



Report to Strategic Sites Planning Committee

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| Application Number: | PL/21/3151/OA |
| Proposal: | Outline application for the erection of residential dwellings including affordable housing (Use Class C3), new vehicular access points off Amersham Road and the Eastern Relief Road, a local centre including a community building (Use Classes E(a)(b)(c)(d)(e), F1(d)(e), F2(a)(b) and C3), a primary school and pre-school (Use Classes E(f) and F1(a)), public open space and associated infrastructure (matter to be considered at this stage: access) |
| Site location: | Land adjacent to Amersham Road and Minerva Way, Beaconsfield |
| Applicant: | The Portman Estate |
| Case Officer: | John Fannon |
| Ward affected: | Gerrards Cross |
| Parish-Town Council: | Beaconsfield Town Council |
| Valid date: | 9 August 2021 |
| Determination date: | 29 November 2021 |
| Recommendation: | Delegate the application to the Director of Planning and Environment to refuse permission . |

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The application seeks Outline planning permission, with all matters reserved except for means of access, for a residential-led development scheme. The proposals include 450 dwellings, a local centre with a mix of uses including retail and community use, land reserved for a 2-form entry primary school and associated open space and landscaping.
- 1.2 The site is approximately 24 ha in area and in agricultural use. It is located to the east of the built-up area of Beaconsfield, just beyond the A355 Amersham Road. To the north and east of the site is the recently constructed Eastern Relief Road (ERR), with Minerva Way to the south.

- 1.3 Councillors Wheelhouse and Ng have requested that the application be considered by committee for the reason that it warrants discussion by planning committee.
- 1.4 The proposed development would constitute 'inappropriate development' in the Green Belt. It would result in the loss of 24 ha of agricultural land and a significant scale of urbanising development that will encroach into the open countryside. Given the open character of the agricultural fields and the existing mature tree belts and woodland it is considered that the development would result in substantial spatial and visual harm to the openness of the Green Belt. It would also conflict with four out of the five purposes of including land in the Green Belt. Overall, the harm to the Green Belt will be very substantial.
- 1.5 Paragraph 147 of the National Planning Policy Framework ('the NPPF') states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. Paragraph 148 confirms that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. It goes on to state that '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.
- 1.6 The layout of the development represents poor design quality. Development located to the south of the site in particular, results in harm to the landscape character of the area and to the setting of heritage assets. The local centre is poorly located discouraging walking to it. The proposals for the retail and community uses are based on the withdrawn Local Plan proposed site allocation for a much larger development of 1,600 homes. This is not an appropriate nor rational basis for facilities to support 450 homes and evidences an inherently unsustainable development proposal. The housing number exceeds the site's capacity and the extent of building above 2 storeys is considered excessive for this location.
- 1.7 The supporting transport assessment is inadequate and it is therefore considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network and will not achieve safe and suitable access. The proposed development fails to make adequate provision to allow accessibility to the site by non-car modes of travel.
- 1.8 The assessment of the development on ecology is deficient and lacks necessary information on protected species. It has not been demonstrated that the proposed development would not have an unacceptable impact on the natural environment. Necessary mitigation of impact on the Burnham Beeches SAC has not been secured and in the absence of this the development would be harmful.
- 1.9 Other harm includes: the less than substantial harm to the setting of heritage assets; an unacceptable impact on greenhouse gas emissions contributing to climate change; loss of BMV agricultural land; air quality; flood risk, and, the

absence of a legal agreement and a mechanism to secure the provision of affordable housing.

- 1.10 The applicant has put forward a case for 'very special circumstances' (or benefits of the proposal) to outweigh the harm to the Green Belt and other harm. The proposed benefits include housing delivery where the Council cannot demonstrate a 5 years' supply of housing land. The housing would include 40% affordable homes and provision for self-build and custom build homes. It is considered that the delivery and type of housing are benefits of the proposals.
- 1.11 The scheme will deliver some other benefits including local facilities and open space. The benefits are limited and that only limited weight can be afforded in the planning balance. Providing infrastructure to meet its own needs and compliance with sustainability and planning policies against which all applications for development are assessed as part of the decision-making process, is not considered to be a significant benefit. The benefits are limited and tempered by this to the extent that only limited weight can be afforded for the planning balance.
- 1.12 The applicants' case relies heavily on the site's proposed allocation within the withdrawn 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 should be considered acceptable. However, the Draft Chiltern and South Bucks Local Plan 2036 was never examined as it was withdrawn. Therefore, the policies contained within it hold no material weight in planning decision-making. Notwithstanding this, the application site covers a much smaller area than the draft site allocation SP BP9; the Draft Local Plan intended that this site 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.
- 1.13 The proposal will lead to significant harm such as the loss of openness, encroachment into the countryside and significant permanent built development in the Green Belt which will also adversely affect the character of the area. The impact on the environment is substantially negative. Overall, notwithstanding the benefits of the scheme taken together, it is considered that the benefits do not "clearly outweigh" the harms. The applicant has not demonstrated 'very special circumstances' that are required to justify inappropriate development in the Green Belt for the purposes of planning policy.
- 1.14 It is considered that the conflict with Green Belt policy provides a "clear reason for refusing" the development proposal. It is concluded that the proposals represent unsustainable development and overall are in conflict with the development plan. It is recommended that permission be refused for the reasons set out.
- 1.15 **Recommendation:** Delegate the application to the Director of Planning and Environment to **refuse permission**.

2.0 Description of Proposed Development

Site and context

- 2.1 The site is located to the east of the built-up area of Beaconsfield, along the A355 Amersham Road, approximately 1.5 km from the town centre and 0.5km from Beaconsfield old town. To the west of the site is the Amersham Road (A335) and allotments, to the north and east is the recently constructed Eastern Relief Road (ERR), and to the south is Minerva Way.
- 2.2 The site is approximately 24 ha in area and in agricultural use comprising three fields with trees including mature trees at the boundaries. A network of woodland runs through the centre of the southern section of the site connecting to Minerva Way along the southern boundary. A public right of way (PROW) (BM.BEA.15/2) crosses the northern section of the site running from west / south west to east / northeast connecting Amersham Road with: 1) Seer Green through Beaconsfield Golf club (BM.BEA.15/1); and, with another PROW (BM.BEA.16/1) which lies along the far eastern border of the site continuing north underneath the railway line.
- 2.3 An area-designated Tree Preservation Order (No.6, 1973) is within the proposed development site as well as Ancient Woodland to the south eastern corner of the site (by the proposed playing pitches).
- 2.4 An area of land to the east of the ERR comprising 1.6 ha is proposed to be utilised for playing pitches. This land is outside the application redline boundary but within the applicant's control.
- 2.5 The site is within the Green Belt. To the north there are agricultural fields and the railway. To the east there is Beaconsfield Golf Club and woodland. To the south is Beaconsfield Cricket Club. To the south east there is Wilton Park (a former Ministry of Defence site that is currently being redeveloped for housing). To the south west there are allotments and to the north west is the Amersham Road and the built-up area of Beaconsfield which fronts onto it.
- 2.6 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.
- 2.7 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. Beyond the southern boundary of the site is the A40 which runs in an east/west alignment and provides access to the M40 motorway and this motorway provides for strategic connections to the M25. 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.

Proposed development

2.8 The application seeks Outline planning permission, with all matters reserved except for 'Means of Access'.

2.9 The description of development is:

“Outline application for the erection of residential dwellings including affordable housing (Use Class C3), new vehicular access points off Amersham Road and the Eastern Relief Road, a local centre including a community building (Use Classes E(a)(b)(c)(d)(e), F1(d)(e), F2(a)(b) and C3), a primary school and pre-school (Use Classes E(f) and F1(a)), public open space and associated infrastructure (matter to be considered at this stage: access)”

2.10 The proposed development will include the following:

- Up to 450 residential dwellings (Class C3);
- Up to 1,000m² of retail related use Class E(a), E(b) and F2(a);
- Up to 1,050m² of community use Class E(d), E(e), F1(d) and F2(b);
- Land for a 2FE primary school
- New vehicular accesses off Amersham Road (1 x access) and the Eastern Relief Road (3 x accesses);
- Retention of the existing PROW and additional pedestrian and cycle routes through the site;
- Open space, formal areas of play and associated facilities and amenity space, including, landscaping, green infrastructure and sustainable drainage systems;
- Car and cycle parking; and
- Landscaping works.

2.11 The non-residential element, which is a proposed Local Centre, will include small scale retail of up to 1,000m² and up to 1,050m² for community uses, as part of the mixed use within the Local Centre located towards the southwest of the site.

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| Total dwellings | | 450 houses |
| | Market housing: | 248 |
| | Social, Affordable or Intermediate Rent | 90 |
| | Affordable home ownership: | 45 |
| | Starter homes: | 45 |
| | Self-build and Custom-build: | 22 |
| Other uses | | 4,550 sq m |
| | Community E(d), E(e), F1(e) and F2(a) | 1,050 sq m |
| | Retail E(a), E(b), E(c) and F2(a) | 1,000 sq m |
| | Education E(f) and F1(a) | 2,500 sq m |

2.12 The proposals include Parameter Plans for approval which set out the key components of the development:

- Land Use – the location of residential and a local centre, primary schools and open space
- Building heights – building height vary in three categories: up to 2, 2.5 and up to 3 storeys
- Movement and access – location of a network of streets, vehicle, cycle and pedestrian routes

- Green & Blue Infrastructure – public open space, play and sports, woodland and attenuation
- Building Density – identifies a mix across the site in six categories from, up to 30 dph to up to 70 dph.

2.13 The development proposal is accompanied by an Environmental Statement (ES). The ES provides an overview of the likely environmental impact of the proposals and assesses “likely significant effects” with a summary of mitigation measures proposed and contains a methodology for assessing the significance of the environmental effects and the cumulative impact. A series of technical chapters within the ES consider the range of environmental factors. The ES contains the following chapters addressing each of the following topics:

- Socio economic
- Ground conditions
- Archaeology and Built Heritage
- Water and environment
- Traffic and Transport
- Noise and Vibration
- Air Quality
- Ecology
- Landscape and visual
- Climate change

Community Engagement and Public Consultation

2.14 The applicant cites consultation and engagement undertaken as part of the CSB Local Plan (now withdrawn) process. No pre-application engagement was undertaken in respect of the application proposals.

3.0 Relevant Planning History

- 3.1 No planning applications have been submitted on the site since 1st January 2000.
- 3.2 The Eastern Relief Road (ERR) was approved in January 2017 (16/02283/CC) and has been constructed to where it meets the Wilton park boundary. A further approval was issued in July 2017 (17/00938/CC) on the basis of additional material.
- 3.3 Wilton Park (the former Ministry of Defence site) to the southeast of the site is as an ‘Opportunity Site’ in the adopted Core Strategy (Core Policy 14) and has outline planning permission to be redeveloped for 304 dwellings (17/01763/OUT) that was granted in 2019. Reserved Matters consent has been granted for 147 dwellings (PL/20/1718/DE).

- 3.4 The Wilton Park approval from 2019 is subject to a Section 106 Planning Agreement which prevents occupation from the 99th dwelling until the southern section of the ERR is delivered.

4.0 Summary of Representations

- 4.1 The application was subject to the relevant consultation, notification and publicity.
- 4.2 Over 500 individual letters of objection from the local community and letters from other bodies have been received. One letter of support has also been received. Appendix A of the Committee Report provides a summary of these representations.
- 4.3 All representations received from statutory consultees, non-statutory consultees and other interested individuals, groups and organisations are also set out in Appendix A of the Committee Report.

5.0 Policy Considerations and Evaluation

The adopted development plan comprises the saved policies of the South Bucks District Local Plan (adopted 1999, consolidated 2007 and 2011), South Bucks Core Strategy (2011), Buckinghamshire Minerals and Waste Local Plan (2019) and the Local Transport Plan 4 (2016). The site is located within the designated Beaconsfield Neighbourhood Plan Area (November 2020). There is currently no neighbourhood plan.

Policy and Guidance

- 5.1 Local Plan policies relevant to the proposals include:

Policy GB1 Green Belt
Policy GB4 - Employment Generating and Commercial Development in the Green Belt (excluding Green Belt Settlements)
Policy GB9: Agricultural Diversification
Policy L10 Trees covered by TPO
Policy EP3 Use, design and layout of development
Policy EP4 Landscaping
Policy EP5 Sunlight and daylight
Policy EP6 Designing to reduce crime
Policy R8 Floodlighting
Policy H9 Residential layout and design
Policy SP6 Out-of-Centre Shopping Development
Policy TR4 Provision for those with special needs
Policy TR5 Accesses, Highway Works and Traffic generation
Policy TR7 Parking provision
Policy COM1 Provision of Community Facilities

- 5.2 The Core Strategy sets out the Spatial strategy which aims to protect the Green Belt by focussing new development on previously developed land within existing settlements. The policies relevant to the proposals include:

Core Policy 1 Housing provision and delivery
Core Policy 2 Housing types and sizes
Core Policy 3 Affordable Housing
Core Policy 5 Open space, sports and recreation
Core Policy 6 Local infrastructure needs
Core Policy 7 Accessibility and transport
Core Policy 8 Built and historic environment
Core Policy 9 Natural environment
Core Policy 11 Healthy and viable town and village centres
Core Policy 12 Sustainable energy
Core Policy 13 Environmental and resource management
Core Policy 14 Wilton Park (Opportunity site)

5.3 The site is located within a Minerals Safeguarding Area for Clay, Silt, Sand and Gravel. Minerals and Waste plan policies relevant to the proposals include:

Policy 1 Safeguarding Mineral Resources
Policy 10 Waste prevention and minimisation
Policy 27: Minimising Land Use Conflict

5.4 Key policy and guidance documents include:

- South Bucks District Council Residential Design Guide Supplementary Planning Document (SPD) 2008
- Affordable Housing SPD 2013 Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan November 2017
- Chiltern and South Bucks Townscape Character Study 2017
- South Bucks District Landscape Character Assessment 2011
- Chiltern and South Bucks Community Infrastructure Levy (CIL) Charging Schedule (2020)
- Chiltern District Council Sustainable Construction and Renewable Energy SPD (2015)
- Local Transport Plan: Buckinghamshire Local Transport Plan 4, (April 2016)
- Chiltern and South Bucks Economic Development Strategy: Chiltern District Council & South Bucks District Council (August 2017)
- Burnham Beeches SAC Strategic Access Management and Monitoring (SAMMS) SPD 2020
- Wilton Park Development Brief SPD 2015

5.5 Other key material considerations:

- National Planning Policy Framework (2021) (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide (2019)
- Chiltern and South Bucks Community Infrastructure Levy (CIL) Charging Schedule (2020)

- 5.6 On 21 October 2020 Buckinghamshire Council resolved to withdraw the Chiltern and South Bucks Local Plan 2036. There is currently no set timetable for the preparation of a new local plan although the Council has stated its intention to have a Buckinghamshire-wide local plan in place by April 2025.
- 5.7 The site of the proposed development formed part of a wider draft allocation (Policy SP BP9) for a residential-led mixed use development of 1,600 dwellings, 20,000 sq m of economic development floorspace, 15 pitches for Gypsies and Travellers, car parking and a community hub to include a 2 form entry primary school and 1,000 sq m of retail space.

Green Belt

Local Plan Saved Policies:

GB1 (Green Belt Boundaries and Control of Development in the Green Belt)
GB4 (Employment Generating and Commercial Development in the Green Belt)

- 5.8 The site lies in the Green Belt. The Government attaches great importance to Green Belts. NPPF paragraph 137 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 5.9 Paragraph 138 of the NPPF 2021 sets out that Green Belt serves the following 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.
- 5.10 NPPF paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 confirms 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.
- 5.11 The NPPF states that that development should be regarded as inappropriate in the Green Belt except in specified exceptions as set out in Paragraph 149 (a – g). The proposed development does not fall within any of the exceptions (a – g) listed in paragraph 149. The proposals are therefore inappropriate development based on this paragraph of the NPPF.
- 5.12 Local Plan policy GB1 states that most development in the Green Belt is inappropriate. There is a general presumption against inappropriate

development. The policy then goes on to set out categories of development (a – h) in Green Belt that would not be considered to be inappropriate. The proposed development is not captured within any of these exceptions. It is therefore contrary to this policy.

- 5.13 The level of consistency between Policy GB1 and the NPPF is sufficient to enable the saved policy to continue to be applied. Paragraph 219 of the NPPF 2021 states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF. As such moderate weight is afforded to Policy GB1.
- 5.14 As the proposed development amounts to inappropriate development within the Green Belt the applicant has provided a case for very special circumstances. This is considered in detail at section 6 in this report.
- 5.15 The factors that can be taken into account when assessing the impact of a proposal on the openness of the Green Belt can include the spatial and visual aspects of the development (NPPG update June 2021, 001 Ref ID: 64-001-20190722).
- 5.16 Background documents to the withdrawn Local Plan include analyses which help inform the assessment of the impact on openness. As part of that evidence it was determined that insufficient land outside the Green Belt was available to meet identified housing and economic development needs. Therefore, the Councils undertook a Green Belt review in two parts. The first was countywide and this recommended that a number of areas be further considered for Green Belt release. These areas were selected for further consideration because they least met the purposes of including land in the Green Belt. The second part of the Green Belt review focused on those areas in Chiltern and South Bucks which had been recommended for further assessment. While the local plan has been withdrawn and carries no weight, the evidence base can be considered material where relevant.

Part 1: The Buckinghamshire Authorities Buckinghamshire Green Belt Assessment Report: Methodology and Assessment of General Areas, 7 March 2016.

- 5.17 The Part 1 study considered 'general areas' and each site was scored against the 5 purposes of the Green Belt (NPPF 138). The site of the proposed development formed part of a wider draft allocation (Policy SP BP9) and the General Areas that correlate to SP BP9 were 47a, 47b and 53b. These sites, and all others, were scored overall for how well they met the 5 purposes and recommendations were made on which sites merited further consideration as development sites in Part 2 of the assessment. The application site broadly corresponds to sub area RSA-17 (Beaconsfield Golf Club). This was assessed as 'strong' with an overall score of 3 (5 being the highest) in meeting the Green Belt purposes. The recommendation in respect of 47a: "General Area 47a meets the NPPF purposes, but there is scope for sub-division; an identified area in the west, west of Beaconsfield Golf Club (RSA-17), may score weakly and could be considered further. The reason sites were recommended to go to Part 2 was because they were: Medium or strongly scoring General Areas

where there is clear scope for sub-division to identify weakly performing 'sub-areas', including the presence of boundary features which have the potential to be permanent and recognisable." The objectives of the Part 2 assessment focussed on Green Belt defensible boundaries.

- 5.18 An options appraisal was undertaken 'Green Belt Development Options Appraisal – October 2016'. The site was identified as 1.13A which proposed a revised boundary for proposed release from the Green Belt. The assessment summary states that 'The proposed A355 relief road would effectively enclose the site and negatively impact the sense of openness which is currently present. Given the distance between the settlements of Gerrards Cross and Beaconsfield this parcel does not contribute to this strategic gap, nor does it perform a crucial part in preventing the coalescence between Seer Green and Beaconsfield.'

Green Belt Assessment Part 2 2019 (Chiltern & South Bucks Stage 2 Green Belt Assessment Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks 2019)

- 5.19 The Part 2 study explains that Green Belt purposes were considered in Part 1 and set out new criteria for scoring sites based on defensible boundaries. The parcel 1.13A was found to perform 'moderately or relatively weak' in meeting the Green Belt purposes. It was noted that the parcel is at the edge of the large built-up area of Beaconsfield preventing its outward sprawl into open land (purpose 1). It was noted that the site has a mainly rural, open character when viewing from west to east but that the A355 relief road will have a detrimental effect on this and effectively enclose it within the road infrastructure and is likely to result in a predominantly semi-urban character (purpose 3). It was noted that although the parcel abuts the historic core of Beaconsfield, it makes limited contribution to the broader setting of the historic core, but that the parcel does make a limited contribution more generally to the rural setting of the town (purpose 4).
- 5.20 The Part 2 study also provides further evidence around the broader strategic roles of different areas of Green Belt noting in particular that: "Parcel 1.13A performs relatively strongly in terms of wider Green Belt objectives. The public right of way to the north supports public accessibility, whilst the allotments to the south contribute to outdoor recreation objectives. The openness and scale of the fields also makes a contribution to the wider landscape and visual amenity. In terms of conflict with the wider strategic function of the Green Belt it was found that If the Wilton Park area (Parcel 1.14) was removed from the Green Belt, Area 1.13A would perform relatively weakly against the purposes. If the adjacent Area 1.14 is not removed from the Green Belt, Green Belt Area 1.13A plays a more significant role in checking the unrestricted sprawl of a large built-up area. In terms of boundary assessment it found: The A355 Amersham Road to the west, the A355 Relief Road to the east and Minerva Way to the south are all considered to be permanent and strong in NPPF terms."

- 5.21 The Chiltern and South Bucks District Council – Green Belt Exceptional Circumstances Report (May 2019) set out specific exceptional circumstances for the release of draft allocation site SP BP9 from the Green Belt. This was not examined prior to the withdrawal of the local plan. The site SP BP9 was justified for inclusion for, amongst other reasons, “development could help support delivery of necessary road infrastructure whilst also making full use of public investment [public funds already committed to the Eastern Beaconsfield Relief Road]” and that the A355 relief road “would effectively enclose the site and negatively impact the sense of openness which is currently present.”

Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan November 2017

- 5.22 The Landscape Capacity Assessment was carried out to appraise in landscape and visual terms the 15 strategic sites which could potentially be released from the Green Belt, subject to other evidence. It is important to note that the purpose of the capacity assessment was not to establish the acceptability of development, but to mitigate harm resulting from development of sites, that could potentially be released from the Green Belt. It states that full Landscape Visual Impact Assessment (LVIA) would need to inform specific development proposals to establish the potential harm and to demonstrate that harm can be minimised or mitigated against through scale of development, layout, provision of strategically placed open space, landscaping or built form design constraints.
- 5.23 The assessment noted that “site 9B is an area immediately east of Beaconsfield and Park Lane (A355). This area includes large open fields dissected by a woodland belt connecting two woodland copses, there are also two ponds. The western boundary is defined at the southern end by a robust hedgerow which partly encircles Wilton Park Farm and the allotments, before aligning Park Lane (A355) which becomes intermittent further to the north. The eastern boundary is not marked by any landscape feature on the ground, it is a continuation of an open field. The southern boundary is Minerva Way (original driveway to Wilton park House).”
- 5.24 The study makes reference to the South Bucks District Landscape Character Assessment, noting that Site 9B lies within LCA 22.1 Beaconsfield Mixed Use Terrace for which the Strategy/ Vision is to conserve and protect the mosaic of woodland, open farmland and parkland, and to maintain the remaining areas of tranquillity.
- 5.25 The assessment of sub area 9B found it to be of medium visual sensitivity, with the northern end being visually open to the A355 and the eastern edge of Beaconsfield, whilst the south eastern end is described as being separate but visually open to Minerva Way. The sub area is assessed as having medium landscape sensitivity, with robust hedgerows, tree belts and woodland copses (forming part of the 18th century historic parkland of Wilton Park estate). It also states that the open landscape would have been open parkland adjacent to Minerva Way, the 18th century driveway to Wilton Park House (now demolished). The wider landscape sensitivity is also stated to be medium, with reference to long views looking north to the wooded horizons within the

Chilterns AONB. The sub area is assessed as having medium/low landscape value, although it is crossed by a well-used PROW and it is stated as forming part of the historic parkland of Wilton Park Estate. The overall landscape capacity for sub area 9B is stated as being medium / high.

- 5.26 The assessment evidences the character and quality of the landscape and identified potential impact on key landscape and visual characteristics:
- Loss of tree and woodland cover
 - Loss of historic features including driveway and ponds
 - Loss of undeveloped space of large open fields
 - Loss of open character of an area of parkland and setting of Minerva Way
 - Loss of views over open countryside on eastern side of Beaconsfield
 - Adverse visual impact on PROW and open character
- 5.27 It was also noted that in terms of potential impact on key settlement characteristics, 'Originally the settlement of Beaconsfield was retained by Park Lane (A355), creating a strong defined edge to the built form. If the new A355 is built this will replace this built edge and extend Beaconsfield further to the east.'
- 5.28 The study includes a recommended development area and landscape mitigation and enhancement measures: "Within these constraints, and subject to the recommendations set out below, a slightly reduced area as shown in Figure 9.2 below could be considered further for housing development. An average density of 30 dph is proposed by the Council across the whole of site 9, and at this density a maximum of 415 dwellings might be accommodated on site 9B, although a lower density may be necessary to face onto Minerva Way to protect its open setting as well as the Wilton Park farmstead and the setting of the 4 Listed Buildings." It is noted that detailed landscape and visual assessment will be essential to inform the final capacity of the site in landscape terms.
- 5.29 The submitted planning application proposed Land Use parameter plan includes residential and primary school development located to the south of the site, within an area excluded from the identified potential development areas within the Landscape Capacity Assessment.



Land use parameter plan
 Blue: Primary school land
 Brown: Housing



Recommended development area
 Purple: Development area
 Green: Landscape buffer

Openness – Spatial and visual impacts

5.30 A Landscape and Visual Impact Assessment has been undertaken as part of the Environmental Impact Assessment (EIA). This reports the outcome of the assessment of likely significant environmental effects arising from the proposed development in relation to landscape and visual amenity. This is addressed from paragraph 5.42 of this report below. The proposed development would be highly visible from several locations including the surrounding roads, the built up area of Beaconsfield to the west including from higher ground, and from the public footpath crossing the northern part of the site. The change to the views over the site would be substantial and the impact on green belt openness would be substantial.

Green Belt Purposes

5.31 The Green Belt purposes are listed in paragraph 138 of the NPPF and are considered in turn below.

Purpose a) To check the unrestricted sprawl of large built up areas

5.32 Beaconsfield is a principal settlement. The A355 Amersham Road provides a strong Green Belt boundary. The proposal would clearly result in a sprawl of development of a 'large built up areas', and there is clear conflict with this purpose.

5.33 The A355 eastern relief road (ERR) was a factor in promoting the site for release through the now withdrawn local plan. However it should be noted that the Green Belt contains many roads and therefore new roads do not de facto compromise openness to the extent that they no longer serve the Green Belt purposes. In this case while the ERR particularly when heavily trafficked would have an impact the sense, it is considered that the site nonetheless contributes strongly to this Green Belt purpose.

Purpose b) To prevent neighbouring towns merging into one another

- 5.34 The separation that exists between Beaconsfield and the nearest settlements, Gerrards Cross (4.48 km), Farnham Common (3.84 km), and Amersham (4.16 km) is significant such that it is not considered that the site strongly supports this purpose. Therefore the proposals would not result in significant detrimental impact to this purpose.

Purpose c) To assist in safeguarding the countryside from encroachment

- 5.35 The Stage 2 Green Belt Assessment 2018 finds that this site performs relatively strongly in terms of wider Green Belt objectives. The openness and scale of the fields contributes to the wider landscape and visual amenity. The public right of way to the north supports public accessibility.
- 5.36 The proposed development will result in the loss of 24 ha of agricultural land and a significant scale of urbanising development that will encroach into the open countryside. The harm to this purpose is therefore apparent. Given the open character of the agricultural fields and the existing mature tree belts and woodland it is considered that the development would result in a significant impact that would be detrimental to this purpose.

Purpose d) To preserve the setting and special character of historic towns

- 5.37 Beaconsfield Old Town Conservation Area is located approximately 100m to the west of the site at its closest point. There is development pre-dating 1880 in the south west portion of parcel 1.13A and 4 listed buildings. These buildings form part of the Beaconsfield Old Town Conservation Area. The remainder of the site is open countryside consisting of fields, allotments and woodland. The open countryside to the east of the Conservation Area is an important feature of its character and setting. The creation of the relief road has introduced an urbanising feature that impacts the sense of openness. Nonetheless the view from the A355 travelling into Beaconsfield currently is of green open space and trees.
- 5.38 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. 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. These views make 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. The Conservation Officer has advised that the impact of the development could be largely mitigated by pulling back the proposed development into the site in order to provide a greater buffer zone. This is consistent with the Landscape Capacity Assessment recommended development are. The proposed parameter plan does not conform with this.
- 5.39 It is therefore considered that the proposed development would negatively impact on this Green Belt purpose.

Purpose e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 5.40 As this purpose is to encourage the development of brownfield land, any proposal would be in conflict with this purpose.
- 5.41 The proposed development would constitute inappropriate development and will result in substantial spatial and visual harm to the openness of the Green Belt. In addition, the proposals will lead to a conflict with four out of the five purposes of including land in the Green Belt. The proposal would be contrary policy GB1 of the Local Plan. In accordance with NPPF paragraph 148 substantial weight is given to any harm to the Green Belt and '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. The 'other harm' is identified in subsequent sections and the very special circumstances in the Planning Balance are assessed at the end of the report.

Landscape and visual Impact

Core Strategy Policies:

CP8 (Built and historic environment)

CP9 (Natural environment)

Local Plan Saved Policies:

EP3 (The use, design and layout of development)

EP4 (Landscaping)

L4 (River Thames setting)

L10 (Proposals involving felling or other works affecting trees covered by a Tree Preservation Order)

- 5.42 The NPPF at Paragraph 174 advises that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and by recognising the intrinsic character and beauty of the countryside. Paragraph 130 c) emphasises the importance of ensuring new developments are sympathetic to local character, including the landscape setting. Paragraph 134 states that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change and that existing trees should be retained wherever possible.
- 5.43 Core Strategy policy 8 states that all new development must be of a high standard of design and make a positive contribution to the character of the surrounding area. Core Policy 9 places the highest priority to the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation. More generally, it seeks to ensure the landscape characteristics and biodiversity resources within South Bucks will be conserved and enhanced by:

- Not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in Biodiversity.
- Seeking the conservation, enhancement and net gain in local biodiversity resources within the Biodiversity Opportunity Areas, on other non-designated land, on rivers and their associated habitats, and as part of development proposals.
- Maintaining existing ecological corridors and avoiding habitat fragmentation.
- Conserving and enhancing landscapes, informed by Green Infrastructure Plans and the District Council's Landscape Character Assessment.
- Improving the rural/urban fringe by supporting and implementing initiatives in the Colne Valley Park Action Plan.

5.44 Saved Local Plan Policy EP3 requires layout and siting of development to be compatible with the character and amenities of the site itself, adjoining development and the locality. Saved Local Plan Policy EP4 details the importance of incorporating appropriate landscaping within development proposals and the need to take account of, and retain, existing planting and landscape features, which are or may become important elements in the character and appearance of the site and wider area. Policy L10 relates to proposals involving felling or other works affecting trees covered by a Tree Preservation Order.

5.45 The Site falls within LCA 22.1 Beaconsfield Mixed Use Terrace as set out in The South Bucks District Landscape Character Assessment 2011 which sets out the Strategy/ Vision to conserve and protect the mosaic of woodland, open farmland and parkland, and to maintain the remaining areas of tranquillity. Guidelines of relevance to the site include:

- Conserve the woodland (including ancient woodland) which provide enclosure in the landscape and forms an important landscape pattern and feature, and invaluable biodiversity benefit.
- Promote appropriate management of arable farmland, to help generate a wildlife rich habitat, and visually attractive landscape.
- Conserve and manage hedgerow boundaries, which provide visual unity and intactness and increase biodiversity, linking areas of woodland and agricultural farmland.
- Consider opportunities for further tree and woodland planting to contain and reduce visual and audible impact of modern development, such as busy roads.
- Maintain open views across fields, and monitor the introduction of vertical infrastructure, which would adversely affect views within the landscape.
- Conserve the low density of dispersed settlement.

- 5.46 The Environmental Statement at Chapter 15 Landscape and Visual, includes a landscape and visual impact assessment (LVIA) of the proposed development. This reports the outcome of the assessment of likely significant environmental effects arising from the proposed development in relation to landscape and visual amenity. The landscape sensitivity of the Assessment Area is assessed based on its ability to accommodate the proposed change. It is stated that the majority of the Assessment Area's landscape features are confined to its boundaries and the internal field boundary. These landscape features are not considered a significant constraint to development, and the majority are capable of being retained within a sensitivity designed scheme. The public footpath which crosses the northern part of the site is noted as a key feature that should be respected within any development proposals. Overall, the Assessment Area is assessed as being of medium landscape sensitivity.
- 5.47 The landscape effects include a significant effect (short term substantial – moderate adverse), on the landscape character prior to the establishment of mitigation planting. Following the establishment of the new areas of public open space, and new structural tree and hedgerow planting, the level of residual effect will generally reduce (to between moderate and slight adverse) and will be not significant. A significant (moderate adverse) residual effect will however remain on the landscape character of the Assessment Area, given the substantial change it will undergo.
- 5.48 The visual effects include impacts on views from public footpath BEA/15/2 (a high sensitivity receptor) towards new housing on both sides of the footpath, as well as towards the new areas of open space. The new housing will also be seen from vantage points along surrounding roads. Following the establishment of mitigation planting after a period of 15 years the majority of views will become increasingly filtered and screened by the new tree and hedgerow planting. The level of residual visual effects will generally reduce (to between moderate and negligible adverse) once mitigation planting has established. Residual, significant adverse visual effects will however remain at year 15 on two high sensitivity receptors, namely on users of public footpath BEA/15/2 (moderate adverse effect) and on properties along Amersham Road between Hyde Green and Ronald Road (substantial – moderate adverse effect).
- 5.49 The proposed development to the south of the site is in an area that was identified to be a landscape buffer in the Landscape Character Assessment (paragraphs 6.17 – 6.26 above). This study recommended substantial areas for “landscape mitigation and enhancement” to the north of Minerva Way (corresponding to the application site), and to the south of Minerva Way (corresponding to the Wilton Park site), both to the general exclusion of built development. These open landscape areas would provide a broad landscape corridor between Wilton Park Farm / the Conservation Area and the countryside to the northeast, and separate areas of built development.
- 5.50 The ES makes reference to the Landscape Capacity Assessment and in reference to the recommended development areas it is stated that ‘From our own assessment of the Application Site, we would note that the dense woodland vegetation between the Application Site and the listed buildings at

Wilton Park Farm to the south west, prevent any inter-visibility, although as noted within the Archaeology and built Heritage chapter, there is some historic functional relationship between these listed buildings and the Application Site. Additionally, although Minerva Way is recognised as a historic approach into the Wilton Park estate, the suggested landscape buffer to Minerva Way identified within the Landscape Capacity Assessment is considered overly generous. This is particularly relevant in the context of the consented Wilton Park scheme, which proposes new built form extending right up to Minerva Way within the central part of the scheme (contrary to the suggested landscape buffer identified for sub area 9C within the Landscape Capacity Assessment).’

- 5.51 It should be noted that Wilton Park is previously developed land within the Green Belt, while the application site is not. The consented development at Wilton Park has maximised the separation between new built development and the listed buildings at Wilton Park Farm, and the Conservation Area. It facilitates a wide landscape setting along the majority Minerva Way, including its central section. The purpose of the substantial landscape buffer in the southern portion of the application site is to deliver a key part of this wide landscape setting around Wilton Park Farm and Minerva Way.
- 5.52 It is therefore considered that the applicant’s proposal to include housing and other forms of built development in this landscape buffer would be harmful to the landscape setting of Minerva Way. The applicant’s LVIA appears to confirm this: “Views from Minerva Way (medium sensitivity) will look towards the new houses, primary school and open space (including a community grow space, sports pitches and a play area) in the south of the Assessment Area. The visual effect at operational stage, prior to the establishment of mitigation planting, will be moderate adverse and significant.”
- 5.53 The proposed landscape strategy indicates a native hedge and tree planting along the boundary with Minerva Way. This type of planting suggests that views north from the road may be obscured once the vegetation matures. Enclosing Minerva Way in this way would be contrary to the objectives of the landscape buffer set out in the Landscape Capacity Assessment, fundamentally changing the character of Minerva Way and its relationship to the adjoining landscape. It should be noted that the landscape capacity study proposes the reduction of existing vegetation along the southern side of Minerva Way in order to open up its’ landscape setting. Retaining and enhancing an open landscape setting to Minerva Way is the primary landscape objective. The proximity of proposed development and the proposal to filter/screen views of it would be likely to have a significant adverse effect upon the landscape character and visual amenity of Minerva Way.
- 5.54 Other aspects of the proposals raise concerns. Firstly, the illustrative masterplan indicates a weak landscape edge to new A355 link road, with inclusion of 3-storey buildings, contrary to the indicative development framework in the Landscape Capacity Assessment. Secondly, 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.

- 5.55 The majority of trees within the site are situated along hedgerow boundaries as well as planted shelter belts. There are two veteran trees with some veteran-characteristic trees. It is considered that important trees and trees of value will be able to be retained and, where possible, enhanced along with existing woodland and vegetation. The Tree Officer advises that the submitted arboriculture assessment is to a high standard.
- 5.56 The proposed development would give rise to significant detrimental impacts on the landscape character of the area. The proposed development and landscape strategy would be harmful to the landscape setting of Minerva Way and contrary to the objectives of the landscape buffer set out in the Landscape Capacity Assessment, fundamentally changing the character of Minerva Way and its relationship to the adjoining landscape. The proposed Green and Blue infrastructure has failed to adequately take account of the existing landscape character and site features. The proposed development is therefore considered to be in conflict with NPPF 130, 131 and 174, with Core Strategy policies 8 and 9, and Saved Local Plan policies EP3 and EP4.

Raising the quality of place making and design

Core Strategy Policies:

CP5 Open space, sports and recreation

CP8 (Built and historic environment)

Local Plan Saved Policies:

EP3 (The Use, Design and Layout of Development)

EP4 (Landscaping)

EP6 (Designing to Reduce Crime)

H9 (Residential development and layout)

COM1 (Provision of community facilities)

- 5.57 The NPPF (2021) at paragraph 126 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 130 states that developments should, among other requirements, function well and add to the overall quality of the area, be visually attractive as a result of good architecture, layout and landscaping, and be sympathetic to local character and history. Paragraph 134 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. The National Design Guide has been introduced and this places great importance on context and detailing, stating, for example that 'well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones'.

- 5.58 Core Strategy policy 8 states that all new development must be of a high standard of design and make a positive contribution to the character of the surrounding area. On land excluded from the Green Belt, new housing should be built at an average density of between 25 and 35 dwellings per hectare. However, actual densities may be higher or lower than this, to reflect factors such as the accessibility of the site and the character of the surrounding area. Development proposals will be expected to accord with Secured by Design principles to achieve crime prevention, reduce the fear of crime and improve other aspects of community safety.
- 5.59 Core Policy 5 requires new development to have adequate open space and recreational facilities. Local Plan policy EP3 states that 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. Poor designs which are out of scale or character with their surroundings will not be permitted.
- 5.60 Saved Local Plan Policy EP3 requires layout and siting of development to be compatible with the character and amenities of the site itself, adjoining development and the locality. Saved Local Plan Policy EP4 details the importance of incorporating appropriate landscaping within development proposals. Saved Local Plan Policy EP6 states that development should be designed and laid out to reduce the opportunities for crime.
- 5.61 Saved Local Plan Policy H9 states that proposals involving the development of land for residential purposes will only be permitted where:-
- a) the proposal would be compatible with the character of the surrounding area in terms of density, layout, design, height, scale, form and materials.*
 - b) the proposal would not adversely affect the character or amenities of nearby properties or the locality in general, for example through overdominance, obtrusiveness, loss of important trees or important groups of trees, loss of privacy or loss of daylight, and the proposal would be in accordance with policy EP3 (Use, Design and Layout of Development); and*
 - c) the proposal includes provision for conveniently located, usable amenity space; and*
 - d) satisfactory access would be available for emergency vehicles and for refuse collection; and*
- The Council will not grant permission for proposals which do not make as full and effective use of land as would be possible whilst remaining consistent with all other policies in this Plan. Permission will not be granted for proposals which sterilise adjacent land or which reduce its availability or suitability for future development.*
- 5.62 The application is in outline form, with all matters reserved except for 'Means of Access'. The scheme design is for consideration at the Reserved Matters Stage. However, the proposals include development parameters for approval, these are:

- Land Use – This includes residential and a local centre, primary schools and open space
- Building heights – building height vary in three categories: up to 2, 2.5 and up to 3 storeys
- Movement and access – a network of streets, vehicle, cycle and pedestrian routes
- Green & Blue Infrastructure – public open space, play and sports, woodland and attenuation
- Building Density – a mix across the site in six categories from, up to 30 dph (dwellings per hectare) to up to 70 dph. It is noted that the average density is 39 dph.

5.63 A Design and Access Statement including an illustrative masterplan has been provided which shows how the design of the scheme has developed and the application of the Parameter Plans. The layout is structured around retained woodland and tree belts (which effectively split the site west and east), and a primary route / street network comprising a route running northwest to southeast connecting to Beaconsfield towards the station and a route running southwest towards Beaconsfield Old Town. The housing layout is characterised by perimeter blocks and tree lined streets with development parcels interspersed with open space. Four indicative design character areas are described:

- Beeches Gate – to the northwest and east, a medium density residential area
- Parkside – centrally located, medium to high density housing next to movement corridors
- Community Heart - to the south, comprising a local centre, school and higher density housing
- Woodlands – to the southwest, lower density housing in more sensitive locations (woodland and adjacent allotments).

5.64 Development is shown fronting Amersham Road where there are three points of access, a vehicular access proposed to be close to Peacock Close and two pedestrian, cycle access points one at the existing PROW and another close to the junction with Waller Road. There are two vehicular access points off the Eastern Relief Road. The southeast corner of the site has land allocated for a primary school with provision for retail and community building use. A community grow space is provided in the southwest of the site adjacent to Minerva Way.

5.65 The proposal is for 450 dwellings which exceeds the site's capacity of 415 as set out in the Landscape Capacity Assessment 2017. The capacity statement identifies a desirable average of 30dph and up to 415 homes, while the applicant's Density Parameter Plan indicates significant areas of up to 35-45dph, peaking at up to 70 dph, with less than 20% of the site at up to 30dph. The lowest density area is not located towards Minerva way as recommended

in the Landscape Capacity Assessment (2017).

- 5.66 In terms of height, significant areas of 2.5 and 3 storey buildings are proposed focussed on the primary routes and towards the eastern part of the site. This is considered excessive for this edge of urban area.
- 5.67 The illustrative concept masterplan suggests a 'wall of buildings' for the 'signature frontage' adjoining the northern roundabout. However, this is a matter that could be addressed through Reserved Matters applications through careful design.
- 5.68 It is a stated objective of the masterplan to ensure that the site is integrated with the existing settlement edge and that the proposals become a 'bridge' between the existing settlement and consented Wilton Park. It is not evident that the proposals would achieve this objective. The local centre is located in the southeast corner adjacent to the countryside and is as far away as possible from the existing built-up area of Beaconsfield at the Amersham Road end of the settlement. It is not considered that the proposed local centre relates well – functionally or in terms of physical linkages – to Wilton Park. There is no evidence of any consideration given to how the proposed local centre uses relate to the consented facilities at Wilton Park and connectivity is compromised by having to navigate around the land proposed to be reserved for a school and school playing fields.
- 5.69 The proposals include public open space, provided for in reference to the 'Fields in Trust' standards. This includes an area for playing pitches outside the site located on the eastern side of the Eastern Relief Road, but in the applicant's control. Sport England have raised concerns in relation to the sports pitches. It is considered that 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.

| Open space typology | Fields for Trust Requirement | Est OS proposed |
|------------------------------|------------------------------|-----------------------------------|
| Amenity Green Space | 0.66ha | 1.59ha |
| Parks & Gardens | 0.87ha | 0.87ha |
| Natural / Semi Natural Space | N/A | 6.06ha |
| Allotments / Community Grow | N/A | 0.23ha |
| On site POS total | | 8.75ha |
| Equipped play (on-site) | 0.27ha | 0.27ha |
| Sports pitches (off-site) | 1.7ha | 1.78ha |
| TOTAL PROVISION | 3.5ha | 10.8ha (9.02 excl pitches) |

- 5.70 This is an outline application with the scheme design including separation distances, daylight/sunlight etc for consideration at the Reserved Matters Stage. Matters relating to amenity for future residents would be adequately dealt with as part of the detailed design stage had the application been recommended for approval. In terms of the amenity of existing residents the separation distances to the new housing are very substantial and would not give rise to detrimental impacts, any loss of privacy, noise or disturbance.

5.71 However, the proposals include development parameters for approval. The layout of the development as framed by these parameters give rise to concerns. Development is located to the south of the site, within a landscape buffer and excluded from the identified potential development areas within the Landscape Capacity Assessment. This is considered to result in harm to the landscape character of the area. The local centre in the southeast corner lies adjacent to the countryside and is as far away as possible from the existing built-up area of Beaconsfield at the Amersham Road. This location will discourage walking to it. The housing number exceeds the site's capacity and the extent building above 2 storeys is considered excessive for this location. It is considered that 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 proposed development layout is therefore considered to represent poor design in conflict with NPPF 124, 127, Core Strategy policies 5 and 8, and Saved Local Plan policies EP3 and H9.

Housing and Affordable Housing

Core Strategy Policies:

CP1 (Housing Provision and Delivery)

CP2 (Housing Type and Size)

CP3 (Affordable Housing)

Local Plan Saved Policies:

H9 (Residential development and layout)

5.72 The NPPF supports the Government's objective of significantly boosting the supply of homes and at paragraph 60 states it is important that a sufficient amount and variety of land can come forward where it is needed. The NPPF at paragraph 63 (affordable housing) specifies "Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

- off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- the agreed approach contributes to the objective of creating mixed and balanced communities"

5.73 The NPPF at paragraph 65 seeks at least 10% of the total number of homes to be available for affordable home ownership. Exemptions to this requirement include where the proposed development is proposed to be developed by people who wish to build or commission their own homes. Affordable housing is defined in Annex 2 of the NPPF as "Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions'

- Affordable Housing for Rent
- Starter Homes

- Discount Market Sales Housing (DMSH)
- Other Affordable Routes to Home Ownership”

- 5.74 Core Policy 1 Housing Provision and Delivery, states provision will be made for a net increase of 2,200-2,800 dwellings in the period 2006 to 2026, broadly in accordance with the Spatial Strategy. At least 80% of this development will be accommodated on Previously Developed Land. It states that the focus for new residential development will be the major settlements including Beaconsfield. Core Policy 2 Housing Type and Size, states the Council will encourage “a range of housing types and sizes” and the Council will support and encourage the provision of sufficient new accommodation for older people.
- 5.75 Core Policy 3 Affordable Housing, states that the Council will seek 40% affordable homes as a developer contribution on residential developments of 5 dwellings or more “unless it is clearly demonstrated that this is not economically viable” and that “that about two thirds of the affordable units provided should be social rented, with the remainder as intermediate affordable dwellings”. Paragraph 3.2.19 of Core Policy 3 also states that “the precise tenure split will vary from site to site, depending upon factors such as the amount and types of affordable housing that already exist in the locality”.
- 5.76 The Council is currently unable to demonstrate the five-year supply of deliverable housing sites. As set out within the Chiltern and South Bucks Interim Five-Year Housing Land Supply Calculation (at 1st April 2020, published 11th September 2020) the South Bucks Area can demonstrate 2.94 years supply. However, with a 20% buffer, due to failing the last housing delivery test, the correct figure is 2.57 years of supply.
- 5.77 The proposed development is residential-led for up to 450 dwellings. The proposal is for 40% affordable housing and self-build plots. The applicant states they reserves the right to submit a viability appraisal during the planning application process if costs become an issue, in accordance with policy. The indicative mix of housing is provided in the table below, but the final mix would be determined at Reserved Matters stage.

| | | | | | |
|------------------------------|------------|----------------|-----|-------------------|-----|
| Total dwellings: | 450 | Private | | Affordable | |
| Market housing: | 248 | | | | |
| Affordable housing: | 90 | 4 bed + | 35% | 4 bed | 5% |
| Affordable home ownership: | 45 | 3 bed | 45% | 3 bed | 25% |
| Starter homes: | 45 | 1&2 bed | 20% | 2 bed | 40% |
| Self-build and Custom-build: | 22 | | | 1 bed | 30% |

- 5.78 It is stated that particular emphasis is placed on the provision of smaller house types for affordability. The affordability mix is indicated as: Social Rent and Affordable Rent 50%; Shared Ownership 25%; and First Homes 25%. First Homes will form part of the definition of affordable housing for planning purposes following the Affordable Homes Update in May 2021. First Homes will: have 30% minimum discount, with a £250,000 price cap (outside London) once the discount is applied; comprise at least 25% of all affordable housing;

prioritise key workers; protect Social Rent tenure, whereas other tenures will be proportionately adjusted down.

- 5.79 The application is accompanied by an Affordable Housing Statement which addresses difference where the proposals deviate from the local policy requirements in terms of the tenure split. It is stated that the proposed affordable housing mix strives to address more than just the number of affordable homes needed, but also the specific types of affordable homes in terms of tenure and dwelling mix. The characteristics of the mix proposed are set out as:
- A policy compliant 40% affordable housing on site, subject to any viability issue.
 - The rented element should be predominantly Affordable Rent, with some rents capped at local Housing Allowance to assist those on full housing benefit.
 - A range of affordable ownership options should be provided, including Shared Ownership.
 - First Homes will form 25% of the affordable mix.
 - The majority of affordable dwellings should be smaller homes (mainly 1 & 2 bed) with particular focus on accommodating the aging population.
 - Giving priority for essential local workers should be considered, especially in respect of widening the professions in this group, and to consider offering a local connection to Beaconsfield depending upon demand for affordable homes in the local area.
- 5.80 Core Policy 3 requires a mix of affordable housing that is two-thirds rented accommodation and one-third intermediate affordable accommodation. The Affordable Housing Statement (paragraph 5.2) 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. The Council would want the finalised affordable housing tenure mix to comply with Core Policy 3. 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. The Affordable Housing Statement (paragraph 4.30) states that the number of households on the Council's Housing Register for South Bucks is considered to be low but it is 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.
- 5.81 It is noted that there is 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 Design and Access Statement). A more

balanced approach is needed to give a balanced community. The Council would want to see a good mix of sizes across all affordable housing tenures and 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, there should be 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.

- 5.82 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 under occupying tenants to move out of family homes, even when incentives and attractive alternative housing options are being offered. Therefore, this is not an argument that justifies having a high proportion of smaller affordable homes in the scheme at the expense of larger family homes.
- 5.83 In terms of affordable housing provision 40% affordable housing provision would meet the Core Strategy Policy CP3 policy requirement. However, the tenure mix of affordable housing should reflect the requirements of CP3. A good mix of property sizes across all affordable housing tenures would be required and not have larger properties concentrated in affordable home ownership.

Mix of uses: community and retail uses

Core Strategy Policies:

CP6 (Local Infrastructure Needs)

CP10 (Employment)

CP11 (Healthy and viable town and village centres)

Local Plan Saved Policies:

GB4 (Employment Generating and Commercial Development in the Green Belt)

SP6 (Out-of-Centre Shopping Development)

COM1 (Provision of Community Facilities)

- 5.84 The NPPF Paragraph 87 states "local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge centre

locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered”.

- 5.85 NPPF Paragraph 90 sets out the circumstances under which a retail impact assessment should be undertaken to accompany proposals for retail development outside of town centres. It states that “when assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold (if there is no locally set threshold, the default threshold is 2,500 m² of gross floorspace)”.
- 5.86 NPPF Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. Mixed use developments with strong neighbourhood centres and provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling, are cited by way of example. NPPF Paragraph 93 supports the provision of social, recreational and cultural facilities and services the community needs.
- 5.87 Core Policy 6 Local Infrastructure Needs, aims to ensure new or improved infrastructure is delivered where and when it is needed. New development will be required to provide for the necessary infrastructure needs arising from the proposal, either directly or via an appropriate financial contribution. The Council will use planning conditions and obligations where appropriate to secure the timely provision of essential infrastructure directly and reasonably related to a development.
- 5.88 Core Policy 11 Healthy and Viable Town and Village Centres, states that proposals for new retail, office and other main town centre uses should enhance the vitality and viability of centres in South Bucks. Beaconsfield New Town is identified as a District Centre and Beaconsfield Old Town is a Local Centre. The Policy states that a limited increase in retail floorspace to meet local needs will be acceptable in Local Centres.
- 5.89 Core Policy COM1 states, proposals for community facilities will be permitted provided that the proposed facility would be located within the developed area; and the proposal would comply with all the other policies in this Plan. The explanatory text clarifies that the Plan should provide a framework to enable locally generated needs to be met and the policy provides that framework by allowing extensions to existing community facilities and by enabling the provision of new community facilities in appropriate locations.
- 5.90 Saved Local Plan Policy GB4 states that proposals to establish new employment generating or other commercial sites or extend the curtilages of existing sites will not be permitted in the Green Belt as such development would be contrary to long- established Green Belt policies.
- 5.91 Saved Local Plan Policy S6 seeks is to sustain or enhance the vitality and viability of town and village centres and the explanatory states that In applying

a sequential approach to the location of new retail development, as outlined in PPG6, out-of- centre shopping development will not be considered acceptable, unless it can be shown that there are no suitable town centre or edge-of- centre sites or the proposal is for very small scale retail development, defined as approximately 100 sq.m gross floor area, such as a local corner shop to provide for local shopping needs.

- 5.92 The Application includes a local centre of approximately 0.5ha (1.2 acres) of land which could provide a mix of uses. The Application seeks planning permission for up to 1,050sqm for a community facility (Class E(d), E(e), F1(d), F1(e) and F2(b) e.g. community hall / meeting space or health centre) and up to 1,000sqm of mixed commercial floorspace (Class E(a), E(b), E(c) and F2(a) e.g. small convenience stores or cafés) within the local centre.
- 5.93 A Retail Statement and a Community Needs Assessment have been submitted in support of the application. The proposals for the retail and community uses are stated to be in accordance with the (withdrawn) CSB LP SP BP9. A sequential approach has not been undertaken in accordance with saved Local Plan Policy S6. It is stated that the proposed retail provision is below the NPPF (and withdrawn CSB LP Policy SP EP1) threshold for a retail impact assessment to be undertaken. The Retail Statement conclusion states that the retail provision on the site is expected to meet local needs and is not considered to impact on the vitality of Beaconsfield Old and New Towns. No reasoned justification is provided to support this conclusion.
- 5.94 An objection, received as community comments, has been made on the basis of concern that the same or similar uses are proposed to those to be provided at Wilton Park, noting that the S.106 agreement associated with the outline planning permission for redevelopment of Wilton Park, includes a requirement for viability reports to be prepared relating to the café and nursery, to assist with ensuring that these facilities were “sustained” to serve the residents of the new community. How the proposed local centre facilities compliment facilities to be provided at Wilton park, has not been addressed in the application submission.
- 5.95 The Community Needs Assessment assessed the local need for community facilities and how the future development will impact that need and also advises on potential new community uses. It found good local provision for GP, Dental, Pharmacies amongst other facilities. In terms of community centres, there is no identified need for a centre on the site. In terms of sport and leisure the assessment found that there is a range of different sports and leisure facilities including green spaces nearby. The community facilities are proposed “to ensure any future community requirements related to the larger 1,600 dwelling development as proposed under SP9 Beaconsfield are not prejudiced.”
- 5.96 Land for a 2-Form Entry primary school is proposed. This is based on the estimated primary school place demand generated by 1,600 dwellings of around 490 pupil places which is the equivalent of 2.3 FE. The Council’s Education officer has confirmed that the proposed development of 450 homes

would not require a new school but to accommodate the development, the Council would seek financial contributions towards expanding existing schools.

5.97 In terms of the proposed football pitches located off site but which could be secured by a S106 Planning Agreement, Sport England has concerns: 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. Sport England 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.

5.98 Concerns regarding the siting of the local centre and how the proposed local centre uses relate to the consented facilities at Wilton Park have been outlined earlier on this report. The Retail Statement conclusion that the retail provision on the site is expected to meet local needs and not impact on the vitality of Beaconsfield Old and New Towns, is not supported by any analysis and the proposals are therefore in conflict with Saved Policy S6. The Community Needs Assessment demonstrates that the area is already well served. The proposals for the community uses are considered to be in conflict with Saved Local Plan Policy COM1. The proposals for the retail and community uses are based on the withdrawn Local Plan proposed site allocation for a much larger development of 1,600 homes. This is not an appropriate nor rational basis for facilities to support 450 homes, and evidence an inherently unsustainable development proposal. This is reflected in reason for refusal number 3.

Historic environment (or Conservation Area or Listed Building Issues)

Core Strategy Policies:

CP8 (Built and historic environment)

5.99 The application proposals have been assessed in relation to the relevant statutory duties, including the Planning (Listed Buildings and Conservation Areas) Act 1990. The National Planning Policy Framework and development plan policies.

5.100 The NPPF at paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

5.101 Core Policy 8 Built and Historic Environment places paramount importance on the protection and, where appropriate, enhancement of the historic environment. It states that all new development must be of a high standard of

design and make a positive contribution to the character of the surrounding area.

- 5.102 No designated heritage assets are located within or immediately adjacent to the area. The proposed development is located to the east of Grade II listed buildings at Wilton Park Farm and Beaconsfield Old Town Conservation Area is located approximately 100m to the west of the site at its closest point. 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.
- 5.103 The application is supported by an Environmental Statement which includes Chapter 9 Archaeology and Built Heritage. It states that construction of the development is likely to remove or disturb below-ground archaeological remains of prehistoric and Roman date and could result in a moderate or large adverse significant effect but would be mitigated through an appropriate scheme of archaeological recording secured by condition and informed by trial trench evaluation that has been undertaken. The development itself will have a slight adverse effect on the Grade II listed buildings at Wilton Park and the Beaconsfield Old Town Conservation Area, comprising 'less than substantial harm' in terms of the NPPF paragraph 202.
- 5.104 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 publicly accessible. 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, inter-visibility would be limited and the likely harm at the lowest scale of 'less than substantial harm'.
- 5.105 Beaconsfield Old Town 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. These views are considered to make only a limited contribution to the significance of the conservation area.

5.106 The harm arising from development located to the south of the site, within an area excluded from the identified potential development areas has been assessed above. The impact on the setting of the heritage assets is considered to be at the lower end of 'less than substantial harm'. As there would be some public benefit arising from the development this would outweigh the 'less than substantial harm'.

Highway Safety, Transport and Access

Core Strategy Policies:

CP7 (Accessibility and transport)

CP14 (Wilton Park Opportunity Site)

Local Plan Saved Policies:

TR4 (Provision for those with special needs)

TR5 (Access, highways work and traffic generation)

TR7 (Traffic generation)

5.107 NPPF Paragraph 110 advises the following: "In assessing specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport can be, or have been taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree"

5.108 Paragraph 111 of the NPPF states that: "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Paragraph 113 states that "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."

5.109 Core Policy 7 Accessibility and Transport, seeks to improve accessibility to services and ensure a safe and sustainable transport network by supporting the rebalancing of the transport system in favour of more sustainable modes of transport, including by encouraging safe and attractive improvements to pedestrian and cyclist routes and facilities. It 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. Core Policy 14 Wilton Park seeks to mitigate traffic impacts on the local and strategic road networks, for example, through the provision of

high quality walking, cycling and public transport routes – with the links to Beaconsfield New Town being of particular importance.

- 5.110 Saved Local Plan Policy TR4 encourages improved access for those having special needs. Saved Local Plan Policy TR5, addresses the effect of development on safety, congestion and the environment and states that where off-site improvements to the highway are required to serve a development, permission will not be granted unless the applicant enters into a planning obligation to secure the implementation of those works. Saved Local Plan Policy TR7 requires appropriate provision for parking.
- 5.111 The proposed development is located to the east 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. There are a number of strategic routes in the vicinity of the application site: the A355 Amersham Road runs in a north/south alignment to the west; 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 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 beyond the southern boundary of the site and provides strategic connections to the M25.
- 5.112 Four new access points are proposed to serve the site, three off the ERR and one off Amersham Road. Pedestrian and cycle connections from the site to the centre of Beaconsfield are to be supported by 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. 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.
- 5.113 The Transport Assessment (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.
- 5.114 The Wilton Park scheme will deliver the southern section of the ERR. The application TA has identified four junctions primarily on the A355 corridor that will require mitigation if the ERR is not delivered. The Environmental

Statement states that “assuming the ERR is not complete it is suggested that a planning condition provides the most appropriate mechanism to limit development until the ERR is fully open to traffic and therefore is able to fulfil the role intended”.

- 5.115 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. These schemes are welcomed, but it is noted there is no firm commitment from the applicant as to whether these will actually be provided. A Framework Travel Plan has been submitted in support of this application.
- 5.116 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. Both the assessment work for the Wilton Park development and the assessment work for the Relief Road application are now a number of years old (2016 and 2017) and relying on it to provide a basis to assess the new planning application may provide results that should not be relied on. 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. Therefore, at this stage, the Council cannot be satisfied that the assessment of the impact considers appropriately the implications of the development proposal.
- 5.117 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.” The ERR has been delivered in sections with the northern section of the road already provided. The southern section of the ERR between Minerva Way and the Pyebush Roundabout will be delivered as part of the Wilton Park development.
- 5.118 In terms of the proposed site access points, 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.

- 5.119 In terms of sustainable transport modes, the footway / cycleway improvements proposed for Corridor A are considered to be limited and do not produce the most convenient and attractive conditions for cyclists. It is also apparent that the applicant is proposing removal of 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). The footway / cycleway improvements proposed for Corridor B provide for cyclists and pedestrians to 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, which are not yet in place. Improvements are proposed to the route to the west of the London End roundabout but there has been no assessment of the remaining carriageway width on London End with the proposed cycle lane facilities in place and there is a concern that any reduction of the width will further exacerbate the high levels of congestion that this link currently experiences.
- 5.120 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. National Highways advise that the assessment of the potential impact the development could have at the Strategic Road Network, namely M40 J2, is not detailed enough for National Highways to be completely satisfied there is no material impact.
- 5.121 It is considered that 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, 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 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.
- 5.122 It is further considered that 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.

Agricultural Land

Local Plan Saved Policies:

GB9 (Agricultural Diversification)

- 5.123 The NPPF, at paragraph 174 b) notes the benefits of protecting the best and most versatile agricultural land (BMV). The footnote to paragraph 171 also states “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”. The glossary of the NPPF gives the following definition. “Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.” In assessing the effects of the development on agricultural land it is necessary to have given consideration to the Agricultural Land Classification (ALC), devised by Ministry of Agriculture Fisheries and Food (1988). This is the standard method used for determining the quality of agricultural land.
- 5.124 Policy GB9: Agricultural Diversification seeks to maintain the viability of agriculture. Proposals which would adversely affect the open and undeveloped character will not be appropriate.
- 5.125 The existing use of the site is agricultural and it is used to grow crops. The proposed development will result in the permanent loss of existing agricultural land. Agricultural Land has been scoped out of the submitted Environmental Statement. The justification given for scoping out is that a majority of exiting agricultural land can be considered moderate quality, and no significant effects are envisaged as a result of the proposed development.
- 5.126 An agriculture and soils report has been produced for the fields (the site and proposed playing fields outside the site). The appraisal of agricultural land quality is consistent with the direction given by the National Planning using the Ministry of Agriculture Fisheries and Food (MAFF) revised guidelines and criteria for Agricultural Land Classification² (ALC) published October 1988. The area has been identified as partly Grade 3a land (25.3%) and partly Grade 3b land (63.2%). The remaining land is non-agricultural and comprises small areas of woodland. Therefore, a significant proportion of the agricultural land is not considered best and most versatile land.
- 5.127 It is stated that a significant proportion of the land is not considered best and most versatile. It is stated that the Portman Estate farm business will realise capital from the proposed development that can be reinvested back into modernisation, enlargement and / or creation of farm enterprises. “An area of outlying land where the management is limited by absence of water supply and the difficulty of supervision of livestock, the benefits to the farm of realising capital exceeds the adverse effects of losing the land”.
- 5.128 While noting the applicant’s view of this matter, it is considered that the development would result in loss of BMV agricultural land which would be afforded negative weight as the permanent loss of agricultural land cannot be mitigated. The proposals would be contrary to the NPPF.

Ecology

Core Strategy Policies:

CP9 (Natural environment)

CP13 (Environmental and resource management).

Burnham Beeches Avoidance and Mitigation Strategy SPD

- 5.129 The NPPF paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils and minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 180 states that when determining planning applications, local planning authorities should refuse planning permission if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. Paragraph 181 states that SACs should be given the same protection as habitats sites.
- 5.130 Core Policy 9 Natural Environment, states that the highest priority will be given to the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation. 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. The policy seeks to conserve and enhance the landscape characteristics and biodiversity resources by not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in Biodiversity.
- 5.131 Core Policy 13 Environmental and resource management, states that new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible. Particular regard should be had to maintaining the integrity of Burnham Beeches SAC and seeking improvements in air quality, especially in the Air Quality Management Area adjacent to the motorways and close to Burnham Beeches SAC.
- 5.132 The application is supported by an Environmental Statement (ES) and Chapter 14 Ecology, provides an assessment of the proposed development in relation to the effects it would have on ecology and nature conservation. The ES relates to a wider area than the application site, which also includes land to the east of the site (east of the Beaconsfield eastern relief road) proposed for sports pitches. 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.

Sites of importance

5.133 The ES Chapter identifies two international statutory sites within 10km of the application site; Burnham Beeches SAC (c3km south) and Chiltern Beechwoods SAC (c9.6km southwest). Potential recreational, air quality and hydrological impacts on the two sites have been identified. 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 SAC through potential recreational impact but not in respect of air quality and hydrological impacts. Natural England have objected to the application as further information is needed to determine the impacts on Burnham Beeches SAC, commenting: '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'. To note an 'Appropriate Assessment' is required to determine the likely significant effect and is appended to this report for the purposes of the Conservation of Habitats and Species Regulations 2017 (as amended).

5.134 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 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." The adequacy of the TA has been addressed earlier in this report. An underestimation of trip rates from the developments would result in an inaccurate assessment of the development on Air Quality.

5.135 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). The ES concludes that these sites will not be significantly impacted on by the proposed development due to their distance from the site.

5.136 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 submitted 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.

5.137 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. 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 provided with the appropriate buffer within the layout of the development.

5.138 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. The proposals would 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, small areas of woodland, semi-improved grassland and scrub. 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 (2021).

5.139 In terms of protected species, summer and autumn 2021 activity surveys have not been submitted. These surveys are required to determine the impacts of the proposals on bats. There are some concerns regarding the potential for cumulative impacts resulting from the consented development, the ERR and the Wilton Park site on bats through fragmentation and loss of habitat, increased disturbance, and lighting. 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. 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 ERR.

5.140 Great crested newts are a European Protected Species and known to be present in the wider area. The ES concludes that on site ponds do not support

great crested newts and that the impacts to habitats are not considered likely to result in any significant effect to the local great crested newt population. It is noted that the majority of surveys were undertaken in 2018 and 2019, and updates would be needed to determine if newts have colonised ponds in the area. The proposals include the creation of at least two attenuation ponds designed to hold water all year round to function also as wildlife ponds. The ES states that the development will require a European Protected Species Derogation Licence.

5.141 The ES has assessed the impact on breeding birds and concludes that 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. As a ground nesting species, their breeding sites will be lost through the proposals (they require large arable/grassland fields for breeding). The loss of skylark territories is a significant negative effect at the local level. As replacement skylark breeding habitat is not possible within the scheme, 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.

5.142 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 would be covered within a Construction and Environmental Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) document usually secured by condition of a planning permission.

5.143 The reptile survey carried out in 2018 recorded three species of reptile on site; slow-worm, common lizard and grass snake. The population sizes indicate 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. The ES concludes based on previous survey work that the proposals will have a negative effect significant at the local level, in the absence of mitigation. Further reptile survey and assessment is required to establish the impact of the development.

5.144 The ES concluded that the development will not result in a significant effect on the local badger population.

5.145 The assessment of the development on ecology is deficient. This was acknowledged in applicant's submission and reference to a proposed addendum to the ES with further information. Information required includes 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). Specific requirements would include:

- 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

5.146 It has not been demonstrated that the proposed development would not have an unacceptable impact on the natural environment and it has not demonstrated that there would be satisfactory biodiversity enhancements, contrary to Core Policies 9 and 13 and NPPF 174, 180 and 181.

Flooding and drainage

Core Strategy Policies:

CP13 (Environmental and resource management)

5.147 NPPF paragraph 159 advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where appropriate, applications should be supported by a site specific flood risk assessment (paragraph 167) and when determining applications LPAs should ensure that flood risk is not increased elsewhere. NPPF paragraph 169 requires that major developments incorporate sustainable drainage systems, unless there is clear evidence this would be inappropriate. Planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to, or adversely affecting, water resources (paragraph 174).

5.148 Core Policy 13 Environmental and resource management, states that new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible.

5.149 The site is located in Flood Zone 1, and at the lowest risk of fluvial flooding. The ES Chapter 10 Water Environment states that there are isolated areas of low to high risk related to surface water across the site which appear to be associated with existing topographical depressions. The Risk of Flooding from Surface Water Map shows that there are two surface water overland flow routes present on the site which have a high to low risk.

5.150 The Flood Risk Assessment (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 and sets out mitigation measures to address the flood risk, primarily focusing on site levels and maintaining 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. The LFFA has advised that 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.

- 5.151 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. The investigations took place in the summer when generally groundwater levels are in decline. Therefore, if the proposals are to be approved, groundwater monitoring over the winter months should take 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.
- 5.152 A Sustainable Drainage Statement (SDS) has been prepared 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. The proposed surface water drainage strategy comprises of a piped network to a basin. 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.
- 5.153 Under Paragraph 169 of the NPPF, sustainable drainage systems used on major developments should where possible, provide multifunctional benefits. 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. However, a Sustainable Drainage Approach drawing (drawing no. 406339/005) has been provided to show indicatively how SuDS can be incorporated into a development parcel. The principles set out on the Sustainable Drainage Approach drawing should be carried forward to detailed design.
- 5.154 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. As such, the proposal is contrary to the requirements of policy CP13 of the Core Strategy and paragraph 167 of the NPPF.

Environmental issues

Core Strategy Policies:

CP12 (Sustainable energy)

CP13 (Environmental and resource management)

Ground Conditions, Minerals Safeguarding, Waste

- 5.155 The NPPF paragraph 183 advises that planning decisions should ensure that “a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination”. Paragraph 184 of the NPPF advises that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
- 5.156 In support of the application, a Phase 1 Geo-Environmental Desk Study and Phase II Geo-Environmental Investigation were carried out. This includes an assessment of the subsurface ground conditions beneath the site that may potentially impact upon and be impacted by the proposed development. Ground conditions are the subject of the ES Chapter 8. It is advised that the proposed development will incorporate significant areas of hardstanding which will break direct contact between any unlikely contamination. A CEMP will also be produced to control any potential contamination risks throughout construction. The ES concludes that risks associated with hazardous ground gases cannot be fully discounted as no gas monitoring has been undertaken, and additional investigations will be required. Were the application to be approved this could be dealt with by way of condition.
- 5.157 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 BMWLP.
- 5.158 The applicant has demonstrated through the mineral assessment provided that prior extraction of resource, sterilised through this development, would not be economically viable to extract due to the variability in the resource. As such, the requirements of Policy 1 of the BMWLP are met.
- 5.159 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.

Air Quality

- 5.160 NPPF paragraph 174 states that decisions should contribute to and enhance the natural and local environment by amongst other things, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Development should, wherever possible, help to improve local environmental conditions such as air and water quality. Paragraph 186 of the NPPF states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA) and Clean Air Zones. Opportunities to improve air quality and or mitigate impacts should be identified.
- 5.161 Core Policy 13 Environmental and resource management, seeks improvements in air quality, especially in the Air Quality Management Area adjacent to the motorways and close to Burnham Beeches SAC. It is noted that this site is not located within a designated AQMA, but it is within approximately 850m north of a designated AQMA.
- 5.162 The ES Chapter 13 considers the construction and operational effects associated with air pollution. During construction, there is a risk that existing properties may be affected by dust generated. The proposed development will generate traffic and the effects of vehicle emissions has been considered.
- 5.163 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." It is understood that all the traffic data used in the Air Quality Assessment has been provided by Mode transport planning, including the data used to verify the model. The Highway Authority has expressed concerns over the transport data including the use of outdated baseline data. There is also concerns raised over the accuracy of the proposed trips rates for the uses on site. An underestimation of trip rates from the developments would result in an inaccurate assessment of the development on Air Quality.
- 5.164 It is stated that an assessment on the potential impacts the development upon Burnham Beeches SAC is not required. The justification given is that the proposed development identified in the Chiltern and South Bucks Local Plan 2036 (now withdrawn) would have no adverse effect on the integrity of the Burnham Beeches SAC. Air quality impacts were therefore screened out of the Habitats Regulations Assessment and this approach was agreed through a Statement of Common Ground with Natural England, dated 29 January 2020. While the Local Plan has been withdrawn, given that the in-combination assessment within the HRA took account of a much larger scale of development than the Proposed Development, and based on a similar quantum of new development locally, this evidence supports the conclusion

that the Proposed Development will have no likely significant effect on Burnham Beeches SAC in respect of air quality, and therefore construction and operational impact assessments on the Burnham Beeches SAC have been scoped out of this ES Chapter. This is accepted.

Noise & Vibration

- 5.165 NPPF paragraph 174 states that decisions should contribute to and enhance the natural and local environment by amongst other things, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution. Paragraph 185 states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should identify and protect tranquil areas which have remained relatively undisturbed by noise.
- 5.166 Core Policy 13 Environmental requires new development to be directed away from existing sources of noise.
- 5.167 The ES Chapter 12 assesses the potential noise and vibration impacts of the proposed development. The impacts of construction noise and vibration on existing residential properties would be mitigated through a CEMP. It is concluded that any moderate impact would be short lived. Construction traffic impacts are assessed as being negligible. It is noted that the illustrative masterplan sets development back from the major sources of road traffic. The noise and vibration assessment 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.
- 5.168 Though the finalised layout of the development has yet to be proposed, the recommendations within the ES would inform what levels of mitigation would be necessary at the detailed design stage, to ensure the indoor ambient noise levels in living rooms and bedrooms meet the standards in BS 8233:2014 for the appropriate time period.

Utilities

- 5.169 Core Policy 6 Local Infrastructure Needs, states that new development will be required to provide for the necessary infrastructure needs arising from the proposal, either directly or via an appropriate financial contribution. The Council will use planning conditions and obligations where appropriate to secure the timely provision of essential infrastructure directly and reasonably related to a development.
- 5.170 The applicant states that a Foul Water and Utilities Assessment was prepared in 2018 to support the promotion of the site through the Local Plan process and based on a site capacity of 1,000 dwellings. This document has been

submitted. It is stated that an updated assessment reflecting 450 dwellings is being produced. Thames Water do not have any objection to the scheme and recommend condition to address wastewater requirements. The assessment area does not currently have a connection to a potable water supply or foul drainage system.

Building sustainability

Core Strategy Policies:

CP8 (Built and Historic Environment)

CP12 (Sustainable energy)

CP13 (Environmental and resource management)

Sustainable Construction and Renewable Energy Supplementary Planning Document, Adopted Feb 2015

5.171 The NPPF at paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate, and it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.

5.172 Core Policy 8 Built and Historic Environment, states new development should be designed to help tackle the causes of, and be resilient to the effects of climate change. Core Policy 12 Sustainable Energy, requires developments to secure at least 10% of their energy from decentralised and renewable or low-carbon sources. Core Policy 14 Environmental and Resource Management, requires new development to be water efficient and include Sustainable Urban Drainage Systems, protect and enhance water quality, seek improvement in air quality and minimise noise impacts.

5.173 In September 2019 South Bucks District Council (SBDC) declared a climate emergency and is in the process of investigating how climate change can be addressed. In March 2020 SBDCs' successor Buckinghamshire Council set out to achieve net carbon zero by 2050.

5.174 The submitted Environmental Statement has assessed likely significant effects in relation to climate change (Chapter 16) as required by the EIA Regulations 2017. The construction and operation (occupation) of the completed development will result in Greenhouse Gas emissions (GHG) emissions from various activities, both on and off-site, including the consumption of fossil fuels, the generation of consumed mains electricity, and associated with transport. It is stated that the GHG emissions from the development represent a very small percentage of the Buckinghamshire Council's 2018 GHG emissions, a smaller percentage of the 2018 emissions across South East England, and a smaller percentage again of the UK Carbon Budget. The construction stage emissions are considered to be of minor magnitude with low probability which reduces their impact to non-significant. The requirement for all UK buildings to be net zero by 2050 (and new homes to be 70-80% lower carbon by 2025), GHG emissions are considered to be of neutral magnitude and very high

likelihood which reduces their impact to non-significant. As such, there is a conflict with planning policy.

- 5.175 The assessment has identified a wide range of primary mitigation inherent to the design of the development, and tertiary mitigation which sets out legislative and/or policy requirements which are to be incorporated into the detailed design stage, construction, or operational practices. Mitigation measures that are included to reduce GHG emissions from the operational stage of the Proposed Development are detailed in the Energy and Sustainability Strategy. As a result, the majority of potential effects have been determined to be insignificant.
- 5.176 There are serious concerns regarding the climate change assessment detailed in Chapter 16 of the Environmental Statement. The assessment area is recognised as “greenfield and farmland with no operational buildings or livestock and may well be expected to act as a carbon sink under the “do nothing” scenario, the vegetation and plant life could well 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.
- 5.177 The Energy and Sustainability Statement outlines the proposed approach to reducing demand for energy from the development itself. These include passive design options (those which utilise building form, massing and design to exploit the natural surroundings of the site to help reduce energy demand) within the illustrative masterplan which includes: strategic planting of trees to shelter lower level buildings from high winds and provide shading from the sun; Dwellings have been oriented with sufficient south spacing roof space to site PV panels (See Be Green); and, building oriented with the sunpath to allow for winter solar gains to reduce heating demand. The approach outlined would be in accordance with the sustainable design and construction advice set out in the Residential Design Guide (2018). Active design measures to be included within the building services specification to reduce energy consumption will meet at least the minimum recommended performance requirements contained in the UK Government Domestic Building Services Compliance Guides (2013).
- 5.178 It is reported that the development has the potential to achieve an 85% reduction in regulated carbon emissions (those assessed under Part L of the UK Building Regulations). This assumes the widespread use of heat pumps and installation of PV panels throughout the site.

5.179 It is considered that the submitted Energy & Sustainability Statement 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. As such the approach is considered to accord with policies 8, 12 and 14.

Infrastructure and Developer Contributions

Core Strategy Policies:

CP6 (Local infrastructure needs)

Local Plan Saved Policies:

COM1 (Provision of community facilities)

5.180 Core Policy 6 states that the Council will use obligations where appropriate to secure provision of essential infrastructure directly and reasonably related to the development. Any agreement would be subject to having regard to the statutory tests for planning obligations in the Community Infrastructure Levy regulations and the National Planning Policy Framework.

5.181 The applicant cites the withdrawn CSB Local Plan Policy BP CP9 which lists a range of infrastructure that was expected to be delivered as part of a wider allocation which includes a two form entry school, local centre, contributions towards junction improvements, improvements to bus services and bus stop infrastructure and financial contributions towards health care facilities and secondary education. The applicant states they are willing to enter into a S106 agreement to deliver relevant planning obligations, subject to the required justification, and has submitted draft Heads of Terms.

| Item | Estimated Contribution | Comments |
|-----------------------------|--------------------------|--|
| Affordable housing | 40% affordable housing | Commitment to provide policy compliant affordable housing on site. 40% equates to 180 affordable units. CIL compliant. |
| Self / Custom build housing | Circa 5% | 5% requirement of self-build plots in accordance with (withdrawn) CSB LP Policy DM LP8. This would equate to c 22 dwellings. CIL compliant. |
| Education | TBC | 1.72ha land to be reserved to deliver a primary school and pre-school on site if required. Not CIL compliant. Not required or justified. Financial contribution expected towards specific primary and secondary education needs arising from the development. This will form part of the CIL payment. |
| Community facilities | TBC | 0.5ha land is proposed for a local centre. Not CIL compliant. Not required or justified. |
| Health | TBC | Withdrawn CSB LP Policy requirement to contribute towards primary health care facilities. Not CIL compliant. Not required or justified. |
| Public Open space | No contribution | On site provision to meet needs of the development. |
| Sports pitches | TBC | 1.7 ha of land outside the site. CIL compliant. |
| Biodiversity Net Gain | TBC | Significant biodiversity improvements are proposed within the site. Land within the Portman Estate has been identified as potentially suitable for biodiversity offsetting to ensure biodiversity net gain. CIL compliant. |
| Burnham Beeches SAC SAMM | c £2,023.87 per dwelling | Requirement within the Burnham Beeches SAC SAMM SPD. CIL compliant. |
| Transport | TBC | Withdrawn CSB LP Policy requirement to contribute towards offsite junction improvements, sustainable transport and new bus infrastructure. Travel Plan proposals also require funding. Not CIL compliant. Not required or justified. |

5.182 The development is a type of development where CIL would be chargeable.

This would include £150 per square metre for C3 (dwellings), A1 (shops), A2 (finance and professional services) and A3 (restaurants and cafes) uses as well as £35 per square metre for D1 (non-residential institutions) and D2 (assembly and leisure) uses.

6.0 Weighing and balancing of issues / Overall Assessment

6.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications are determined in accordance with the development plan unless other material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,
- b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
- c. Any other material considerations

- 6.3 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.
- 6.4 Human Rights: In line with the Public Sector Equality Duty the LPA must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation). The application provides for housing and associated development. It is not considered that discrimination or inequality would arise from the proposal.
- 6.5 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is considered appropriate in upholding the Council's adopted policies and is not outweighed by any engaged rights.
- 6.6 The Council is currently unable to demonstrate the five-year supply of deliverable housing sites. As set out within the Chiltern and South Bucks Interim Five-Year Housing Land Supply Calculation (at 1st April 2020, published 11th September 2020) the South Bucks Area can demonstrate 2.94 years supply. However, due to failing the last housing delivery test, the correct figure is 2.57 years. In the absence of an up to date five-year supply of housing land, and in accordance with NPPF paragraph 11 there is a presumption in favour of sustainable development. As the site lies within the Green Belt paragraph 11d) i) is engaged. This requires that planning permission should be granted unless 'the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed'. It is necessary to apply the development control tests relating to the Green Belt in particular to ascertain whether these provide a clear reason for refusal.
- 6.7 There are relevant development plan policies that apply to this application. Those policies which are most important for determining this application are CP3, CP7, CP8, CP9, CP12, CP13, GB1 and TR7 and overall the suite of development plan policies are considered to be up-to-date. Thus the tilted balance in paragraph 11d) of the NPPF is not engaged and the S38(6) balance is followed.
- 6.8 The NPPF sets out in paragraph 147 that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'Very Special Circumstances'. Paragraph 148 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt and that 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

- 6.9 Development should be regarded as inappropriate in the Green Belt except in specified exceptions as set out in NPPF Paragraph 149 (a – g). Saved Local Plan policy GB1 similarly identifies categories of development that may be considered appropriate. The proposed development does not fall within any of the exceptions listed in paragraph 149 or Policy GB1. The proposals are therefore inappropriate development based on this paragraph of the NPPF and contrary to development plan policy.

Green Belt and other harm

- 6.10 The assessment of the proposals against the Green Belt purposes concludes that there are clear conflicts. Beaconsfield is a principal settlement, the A355 Amersham Road provides a strong Green Belt boundary. The proposal would clearly result in a sprawl of development of a 'large built up areas'. Furthermore, the proposed development will result in the loss of 24 ha of agricultural land. Given the open character of the agricultural fields and the existing mature tree belts and woodland it is considered that the development would result in significant spatial and visual impact on the openness of the Green Belt. The proposal would conflict with four out of the five purposes of including land in the Green Belt. The proposal would not accord with policy GB1 of the Local Plan and the NPPF. The overall harm to the Green Belt is very substantial and this harm is afforded very substantial weight. As a result, it is necessary to establish whether there are any 'Very Special Circumstances'. The NPPF states at paragraph 148 that VSC 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. The assessment of 'other harm' is considered further below.
- 6.11 The proposed development close to Minerva Way in an area identified as a landscape buffer and excluded from the identified potential development areas within the Council's Landscape Capacity Assessment, would be harmful to the landscape setting of Minerva Way and the setting of heritage assets. The proposed landscape strategy along the boundary with Minerva Way would be contrary to the objectives of the landscape buffer set out in the landscape capacity assessment, fundamentally changing the character of Minerva Way and its relationship to the adjoining landscape. The LVIA accompanying the application finds that there will be a significant residual effect on the landscape character of the Assessment Area, given the substantial change it will undergo. While the level of residual visual effects would generally reduce once mitigation planting has established, nonetheless adverse visual effects will remain for users of public footpath and on properties along Amersham Road. This results in further harm which would be afforded moderate negative weight.
- 6.12 The layout of the development represents poor design quality. The local centre lies adjacent to the countryside and is as far away as possible from the existing built-up area of Beaconsfield and this location will discourage walking to it. It has not been demonstrated that the proposed local centre and facilities will relate positively to Beaconsfield or the local area. The proposals for the retail and community uses are based on the withdrawn Local Plan proposed site

allocation for a much larger development of 1,600 homes. This is not an appropriate nor rational basis for facilities to support 450 homes and evidences an inherently unsustainable development proposal. The housing number exceeds the site's capacity and the extent of building above 2 storeys is considered excessive for this edge of centre / rural edge location. This results in further harm which would be afforded moderate negative weight.

- 6.13 The supporting transport assessment is inadequate and it is therefore 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. The proposed development fails to make adequate provision to allow accessibility to the site by non-car modes of travel. This results in further harm which would be afforded moderate negative weight.
- 6.14 The assessment of the development on ecology is deficient and lacks necessary information on protected species. It has not been demonstrated that the proposed development would not have an unacceptable impact on the natural environment including on the Burnham Beeches SAC or result in biodiversity enhancements. This results in further harm which would be afforded significant negative weight.
- 6.15 The harm arising from the impact on the setting of the heritage assets is considered to be at the lower end of 'less than substantial harm'. As there would be some public benefit arising from the development this would outweigh the 'less than substantial harm'. This harm is therefore considered to be neutral in the planning balance.
- 6.16 It has not been demonstrated that the proposed development would not have an unacceptable impact on greenhouse gas emissions contributing to climate change. This results in further harm which would be afforded limited negative weight.
- 6.17 It is considered that the development would result in loss of BMV agricultural land which would be afforded negative weight as the permanent loss of agricultural land cannot be mitigated. This results in further harm which would be afforded limited negative weight.
- 6.18 It has not been demonstrated that the air quality impacts of the proposal would not have an unacceptable impact on human health or biodiversity including on the Burnham Beeches SAC. This results in further harm which would be afforded moderate negative weight.
- 6.19 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. This results in further harm which would be afforded limited negative weight.

Benefits

- 6.20 The benefits put forward to support very special circumstances include:
- Housing delivery

- Affordable housing
- Self-build and custom build homes
- Accessible location
- Local centre, Community Facilities and Social Benefits
- Education and land for future school
- Public Open Space and playing pitches
- Biodiversity benefits
- Sustainability benefits

- 6.21 Clearly the provision of housing given the need is a benefit and where the Council cannot demonstrate a 5 years' supply of housing. South Bucks can demonstrate a 2.57 year supply of housing between 2020-2025. A material factor in meeting housing need is the adoption of the Vale of Aylesbury Local Plan (VALP) in September 2021 which makes provision for unmet need from the former Wycombe, Chiltern and South Bucks Districts. A total of 5,725 dwellings from the former Chiltern and South Bucks areas will be accommodated by the plan over the plan period to 2033. This inclusion effectively reduces the housing target for the South Bucks area and as such impacts on the 5 year housing supply calculation for this area. The Council is in the process of updating the 5 year housing supply position statement in light of the adoption of VALP and to incorporate the most up to date housing delivery data. As such it is considered that this dilutes the weight can be attributed to the delivery of housing as a benefit of the scheme. It is considered that housing delivery is a benefit that can be attributed moderate weight.
- 6.22 The provision of affordable housing is a benefit of the scheme. The adopted VALP provision for unmet need in the former Bucks Districts (estimated at 5,725 dwellings) would be subject to Policy H1 which seeks 25% affordable housing on qualifying development sites. The affordable housing provision would merely be policy compliant. Furthermore the high proportion of smaller homes in the scheme at the expense of larger family homes and an indicative mix that does not meet the policy objective serve to further temper the weight that can be attributed to affordable housing as a benefit of the scheme. It is considered that significant weight can be attributed to the delivery of affordable housing as a benefit of the scheme.
- 6.23 Provision for 22 self-build / custom build homes is a benefit of the scheme. 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 the Council 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. Part 1 of the Register contains just 30 applications. The provision of 22 plots is a benefit of the scheme that can be attributed limited weight as a benefit of the scheme.
- 6.24 The site's accessibility is presented as a benefit and it is stated that the scheme will also improve the accessibility of Wilton Park to Beaconsfield town centre. It is accepted that located on the edge of the built up area of Beaconsfield the site is accessible. However, because of the poor layout the proposal is not well

integrated with the urban area and furthermore inadequate provision is made for sustainable access. Therefore only limited weight is attributed to the site's accessibility as a benefit of the scheme.

- 6.25 The inclusion of a local centre reflects the development brief for the now withdrawn Site Allocation Policy SP BP9 (for a much larger development). It is not clear that this would be a sustainable proposal given the much smaller scale of development or that it would complement facilities approved at Wilton Park. In this context it is considered that the local centre and community facilities could only be attributed limited weight as a benefit of the scheme.
- 6.26 The contributions towards education provision will 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 cannot themselves be considered benefits that can be attributed weight.
- 6.27 Land is proposed for the delivery of a 2 Form Entry Primary School and pre-school should Buckinghamshire Council require education provision to be provided on site. Education Officers have confirmed that it is not required. It is noted that provision for a new school was included within the draft allocation within the submission version of the Chiltern and South Bucks Local Plan 2036 (now withdrawn) but that was for a much larger number of dwellings, 1,600. Notwithstanding that there is no requirement for a new school at the site, the provision of land for future provision can be considered a benefit that can be attributed only limited weight.
- 6.28 It is proposed to provide circa 10.8ha of public open space whereas the Fields for Trust requirement would be 3.5ha. Furthermore it is stated that 64% of the site will be publically accessible. It is noted that the majority of this is Natural / Semi Natural space (6.06ha) corresponding to the woodland that is being retained on site. The amenity green space proposed is 1.59 ha against a need (Fields for Trust) of 0.66ha. There is also provision of 0.23ha of allotments / Community Grow space. Public space provision is a benefit that could only be attributed only limited weight as it primarily serves the development itself.
- 6.29 An area 1.78 ha in area outside the site (within the applicant's ownership) is proposed to deliver sports pitches if required. The requirement (Fields for Trust) for sports pitches is 1.78ha. Sport England has concerns given the lack of supporting evidence which suggests the pitches are needed or would meet an identifiable demand; that the proposed location lacks accessibility to the new community, and the lack of ancillary provision. No weight could be attributed to sports pitch provision noting the concerns of Sport England.
- 6.30 Biodiversity net gain through the retention and enhancement of existing habitats on site and the creation of new habitats within the site and wider Portman Burtley Estate is a benefit that can be attributed only limited weight given the loss of agricultural fields, loss of open countryside and because it has not been demonstrated that the proposed development would not have an unacceptable impact on the natural environment.

- 6.31 The submitted 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. Compliance with sustainability objectives is a requirement and not considered to be a significant consideration that outweighs the harm to the Green Belt (including potential environmental harm) caused by the development itself. It is not considered that this is a benefit that can be attributed weight in the planning balance.
- 6.32 The proposed development results in 'less than substantial harm' to the setting of heritage assets. NPPF paragraph 202 states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. The harm to the setting of the heritage assets is considered to be at the lower end of 'less than substantial harm' and the benefits of the scheme while providing limited benefit to the public, would be sufficient to meet this policy requirement.
- 6.33 While the applicant has not put forward an economic benefits case this is potentially a benefit that would be considered but is afforded limited weight in the planning balance.

Conclusion

- 6.34 The applicants' case relies heavily on the site's proposed allocation within the withdrawn 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 should be considered acceptable. However the Draft Chiltern and South Bucks Local Plan 2036 was never examined as it was withdrawn. Therefore the policies contained within it hold no material weight in planning decision-making. 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.
- 6.35 The Very Special Circumstances case in effect seeks to translate the Exceptional Circumstances case put forward to support the proposal to remove the application site from the Green Belt, through the now withdrawn Local Plan. However that case and the supporting evidence base was derived from the context of strategic plan-making. NPPF paragraph 140 states that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." Individual planning applications for development within the Green Belt cannot rely on the policy provisions for altering Green Belt boundaries.

- 6.36 The NPPF reiterates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 confirms 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.
- 6.37 The Green Belt balance has set out all of the harms on one side and all of the benefits and other material considerations on the other side of the balance and officers have concluded that all of the harms are not clearly outweighed by all of the benefits. 'Very Special Circumstances' do not exist in this case.
- 6.38 It is considered that the application of policies in the National Planning Policy Framework provides a "clear reason for refusing" the development proposal under NPPF paragraph 11(d)(i). It is concluded that the proposals are in conflict with the development plan policies in so far as they relate to the Green Belt, design and the built and historic environment, the natural environment, accessibility, sustainability and transport. There are no other material considerations that have a bearing on the balance.
- 6.39 There would be an adverse effect from the proposed development of the Burnham Beeches SAC from recreational impacts, alone or in combination with any other plans or projects. As such, planning permission cannot be granted for the proposed development as there is a conflict with the Conservation of Habitats and Species Regulations 2017 (as amended).
- 6.40 The proposals represent unsustainable development and it is recommended that permission be refused for the reasons set out.

7.0 Working with the applicant / agent

- 7.1 The Council notes paragraph 38 of the NPPF (2021). No pre application advice was sought prior to the submission of the application. The Council offers a pre-application service (paragraphs 39 to 41 of the NPPF). In this instance the application was determined without delay, and within the statutory timeframe.
- 7.2 A number of meetings and discussions were held with the applicant during the determination of the application. The applicant was advised how the proposal did not accord with the development plan, that no material considerations are apparent to outweigh these matters and provided the opportunity to withdraw the application.

8.0 RECOMMENDATION: Refuse permission for the following reasons:

1. The proposed development would constitute inappropriate development and will result in spatial and visual harm to the openness of the Green Belt. In addition, the proposals will lead to a conflict with four out of the five purposes of including land in the Green Belt. The benefits of the scheme taken together do not clearly outweigh the harm and other harm. 'Very special circumstances' have not been demonstrated to justify this inappropriate development in the Green Belt. The proposals are therefore contrary to the

South Bucks District Local Plan (1999, consolidated 2007 and 2011) saved Policy GB1 and paragraphs 137, 138, 147, 148, 149 and 150 of the National Planning Policy Framework (2021).

2. The proposed development would give rise to significant detrimental impacts on the landscape character of the area. The proposed development and landscape strategy would be harmful to the landscape character and visual amenity of Minerva Way and contrary to the objectives of the landscape buffer set out in the Landscape Capacity Assessment, fundamentally changing the character of Minerva Way and its relationship to the adjoining landscape. The proposed development is therefore considered to be in conflict with Core Strategy policies 8 and 9, Saved Local Plan policies EP3 and EP4, and paragraphs 130, 131 and 174 of the National Planning Policy Framework (2021).

3. The development parameters and layout represent poor design and fails to relate positively to the site and local context. The local centre lies adjacent to the countryside and is as far away as possible from the existing built-up area of Beaconsfield and this location will discourage walking to it. It has not been demonstrated that the proposed local centre and facilities will relate positively to Beaconsfield or the local area. It is considered that the housing number exceeds the site's capacity and the extent building above 2 storeys is considered excessive for this location. The proposed development is therefore considered to represent poor design in conflict with Core Strategy policy 8, Saved Local Plan policies COM1, S6, EP3 and H9 and with paragraphs 124 and 127 of the National Planning Policy Framework (2021).

4. 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 road network and will not achieve safe and suitable access contrary to the National Planning Policy Framework, Core Policy 7 of the South Bucks Core Strategy, Saved Local Plan policy TR5, Buckinghamshire Council's Highways Development Management Guidance (2018) and the aims of Buckinghamshire's Local Transport Plan 4.

5. 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 7 of the South Bucks Core Strategy, Buckinghamshire Council's Highways Development Management Guidance (2018) and the aims of Buckinghamshire's Local Transport Plan 4.

6. The assessment of the development on ecology is deficient and lacks necessary information on protected species. It has not been demonstrated that the proposed development would not have an unacceptable impact on the natural environment. Furthermore necessary mitigation of recreational impact on the Burnham Beeches SAC has not been secured. Lastly, it has not demonstrated that there would be satisfactory biodiversity enhancements. The proposals are therefore contrary to Core Policies 9 and 13 and paragraphs 174, 180 and 181 of the National Planning Policy Framework (2021).

7. For developments of this scale, Core Strategy Policy CP3 seeks to secure at least 40% of dwellings to be provided in the form of units of affordable accommodation on site, unless it is clearly demonstrated that this is not economically viable. The application proposes that 40% of the units subject to viability shall be for affordable accommodation. In the absence of a suitable and completed legal agreement and a mechanism to secure the provision of

this affordable housing, and failure to demonstrate a tenure mix and affordable housing size mix to meet requirements, the proposed development would be contrary to policy CP3 of the South Bucks Core Strategy (2011) as well as the aims of section 5 of the National Planning Policy Framework (2021).

8. It has not been demonstrated that the proposals would have an acceptable impact on greenhouse gas emissions contributing to climate change. The assessment undertaken has failed to factor in the area as “greenfield” and farmland which may well be expected to act as a carbon sink in the absence of development. On this basis the assessment has failed to accurately assess the climate change impact of the proposed development, contrary to paragraph 152 of the National Planning Policy Framework (2021).

9. The proposal would result in loss of agricultural land including ‘best and most versatile’ (BMV) land. The proposals would be contrary to paragraph 174 of the National Planning Policy Framework (2021).

10. The integrity of the Air Quality modelling undertaken to support the proposals is reliant on traffic modelling which is not up to date. It has not been satisfactorily demonstrated that the air quality impacts of the proposal would be acceptable, contrary to Core Policies 9 and 13 of the South Bucks Core Strategy (2011) and paragraph 174, 180 and 181 of the National Planning Policy Framework (2021).

11. 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. As such, the proposal is contrary to the requirements of policy CP13 of the Core Strategy and paragraph 167 of the of the National Planning Policy Framework (2021).