a barrow (Appendix 6B).

The Solent Thames Research Framework suggests that barrows are far more complex than previously believed and that further analysis of their chronology and function is required, (Bradley, 2014). The Research Framework also recommends that the areas around barrows should be excavated, not just the ditches and burials. The Possible Bowl Barrow (Asset 34) has the potential to contribute to these regional research objectives and therefore is of medium value.

## Sustainability

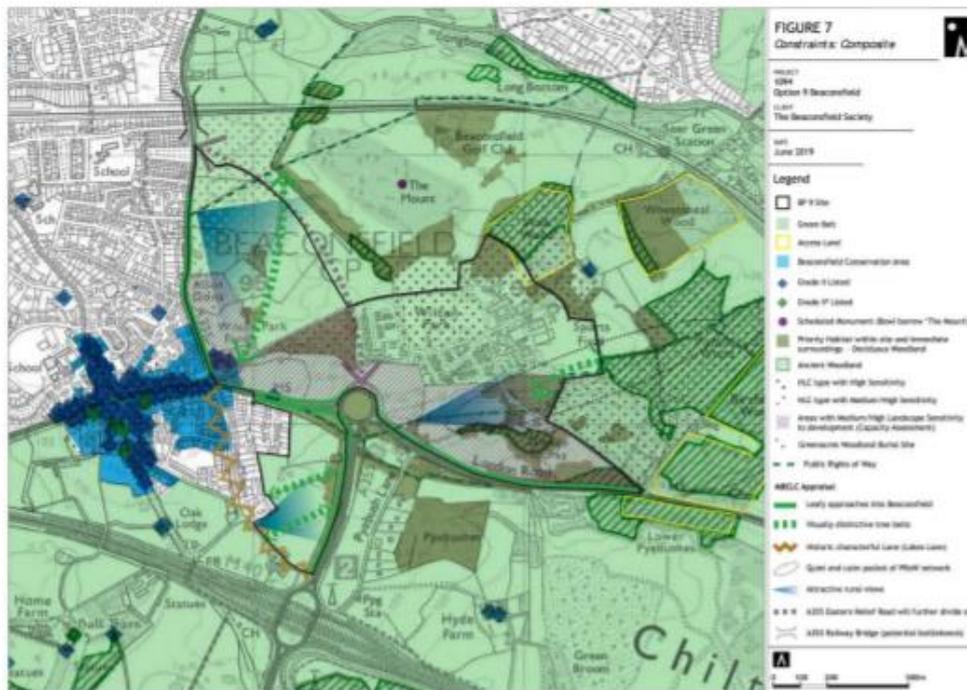
This scheme is emphatically NOT sustainable for the following reasons:

- The water and utilities assessment provided by the applicant states at Para.4.18 "based on initial studies of the foul water network, Thames Water have confirmed that the existing network DOES NOT seem to have sufficient capacity to accommodate the additional foul flows from the proposed development site." The scheme would be gross overdevelopment in an area where even the application says that **the sewerage system does not have capacity.**
- And at Para. 4.16 the applicant's water and utilities assessment says "**discussions with Affinity Water have confirmed that the existing network DOES NOT have sufficient capacity to supply the site.**" The scheme would be gross overdevelopment of a site where even the application states that the water supply does not have capacity. The aquifer is already over-abstracted.
- Adverse impact on the internationally protected Burnham Beeches SAC. SANGs provision is not included, rendering this site unsustainable and increasing pressure on Burnham Beeches SAC and SSSI. To calculate SANGs, the following formula should be employed: 1. 450 (homes) X 2.4 (residents per home) = 1,080 residents. 2. Apply .008ha per resident (based on Natural England's standard multiplier of 8ha per 1000 residents) 1080 X 0.008ha = 8.64ha of SANGs. Practically this is not possible and the balancing between residential land and SANGs necessary to mitigate the adverse impact on Burnham Beeches SAC would not be achieved.
- The Sustainability Appraisal of the withdrawn Draft Local Plan identified that the proposed development associated with Policy SP BP9 would result in a Moderate Negative impact overall, **which is the second highest/most harmful level identified within the Sustainability Appraisal**. The large size of the site, its undeveloped nature, and its role in separating Beaconsfield from Seer Green are cited in the Sustainability Appraisal's explanation for the level of impact identified.

- According to Savill's Environmental Statement, a large area of the site if developed, including the proposed school and nursery, plus neighbouring Amersham Road properties would be subject to noise levels up to 100 decibels from the relief road and Amersham Road.
- The noise monitoring which took place in June 2021 during the Covid pandemic would not have revealed normal, higher, noise levels.
- The applicant refers to Amersham hospital but this hospital has no A&E. Local health services are woefully over-subscribed. Nearest A&Es are at Stoke Mandeville Hospital or outside area at Wexham Park.
- Up to 7,900 tonnes of construction waste would be generated.
- Adverse impact on air quality. We understand there is no automatic air quality monitoring station in Beaconsfield, the nearest one being in Gerrards Cross. This extract is from the Jacobs report supplied at the time of the relief road planning application. There has been no adequate assessment of impact on air quality.

There is no automatic air quality monitoring station within the study area, however, four diffusion tubes are located in Beaconsfield town which are operated and managed by the local authority. The continuous air quality analyser at A40 Gerrards Cross fire station is the closest continuous monitoring station to the scheme, and measures NO<sub>2</sub>, PM<sub>10</sub>, and NO<sub>x</sub>. However, the monitor is located approximately 7km to the east of the Proposed Scheme, and is therefore not considered to be representative of the study area. The details of the diffusion tube

- CSA Badger survey reports 2019 and 2021 have been redacted. These should be provided in their entirety. Protected species are on site, including great crested newts and bats.
- This plan provided by Michelle Bolger (expert landscape consultancy) details the site's constraints – Green Belt; HLC; priority habitat; tree belts; medium/high sensitivity; public rights of way; attractive rural views; Conservation Area:



### Housing Numbers

**Housing delivery is currently such that Buckinghamshire emphatically meets and exceeds its Housing Delivery Test. See detail supplied in the submission made by DLP on behalf of The Beaconsfield Society. No exceptional circumstances exist for release of Green Belt. The tilted balance does not apply.**

Mistakes by CSB in their calculation of local housing need (prior to withdrawing the CSB draft Local Plan) led to CSB calculating a higher housing need than required under the standard methodology by 2,204 homes. Therefore, no need exists for 450 homes from this site because amendments to the CSB supply calculations as required would have strengthened the Council's 5 year land supply with a surplus over the plan period of 1,614 dwellings, meaning that there is no need and will be no need to rely on this scheme to support a 5 year housing supply.

Moreover, the VALP provides for c8,000 homes to meet unmet need elsewhere in the HMA. This figure should have been removed from the CSB requirement as this had implications for how the supply and buffer was calculated in the withdrawn CSB Local Plan. The methodological mistakes and ambiguity surrounding the derivation of supply figures rendered the figures produced in the withdrawn Local Plan evidence base unreliable.

The housing from this scheme would not be delivered until 2025, by which time the Buckinghamshire Plan will be in place. This application is a highly speculative attempt to pre-empt the new Plan. Should this application be refused and refused on appeal, please will the Inspector award costs against the applicant.

### **Transport**

We really shouldn't need to comment on the dire state of congestion and parking problems which are evident for all to see in the town. Most of the town's parking spaces are located on Common Land which means that they cannot be regulated and parking is chaotic. There are insufficient parking spaces to meet demand in the town; many homes rely on on-street parking and there is fierce competition for spaces between residents, shoppers, businesses, employees and visitors, from morning to night when many then visit the restaurants and pubs. Increasing the population by a further 1,000 people (in addition to the 840 residents expected from the 350 homes at the consented Wilton Park scheme) renders this application entirely unsustainable.

The relief road is not expected to be completed until the Wilton Park scheme sells its 98<sup>th</sup> home, under a s106 obligation. Even when it is completed it will be congested as soon as it opens as the relief road is decades overdue, being debated since our planning team was still in school! With multiple accesses, zebra crossings, bus stops, and roundabouts along its very short route, it will not offer any relief, especially as it is not a by-pass and does not cross the railway line, where there is a bottle-neck. It merely feeds onto the existing A355 at a roundabout, at an already congested junction with a difficult junction with Maxwell Road, where traffic turning right from the A355 into Maxwell Road holds up through traffic. The relief road will also serve as the access road for the 350 homes at the consented discrete Wilton Park development.

Policy TR5 provides "proposals involving either the construction of a new site access or a material increase in the use will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road by others." This scheme breaches policy TR5 for the reasons given above. Beaconsfield's car ownership rates are amongst the highest in the country, and the majority of working residents commute out to work.

The creation of 3 new accesses from the so-called, incomplete, relief road (dubbed locally as the "road to nowhere") AND an additional access from Amersham road would compound the misery already suffered daily by residents and all those travelling through the town.

HS2 HGV movements and the impact on traffic from the Wilton Park development have not been factored in.

The applicant's Design and Access Statement says "also noteworthy is the Beaconsfield Community Bus"! Please note this has been discontinued as it was a volunteer trial scheme;

it was a small shared minibus with a school; it ran during limited hours and on limited days; it currently has no funding and the borrowed school bus was driven by volunteers!

The impact of HGV traffic generated by this scheme is shown here and shows a maximum of **44 HGV movements daily, 4 per hour – and this does not include HS2 or Wilton Park HGVs:**

**Beeches Park**  
**Environmental Statement Chapter 11: Traffic and Transport**  
**(202528)**  
**Construction Timings and HGV Traffic Estimate**  
**Appendix 11.9**

Construction Phasing						
Year/Phase	Land Use	Quantum	Unit	2025	2026	2027
1	Residential	63 dwellings		63		
	Residential	147 dwellings			147	
2	Primary School	224 units			224	
3 - Drilling	Topsoil Strip/Earthworks	39560 cubic metres				39560
	Residential	132 dwellings				132
3	Local Centre	3952 units				3952
4 - Drilling	Topsoil Strip/Earthworks	39560 cubic metres				39560
4	Residential	129 dwellings				129

HGV Trip Rates		
Factor	Trips/unit	Trips/day
Dwellings	1 dwelling	22.2
Primary School	100sqm GFA	100.0
Local Centre	100sqm GFA	14.2
Earthworks/Topsoil Strip	100m <sup>3</sup>	2

Trip rates taken from planning application 16/01538/01/19 for an SUE in Newark-on-Trent - ref: paragraph 11.71, Addendum 15 April 2021

HGV Calculations						
Year/Phase	Land Use	Quantum	Unit	2025	2026	2027
1	Residential	63 dwellings		1419		
	Residential	147 dwellings			3276	
2	Primary School	224 units			2240	
3 - Drilling	Topsoil Strip/Earthworks	39560 cubic metres				7912
	Residential	132 dwellings				2928
3	Local Centre	3952 units				5612
4 - Drilling	Topsoil Strip/Earthworks	39560 cubic metres				7912
4	Residential	129 dwellings				2852
<b>Total (Demand)</b>				<b>1419</b>	<b>1250</b>	<b>12000</b>
<b>Total (Supply)</b>				<b>0</b>	<b>0</b>	<b>0</b>
<b>Total (Net)</b>				<b>1419</b>	<b>1250</b>	<b>12000</b>

Assumes 210 working days (weekdays only, no bank holiday working)

Assumes an 10-hour working day

Worst case year is therefore **2027**

Without the relief road in place, the number of HGVs on the following roads in the town are shown here (this does not include HS2 traffic or Wilton Park traffic):

**Beeches Park**  
**Environmental Statement Chapter 11: Traffic and Transport**  
**Appendix 11.8**  
**Summary of 2027 Baseline Traffic Flows (NO ERR)**

Ref	Link	24 Hour AADT			Speed (mph)
		Total	HGV	HGV %	
1	Penn Road (B474) north of Ledborough Lane	16984	379	2.20%	30
2	Ledborough Lane	7705	64	0.80%	30
3	Penn Road (B474) south of Ledborough Lane	12157	363	3.20%	30
4	Penn Road (B474) north of car park access	13644	424	3.10%	30
5	Reynolds Road	2025	40	2.00%	30
6	Baring Road	1759	27	1.50%	30
7	Penn Road (B474) south of car park access	19219	608	3.20%	30
8	Car park access	4618	216	4.70%	30
9	B474 north of Gregories Road	20084	651	3.20%	30
10	Gregories Road	9977	0	0.00%	30
11	B474 south of Gregories Road	18046	651	3.60%	30
12	Burkes Road	6953	0	0.00%	30
13	B474 south of Burkes Road	16213	653	4.00%	30
14	Maxwell Road	5785	0	0.00%	30
15	B474 south of Maxwell Road	11964	0	0.00%	30
16	Ledborough Lane	9841	80	0.80%	30
17	A355 north of Longbottom Lane	26863	327	1.20%	40
18	Longbottom Lane	6439	173	2.70%	40
19	A355 south of Longbottom Lane	33883	533	1.60%	40
20	A355 north of Relief Road	30580	553	1.80%	40
21	Stub	0	0	#DIV/0!	0
22	Relief Road	0	0	#DIV/0!	30
23	A355 (opposite stub)	30580	553	1.80%	40
24	A355 north of Maxwell Road	30580	553	1.80%	40
25	Maxwell Road	5649	192	3.40%	30
26	A355 south of Maxwell Road	34080	498	1.50%	40
27	A355 north of site access	34080	498	1.50%	30
28	A355 Site Access (NORTHERN)	0	0	#DIV/0!	0
29	A355 south of site access	34080	498	1.50%	30
30	M40 MAINLINE (east of junction)	146140	14325	9.80%	70
31	A355 south of J2 M40	16337	585	3.60%	70
32	M40 MAINLINE (west of junction)	145967	13661	9.40%	70
33	Relief Road	0	0	#DIV/0!	30
34	Relief Road Site Access (NORTHERN)	0	0	#DIV/0!	30
35	Relief Road	0	0	#DIV/0!	30
36	Relief Road	0	0	#DIV/0!	30
37	Relief Road Site Access (Middle)	0	0	#DIV/0!	30
38	Relief Road	0	0	#DIV/0!	30
39	Relief Road	0	0	#DIV/0!	30
40	Relief Road Site Access (Southern)	0	0	#DIV/0!	30
41	Relief Road	0	0	#DIV/0!	30
42	Relief Road	0	0	#DIV/0!	30
43	Relief Road	0	0	#DIV/0!	40
44	Relief Road	3476	25	0.70%	40
45	Relief Road	3476	25	0.70%	40
46	Relief Road	0	0	#DIV/0!	40
47	Relief Road	3476	25	0.70%	40
48	Relief Road	3476	25	0.70%	40
49	London Road (A40) east of Pyebush	20658	778	3.80%	50
50	A355 south of Pyebush	46965	1201	2.60%	70
51	London Road (A40) west of Pyebush	43971	820	1.90%	50
52	A355 north of J2 M40	46965	1201	2.60%	70
53	A40 east of Minerva Way	41378	0	0.00%	30
54	A40 west of Minerva Way	20066	0	0.00%	30
55	A355 north of A40	30110	0	0.00%	30
56	Minerva Way	364	0	0.00%	0
57	A40 east of Windsor Road	20066	673	3.40%	30
58	Windsor Road	1013	0	0.00%	30
59	Wycombe End (A40)	18399	377	2.00%	30
60	B474 north of Wycombe End	8520	605	7.10%	30
61	Broad Lane	11699	178	1.50%	60
62	A40 east of Broad Lane	25739	390	1.50%	50
63	A40 west of Broad Lane	16756	217	1.30%	50
64	A355 between junctions	33658	565	1.70%	40

And in 2027 with the relief road and Wilton Park the number of HGV movements on the town's roads are shown here (NOTE this does not include HS2 traffic):

**Beeches Park  
Environmental Statement Chapter 11: Traffic and Transport  
Appendix 11.7  
Summary of 2027 Baseline Traffic Flows (with Wilton Park and ERR)**

Ref	Locn	24 hour AADT			
		North	West	Speed (mph)	
1	Penn Road (B474) north of Leddon	17003	374	2.20%	30
2	Ledborough Lane	8100	64	0.80%	30
3	Penn Road (B474) south of Leddon	13372	366	2.90%	30
4	Penn Road (B474) north of car park	14869	433	2.90%	30
5	Reynolds Road	2068	43	1.80%	30
6	Baring Road	1821	27	1.50%	30
7	Penn Road (B474) south of car park	20566	617	3.00%	30
8	Car park access	4624	216	4.70%	30
9	B474 north of Gregories Road	21375	654	3.10%	30
10	Gregories Road	8748	0	0.00%	30
11	B474 south of Gregories Road	17665	654	3.70%	30
12	Burkes Road	7026	0	0.00%	30
13	B474 south of Burkes Road	14596	654	4.50%	30
14	Maxwell Road	4310	0	0.00%	30
15	B474 south of Maxwell Road	11748	0	0.00%	30
16	Ledborough Lane	8841	80	0.80%	30
17	A355 north of Longbottom Lane	26883	327	1.20%	40
18	Longbottom Lane	6432	173	2.70%	40
19	A355 south of Longbottom Lane	23883	533	1.80%	40
20	A355 north of Relief Road	32518	531	1.60%	40
21	Stub	0	0	#DIV/0!	0
22	Relief Road	18537	518	3.10%	30
23	A355 (opposite stub)	18238	482	2.60%	40
24	A355 north of Maxwell Road	18238	488	2.70%	40
25	Maxwell Road	5112	944	18.80%	30
26	A355 south of Maxwell Road	17077	341	2.00%	40
27	A355 north of site access	17077	341	2.00%	30
28	A355 Site Access (NORTHERN)	0	0	#DIV/0!	0
29	A355 south of site access	17077	341	2.00%	30
30	M40 MAHL INE (east of junction)	148140	14325	9.80%	70
31	A355 south of J2 M40	16337	580	3.60%	70
32	M40 MAHL INE (west of junction)	149487	13661	9.40%	70
33	Relief Road	16637	518	3.10%	30
34	Relief Road Site Access (NORTHERN)	0	0	#DIV/0!	30
35	Relief Road	16637	518	3.10%	30
36	Relief Road	16637	518	3.10%	30
37	Relief Road Site Access (Middle)	0	0	#DIV/0!	30
38	Relief Road	16637	518	3.10%	30
39	Relief Road	16637	518	3.10%	30
40	Relief Road Site Access (Southern)	0	0	#DIV/0!	30
41	Relief Road	16637	518	3.10%	30
42	Relief Road	16637	518	3.10%	30
43	Relief Road	0	0	#DIV/0!	45
44	Relief Road	18701	573	2.90%	40
45	Relief Road	18701	573	2.90%	40
46	Relief Road	0	0	#DIV/0!	40
47	Relief Road	18701	573	2.90%	40
48	Relief Road	18701	573	2.90%	40
49	London Road (A40) east of Pyebush	21862	779	3.50%	50
50	A355 south of Pyebush	47237	1304	2.80%	70
51	London Road (A40) west of Pyebush	28837	387	1.30%	50
52	A355 north of J2 M40	47237	1304	2.80%	70
53	A40 east of Minerva Way	26319	0	0.00%	30
54	A40 west of Minerva Way	26369	0	0.00%	30
55	A355 north of A40	16218	0	0.00%	30
56	Minerva Way	401	0	0.00%	0
57	A40 east of Windsor Road	20289	346	1.70%	30
58	Windsor Road	376	0	0.00%	30
59	Wycombe End (A40)	18198	228	1.20%	30
60	B474 north of Wycombe End	6964	117	1.70%	30
61	Broad Lane	11875	177	1.50%	80
62	A40 east of Broad Lane	28054	380	1.30%	30
63	A40 west of Broad Lane	18827	205	1.20%	50
64	A355 between junctions	33668	580	1.70%	40

To put it simply, the town would be grid-locked.

**Large parts of the applicant's Mode Transport Assessment August 2021 have been redacted and should be disclosed.**

The Jacobs Transport report prepared for the withdrawn Local Plan identified that: several junctions along the B474 in the town are currently operating over capacity; Pyebush Roundabout would require new lanes including a filter lane to the M40 spur; the A 40 junction with Burnham Avenue would require improvements; the A40 junction with Broad Lane would require improvements and the A355 junction with Ledborough Lane would require a roundabout; traffic calming measures would be required on other roads. **The applicant has offered no mitigating transport measures to overcome these problems identified by Jacobs if this land were to be developed and these have not been costed for viability purposes.**

There has been no site specific junction modelling at these junctions nor feasibility of mitigation works. Impact from HS2 traffic should also be factored in.

**The proposed on-road 1.5m "mandatory" cycling lanes on London End would cause traffic chaos on a crowded road which is too narrow.**

**Would CPOs be required to widen pavements on London End and Park Lane and A355?**

**Loss of parking on Maxwell Road would exacerbate parking problems.**

#### Viability

**No Financial Viability Statement has been provided by the applicant.**

No costings or income figures have been provided. Viability has not been demonstrated for affordable housing, school, pre-school, community building, football pitches, transport mitigation etc.

**The applicant in its Planning Statement (Para.3.2.4) says that, although the application includes a school, "further discussion is required with Buckinghamshire Council, but it is not expected that this application will generate the need to provide a new school." Our schools are full, with 350 homes consented on Wilton Park.**

The applicant's Affordable Housing Statement at Para.1.6 says: "It must be noted that the applicant is currently in the process of identifying relevant costs from the various sources, including Buckinghamshire Council." Therefore, this application is not just highly speculative but also does not provide all required information to enable viability to be assessed.

The Retail and Town Centres Topic Paper September 2019 is now woefully out of date given the paradigm shift in shopping habits and permitted development rights for change of use from Class E, MA and ZA.

There is NO evidence to support that the scheme is viable or deliverable as presented.

Please reject this application.

### **Chiltern Society - Chiltern Society Planning Group Response**

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our supporters are passionate about the protection of the Chilterns, which is a special area of landscape within easy travelling distance of several towns and the City of London. Much of the area is classified as both AONB and Green Belt and should receive extensive protection under the national policies in the National Planning Policy Framework (NPPF).

The Chiltern Society strongly objects to the Outline application PL/21/3151/OA to build 450 dwellings on this Green Belt site. House Building is classed as 'inappropriate development' in the Green Belt. The Society opposes development in the Green Belt which fails to protect

its openness or undermines its 5 purposes. These are: to check unrestricted sprawl of large built up areas; to prevent neighbouring towns merging into one another; to assist safeguarding the countryside from encroachment; to preserve the settling and special character of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Whilst NPPF 140 refers to exceptional circumstances in relation to changes in Green Belt this is not relevant in this case as it relates to changes in Green Belt itself, which can only be changed as part of a Local Plan. In this respect, the land concerned in this application is currently and will remain Green Belt unless reviewed in the new Buckinghamshire Council Local Plan.

Accordingly the only basis on which this application could be approved is under NPPF 146/7 which requires very special circumstances to be established.

We submit however, that this paragraph is not intended to apply to a wholesale redevelopment of this area, the effect of which if approved, would leave no remaining Green Belt protected land and would have the effect therefore of removing this whole area from Green Belt protection whilst still technically remaining Green Belt. Indeed this proposed development is by definition inappropriate as it does not fall under any of the matters listed in NPPF 149 which only potentially accepts the listed exceptions and anything else is ipso facto inappropriate. If NPPF 148 is applied here then how can this development qualify given that it entails a full override of the benefits of the Green Belt; so how can it qualify as very special circumstances?

Nevertheless, the applicant contends that the Beeches Park development represents Very Special Circumstances (VSC) for the building of 450 dwellings at this site in the Green Belt. We disagree and strongly argue that the loss of openness of countryside on the eastern flank of Beaconsfield and the adverse impact on bio-diversity and the local environment arising from this development on Green Belt land far outweigh the proposed benefits that the applicant has indicated in the application.

The Planning Statement (Chapter 5) seeks to set out the case for 'very special circumstances', but is very poor. The applicants spell out the benefits as they see them in paras 5.1-5.11 and then dismiss the Green Belt in para 5.12. They should be assessing harm to the Green Belt and other harm in similar detail to the benefits and then applying a weight to each one. They particularly need to assess the impact on openness, which will be, by definition, substantial, and then assess a range of harms, such as loss of farmland, loss of biodiversity, impacts on trees, landscape and visual impacts, the setting of the town, historic environment etc. They have assessed some of these issues in other reports, but they are crucial as part of the VSC test. As submitted, the application does not comply with paras 147 and 148 of the NPPF 2021 and, in the absence of 'very special circumstances', must be refused.

A development on this scale within the Green Belt should only be promoted through the development of a new Local Plan and the demonstration of exceptional circumstance for removing land from the Green Belt. In sensitive locations such as Beaconsfield the Council should be rigidly applying a plan-led system and not allowing piecemeal applications for substantial developments.

Our principle objections are as follows :-

### 1 Loss of Openness

The proposed site is open countryside that separates Beaconsfield from the neighbouring communities in Seer Green and Gerrards Cross. With the completion of the A355 Eastern Relief Road to the east of the site, this open countryside will further provide a barrier to noise and pollution from the additional traffic by passing Beaconsfield. The openness of the area represents the eastern boundary of Beaconsfield and is used informally by the community with access via a Protected Right of Way. The breadth and depth of the area of open countryside is illustrated in the applicant's supporting photographs (ES Figure 15.3 Pgs 1-35).

The adverse impact of the proposed housing development on this open space is evident in the applicant's supporting visualisations of the development (ES Figure 15.8). The height of the buildings of up to 3 floors has a wider adverse impact on visibility of the development particularly from higher land to the North and North West which is within the Chilterns Area of Natural Beauty (AONB). This is illustrated in the applicant's supporting information (ES Figure 15.6 Proposed ZTV).

This area of open countryside within the Green Belt represents a 'buffer' against urban spread that will become even more important when the approved brownfield development of 306 houses on the former MOD site at Wilton Park is completed. It maintains a ribbon of Green Belt protected land to the east of Beaconsfield that delineates the town providing a natural corridor of countryside that protects against noise and environmental pollution arising from the M40 traffic to the south.

### 2 Loss of Biodiversity

This area of open countryside represents a rich mix of flora and fauna, particularly in the established hedgerows and woodland areas across the site of the proposed development. The applicant's own bio-diversity reports reference the importance of local wildlife, particularly birds and bats in the area. We specifically note the observation of nesting skylarks on the open arable land.

### 3 Adverse Impact on the local environment

Building 450 additional dwellings on this site will cause further congestion and strain on the already stretched facilities and the infrastructure of Beaconsfield. The applicant's proposal suggests limited supporting infrastructure will be included in the scheme and that 40% of the development's dwellings will be 'affordable' with the caveat 'subject to viability'. However there is no further information available in the application on the viability of the development.

We contend the residents of this development will be dependent on using existing facilities in Old and New towns of Beaconsfield. These include schools, particularly secondary schools, shops, hospitality services, and medical facilities to the west of the development. This will inevitably increase traffic movement from east to west across the town at peak times causing further congestion, noise and pollution in an already congested town. This

traffic movement will be in addition to the existing north / south traffic along the A355 to and from the M40.

The additional traffic that will be created by this development on the Green Belt will negate the benefit of the anticipated reduction in congestion when the new Eastern Relief road is opened. This new road will route the north / south traffic on the A355 away from Beaconsfield to reduce the strain on the Park Lane roundabout in Beaconsfield Old Town. In particular, the relief road reroutes HGV traffic including the HS2 construction lorries away from Beaconsfield Old Town and conservation area. However, the 4 proposed access points (3 on the Eastern Relief Road and 1 on Amersham Road) from the proposed Beeches Park development will generate additional traffic movements, particularly right turns at peak times which are likely to further slow traffic movement in the area.

We also note that the application identifies that there will be further pressure on local clean water provision and the foul water disposal which has not yet been addressed.

In conclusion, the Chiltern Society considers the applicant's proposal to represent 'inappropriate development' in the Green Belt and outline planning permission should be refused. We further contend that Very Special Circumstances do not apply for the development.

We strongly object to this proposed development on Green Belt land to the east of Beaconsfield. The proposed scheme will result in the loss of open countryside and will adversely affect the local community in Beaconsfield. The applicant has failed to demonstrate that the benefits of the development clearly outweigh the harm that the development will cause with the loss of open countryside and its adverse impact on local biodiversity and environment.

#### **CPRE – Objection**

##### **The site is within the London metropolitan Green Belt**

The Green Belt serves five purposes:

- (a) to check the unrestricted sprawl of large built up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns: and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This application is open land and clearly breaches purpose a) because it is extending the built up area of Beaconsfield into the countryside. It also breaches purpose c) (for the same reason) and works against prioritising derelict and urban land (purpose e). The latter is relevant because this site is not derelict or urban land – and there are many areas of brownfield that should be used first. It is very clear that this application would considerably expand the built-up area of Beaconsfield into the Green Belt – a classic example of “urban sprawl”.

### Very Exceptional Circumstances do not exist

Section 13 of the NPPF makes it very clear that Green Belt boundaries may only be changed in certain exceptional circumstances and that such changes can anyway be ONLY be done through the strategic planning process of producing a Local Plan. Paragraphs 141 and 142 spell out what must be demonstrated before even considering if there are exception circumstances. NONE of these actions at Para 141 a), b) and c) have been demonstrated, indeed there is lots of brownfield and greater density options available to the Council which need to be implemented before any Green Belt release can be contemplated.

Turning to the “very special circumstances”, none of the exceptions at Para 149 of the NPPF apply in this case. Furthermore, the potential exceptions in Para 150 of the NPPF do not apply in this case either. In fact, the applicant has not even attempted to justify this proposal on any of those grounds at all.

### Justification is solely on the basis of out of date, redundant Policies

The Planning Statement for this application ... Makes much of the saved policies that were in the old South Bucks Local Plan, Core Strategy and the Bucks Minerals and Waste Local Plan. All of these are out of date (in some cases over 20 years old) and we would suggest carry no weight whatsoever in considering an application now. It also tries to bring into consideration the Chiltern and South Bucks Local Plan that was abandoned after being rejected by the Independent Inspector (but NOT for the reason stated in the Planning Statement!) Similarly, this rejected draft Local Plan carries no weight whatsoever.

It should also be noted that these old Policies were made against much older versions of the NPPF. The NPPF has been updated multiple times since those Policies are drawn up and in particular has been strengthened in terms of its protection of the Green Belt.

In summary, the Planning Statement attempts to justify this application on the basis of a set of Policies that are out of date, irrelevant and do not override the (current) NPPF. It is particularly noticeable that the Environment Statement, Chapter 6 “Planning Policy and Context”, which goes to some lengths to address various paragraphs of the NPPF but makes NO ATTEMPT WHATSOEVER to address Section 13 of the NPPF!!

There are a great many other issues with this application, but it is so clearly in breach of the NPPF regarding the Green Belt that it must be rejected on those grounds alone. We therefore strongly object to this application and urge the Council to comply with the NPPF and refuse it.

### **Buckinghamshire Affordable Housing Officer**

I have now reviewed the details of the application and specifically the proposals for providing affordable housing in the development as set down in the Design and Access Statement and the Affordable Housing Statement.

The application states that the proposed development will fully deliver affordable homes in accordance with South Bucks Core Strategy Core Policy 3 (Affordable Housing) requiring that at least 40% of dwellings should be affordable.

Core Policy 3 requires a mix of affordable housing that is 2/3 x rented accommodation and 1/3 x intermediate affordable accommodation. Although the application states that at least 40% of dwellings on the site will be affordable, it does not provide any further details of the proposed tenure split. The Affordable Housing Statement (5.2) does make general reference to a blended approach between tenures to cover all incomes and households needs that cannot access the housing market. However, it does not confirm that this will comply with the tenure mix that is required by Core Policy 3. I would want the finalised affordable housing tenure mix to comply with the 2/3 x rented accommodation: /3 x intermediate affordable accommodation. This reflects the pressing need for affordable housing for rent in the South Bucks area and across Buckinghamshire as a whole as reflected by the demands on the Council's Housing Register and Homelessness Services. I note the comment in the Affordable Housing Statement (4.30) that the number of households on the Council's Housing Register for South Bucks is considered to be low. I am not clear of the basis for this conclusion and what analysis or comparisons have been made to justify this comment. The Council faces a significant demand for social housing for rent in the South Bucks area and households on the register are often facing a significant wait for accommodation that can run into several years or more.

The indicative mix of affordable housing sizes is set down as follows in the Design and Access Statement:

4 bedroom	5%
3 bedroom	25%
2 bedroom	40%
1 bedroom	30%

The outline application does not set down how this mix is split between tenures. With this in mind, my comments on the size mix are:

- I would want to see a good mix of sizes across all affordable housing tenures. I would not want to see a situation where a disproportionate number of the larger family homes (e.g. 3 bedroom and 4 bedroom) are for sale (via low cost home ownership schemes) and the smaller properties are concentrated in the affordable housing for rent. There is a significant need for all accommodation sizes as affordable housing for rent and this includes the need for larger family homes.
- Given that there will be in the region of 180 affordable homes being delivered, I would like to see a higher proportion of 3 and 4 bedroom family homes to provide more opportunities for families to secure housing via the Council's Housing Register.
- Further to my comments above, the Affordable Housing Statement states that the majority of the affordable dwellings will be smaller homes with the focus on accommodating the ageing population and assisting households to downsize from existing affordable homes, thereby freeing up family homes elsewhere in Beaconsfield. The argument seems to be that the low proportion of affordable family housing in the scheme will be offset by vacancies in family homes generated elsewhere by downsizers moving to the scheme. However, there does not seem to be any evidence underpinning this expectation. The Council's experience is that it has been very challenging to persuade underoccupying tenants to move out of family homes, even when incentives and attractive alternative housing options are being offered. Therefore, I do not consider

that this is an argument that justifies having a high proportion of smaller affordable homes in the scheme at the expense of larger family homes.

- For the 2 bedroom affordable housing properties being delivered in the scheme, it is not stated if these would be 3 person or 4 person properties. This is an important point as this will impact on the suitability of properties for smaller families. My preference would be for 2 bedroom 4 person properties as these provide more flexibility on the size of family that can be accommodated.

Overall in conclusion:

- I am satisfied based on the submission that the proposed scheme will provide 40% affordable housing as required by Core Strategy Policy CP3.
- I would wish to see the tenure mix of affordable housing to reflect the requirements of CP3 for 2/3 x rented accommodation: 1/3 x intermediate affordable accommodation.
- I would wish to see a good mix of property sizes across all affordable housing tenures and not have larger properties concentrated in affordable home ownership.

### **Buckinghamshire Highways DM Officer**

The application site is located to the east of the main settlement of Beaconsfield and is set between the newly constructed northern section of the Eastern Relief Road (ERR), which runs along the eastern boundary of the site and the existing A355 which runs along the western boundary of the site. To the south east of the site is the Wilton Park site which has already received outline permission for 304 dwellings. The Wilton Park site will deliver the southern section of the relief road, which according to the Section 106 Agreement for that site, is required to be delivered prior to the occupation of the 99th dwelling. Paragraph 1.2.3 of the submitted TA for this new application states that "On the basis that this application (Wilton Park) was approved, all supporting technical work is deemed to be satisfactory and sound". While this may have been the case for the Wilton Park development it is noted that the assessment work is now a number of years old and therefore reliance on the associated data to carry out assessments on a new development may produce results that are should not be relied on.

The northern section of the ERR runs adjacent to the eastern boundary of the application site and has been constructed by the Council. The application for that section of the relief road was submitted in 2016 and was approved in 2017. In relation to the Council's application for the relief road, paragraph 1.2.5 of the TA submitted for this new application states "On the basis that this application (The Relief Road Northern Section) was approved, all supporting technical work is deemed to be satisfactory and sound." As with the assessment work for the Wilton Park development, the assessment work for the Relief Road application is now a number of years old and relying on it to provide a basis to assess a new planning application may provide results that should not be relied on.

There are a number of strategic routes in the vicinity of the application site which are as follows. The A355 Amersham Road runs in a north/south alignment to the west of the site. This is a two-way single carriageway road with an 'A' classification and in the vicinity of the site is subject to a 30mph speed limit. To the south of the site is the A40 which runs in an east/west alignment and provides access to the M40 motorway. To the east of the site is the ERR which, when completed, will provide a link between the A355 at Maxwell Road to the

north and the Pyebush Roundabout to the south and will divert traffic away from the London End roundabout junction. The M40 is also located to the south of the site and provides strategic connections to the M25.

#### London End Roundabout Congestion Issues

Existing significant congestion issues at the London End roundabout are well known and due to the physical constraints around the junction, significant alterations in order to improve conditions are not possible. The South Bucks Core Strategy recognises the issues at this junction. Core Policy 7 deals with Accessibility and Transport and states that “existing traffic congestion to the east of Beaconsfield will be addressed through a range of measures, which could include provision of an A355/A40 Relief Road later in the Plan period.” We are now in a situation where there are planning permissions in place to secure an Eastern Relief Road to reduce the congestion at the London End roundabout, with the northern section of the road already provided. As stated above, the southern section of the ERR between Minerva Way and the Pyebush Roundabout will be delivered as part of the Wilton Park development, however the trigger for its completion is not met until the 99th dwelling on the site is occupied. The date of this is currently not known and not in the control of the Highway Authority.

#### Impact on Local Highway Network

In order to determine the impact of the proposed development on the local highway network the TA first looks at existing traffic conditions. The TA notes that recent traffic conditions have not been what would be classified as typical given the COVID restrictions that we have been subject to, therefore the collection of current traffic survey data to inform the assessment has not been considered appropriate. As a result, no traffic surveys have been undertaken at this stage.

In paragraph 3.4.2 the TA confirms that the assessment is reliant upon historic traffic data to enable the assessment of traffic impacts and that the data has been obtained from the two consented planning applications for the Council’s section of the ERR and the Wilton Park Development.

I have already raised concerns about relying on traffic data that is a number of years old, with the Council’s application for the ERR being submitted in 2016 and the application for the Wilton Park development being submitted in 2017. I am also concerned that extrapolating data from a number of sources in order to test the impact of what is a strategic site in a sensitive and congested area will provide results that may be unreliable.

A development of this scale in this location would be required to utilise the Council’s Strategic Model and Micro Simulation Model of the A355 corridor in order to assess the impact of the development including the assignment of traffic and any consequent reassignment issues on the network. This is the process that was undertaken for both the Relief Road and Wilton Park planning applications. I note that the impact of this development has not been tested using these methods and instead the TA is manually manipulating out of date data that also doesn’t reflect and consider the implications of the additional access positions and the loading and distribution of traffic specific to the current proposal. Therefore at this stage the Council cannot be satisfied that the impact of the

development is correct and considers appropriately the implications of the development proposal.

As a result of this I will not go into the detail of the assessments that have been carried out but I will comment on the principles used by the applicant to determine the trip rates and scope of their assessment as this may be useful moving forward.

#### Trip Rates, Purpose and Distribution

The proposed trips rates for the uses on site, apart from the school use, have been reviewed and appear to be consistent with what was agreed for the Wilton Park development and are therefore acceptable in principle. That said, they originate from a number of years ago and a sensitivity sense check against up to date data should be undertaken to confirm that they are still appropriate. The trips from the proposed school use have been determined from the TRICS® database with a reduction to account for the likely internal trips where residents of the site will access the school. It is noted that the range of pupil numbers chosen is 210-420 while the total number of proposed primary students is 420. The maximum range should therefore be revised and any difference in the resulting trip rates to be adjusted in the TA.

Paragraph 5.2.3 of the TA states that the forecast residential traffic has been categorised based on journey purpose, with the percentages being derived using the National Travel Survey (NTS) obtained from TEMPro v7.2, which reflects the 2019 NTS.

Table 5.2 on page 46 of the TA shows the journey purpose for the residential trips. It is noted that Appendix D contains calculations to show how these figures have been obtained, however calculations for retail and leisure uses appear to be missing.

The methodology used for calculating the distribution of development trips appears to be based on the methodology used for Wilton Park. It is stated that an overview of the methodology and the data is provided in Appendix D, however no details are provided with regards to the calculations. Additional details would be required in order to confirm that the gravity weighting is acceptable.

#### Screening for Junction Assessments

The TA includes a two stage screening process in order to determine which junctions on the surrounding highway network should be assessed in detail. Notwithstanding the issues I have raised above in relation to the data used to assess the impact of the development traffic, I will provide comments on the principle of the methods used in this screening process.

In order to carry out the first stage of screening the applicant has based their methodology on the traditional Guidance on Transport Assessment (GTA) approach. It is stated in paragraph 6.8.3 of the TA that “Despite the GTA guidance being replaced in 2014, its replacement ‘Transport Evidence Bases in Plan Making’ is not a like-for-like document, providing no guidance on the production of Transport Assessment.” The paragraph goes onto state “It is commonly accepted by other practitioners that GTA still represents industry best-practice and remains relevant.” The applicant has therefore used the traditional 30

two-way trip threshold in order to sift out junctions that they consider do not require further assessment.

While using the 30 two-way movement threshold can be useful in certain circumstances, the current guidance recognises the need for applicants to agree the scope of TA's with the relevant Local Highway Authority. This is due to the fact that what constitutes a material impact will vary from site to site and location to location, where 30 two-way movements may be immaterial in one location but may be very material in another more sensitive location. In this case, the highway network surrounding the application site is known to be congested and is sensitive to changes in traffic flows. In this instance the applicant would therefore be required to agree the scope of the TA with the Highway Authority, as advised by the guidance. It is noted that this scoping process has not been carried out. That said the impact of the development cannot be properly determined without strategic model runs that reflect the particular proposals and loading points associated with this development. It is after this has been completed that the full scope for junction assessments can be determined.

The second stage screening process used by the applicant looks at the percentage impact of development traffic on the overall flows at the junction, and where any impact is deemed to be 3% or less the junctions have not been considered for further assessment. To look at the impact on overall flows through the junction does not give a true reflection of the impact; instead the applicant should be considering the percentage impact on each individual arm of the junction and base a judgement on what should be included for further assessment on that. The methodology used in the TA is not therefore considered to be appropriate.

#### Site Access Points

As mentioned previously, there are proposed to be 4 new access points to serve the site, with three taken from the ERR and one taken from the existing A355 Amersham Road. I will reserve making comment on their capacity to accommodate development traffic until the TA has been updated accordingly, however I will make general comment on the plans provided.

Firstly the plans provided do not contain any lining detail on the existing carriageways, therefore it is difficult to ascertain the impact larger vehicles will have on the carriageway of the main road when leaving the site. The tracking shows that larger vehicles will likely run over the centre line of the main road and also the centre line of the access points when moving through the access, This is of concern due to the impact this will have on the ability for vehicles to use the access points simultaneously and will also impact on the ability for vehicles to clear the main carriageway without delay. This is of particular importance, especially for the access points on the ERR due to the strategic nature of the road and high levels of traffic flow, where it is important that any delay to the through flow of traffic and detrimental impact on safety is minimised.

#### Sustainable Access Strategy

#### Footway/Cycleway improvements

In order to ensure the pedestrian and cycle connections from the site to the centre of Beaconsfield provide safe and attractive routes to encourage sustainable forms of transport, the applicant has investigated improvements to two main movement corridors. The first (Corridor A) is the link between the site and Beaconsfield 'New Town' and Beaconsfield Railway Station along Maxwell Road, and the second (Corridor B) is the link between the site and Beaconsfield 'Old Town' along London End to the west of the London End roundabout junction.

Corridor A would be accessed from the north of the site via the existing shared footway/cycleway provision along the ERR which links to a crossing on the A355 Amersham Road which is proposed to be upgraded to a Toucan Crossing. This would in turn link to the existing footway/cycleway provision on the western side of the A355, which currently terminates to the north as Maxwell Road turns to the west. The proposed improvements then include a shared 3m wide footway/cycleway along the northern edge of Maxwell Road which is achieved by widening the existing footway provision. There are currently no proposals along the southern side of Maxwell Road.

The shared footway/cycleway provision continues to the west and appears to terminate opposite Chesterton Green. It is unclear why the provision terminates in this location when there appears scope for it to be extended further. Beyond this point it is proposed to continue a provision for cyclists in the form of an advisory 1.5m wide cycle lane marking on the carriageway. However, this provision is only present on the northern side of the carriageway, which will only cater for cyclists travelling in an easterly direction. There is no provision for cyclists travelling in a westerly direction beyond the termination of the shared footway cycleway, which is something that is required to be addressed.

I am also not convinced that the principles contained within LTN 1/20 in relation to the provision for pedestrians and cyclists have been adequately applied in order to produce the most convenient and attractive conditions for cyclists. It is also apparent that the applicant is proposing to remove existing on- street parking along Maxwell Road to the west of where the proposed shared footway/cycleway provision terminates. There has been no information submitted to demonstrate that the loss of this parking provision is acceptable, especially when this provision appears to be subject to a Traffic Regulation Order (TRO).

Corridor B leads from the southern end of the site and continues to the west into Beaconsfield 'Old Town'. It is proposed that cyclists and pedestrians leave the site to the south via connections onto Minerva Way which will be subject to footway/cycleway improvements delivered as part of the Wilton Park development. These improvements are not yet in place and therefore any potential residents from the new site will be required to use the existing 1.5m footway provision along the southern side of Minerva Way and cyclists would need to use the carriageway. As Minerva Way is no longer a through route for vehicular traffic and only serves a limited number of private dwellings, traffic movements are low and therefore the use of Minerva Way to provide pedestrian and cycle access to the site in the interim is acceptable.

Cyclists and pedestrians will then need to cross the London End roundabout junction in order to travel into the old town. Existing conditions at this junction do not lend themselves

to providing safe and suitable access for pedestrian and cyclists. A signalised crossing will be provided to the north of this junction as part of the Wilton Park development; however this will only be delivered when the ERR is open prior to the occupation of the 99th dwelling on the Wilton Park site which will in turn ease traffic conditions on the junction.

In order to improve conditions for pedestrians and cyclists at this junction the applicant is proposing to provide tactile paving at the existing dropped crossing points. It is not considered that this will provide adequate facilities in order to provide safe and suitable crossing facilities for pedestrians and cyclists associated with the development.

The applicant has also considered improvements to the route to the west of the London End roundabout and has proposed to provide mandatory on-road 1.5m wide cycle lane markings along both edges of the carriageway on London End which run from the London End roundabout to the roundabout with Wycombe End, Windsor End and Aylesbury End to the west. These markings turn into advisory markings in the vicinity of the London End roundabout. There has been no assessment of the remaining carriageway width on London End with these cycle lane facilities in place and I am concerned that any reduction of the width that is already there will further exacerbate the high levels of congestion that this link currently experiences. As proposed, I am not convinced that this is an acceptable solution to provide safe and suitable cycling facilities for residents of the site, taking into account the principles contained within LTN 1/20.

#### Bus Services

The TA states that the local bus services provide regular services to Beaconsfield New and Old Towns, Beaconsfield Railway Station as well as wider destinations such as Uxbridge, Watford and High Wycombe. There are existing bus stops on the A355 adjacent to the western boundary of the site and also slightly to the north of the site on the A355. It is also proposed to provide two new bus stops on the ERR adjacent to the eastern boundary of the site. It is stated that all areas of the proposed development will be within 300m of an existing or proposed bus stop. While it appears that residents of the site will have access to bus stops there are no measures proposed in order to encourage them to use the bus as an alternative to their private car. Additional measures could include the provision of a contribution towards the purchase of a season ticket for each dwelling for the use of public transport for a year.

The proposed bus stops would be required to include shelters, solar lighting if existing street lighting is not sufficient and RTPI displays. A financial contribution would be required to enable community transport or additional peak services to Beaconsfield Station to reduce car usage. The value of contribution is to be confirmed with the Passenger Transport team in conjunction with the Highway Authority.

#### Railway Services

The TA notes that the nearest railway station is located approximately 1km to the north west of the site, which is around a 13 minute walk or 4 minute cycle. The station is operated by Chiltern Railways and offers services to destinations such as London Marylebone, Oxford, Birmingham Moor Street including connections with West Ruislip and South Ruislip which provides onward connections on the London Underground Central Line.

As referred to above, the applicant is proposing to improve links to Beaconsfield Station and following a review of those improvements the applicant is required to give them further consideration.

Seer Green & Jordans Railway Station also offers services to the same destinations on the Chiltern Line however the services are less frequent to those offered at Beaconsfield Station.

#### Further Potential Opportunities/Measures

The TA has included a number of other measures that could be introduced to encourage the use of sustainable forms of transport which include a Bicycle Hub, Bicycle Hire/Brompton Schemes, Electric Scooters/Future Technology and Mobility Credits. While the suggestion that these schemes could be provided is welcomed, there is no firm commitment from the applicant as to whether these will actually be provided. The applicant is required to provide a firm commitment of what is to be provided and how it will work.

#### Framework Travel Plan

A Framework Travel Plan has been submitted in support of this application. I have passed this onto the Council's Travel Planning Section for comment and I will provide an update as soon as comments are received.

#### Conclusion

As submitted, the information contained within the TA is not adequate in order for the Highway Authority to assess the impact of the proposed development on the local highway network. As such the Highway Authority is unable to confirm that the impacts of the proposed development on the local highway network will not be severe. To enable highways matters to be considered further the applicant would be required to address the points raised in the comments above, which include:

- Utilising the Council's Strategic Model and Micro Simulation Model in order to test the impact of the development on the surrounding highway network;
- Agreement of the scope of junction assessments with the Highway Authority following the completion and assessment of the strategic modelling outputs;
- Addressing the issues relating to the proposed access points;
- Further consideration of the footway/cycleway improvements, including the movements of pedestrians and cyclists across the London End Roundabout;
- Consideration of further measures to encourage the use of sustainable forms of transport.

As submitted, I must therefore recommend the refusal of this application for the following reasons:

*Reason 1:* Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed on an individual and cumulative basis. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing

distributor road network and will not achieve safe and suitable access contrary to the National Planning Policy Framework, Core Policy 14 of the South Bucks Core Strategy, Buckinghamshire Council's Highways Development Management Guidance (2018) and the aims of Buckinghamshire's Local Transport Plan 4.

*Reason 2:* The proposed development fails to make adequate provision to allow accessibility to the site by non-car modes of travel. The development will therefore be heavily reliant on the use of the private car contrary to sustainable policies as set out in the National Planning Policy Framework, Core Policy 14 of the South Bucks Core Strategy, Buckinghamshire Council's Highways Development Management Guidance (2018) and the aims of Buckinghamshire's Local Transport Plan 4.

### **National Highways**

Advise that the assessment of the potential impact the development could have at the SRN, namely M40 J2, is not detailed enough for National Highways to be completely satisfied there is no material impact. They recommend that the application should not be approved for a period of 56 days to enable further assessment to be undertaken.

Referring to the consultation on a planning application referenced above, in the vicinity of the M40 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

### Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Following a full review of the transport assessment supplied by Mode Transport Planning (August 2021), the assessment of the potential impact the development could have at the SRN, namely M40 J2, is not detailed enough for National Highways to be completely satisfied there is no material impact.

### Personal Injury Analysis

The analysis should be extended to the M40 and an assessment of collision trends at Junction 2 and whether the development could further detriment the safety of SRN users.

### Trip Generation

Full TRICS outputs provided to support the provided trip rates. The 2017 rates as extracted from the Wilton Park transport assessment (PJA, 2017) are acceptable in principle but should be compared against the latest TRICS database.

Adjusted trip generation (Section 5.4) is unsubstantiated beyond stating likely reductions. Evidence for the applied reduction of each development type should be explained in greater detail and where guidance or best practice has been applied then this presented clearly and sourced.

#### Highway Assessment

The highway assessment does not include the M40 Junction 2 therefore no determination of the impact the development has at the SRN can be concluded. It is stated in Table 6.1 that development trips could (after reductions as queried above) be 91 two-way morning peak trips and 66 two-way evening peak trips. In this section Mode identify it is above the historical threshold of 30 two-way trip yet no impact assessment is provided. Furthermore, Pyebush Roundabout, approx. 600 metres north of the M40 J2 is subject to a potential minimum increase of 107 two-way morning peak trips and 81 two-way evening peak trips as a result of the development. It is therefore recommended both junctions are assessed together to ensure the latent demand from each junction is properly captured in the assessment.

#### Recommended Non-Approval

It is recommended that the application should not be approved for a period of 56 days (Ref: PL/21/3151/OA) from the date of this recommendation to enable further assessment to be undertaken.

Reason: To allow Highways England to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice

#### **Buckinghamshire Air Quality Officer**

Having read chapter 13: Air Quality of the Environmental Statement for the application outlined

above I have no comments to make on the methodology used. However, the integrity of the results

produced by Air Quality modelling is reliant on the accuracy of the input data used. This is highlighted in section 13.2.70 of the report submitted:

*“There are many uncertainties when considering both measured and predicted pollution concentrations. The model is dependent upon the traffic data provided for the project, and should this be subject to change, so may the resulting pollution concentrations.”*

Any changes to the Transport Assessment must be reflected in the Air Quality Assessment, for

example an underestimation of trip rates from the developments would result in an inaccurate assessment of the development on Air Quality.

It is recommended that a condition to develop and implement a Dust Management Plan (DMP),

which may include measures to control other emissions. The plan to be approved by the Local Authority.

### **Buckinghamshire Ecology Officer**

Submission of Defra Biodiversity metric to provide an assessment of the impact of the development on biodiversity

- An Ecological Addendum is expected to be submitted in October 2021, which is expected to be informed by a number of update protected species surveys (including reptile survey and bat activity surveys). This should include an update assessment of potential cumulative impacts on protected species (in particular reptiles and bats).
  - Bat surveys of trees at height or presence/absence surveys
  - Lighting contour plans of the floodlighting associated with the proposed sports pitches
  - Location of off-site skylark compensation measures
  - GCN surveys of the three mitigation ponds, to inform updated mitigation measures

### Discussion

The proposals include the development of up to 500 dwellings, with a local centre, primary school, pre-school and public open space. The application is proposed to be phased. The Environmental Statement relates to a wider area (the "Assessment Area") than the application site. The Assessment Area also includes land to the east of the site (east of the Beaconsfield eastern relief road) of proposed sports pitches.

The following documents submitted with the application have been reviewed to inform this response:

- Savills Environmental Statement Chapter 14: Ecology
- Savills and CSA Environmental Statement Ecology Technical Appendices 14.1 – 14.13
- Planning Statement (August 2021) and associated Appendices
- Savills Environmental Statement Chapter 17: Assessment Summary and Mitigation Implementation
- Application Site Boundary Figure 1.1 (Drwg No. PAB01, June 2021)
- Assessment Area Boundary. Figure 1.2 (Drwg No. EAB01, June 2021)
- Illustrative Masterplan, Figure 3.1 (Drwg No 406339, July 2021)
- Green & Blue Infrastructure Plan Figure 3.6 (Drwg No GBPP01v2)
- Landscape Strategy Figure 15.7 (Drwg No CSA/3484/145 Rev B)

The following document which provides an assessment of the impacts of the development on ecological receptors should be reviewed by the relevant technical consultee:

- Savills Environmental Statement Chapter 13: Air Quality

An extended Phase 1 habitat survey was undertaken in April 2021. The assessment area comprises of arable fields, semi-improved grassland, broad-leaved woodland, one pond, a large number of mature and semi-mature trees, areas of scrub and tall ruderal habitat. The boundaries comprise of hedgerow on the western boundary, scattered scrub on the southern boundary and semi-improved grassland margins on the western/northern boundary.

### Biodiversity Impact Assessment

The development will result in the loss of existing habitats and the creation of habitat within the outline scheme, which include SuDs, areas of open space, amenity grassland, built development/hardstanding, gardens, and tree planting. Whilst we welcome the protection and retention of the existing central woodland belt and trees/hedgerows where illustrated, the proposals will need to demonstrate a net gain in biodiversity, in line with the NPPF and the South Bucks District area core policy CP9. Although the proposals retain most of the existing woodland and trees, there will be removal of sections of hedgerow (B1 and B9), small areas of woodland, semi-improved grassland and scrub.

It will be important to retain the existing ecological corridors within the layout of the development and avoid habitat fragmentation. Opportunities should be maximised to create habitats and ecological corridors within the development. Although we welcome the creation of two new wildlife ponds, we would suggest further opportunities for pond creation could be taken given the size of the site. A Biodiversity Metric is required prior to determination of the application to demonstrate if the development will result in an overall biodiversity net gain or loss, in line with the NPPF (2019).

Whilst it is appreciated that the plans are in outline form, if full landscape details are not yet known, a precautionary worst case scenario approach should be taken at this stage. At the reserved matters/phased application submissions, updated metrics should be undertaken based on the detailed landscape plans.

Biodiversity Net Gain (BNG) is an approach to development that leaves biodiversity in a better state than before. BNG protects existing habitats and ensures lost or degraded habitats are compensated for by restoring or creating habitats that are of greater value. This development needs to demonstrate measurable net gains for biodiversity and the following evidence submitted:

- a. Biodiversity Impact Plan. Produced using the information from the Ecological Impact Assessment. The plan should clearly show the areas covered by each of the existing habitat types and the area in hectares of each habitat type (or for each habitat parcel, as some habitats may be scattered throughout the site).
- b. Proposed Habitats Plan. This can be taken from the site layout plan, illustrative masterplan, green infrastructure plan or landscape plans (if they are available). The plan should clearly show what existing habitat types are being retained and enhanced, and what new habitat types will be created; it should be colour coded so that each habitat type is easily identifiable and the area of each habitat type should be quantified in hectares. Other proposed biodiversity enhancements should also be shown on this plan.
- c. A copy of the completed Biodiversity Metric. The information in the metric should be directly related to the Biodiversity Impact Plan and the Proposed Habitats Plan. A copy of the metric (i.e. the completed spreadsheet) or the full calculations included in the metric should be submitted and not just a summary. Detailed justifications for the choice of habitat types, distinctiveness and condition should be added to the comments column or provided separately in a report.

- d. Biodiversity Net Gain Good Practice Principles for Development (CIEEM, CIRIA, IEMA, 2016). Full justification of how the principles have been applied as part of the net gain assessment.

The Council is in the process of developing a Biodiversity Supplementary Planning Document (SPD). Prior to the SPD being adopted, the Defra Biodiversity Metric 3.0 (or 2.0) can be used to determine the quantitative ecological impact of any development. In line with the government's draft Environment Bill a minimum of 10% BNG should be demonstrated for the development proposals to be deemed acceptable.

#### Air quality

The Air Quality ES Chapter considers potential effects of air pollution on woodlands, (including ancient woodland), and local and national sites of nature conservation importance including Burnham Beeches and the Chilterns SACs. Potential effects on ecological receptors (e.g. through increase in nitrogen) could arise from the increase in vehicles. The impact on air quality is not our area of expertise and the assessment should be reviewed by the relevant technical consultee. If you need any further advice however please contact us.

#### Sites and habitats of nature conservation importance

##### Ancient Woodland

The application site lies close to Ancient Woodland to the east of the assessment area, with additional areas present within the wider landscape. Standing advice from Natural England and Forestry Commission provides advice on providing protective buffer zones between development of at least 15m of semi-natural habitat (ie. woodland, scrub, grassland or wetland planting) which forms part of the green infrastructure, ie. is not developed land. The Landscape Strategy shows the location of the 15m buffer zone around the ancient woodland boundary. Impacts on the ancient woodland could also arise from increase in lighting, disturbance from increased recreation and noise disturbance. Due to the proposed sports pitches, it would be helpful to confirm if the buffer zone will be accessible to the public, and the floodlighting contour plans should be provided to show the levels of expected light spill around the sports pitches. Although a minimum 15m buffer would be acceptable in line with standing advice, a wider buffer zone would be preferable as this is a key area for bat activity, to ensure that bats are not affected by the sports pitch lighting/floodlighting. The updated bat survey and assessment in the ES addendum should assess the impacts on bats.

##### Priority Habitats

The mature broad-leaved woodland parcels on site are of high ecological value. These woodlands are Priority Habitat/Section 41 Habitat of Principal Importance. There are a number of mature hedgerows on site, these are of intrinsic ecological value and also Priority Habitat. Removal of priority habitats does appear to have been avoided where possible within the layout. The Biodiversity Metric should confirm the extent of habitat removal and compensation (e.g. woodland planting).

A large number of mature and semi-mature trees are present on site, mainly oak, beech and ash. Several display significant damage or veteran features. Although trees are not Priority Habitat, they are of high intrinsic ecological value for a variety of species. Two veteran trees (T23 and T37, both oak, AIA report) are proposed to be retained and buffered within the layout of the development which is welcomed.

#### Statutory and non-statutory sites of nature conservation interest

The ES Chapter identifies two international statutory sites within 10km of the application site; Burnham Beeches SAC and Chiltern Beechwoods SAC. Potential recreational, air quality and hydrological impacts on the two sites have been identified during the occupation phase of the development. It concludes no likely significant effect from increased recreational pressure on Chilterns Beechwoods SAC. However there will be a negative effect significant at a national level on Burnham Beeches through potential recreational impact. We would take the lead from Natural England as the statutory body and recommend that a Habitat Regulations Assessment (HRA) is required to determine the likely significant effect. Mitigation measures should be agreed in line with the Burnham Beeches Avoidance and Mitigation Strategy SPD.

Non-statutory sites within 2km of the site include South Bucks Heaths and Parklands Biodiversity Opportunity Area within 1km south, Dean Wood Local Wildlife Site within 1km east, Bower and Burtley Woods LWS (1.3 km south) and Long Grove Wood BBOWT Reserve (1.3km north east). I am in agreement with the conclusion of the ES that these sites will not be significantly impacted on by the proposed development due to their distance from the site.

#### Protected Species

##### Bats

Bat activity surveys have been undertaken in 2018 and updated surveys in May 2021. The surveys have comprised one survey in spring, summer and autumn in 2018, and a spring survey in 2021. I understand that summer and autumn 2021 activity surveys have been carried out and the assessment will be submitted as an ES addendum. This will be required to determine the impacts of the proposals on bats and I will provide full comments once this has been submitted. I have some concern regarding the potential for cumulative impacts resulting from the consented development the Eastern Relief Road and the Wilton Park site on bats through fragmentation and loss of habitat, increased disturbance, and lighting.

The location of the transect routes should be included in the report.

It will be important to maintain connectivity throughout the site through dark corridors, in particular the central woodland belt and the boundary hedgerows and tree lines along the eastern relief road, Minerva Way and the Amersham Road. The area adjacent to the golf course and ancient woodland is an area of high bat activity during the surveys. This area is where the proposed sports pitches are proposed which is of a concern due to the expected floodlighting. Bat commuting routes within the site (ie. woodland and hedgerows) should be retained and enhanced to ensure connectivity with the two bat hop-overs which have been approved in the design of the Eastern relief road.

A preliminary ground level roost assessment of 54 trees on site was undertaken in April 2021. The survey identified five trees with high roost potential, 39 with moderate roost potential and 5 with low roost potential. There appears to be a discrepancy in the figures and the Figure in Appendix 1.4 as fewer trees appear on the plan than identified. Further surveys of any trees to be removed or impacted will be required prior to determination of the application to determine the suitability for bats and if a bat roost is present. This should be a climbing inspection undertaken at height by a suitably qualified ecologist, or emergence/re-entry activity surveys in line with the Bat Conservation Trust guidelines (2016).

#### Great crested newt (GCN)

A total of 15 ponds have been identified within 500m of the assessment area, of which three (Mit 1, 2, and 3) are recently-created mitigation ponds/attenuation basins which were designed to support great crested newts as a requirement of the construction of the Eastern Relief Road. GCN surveys of the ponds have been undertaken in 2018, 2019 and 2021, which included Habitat Suitability Index assessments of all ponds. In June 2018, Ponds P4 to P8 and P11 were tested using eDNA sampling (repeated in 2021 for Pond 5 and P6 only). All ponds were negative for GCN eDNA apart from P4, which lies approx., 100m north of the assessment area, and P11 which is over 500m from the assessment area boundary. Traditional presence/absence surveys undertaken in 2019 in suitable conditions and in line with the appropriate methodologies. Despite the positive eDNA results, no GCN were recorded during the 2019 surveys.

Great crested newts are a European Protected Species. The majority of the surveys were undertaken in 2018 and 2019, and may require update surveys. In light of the survey work, I agree with the conclusion of the report that GCN are known in the wider landscape of the application site. Pond 4 in particular, despite no GCN being recorded in 2019, was positive for eDNA in 2018 and a small population was recorded in 2016 (Jacobs, Eastern Relief Road application CC/65/16). There is potential for killing and injury of GCN in the absence of mitigation and loss of suitable terrestrial habitat during construction. The ES chapter states that there is potential for Pond 5 to be impacted by the development, but it is anticipated that it can be maintained. We would strongly recommend retention of the pond within the development as having intrinsic value for wildlife.

The three mitigation ponds were assessed as having good (Mit 1 and Mit 3) or below average (Mit 2) suitability for great crested newt (HIS scores of 0.78, 0.78 and 0.59). There is a 600mm culvert providing permeability between under the Eastern Relief Road linking the ponds and drainage features (Condition 20-22 attached to consent CC/65/16, Fig 2, Landscape and Ecology Mitigation, Management and Enhancement Plan). In addition, splay kerbs were used as mitigation to increase permeability for newts crossing the road. As such in light of the proximity of the ponds to the development site, presence/absence surveys of ponds Mit 1, 2, and 3 should be undertaken to determine if newts have colonised the ponds and their population size to inform the impact assessment. The GCN surveys should be undertaken prior to determination of the application.

The proposals include the creation of at least two attenuation ponds which designed to hold water all year round to function also as wildlife ponds. We welcome the creation of wetland

features such as swales, and new terrestrial habitat in the central green corridor to include grassland, thicket and new woodland infill planting. Gully pots and kerbs in the road design will also need to be carefully designed to avoid killing of GCN within the operational phase of the development, in particular where roads are proposed adjacent to the ponds, e.g. Pond 5.

The ES states that the development will require a European Protected Species Derogation Licence. The District Level Licensing Scheme in Buckinghamshire Council is currently only applies to the former Aylesbury Vale area and county applications however it is anticipated to be rolled out across the rest of Buckinghamshire within the near future (potentially spring 2022). Therefore further discussions will be required to check the suitability of the DLL licence between the applicant's ecologists and Naturespace (and ourselves) to confirm this is a suitable approach. Standard mitigation measures such as fencing, trapping and translocation may still be required depending on the requirements of the licence.

### Breeding birds

I am satisfied that sufficient bird survey work has been carried out at this site, in accordance with best practice. From the survey results of the breeding bird surveys undertaken in 2018 and 2021, red and amber listed bird species for the site are herring gull, house sparrow, linnet, skylark, song thrush, starling, dunnock, kestrel, mallard, meadow pipit, stock dove, swift and tawny owl. Of these, dunnock, house sparrow, kestrel, linnet, mallard, red kite, skylark, song thrush, stock dove and tawny owl were confirmed as possible or probably breeding. In addition, bullfinch, and lesser redpoll were recorded in 2018 as possible breeding on site. I agree that the conclusions the breeding bird assemblage of the site is important at the local level. The surveys revealed at least eight nesting territories of skylark in 2021, indicating likely breeding on site and a site of importance at the local level. As a ground nesting species, their breeding sites will be lost through the proposals (they require large arable/grassland fields for breeding).

Nesting birds may be impacted by the removal of scrub, hedgerows and trees during the construction period, and through increased predation by cats and increased recreational disturbance of habitats in the occupation phase. Mitigation measures for long-term habitat creation and management of suitable habitat for nesting birds should be covered within the Construction and Environmental Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) documents.

As replacement skylark breeding habitat is not possible within the scheme, appropriate compensation measures are proposed through a farmland bird compensation scheme to increase the provision of potential nearby skylark territories and other opportunities for farmland birds, elsewhere within the applicant's landownership. A scheme of delivery of skylark plots is proposed for 10 years. We support this approach. Further details to confirm the compensation land location and outlining the scheme should be provided by the applicant. The scheme, including provision of details of the funding for the cost of the long-term management, should be secured by a S106 agreement or condition.

### Reptiles

We will provide full comments when the results of the 2021 reptile survey and assessment has been submitted, expected as part of the ES Addendum. The reptile survey carried out in 2018 recorded three species of reptile on site; slow-worm, common lizard and grass snake. The population sizes indicates that the site supports a medium population of slow worm and grass snake, and a small population of common lizard. The site is therefore of significant value for these species. A reptile mitigation strategy will be required for the site and for each phase of the development. Due to reptile mitigation being required for the eastern relief road and Wilton Park developments, the impact assessment should take into account potential cumulative effects arising from these developments (including translocation exercises).

Badger      *Redacted*

#### Dormouse

I am satisfied that sufficient survey work for dormouse has been carried out. No dormice were recorded during the survey, and the development is not expected to have any significant impact on this species.

#### Invertebrates

Invertebrates have been scoped out of the assessment. The survey notes that notable invertebrates small heath, and Essex skipper butterflies have been recorded on site and that deadwood habitat on site may support a variety of saproxylic invertebrates. Whilst we agree the development is unlikely to have any significant impacts on invertebrate species, we would require habitat enhancements for invertebrates to be detailed within Landscape and Ecological Management Plan for the site.

#### Invasive species

Invasive non-native species Himalayan Balsam is present on site in woodland W3. A strategy will be required within the CEMP to ensure this species is not spread off-site.

#### **Local Lead Flood Authority**

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

- Flood Risk Assessment (ref. LEB-BWB-ZZ-XX-RP-YE-0001\_FRA, July 2021, BWB)
- Sustainable Drainage Statement (ref. LEB-BWB-ZZ-XX-RP-CD-0001\_SDS, July 2021, BWB)

The LLFA requests further information prior to the determination of the above proposals due to the inadequate proposals to manage the existing surface water flood risk to the site.

#### Surface Water Flood Risk

The Risk of Flooding from Surface Water Map shows that there is two surface water overland flow routes present on the site which have a high to low risk. The surface water flood risk is illustrated in Figure 3.1 within the Flood Risk Assessment (FRA). The FRA identifies that the site lies within an Area of Critical Drainage as identified in the Strategic Flood Risk Assessment (Jacobs, 2018). The FRA concludes that the risk of surface water flooding is significant.

Under Section 4 of the FRA sets out several mitigation measures to address the surface water flood risk, primarily focusing on site levels. The FRA suggests that finished floor levels should be raised, but it does not specify a particular level. Indicative finished floor levels for the catchments shown on drawing X should be provided to ensure that future occupants are not at risk of flooding from existing sources. The FRA also promotes the general principle of not building in topographic low points on the site where it is likely that surface water will collect in a flood event. With reference to the existing surface water overland flow routes, the FRA sets out that 'where possible flow routes through the site should be maintained within a green corridor or as public open space in order to prevent further flood risk to the wider development. Where this is not feasible and localised low points are being built on levels should be profiled to channel pluvial flow through the proposed development into the positive drainage system'. This commentary lacks specific detail regarding the proposed conveyance features and their relative storage capacity to accommodate both surface water runoff from the site and that from offsite sources. The FRA should examine the upstream catchment of the overland surface water flow routes to assess the contributing area to quantify the offsite flows and the additional storage requirements. It would also be beneficial to overlay the development proposals on the Risk of Flooding from Surface Water to identify any areas for concern. In the absence of a suitably detailed assessment of the surface water overland flow routes, it is not possible to conclude that the proposals have adopted a sequential approach to locating development or that flood risk is not increased elsewhere and to future site occupants in line with Paragraph 167 of the NPPF.

#### Groundwater flood risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016), shows the groundwater level in the area of the proposed development to be between half a metre and five metres or greater than five metres. This means that the risk from groundwater flooding in the 1 in 100 year return period ranges from possible flooding to subsurface assets to any flooding being unlikely. The FRA (3.17) details that ground investigations have been completed on site in July 2018. No groundwater was encountered to a depth of 3.6m below ground level. I would highlight that the investigations took place in the summer when generally groundwater levels are in decline. Therefore, if you are minded to approve the above proposals, I would recommend that groundwater monitoring over the winter months takes place to inform the design of the surface water drainage scheme. The reason for this is that infiltration basins should have a minimum of 1m freeboard between the base of the structure and the water table to prevent capacity issues and for management of pollutants.

#### Surface water drainage

A Sustainable Drainage Statement (SDS) has been prepared by the applicant to address the mitigation measures required to manage the increase in surface water runoff as a result of the development proposals. The SDS sets out that surface water runoff will be captured via a combination of gullies and downpipes before being conveyed via a beneath ground pipe network towards each infiltration basin. The method of surface water disposal proposed within in the SDS is infiltration to the underlying geology. To support this approach, the SDS details that two phases of ground investigations which included permeability testing were completed on site, in July 2018 and then in November 2019. The SDS contains the findings of the Phase 2 investigations only. The SDS does summarise the findings of Phase 1

investigations and states that 'permeability was indicated to be medium/low to very low, and the drainage characteristics as good to practically impervious'.

The Phase 2 investigations encountered Beaconsfield Gravel (Sand and Gravel) which was described as comprising orangish brown mix of sandy gravelly clays, gravelly clayey sands and rare gravel bands. The SDS reports that infiltration rates were able to be calculated in three test locations (SA201, SA204 and SA206), however on inspection of the Permeability Test Results (ref. RTR/ZT/NTW2656/191122, 22.11.20219, BWB) it appears that in all cases the results were extrapolated. Extrapolation of infiltration rates is not in line with best practice as set out in the CIRIA SuDS Manual (753) and therefore, I cannot accept the infiltration rate of  $1.90 \times 10^{-6}$ m/s used in the drainage design and it is my view that in this respect the drainage design fails to meet Paragraph 169 of the NPPF. If the applicant wishes to pursue infiltration as a means of surface water disposal then further infiltration rate testing is required and this must be in strict accordance with the BRE Digest 365.

Under Paragraph 169, sustainable drainage systems used on major developments should where possible, provide multifunctional benefits. The proposed surface water drainage strategy comprises of a piped network to a basin. Given the scale of the development, the emphasis on an end of pipe solution is disappointing and does not seek to create blue-green infrastructure. There are some additional SuDS measures, such as a wetland and swales, shown on the Illustrative Masterplan but the surface water drainages scheme fails to consider if the proposed locations are appropriate and how they will be integrated into the wider drainage scheme. For instance, the wetland area is proposed north of Catchment 7 but surface water runoff from this parcel is direct south and so under the current proposals there will be no runoff supplied to the wetland feature so it may not function as intended. There is also reference to inclusion of rain gardens, permeable paving and tree pits but the SDS makes no firm commitment that these measures will be taken forward. The SDS splits the site into seven catchment areas, it is reasonable to expect that within each of those catchments, a high-level assessment of the feasibility of incorporating source control methods (such as permeable paving) are clearly set out. This will ensure that suitable space is allocated to multifunctional SuDS.

The SDS sets out the general principles of the design of the basins, including consideration of maintenance requirements and managing exceedance events. The principles are acceptable and should be carried forward to detailed design.

It is noted that the surface water drainage system will store surface water runoff up to the 1 in 100 plus 40% climate change allowance. There is an additional 10% allowance for urban creep. The SDS highlights that half drain down times exceed the 24 hour limit and so the resilience of the drainage system has been tested with a consecutive 1 in 10 year storm event. These calculations will need to be re-run following the completion of the infiltration rate testing or if an alternative method of surface water disposal is proposed, therefore I have not conducted a detailed review yet.

Please note that the drainage strategy drawing contained in Appendix 9 appears to have some errors and therefore does not display fully.

I look forward to receiving the additional information requested above. I request that the Local Planning Authority consults the LLFA when they are in receipt of this information so that I can review our position in relation to the above proposals.

### **Natural England**

Thank you for your consultation on the above dated 31 August 2021 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### NATURAL ENGLAND'S ADVICE

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

#### WITHIN 5.6 KILOMETRES

Between 500 metres to 5.6km from Burnham Beeches SAC, a Habitats Regulations Assessment is required to determine Likely Significant Effect. Mitigation measures will be necessary to rule out adverse effects on integrity. This should be in line with Adopted Burnham Beeches Avoidance and Mitigation Strategy Supplementary Planning Document (SPD), which requires proposals to;

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

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

Please re-consult Natural England once this information has been obtained.

South Bucks adopted Core Strategy's Core policy 9 Natural Environment states "where a specific development could result in significant effects on the SAC, a Project level (regulation 48) HRA will need to be carried out by the developer when the planning application is submitted to determine whether mitigation measures are required."

When there is sufficient scientific uncertainty about the likely effects of the planning application under consideration, the precautionary principle is applied to fully protect the qualifying features of the European Site designated under the Habitats Directive.

Due to new evidence on the impacts of recreational and urban growth at Burnham Beeches SAC carried out by Footprint Ecology in 2019, Natural England recognises that new housing

within 5.6km of the internationally designated Burnham Beeches Special Area of Conservation (SAC) can be expected to result in an increase in recreation pressure.

The 5.6km zone proposed within the Adopted Avoidance and Mitigation strategy SPD and evidence base carried out by Footprint Ecology represents the core area around the SAC where increases in the number of residential properties will require Habitats Regulations Assessment. Mitigation measures will be necessary to rule out adverse effects on the integrity of the SAC from the cumulative impacts of development.

Impacts to the SAC as a result of increasing recreation pressure are varied and have long been a

concern. These impacts, which have the potential to adversely affect its interest features, include:

- Contamination (e.g. dog fouling, litter, spread of plant pathogens);
- Increased fire risk;
- Trampling/wear (e.g. loss of vegetation, soil compaction, erosion, damage to trees from climbing);
- Harvesting (e.g. fungi, wood);
- Difficulties in managing the site (e.g. maintaining the grazing regime);
- Disturbance (e.g. affecting the distribution of livestock and deer).

In light of the new evidence relating to the recreation impact zone of influence, planning authorities must apply the requirements of Regulation 61 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, to housing development within 5.6km of the SAC boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SAC.

Development in accordance with the adopted South Bucks Core Strategy's Core policy 9 and Adopted Avoidance and Mitigation Strategy SPD would not be likely to have a significant effect on the SAC because they will provide, or make an appropriate contribution to, acceptable avoidance and mitigation measures. The planning authority can grant planning permission to such developments in accordance with the Regulations.

However, development proposals which are not in accordance with the above would be likely to have a significant effect on the SAC, either alone or in combination with other plans and projects. In accordance with Regulation 61, before granting planning permission for such a proposal, the planning authority must undertake an appropriate assessment of the implications of the development on the SAC, in light of the site's conservation objectives. The conservation objectives are to maintain and, where not in favourable condition, to restore, the Atlantic acidophilous beech forest habitat.

Consequently, it is Natural England's view that the planning authority will not be able to ascertain that this proposed development as it is currently submitted would not adversely affect the integrity of the SAC. In combination with other plans and projects, the development would be likely to contribute to a deterioration of the quality of the habitat by reason of increased access to the site including access for general recreation and dog-

walking. There being alternative solutions to the proposal and there being no imperative reasons of overriding public interest to allow the proposal,

### Biodiversity Net Gain

We advise the implementation of the Biodiversity Metric and submission of a plan demonstrating measurable net gains for biodiversity could be applied.

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the Biodiversity Metric 3.0, can be used to measure gains and losses to biodiversity resulting from development. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain. The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain.

### Priority habitats and species

The site coincides with deciduous woodland priority habitat. Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here<sup>1</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

### Ancient woodland, ancient and veteran trees

The site coincides with a stand of ancient woodland. You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

### Protected Species

Natural England has produced standing advice<sup>2</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

If you have any queries relating to the advice in this letter please contact the case officer Ellen Satchwell at [ellen.satchwell@naturalengland.org.uk](mailto:ellen.satchwell@naturalengland.org.uk). For any new consultations or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

### **Forestry Commission**

As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understory (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

It is therefore essential that the ancient woodland identified is considered appropriately to avoid the above impacts.

### **Buckinghamshire Heritage Officer**

My preference would be to have some revisions to give more of a landscape buffer/mitigation between the proposed development and the heritage assets. However I would not sustain a refusal on this basis.

Summary: As the NPPF states, heritage assets are an irreplaceable resource and it is important to conserve them in a manner appropriate to their significance. Further information and/or amendments are therefore required.

#### Heritage assets:

Wilton Park Farmhouse and associated barn – Grade II listed building

Granary at Wilton Farm – Grade II listed building

Stables at Wilton Farm – Grade II listed building

Beaconsfield Old Town Conservation Area

The proposed development is located to the east of Grade II listed buildings at Wilton Park Farm and Beaconsfield Old Town Conservation Area. The proposed development is within the former extent of Wilton Park, a historic parkland that focused on the now demolished Wilton Park House. The former parkland has been extensively altered and only fragments survive.

No designated heritage assets are located within or immediately adjacent to the area. Beaconsfield Old Town Conservation Area is located 95m to the southwest. Listed buildings

at Wilton Park Farm are within the conservation area closest to the site located between 115m and 180m to the west of the site. These buildings are visible from the road but are not public accessible. The listed buildings are all 18C in origin and have been converted to residential use. The setting of the listed buildings comprises garden areas, modern residential buildings to the north and south and agricultural land beyond to the west. There are glimpsed views and limited visibility between the majority of the proposed development site and the listed buildings at Wilton Park Farm.

The significance of the listed buildings at Wilton Park Farm primarily derives their significance from their historic interest as examples of 18th century farm buildings. Adjacent agricultural land enables their origins to be understood and can be considered to make some contribution to their significance; it also adds to the openness of their setting. The proposal would alter the wider setting around the former farm however if appropriate landscape mitigation was put in place, I consider inter-visibility would be limited and the likely harm at the lowest scale of less than substantial harm.

Beaconsfield Old Town Conservation Area is located approximately 100m to the west of the site at its closest point. The conservation area character appraisal identifies Park Lane as a distinct character zone and Wilton Park Farm House as a landmark building close to the road. It also identifies that the roundabout at the southern end of Park Lane was a triangular green in front of the gates to Wilton Park. The lodge survives and Minerva Way follows the line of the historic drive. However this is virtually unrecognisable as the original park entrance with all the modern highway works. The setting of the conservation area to the north, north-west and south-east comprises later built form, with agricultural land to the south-west and north-east between the conservation area and the proposed development site. Only when on the most eastern boundary of the conservation area on Minerva Way, are there glimpsed views of the site. From within the site itself, views to the conservation area are screened by trees. I consider that these views make only a limited contribution to the significance of the conservation area, which is principally defined by the architectural and historic interest of the built form and the settlement layout.

In conclusion, in heritage terms the agricultural land in the central and northern part of the site has a historic function and relationship with Wilton Park Farm however is not directly adjacent to the farm. There is limited potential for potential limited views to the proposed development from the listed buildings at Wilton Park Farm however I would anticipate that this could be mitigated by an acceptable landscaping scheme in order to reduce the level of harm to be at the lower end of the spectrum of less than substantial harm. In regards to Beaconsfield Old Town Conservation Area, inter-visibility is limited to a glimpsed view from Minerva Way at the eastern end of the conservation area. This I consider could be largely mitigated by pulling back the proposed development into the site in order to provide a greater buffer zone and providing a sensitive landscape scheme.

Heritage Policy Assessment: This assessment will be made once the requested additional information/amendments (see below) have been received.

Conclusion: For the reasons given above it is felt that in heritage terms:

The following further information and/or amendments are required before the application can be determined/fully assessed:

- Revised masterplan showing proposed mitigation in order to reduce the likely harmful impacts on the significance of the designated heritage assets. This should also be annotated on the key to the proposals.

#### **Buckinghamshire Archaeology - Condition**

We welcome that the applicant has included a chapter on Archaeology and Built Heritage within the Environmental Statement and has commissioned the archaeological evaluation of the site. The written scheme of investigation for this has been agreed and a site meeting has taken place. Archaeological features and finds have been recorded however they are not sufficiently extensive and/or significant to warrant an objection to this outline application. The archaeology can be appropriately preserved and/or excavated by condition, if granted consent, following the full evaluation report.

Ground works associated with the development may impact on buried archaeological remains. If planning permission is granted for this development then it is likely to harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 205. With reference to the NPPF we therefore recommend that any consent granted for this development should be subject to a staged condition along the following lines:

Prior to the submission of the reserved matters no development shall take place, unless authorised by the local planning authority, until the full findings of the archaeological evaluation have been supplied. This information will inform whether further investigation is warranted and if appropriate, areas that should be preserved in situ and/or excavated. Archaeological remains to be preserved in situ may require further assessment. Prior to the submission of the reserved matters where archaeological remains are to be preserved in situ, no development shall take place in these areas until the applicant, or their agents or successors in title, have provided an appropriate methodology for their preservation in situ which has been submitted by the applicant and approved by the planning authority.

Where archaeological remains are recorded by evaluation and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place in these areas until the applicant, or their agents or successors in title, have secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority.

The archaeological investigation(s) should be undertaken by a professionally qualified archaeologist working to the agreed written scheme of investigation(s) based on our on-line template briefs and will be based on the findings of the evaluation.

#### **Buckinghamshire Environmental Services (Noise) Officer**

The noise and vibration assessment produced by Savills identifies the areas of the development which will require enhanced glazing and/ or alternative means of ventilation. The A355 relief road is expected to increase the noise levels for some parts proposed

development area and will expose some areas to noise levels of up to 71dB LAeq. Though the finalised layout of the development has yet to be proposed, the developer can use the recommendations within the Savills report to determine what levels of mitigation will be necessary. The scheme must ensure the indoor ambient noise levels in living rooms and bedrooms meet the standards in BS 8233:2014 for the appropriate time period. Unless otherwise agreed in writing with the Local Planning Authority it shall be assumed that the existing noise level at the façade of the proposed development is 71dB LAeq16 hour and 66dB LAeq, 8 hour.

Recommendation (with conditions if appropriate):

L07V Sound Insulation - Traffic Noise

A scheme to protect the proposed development from traffic noise from Amersham Road and the A355 relief road shall be implemented before any part of the accommodation hereby approved is occupied, unless the Local Planning Authority otherwise agrees in writing. The scheme shall ensure the indoor ambient noise levels in living rooms and bedrooms meet the standards in BS 8233:2014 for the appropriate time period. Unless otherwise agreed in writing with the Local Planning Authority it shall be assumed that the existing noise level at the façade of the proposed development is 71dB LAeq16 hour and 66dB LAeq, 8 hour. The scheme shall include mechanical ventilation.

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

Construction/Demolition Noise INFORMATIVE

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

#### **Buckinghamshire Environmental Services (Land contamination) Officer**

Site Investigation & Assessment PRA identified a number plausible contaminant linkages that required further investigation. An intrusive investigation was recommended. The intrusive investigation identified marginally elevated concentrations of benzo(a)pyrene at one location in the north of the site with the soil. No other elevated concentrations of contaminants of concern were identified within the soils. The risk to human health was considered to be low. No ground gas monitoring or assessment has been undertaken. The Environmental Consultant has recommended that ground gas monitoring be undertaken to confirm gas protection requirements.

Chapter 8 of the ES states that the intrusive investigation was completed across the site to inform drainage design, the opportunity was taken to take limited soils samples (16 x machine excavated trail pits to a maximum depth of 3.7mbgl) for laboratory testing to allow for a preliminary human health assessment to be undertaken.

The proposed development will have a sensitive end use (residential development, schools and nurseries, children's play areas etc.). I would therefore anticipate further soil sampling being undertaken to provide greater site coverage. As the site has had an agricultural use, laboratory analysis should perhaps include testing for pesticides. I would also anticipate ground gas monitoring being undertaken. This would allow the site to be fully characterised.

Based on this, the following contaminated land condition is recommended on this and any subsequent applications for the site.

The application requires the following condition(s):

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) A site investigation, based on the Phase 1 Geo-Environmental Assessment prepared by BWB Consulting (Report ref. LEB-BWB-ZZ-XX-RP-YE-0001-Ph1), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments.

ii) The site investigation results and the detailed risk assessment (i) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (ii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation

and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 1.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. The applicant should be aware that where a site is affected by contamination issues, responsibility for securing a safe development rests with the developer and/or landowner.

### **Buckinghamshire Minerals and Waste Officer**

The application site lies within the Minerals Safeguarding Area (MSA) identified in the Buckinghamshire Minerals and Waste Local Plan 2016-2036 (BMWLP). Policy 1: Safeguarding Mineral Resources of the BMWLP seeks to prevent the sterilisation of mineral resource within the County and identifies what developments within the MSA need to demonstrate, through a mineral assessment, to prevent the sterilisation of mineral resource. The proposed development does not meet the exemption criteria set out in the plan and the application includes a mineral's assessment (The Mineral Assessment Appendix 8.3 of the Environmental Statement dated July 2021). Whilst the application site sits within a larger area that was identified suitable for development, within previous and withdrawn local development plan, it does not remove the requirement to meet the requirements of Policy 1 in the MWLP.

Upon reviewing the mineral assessment provided the applicant has demonstrated that prior extraction of resource, sterilised through this development, would not be economically viable to extract due to the variability in the resource.

Policy 10: Waste Prevention and Minimisation in New Development requires major development to demonstrate how new developments will support the efficient use and recovery of resource. The Outline Waste Management and Servicing Strategy (Appendix 3.1 of the Environmental Statement dated July 2021, document ref 19514-HYD-XX-XX-REP-Y-5002) was submitted as part of the application evidence. The applicants have demonstrated how the construction would maximise the re-use and recovery of construction materials and meeting the authority's requirement on household and commercial refuse management.

Policy 27: Minimising Land Use Conflict requires sites within 300m of a minerals or waste site to demonstrate that it would not adversely affect the continued operation of the permitted site. The nearest waste site, Beaconsfield Household Recycling Centre, is over 300m away from the site therefore there is no policy conflict with Policy 27. To note, within a 5km radius of the application site there are 2 mineral extraction sites with associated waste operations; Springfield Farm with restoration through non-hazardous landfill and Slade Farm with restoration through inert landfill. Furthermore, there is a landfill site Wapsey's Wood, with a C&D waste recycling operation, that has a site restoration condition by the 31st December 2021.

### **Network Rail**

Whilst the proposal is not adjacent to the existing operational railway – consideration of the proposal impacts upon Beaconsfield Railway Station should form part of the planning process. The council are asked to consider encouraging residents of the dwellings to utilise the station, including walking routes to the station, vehicle or cycle parking. The applicant or council are more than welcome to contact Network Rail to assess how the proposal could include and support more sustainable transport.

### **Thames Valley Police**

As this is an outline application I do not wish to object to the application however the following is provided in response to the documents submitted with this application and to aid the applicant moving forward to reserved matters.

Whilst it is appreciated that the exact layout of the site may be amended, it is good to see the Illustrative Masterplan generally incorporates a back to back layout. This allows the front fascia of the buildings to protect the private space to the rear and could facilitate a good level of surveillance over the public realm (dependant on subsequent floor plans) deterring those intent on crime and anti-social behaviour.

Similarly it is good to see parking 'on plot' or 'on street' is provided however some communal/rear courtyard areas are also proposed and could increase the potential for crime and anti-social behaviour where surveillance and guardianship is diminished. The DAS refers to the inclusion of some under-croft parking for the apartments (p105) which must be robustly secured to replace the absence of natural surveillance.

Under-croft parking can provide shelter from the elements, light and a secluded location which can be a draw to those intent on anti-social behaviour. Parking barns whilst reducing the impact of parked vehicles aesthetically, also reduce the surveillance potential from surrounding dwellings particularly from the first floor due to the roof structure. The reduction in surveillance is not however mitigated by any additional security to the vehicles which are still easily accessible.

From the DAS Section 4.1, apartments are proposed to be located above community and commercial spaces to provide oversight to the public realm. Defensive space and clear separation must be present between the residential facilities and those provided to the commercial units, ensuring their sense of ownership and privacy is not undermined. The ability to achieve this will help promote and maintain a willingness of residents to act as guardians to commercial and community areas. For example, entrance lobbies, bin and cycle stores should be provided for the sole use of residential occupants and should not be a shared facility.

Apartments should include appropriate access controls and visitor entry systems as well as provisions for postal services, removing the need for couriers/postal staff to enter the private residential corridors for through the door deliveries.

Section 4.2 of the DAS (Beeches Gate) refers to pedestrian routes between blocks for connectivity, however

connective routes should not undermine the defensive space of residential communities and impact their sense of ownership. Excessive connectivity could result in under-utilised routes allowing offenders to capitalise moving easily to and from an offence without the risk of detection. Lighting in these locations could be problematic in terms of ensuring adequate, good quality light is present. In general lighting should meet the standards of BS5489:2020 but as a minimum should be lit from above to allow facial recognition this may be hard to achieve without negatively impacting the surrounding plots. Active surveillance from neighbouring dwellings must oversee these areas but again balanced with appropriate defensive space to protect privacy.

The Das includes a section on cycle storage (p117) which suggests covered and accessible cycle parking for apartments. The structure shown will not prevent access to cycles in this location however they will obscure sightlines to them. If cycle storage is to be left accessible then these structures should be visibly permeable and of height and shape that would prevent them being used for any other activity or providing a place to gather.

At this juncture I would like to request and encourage further engagement with Thames Valley Police for all forthcoming planning applications wherever possible. I ask that crime prevention and community safety is a key consideration which is addressed in the future Design Code and subsequent applications. I strongly encourage the applicant to consult the guidance provided by Secured By Design, and use the principles contained within the design guides to inform the proposed development, designing out crime from the outset.

### **Buckinghamshire Strategic Access Officer**

The local rights of way in the northern part of the proposed development is shown in Plan 1.



**Plan 1**

There are additional rights of way and permissive footpath within Beaconsfield which are also of interest in relation to the development and these are highlighted in Plan 2.



## Plan 2

RED – permissive footpath to train station

BLUE – cycleway between Maxwell Road and One Tree Lane

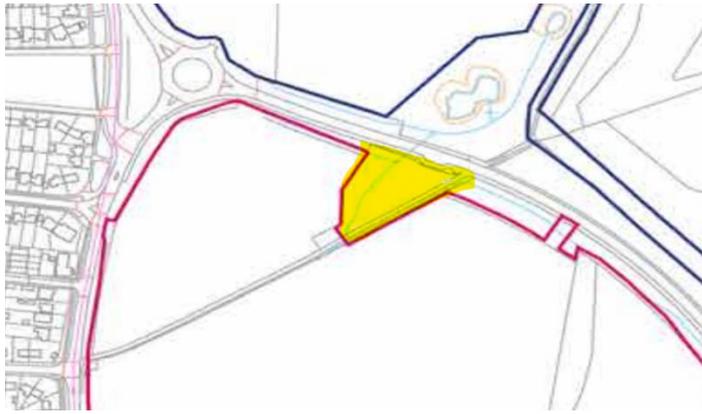
PINK – Footpath BEA/14/1 and adopted highway between Maxwell Road and Hyde Green / Waller Road

GREEN – Footpath BEA/13A/1 between Candlemas Mead to Garvin Ave.

Footpath BEA/15/2 passes through the site between Amersham Road and the Eastern Link Road. The surface was upgraded to a 3m wide bitumen suitable for cyclists and walkers to connect between the aforementioned roads, with onwards links along Ronald Road. The work was completed following the 2017-approved planning application submitted by the council (Photos 1 and 2). While the link road remains unavailable for cyclists and walkers Footpath BEA/15/2 is used only for recreation.

However, in a residential development situation the link will need lighting to provide for winter morning and evening walking and cycling to school and train station, for example, and the barbed wire fence removed to meet safe by design principles (avoiding users feeling hemmed-in) and to promote permeability.

Moreover, the status of the route remains public footpath with permissive cycling, which is unsatisfactory in a residential development situation, with most of the land in control of the applicant. The short final section to the Eastern Link road is owned by the council (yellow shading on Extract 1) for landscape/flood purposes, but could also be upgraded to provide the link to the Eastern Link road cycleway. The route within the development needs to be upgraded to bridleway to allow cycling rights to be guaranteed in perpetuity for new residents, I would suggest using s25 Highways Act 1980. Two conditions are recommended to cover lighting and status upgrade.



**Extract 1**

At the same Eastern Link Road planning application (2016/17) the council sought to upgrade the status of the existing Footpath BEA/13A/1 (GREEN) to allow cyclists to connect to and from the town centre and train station along surrounding quiet streets: Ronald Road, Candlemas Mead and Garvin Avenue. This ultimately stalled due to local objections to the Cycle Track Order and there was no financial resource to take the matter to public inquiry. As a result, although the widths along this short footpath connection (GREEN) are suitable for shared walking and cycling (Photo 1), no formal route is currently provided for cyclists, which breaks the desire-line into the town centre from the proposed development. There is still no resource to take the matter forward, but a general contribution to Beaconsfield cycling schemes, set within a s106 Agreement, could cover legal expenses and surface widening to 3m bitumen.

The application suggests a likely cycle route (GREEN-DASHED LINES) along Waller Road and Hyde Green which also forms part of Footpath BEA/14/1 (PINK on Plan 2).



My understanding of the PINK section (Footpath BEA/13/1), along Waller Road and Hyde End, connecting with Maxwell Road, is that this is entirely public vehicular highway and the existence of footpath rights has been superseded by the vehicular highway rights. As such, it is for the council to delete the footpath as there is currently a duplication of rights which may be confusing for the public. The footpath's adoption as vehicular highway is likely to have taken place when this residential part of Beaconsfield was originally developed. Nevertheless, any comments on the suitability of this route is for Highways Development Management to comment upon.

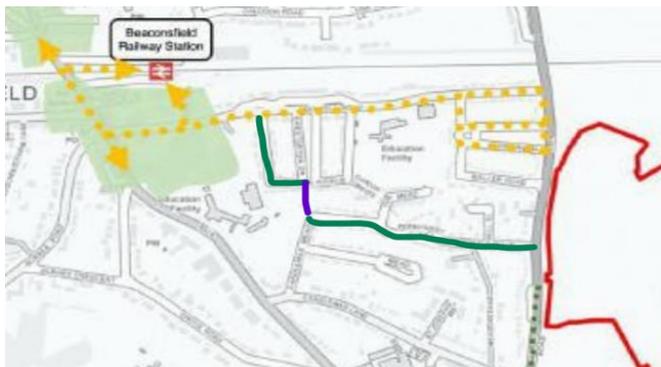
The existing cycleway (BLUE on Plan 2) between Maxwell Road and One Tree Lane would facilitate access from the new development to the residential area north of the railway line. This route has been completed by the council, with the footpath upgrade to cyclway and the

surface has already been improved. The route seems likely to be attractive for walking from the development to the train station via the permissive route highlighted RED. Nevertheless, the cycling improvements sought by Highways Development Management along Maxwell Road will compliment this existing route and are supported.

The application also suggests a likely cycle route (GREEN-DASHED LINES on Extract 2) along Ronald Road which links onto Candlemas Mead and Candlemas Road from the existing cycling provision along Footpath BEA/15/1 within the development. I have annotated this green and blue onto the suggested 'Key Movement Corridor A' plan in Extract 2 for comparison.



**Extract 2**



**Extract 3**

With cycling access encouraged from the Green gateway in this westerly direction, there is an increased need to upgrade the route of Footpath BEA/13A/1 to cycleway between Candlemas Mead and Garvin Ave. This would assist new residents to cycle to the town centre and train station along a more direct route than travelling south towards Candlemas Lane via Candlemas Mead from Ronald Road. The likely cost to upgrade the status would be around £15,000 and I suggest this is included within the s.106 Agreement for this application; with the existing bitumen footway surface widened to 3m for shared use along the 55m length. I would estimate this to be an additional £12,000.

There seems to be an opportunity to develop the off-site cycling network more widely in Beaconsfield that would support the sustainability of the development beyond simply the priority routes A and B. This is almost exclusively within the vehicular highway network and I would support any wider, off-site cycling contribution, set within a s.106 Agreement, which compliments the existing rights of way network and assists new residents integrating into

Beaconsfield by means of walking and cycling. I would support any such contribution, but this will be a matter for Highways Development Management.

With regard to onsite improvements on the rights of way network (lighting and status upgrade of Footpath BEA/15/1), I believe this forms part of the 'access' to be considered at this stage, so two conditions are recommended.

#### Condition

Prior to first occupation, the applicant shall dedicate a public bridleway under s25 Highways Act 1980 along the existing alignment of Footpath BEA/15/1 within the applicant's control east of Amersham Road A355.

#### Reason

In order to connect new residents with the existing quiet lane network suitable for cycling in the network of quiet streets surrounding Ronald Road; to provide certainty to new residents that cycling rights are provided in perpetuity; and to comply with guidance in the National Planning Policy Framework and Local Plan Policy CP7.

#### Condition

Prior to first occupation, a scheme for the provision of street lighting and fence replacement along the existing alignment of BEA/15/1 shall be submitted and approved in writing by the LPA. The scheme shall be implemented prior to the 50th dwelling being occupied.

#### Reason

In order to support walking and cycling use after dark and to comply with guidance in the National Planning Policy Framework and Local Plan Policy CP7.

#### **Buckinghamshire Education Officer**

I have considered the details of the above application for 450 homes and can confirm that we would require a financial contribution to expand existing primary and secondary school provision to accommodate the above development.

Primary schools in the town are currently at capacity. To accommodate the above development, the Council would seek to expand existing provision. The Council is however mindful that the site originally formed part of a draft allocation within the submission version of the Chiltern and South Bucks Local Plan 2036 (now withdrawn). The draft allocation was for a residential-led mixed-use development of approximately 1,600 dwellings; A development of this scale will clearly have more significant capacity implications and as such the application acknowledges that while 450 homes will not generate the need to provide a new school, land is being reserved to ensure that if required, there is sufficient education provision to meet the needs of the site and any future housing development proposals.

Secondary schools are currently at 5% surplus capacity – although much of the surplus is concentrated in the older year groups. The Council is currently developing plans to expand existing secondary provision to accommodate projected increased demand in the planning area.

I have included the education infrastructure costs per dwelling type to allow an assessment to be made of the scale of contributions required on the scheme in accordance with Council adopted S106 guidance:

Provision

Provision Type	Flats			Houses			
	1 Bed	2 Bed	3+ Bed	1 Bed	2 Bed	3 Bed	4+ Bed
Primary	£403	£1,298	£2,640	£1,715	£3,296	£5,787	£6,965
Secondary	£363	£1,112	£3,404	£1,884	£3,381	£7,489	£9,894

**Buckinghamshire**

**Landscape Officer**

Key urban design and landscape issues for the high-level development proposal in front of us are as follows. Other matters are likely to come to light at a more detailed design stage.

Urban Design

The proposal is for up to 500 dwellings according to the Environmental Statement (ES), though 450 is stated in the Design & Access Statement (DAS). This exceeds the site's capacity (stated in District Landscape Capacity Assessment for Site 9B) by 20%. The capacity statement identifies a desirable average 30dph and up to 415 homes, while the applicant's Density Parameter Plan indicates substantial areas of 'up to 35-45dph', peaking at 'up to 70 dph', with less than 20% of the site at 'up to 30dph'. The higher numbers and densities are facilitated by moving strategic open space (sports pitches) outside of Area 9B, beyond the new link road into the surrounding countryside, contrary to the Landscape Capacity Assessment.

The lowest density of development is not located towards Minerva Way, as recommended in the capacity assessment, which is more likely to result in adverse landscape and visual impacts from denser forms of built development upon Minerva Way.

There are significant numbers/areas of 2.5 and 3 storey buildings throughout the scheme, to an extent that seems excessive for this edge of urban area / landscape transition location. This is likely to lead to poor placemaking and a poor relationship to the adjoining residential areas and open countryside. Exceptions can be made for the local centre, some gateway locations and some of the spine route to aid legibility by emphasising these locations as focal points for this new neighbourhood.

Care is needed with the 'signature frontage' adjoining the northern roundabout. The illustrative concept masterplan indicates a 'wall of buildings', whereas something more visually permeable would be less imposing and draw in the eye to give depth to the new urban landscape. For example, this could be 'best quality' buildings fronting a linear park

that leads the eye inwards. Tall buildings fronting the road in this location are unlikely to be an appropriate design response.

Is the local centre in the right location? It is as far away as possible from the existing built-up area and will discourage walking to it; it also lies adjacent to the countryside. The western gateway adjoining the Amersham Road feels like a more appropriate location unless residential development in other parts of Area 9 is forthcoming.

There is a heavy bias towards large private homes and small affordable homes. 70% of affordable homes are 1 and 2 bed, while 80% of private homes are 3 and 4 bed (from DAS). A more balanced approach is needed.

### Access

Three vehicular access points onto the new link road seems excessive - two should be sufficient.

### Landscape

The proposed sports pitches extend outside area 9B, while key landscape buffers are not delivered at the site's southern boundary, as set out in capacity assessment for Area 9B (in Figure 3.2). Instead the layout and LVIA propose tree and hedge planting as a setting to Minerva Way, suggesting views will be truncated. This is not acceptable as it is at odds with the principle of landscape mitigation for Minerva Way by retaining an open green landscape setting. This might be achieved by locating the sports pitches along the southern boundary of Area 9B.

For reference, the consented development for Area 9C 'Beeches Park' (formerly Wilton Park) has adopted a layout that removes existing development from adjacent to Minerva way and consolidates most new built development further east, to which Minerva Way leads. As a result, this maximises the open landscape setting to the central and western parts of Minerva Way, which maintains a strong landscape link between Wilton Park Farm and the countryside to the east/northeast of it. An open landscape setting to the southern portion of Area 9B is key to maintaining this openness and the strong landscape infrastructure surrounding Minerva Way and Wilton Park Farm. The capacity study for Area 9 also proposes opening up existing planting to the southern side of Minerva Way for the same purpose.

There is a weak/inappropriate landscape edge to the new A355 link road, with intrusive 3-storey buildings, formal tree avenues and minimal soft landscape buffers, contrary to the indicative development framework in the capacity assessment. Much stronger and naturalistic landscape infrastructure is needed along this edge as a buffer to the adjacent open landscape, to be punctuated only by key buildings framing site entrances. Attractive building frontages with modest setbacks and hedgerows is not sufficient (as indicated in the DAS).

The location of a formal park adjacent to / incorporating the existing woodland (a 'woodland park' according to the DAS) is likely to give rise to conflict between amenity/recreation and biodiversity. The two should be reconsidered and preferably separated.

### Drainage

Chapter 3 of the ES suggests the principal approach to surface water drainage will be infiltration basins. A much more comprehensive approach is needed, beginning with on-plot / at source SuDS elements, such as permeable pavements, swales and rain gardens. A 'pipe-and-bomb-hole' approach to SuDS will not be accepted due to the impact this has on the extent and quality of green open space; it is considered the poorest form of SuDS. The provision of water butts is noted but these are easily value-engineered out at a later stage.

### **Buckinghamshire Trees Officer**

An Area designated Tree Preservation Order known as No.6, 1973 (W3 and G10 and T37 in submitted AIA) is within the proposed development site as well as Ancient Woodland on the southern east corner of the site (by proposed playing fields). I'm aware looking at documents submitted for this application that the FC have already been consulted as required by standing advice. It would appear the majority of trees within the site are situated along hedgerow boundaries as well as planted shelter belts.

The submitted DAS outlines on page 32 that two veteran trees with some veteran characteristic trees are going to be retained with the majority of trees being classified as category B under BS 5837 guidance with one tree being recorded as category A. Also smaller trees have been recorded as category C. Page 38 outlines existing woodland and vegetation are to be retained and enhanced where possible as defined on the GI network illustrated on page 49 & 59. Further information on the proposed GI is on page 96-101 with civic spaces on pages 102-103. Overall framework plan can be found on page 132 of the submitted DAS which was prepared by Thrive in 2019/20 which according to the DAS 'had not fully addressed key issues such as arboriculture and Savills design team had then sought to address place making by looking at different approaches to a central park form and east west routes through the site'.

I have reviewed Barton Hyett Associates Arboricultural Consultants AIA (July 2021) which is to a high standard and in accordance with BS 5837 guidance. Section 3 of this report covers tree retention/removal and T22 & T37 being veteran trees mentioned in the DAS. I agree with paragraphs 5.12-5.14. I agree with the summary described in chapter 8 and conclusion in paragraphs 8.3 & 8.4.

### **Buckinghamshire Climate Response Officer**

The following comments have been prepared by the Climate Response team, starting with Chapter 16, and then turning to Appendix 16.1 of the Environmental Statement.

### Chapter 16: Climate Change

The following comments highlight serious concerns with the content of the climate change assessment detailed in Chapter 16 of the Environmental Statement.

The assessment lays out the methodology, legislative context clearly and relevant guidance clearly.

The assessment of baseline conditions assumes zero emissions. Given that the assessment area is recognised as “greenfield and farmland with no operational buildings or livestock”<sup>1</sup> this seems questionable. Firstly, the assessment area would be expected to act as a carbon sink under the “do nothing” scenario; the vegetation and plant life would likely have negative emissions over the assessment period. Secondly, as a carbon sink over many years the assessment area is highly likely to have significant naturally embedded carbon locked up in biomass and the natural environment which would presumably be at risk of emission to atmosphere if the proposed scheme went ahead. Neither of these two critical points have been recognised or assessed within the baseline scenario. This fundamentally undermines the “worst-case assessment of net emissions” which forms the basis for all subsequent comparisons within this chapter. On this basis alone the work within this chapter and its conclusions appears flawed and should be rejected as having failed to accurately assess the climate change impact of the proposed development.

The “Significance Matrix” presented in Table 16.4 must also be assessed as completely inadequate. A matrix with over 25 cells has been split into only two possible results “Significant” and “Non-significant”. This is highly problematic. Firstly, it represents an inappropriate simplification of a complex problem, a 5x5 matrix should have a far higher level of granularity with a greater range of possible assessment results to reflect the highly diverse range of possible outcomes. It is totally unreasonable that a “Substantial” magnitude outcome with a “Very High” likelihood is assessed as having the same significance as a “Minor” magnitude outcome with a “High” likelihood, this matrix is totally unfit for purpose and again fatally undermines the conclusions subsequently drawn within this chapter.

Tables 16.15, 16.17 and the associated analysis, which attempt to contextualise the emissions associated with the construction and the operational phases of the development respectively, are highly problematic. The emissions are set against the carbon budgets for, variously, the Buckinghamshire Council area, the South East and the entire UK Carbon Budget. This is an inappropriate mechanism to use for the following reasons. Firstly, there is no clear guidance available upon how to allocate the UK Carbon Budget, or at least none has been presented. Secondly, although one housing development may represent a “small” contribution to the use of the carbon budget for the UK, such a logic if applied to all planning applications would prove fatal to any attempt to reach net zero and use the UK’s carbon budget wisely. By such a logic, there would be no case for any individual to make a change such as taking the bus instead of driving to work. This assessment methodology is flawed and should be rejected.

In conclusion, the climate change assessment does not assess the baseline properly, uses a significance matrix with an inappropriate lack of granularity and uses an inappropriate contextualisation to justify the emissions. It does not adequately assess the climate change impact of the new development.

#### Appendix 16.1: Energy & Sustainability Statement

The classification of heat pumps as “Low carbon” rather than zero carbon or renewable is questionable. Renewable energy can be defined as using energy from natural resources that

are replenished within a short number of years<sup>2</sup>. Whereas a gas boiler converts heat energy from a fossil fuel to heat energy through combustion, clearly not replenished within a human lifetime, a heat pump transfers heat energy from ambient (air, water or ground) into the property to be heated using refrigerant. The ambient energy is replenished, in effect, almost immediately and therefore this technology could reasonably be classified as renewable. The argument about grid carbon intensity is reasonable, however this could be overcome by consumers utilising a renewable energy tariff. The justification for classifying heat pumps as “low carbon” rather than renewable appears incomplete. It would seem more appropriate for these measures to be assessed within the “Be Green” than the “Be Clean” section.

The previous comment notwithstanding, the document demonstrates a sound technical understanding of the options available for carbon reduction and seeks to apply these logically following the energy hierarchy. A plausible scheme to allow the development to reduce emissions by 85% below the Part L compliant baseline emissions has been put forward and represents an ambitious approach to minimising emissions from the new development’s operational phase.

#### Concluding Remarks

While the Energy & Sustainability statement appears ambitious and sound, applying the energy hierarchy to reduce emissions significantly below the Part L compliant baseline, the same cannot be said for the climate change chapter. The baseline is incorrectly assessed, failing to account for the carbon sink effects and negative emissions that would be expected from green belt land. The significance matrix is deeply flawed with a lack of appropriate granularity. It is the Climate Response team’s view that the climate change chapter fails to adequately assess the impacts of the proposed development.

#### **Thames Water**

##### Waste Comments

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

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. “The development shall not be occupied until confirmation has been provided that either:- 1. All wastewater network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.” Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition

by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.

#### Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

#### **Sport England**

##### Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities> .

This application falls within the scope of the above guidance as it relates to major residential development of 300 dwellings or more; and the creation of new playing fields.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport> .

#### The Proposal and Assessment against Sport England's Objectives and the NPPF

Sport England notes that the proposal as defined by the red line boundary seeks to provide a primary school with playing field. Sport England would ask that a community use agreement is put in place to enable the community; clubs and groups to use these pitches on a secure basis.

There is a free online resource from Sport England (Use Our School) that offers further guidance and information for local authorities and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here; [www.sportengland.org/useourschool](http://www.sportengland.org/useourschool).

Outside the red line boundary, the illustrative masterplan shows an area of playing field in the south east of the site which is approximately 1.76ha and is marked out with a configuration of 3no. football pitches of varying sizes. Sport England is not clear about the evidence of need or demand which has informed the proposed provision, notwithstanding that it is illustrative at this stage.

Sport England considers that the area of playing field is cut-off from the rest of the development by a main road and accessibility would be an issue. Indicatively, access would be provided by a toucan crossing shown on the illustrative masterplan. The masterplan doesn't indicate that there would be any ancillary provision in the form of car parking and/or changing/pavilion/clubhouse facilities to serve the proposed playing pitches, nor is there any indication of vehicular access arrangements.

Sport England notes that the land outside the red line boundary to be used as playing field/pitches would be secured through a S106 agreement as set out in the planning statement. We further note that the agent considers the proposed sports pitches do not require planning permission, hence why they are outside the red line boundary. However, we have raised concerns about the lack of ancillary provision which would support accessibility to these pitches. Such ancillary provision would require planning permission.

Noting the land to be used for playing field/sports pitches is agricultural land, we would expect a ground conditions assessment to be carried out of the proposed playing field land area by a specialist sports turf contractor/agronomist. This should be carried out in accordance with our natural turf for sport guidance (2011).

Further, it will be important that any natural turf pitches are designed and constructed in accordance with our natural turf for sport (2011) guidance, in relation to compliance with recommended gradients and orientations. Pitches should be sized in accordance with the national governing body's recommended size guidelines, including making allowances for run/off areas around the perimeter of pitches.

Sport England has consulted the national governing bodies for sport to gather their views on the opportunities; priorities and issues for their sports and we have received the following comments.

England Hockey comments that there are two hockey clubs within close proximity to the proposed development. These are:

- Amersham & Chalfont HC – Amersham – approx. 5 miles from the proposed development; and

- High Wycombe HC – High Wycombe - approx. 7 miles from the proposed development.

There is no hockey club within Beaconsfield (Gerrads Cross HC merged with Amersham & Chalfont HC in 2020) and the two clubs listed above would be able to service the additional population, both clubs have ambitious facility plans and would be able to provide suitable projects for offsite contributions to support the additional hockey demand from the development.

The RFU comments that there is one Rugby club in close proximity to the proposed development. Beaconsfield RFC is 0.9 miles and 4 mins from the proposed development site. There is no need to develop a new Rugby pitch or club at the above site as BRFC would be able to service the additional population, the club has ambitious facility plans and would be able to provide suitable projects for offsite contributions to support the additional Rugby footfall from the development.

The LTA comment that there is good local tennis facility provision at Beaconsfield Tennis Centre very near to the proposed development, however there are currently no community pay and play tennis facilities in the town or within a 10 minute drive time of the proposed development. The LTA comments that their insight shows estimated penetration of 701 individuals being likely to use a pay and play tennis facility at this site. This is excluding population growth from the new housing. Any tennis provision as part of this development should therefore follow a pay and play model to provide a lower price point opportunity, with consideration of how the courts would be sustainably operated (we can support with this process).

### Conclusion

Sport England has concerns about the proposed approach given the lack of supporting evidence which suggests the pitches are needed or would meet an identifiable demand; the proposed location of these pitches; their lack of accessibility to the new community; and the lack of ancillary provision. We would consider that a better approach would be to make an off-site contribution to enhance existing sports facilities in the area which could better meet the demand for sport arising from the new community.

Given our concerns, Sport England considers that further work is needed to demonstrate that the proposal would meet our objective 3 - To provide new opportunities to meet the needs of current and future generations. Therefore, Sport England objects to this application in principle.

However, if the council is minded to approve the application against Sport England's objection, we would ask that the following planning conditions are imposed:

- 1 No development of playing field land shall take place unless and until:
  - a. A detailed assessment of ground conditions of the land proposed for the new playing field land as shown on the open space typology plan and the new playing field land which is ancillary to the proposed primary school is undertaken (including drainage and topography) to identify constraints which could affect playing field quality; and

- b. Based on the results of this assessment to be carried out pursuant to (a) above of this condition, a detailed scheme to ensure that the playing fields will be provided to an acceptable quality (including appropriate drainage where necessary) shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England.

The works shall be carried out in accordance with the approved scheme within a timescale to be first approved in writing by the Local Planning Authority after consultation with Sport England.

Reason: To ensure that site surveys are undertaken for new or replacement playing fields and that any ground condition constraints can be and are mitigated to ensure provision of an adequate quality playing field and to accord with LP Policy \*\*

2. The playing field land shall be used for Outdoor Sport and for no other purpose (including without limitation any other purpose in Class D2 Use Classes Order 2005, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Reason: To protect the playing field from loss and/or damage, to maintain the quality of and secure the safe use of sports pitch/es and to accord with LP Policy \*\*.

3. The playing field/s and pitch/es shall be constructed and laid out in accordance with the standards and methodologies set out in the guidance note "Natural Turf for Sport" (Sport England, 2011), and shall be made available for use before first occupation [or other specified timeframe] of the development [or specified part of the development/] hereby permitted.

Reason: To ensure the quality of pitches is satisfactory and they are available for use before development (or agreed timescale) and to accord with LP Policy \*\*.

4. Prior to the bringing into use of the sports pitches a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the sports pitches.

Reason: To ensure that new facilities are capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport (National Planning Policy Framework (NPPF) para 97) and to accord with LP Policy \*\*

5. Prior to first use of the primary school a community use scheme must be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The scheme shall apply to the playing field and shall include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities, a mechanism for review and a programme for implementation. The approved scheme shall be implemented upon the start of use of the development and shall be complied with for the duration of the use of the development.

Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with LP Policy \*\*.

If you wish to amend the wording of the recommended condition(s), or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport

England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

#### OTHER REPRESENTATIONS:

Representations include 515 objections and one letter in support. Over 90% of these cited objection on Green Belt grounds amongst other concerns.

The grounds of objection are summarised below:

#### **Green Belt**

- Loss of Green Belt
- Inappropriate development in the Green Belt
- Contrary to purposes of Green Belt
- Inadequate case for Very Special Circumstances demonstrated
- Should develop brownfield and convert office buildings to residential in preference

#### **Highways/traffic congestion**

- Traffic congestion
- Already highly congested roads
- Increased risk of traffic accidents
- Objection to access arrangements

#### **Infrastructure / local services**

- Strain on local infrastructure and services
- Inadequate provision for infrastructure and local services
- Overly dense development that will put unacceptable strain on Beaconsfield infrastructure and services

#### **Amenity / pollution**

- Impact on amenity value of undeveloped area
- Impact on ability to walk, cycle, walk dogs
- Increase in air pollution
- Increase in noise pollution

#### **Biodiversity/ecology/environment**

- Detrimental impact on local wildlife, biodiversity, trees, flora and fauna
- Harm to Burnham Beeches
- Increased carbon footprint
- Inadequate provision for renewal energy
- Land should be kept undeveloped for carbon capture
- Contribute to flooding

**Design/character/ landscape**

- Out of character with landscape
- Out of character with historic townscape
- Impact on openness and views

**Affordable housing**

- Affordable housing not adequately provided for
- No viability appraisal provided