



## Report to Strategic Sites Planning Committee

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<b>Application Number:</b>	18/07194/OUT
<b>Proposal:</b>	Outline application (including details of access and layout) for erection of 101 dwellings with all other matters reserved (amended plans received)
<b>Site Location:</b>	Tralee Farm 20 Wycombe Road Holmer Green Buckinghamshire HP15 6RY
<b>Applicant:</b>	Inland Ltd
<b>Case Officer:</b>	Declan Cleary
<b>Ward(s) affected:</b>	Hazlemere Penn Wood and Old Amersham
<b>Parish-Town Council(s):</b>	Hazlemere Parish Council Little Missenden Parish Council
<b>Date valid application received:</b>	31 <sup>st</sup> August 2018
<b>Statutory determination date:</b>	30 <sup>th</sup> November 2018

### Recommendation:

The recommendation is that the application be delegated to the Director of Planning and Environment for **APPROVAL** subject to the satisfactory completion of a legal agreement to secure the following:

- a) Provision of a minimum 48% on-site affordable housing (and related controls)
- b) Provision of 5 custom/self-build dwellings
- c) Provision of on-site public open space, including play equipment and its future management and maintenance, including on site woodland and delivery of pedestrian/cycle connections
- d) Financial contribution towards a MUGA and NEAP within HW8 as necessary
- e) Future management and maintenance of on-site sustainable drainage system

- f) Provision of a scheme of biodiversity off-setting to provide a net gain in biodiversity
- g) Financial contributions towards off site highways works including Real Time Passenger Information (RTPI) upgrades to bus stops and waiting restrictions within Highway.
- h) Provision of a pedestrian route (either permanent or temporary until other routes are provided) to provide access between Wycombe Road and the southern site boundary if required by the needs of the HW8 development that will gain its vehicular access from Amersham Road including a step in right for the route to be constructed if the Tralee development does not proceed as fast as the remainder of the HW8 development.
- i) Removal of any ransom opportunities relating to other development of the HW8 site.

subject to the receipt of no new material representations and conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused for such reasons as the Director of Planning and Environment considers appropriate.

## **1.0 Summary & Recommendation/ Reason for Planning Committee Consideration**

- 1.1 The application seeks outline planning permission for the construction of 101 dwellings with matters of access and layout for approval. Details of scale, appearance and landscaping remain reserved. Access would be provided from Wycombe Road
- 1.2 Cllr Catherine Oliver and Cllr Ed Gemmell (representing Hazlemere ward), and Cllr Jonathan Waters (representing Penn Wood and Old Amersham ward) have all requested that the application be called-in to Committee. Representations have also been received by Cllr Ron Gaffney objecting to the proposed development. Full details of the reasons for call-in and objections raised can be found in Appendix A.
- 1.3 While the scale of the development would ordinarily be referred to an Area Planning Committee, the application site straddles two committee areas and could not be considered at one committee. Therefore, the application has been referred to Strategic Sites Committee for consideration.
- 1.4 The application site is located within HW8 (Land off Amersham Road including Tralee Farm, Hazlemere), an allocated site for residential development within the Wycombe District Local Plan. It is therefore the Councils planning policy position to allow for housing development at this site. The principle of residential development at this site is therefore acceptable.
- 1.5 The proposed development is considered to be in accordance with the Development Plan, taken as a whole, and would deliver sustainable development in the context of environmental, social and economic elements. Paragraph 11 of the NPPF indicates that the decisions should apply the presumption in favour of sustainable

development and where they accord with an up to date development plan, they should be approved without delay.

- 1.6 The application is recommended for approval subject to the completion of a legal agreement and subject to a number of planning conditions which are considered necessary to ensure the scheme accords with development plan policy and that a high quality development is implemented on the ground.

## **2.0 Site Description**

- 2.1 The site straddles the former Wycombe and Chiltern district areas, with the majority of the site lying within Hazlemere (Wycombe) and part of the site which falls within the curtilage of 20 Wycombe Road lying within Holmer Green (Chiltern). The application site is located within the settlement boundary for the High Wycombe urban area as defined by the Wycombe District Local Plan Policies Map, with a small part of the site located within the Holmer Green built up area as defined by the Chiltern District Adopted Proposals Map. Within the former Wycombe District area, the application site forms part of a larger site which is allocated for development within the WDLP under policy HW8 (see below).
- 2.2 The site comprises a two storey detached residential dwelling and its curtilage which fronts onto Wycombe Road to the north of the site. A number of buildings of agricultural character, and associated hardstanding, are located to the northern part of the site. The north-eastern parcel of land is woodland, while the north-western parcel of land is understood to be part of a former commercial orchard. The remainder of the site comprises fields, with some hedgerows across the site. The topography of the land slopes towards a valley to the east of the site.
- 2.3 A larger woodland area is located to the east of the site, which is a traditional orchard and priority habitat, and which is a formally protected area of green space. A TPO has also recently been placed on that orchard woodland. Residential properties and their curtilages are located to the south, west and north of the site. Back garden boundaries predominantly define the western and northern boundaries of the application site. To the south and south-east of the site is the wider HW8 allocation.
- 2.4 The site is located within Flood Zone 1 as defined by the Environment Agency indicative flood map for planning. However, the valley within the site has been identified as being susceptible to surface water flooding.
- 2.5 The site has been removed from the Green Belt through the Development Plan process. The Chilterns AONB lies to the south of the site at Amersham Road. No public rights of way cross the site.
- 2.6 There are no designated heritage assets (Conservation Area or Listed Building) within the site or within the immediate setting of the site.

### 3.0 Description of Proposed Development

- 3.1 The application seeks outline planning permission for the construction of 101 dwellings. The application seeks approval for layout and access, with matters of appearance, scale and landscaping reserved.
- 3.2 Access is proposed to be provided from Wycombe Road. To facilitate this the existing property, No.20 Wycombe Road, would be demolished. A 4m radii bellmouth junction onto Wycombe Road is proposed. The plans demonstrate that visibility splays of 2.4m x 43m would be achieved from the access point. A footpath would be provided on one side of the access road (eastern side) with landscaping proposed on the western side.
- 3.3 The proposals include 101 dwellings comprising a mix of detached, semi-detached, terraced and apartments. Of the 101 dwellings proposed, 49 units are proposed as affordable housing. The overall housing mix comprises:

<i>No. Bedrooms</i>	<i>No. Affordable Units</i>	<i>No. Market Units</i>	<i>Total Units</i>
<i>1 bedroom</i>	<i>1</i>	<i>0</i>	<i>1 (1%)</i>
<i>2 bedroom</i>	<i>40</i>	<i>16</i>	<i>56 (55.4%)</i>
<i>3 bedroom</i>	<i>8</i>	<i>11</i>	<i>19 (18.8%)</i>
<i>4 bedroom</i>	<i>0</i>	<i>25</i>	<i>25 (24.7%)</i>

- 3.4 The scheme includes an affordable housing tenure split of 39 units rented and 10 units intermediate.
- 3.5 The layout details a single access road into the site, from Wycombe Road with no through route to the remainder of the HW8 allocation. The layout shows dwellings backing onto the back gardens of dwellings on Laceys Drive and Kestrel Drive to the west and Wycombe Road to the north. Four perimeter blocks, comprising a mix of dwellings are proposed within the remainder of the site, with a network of roads proposed around these blocks.



*Proposed site layout for consideration*

- 3.6 Parking is proposed to be provided throughout the site in a mix of garages, off street parking on driveways and parking courts, and on street parking. A total of 224 parking spaces are proposed, of which 187 are allocated parking spaces (including 47 garages) with an additional 37 parking spaces for visitors.
- 3.7 The existing woodland in the north east of the site would be retained, managed and maintained and with public access provided. The scheme also shows a replacement orchard which would be sited adjacent to No.3 Kestral Drive. An area of public open space would be provided at the southern part of the site along its entire width. Small pockets of incidental open space are provided within the scheme. While landscaping is a reserved matter the submitted layout indicates landscaping within the areas of open space, retained woodland, within the street and within the rear gardens.
- 3.8 A SUDS feature is proposed within the south eastern corner of the site within the area of open space. The scheme also includes a pumping station which would be provided within the southern parcel of open space. An emergency access is proposed which would connect to the remainder of HW8 beyond the southern boundary. Two additional pedestrian/cycle points of access have also been provided which would link to the wider allocated site.
- 3.9 Details of scale, appearance and landscaping are reserved matters and as such are not for consideration in this application as amended.
- 3.10 The application has been supported by the following documents which are for consideration:

Plans/Documents received 19<sup>th</sup> January 2022

- *Required Site Access Alignment (141278/A/A07 Rev A dated 18/05/20)*

- *Amended Coloured Site Layout (18083 – C201B)*
- *Amended Proposed Site Layout (18083 – P202M)*
- *Amended Indicative Schedule of Accommodation*
- *Updated Biodiversity Impact Assessment Metric*
- *Supporting Letter dated 14<sup>th</sup> January 2022 (prepared by Nexus Planning)*

Plans/Documents Received 8<sup>th</sup> November 2021:

- *Site Section – Western Boundary (18083 P207)*
- *Site Section D-D (18083 P206 Rev A)*
- *Swept Path Analysis – Refuse Vehicles (141278/A/02/AT01 Rev A)*
- *Supporting Letter dated 5<sup>th</sup> November 2021 (prepared by Nexus Planning)*

Plans/Documents Received 26<sup>th</sup> August 2021:

- *Drainage Technical Note (prepared by Adama Consulting)*

Plans/Documents Received 21<sup>st</sup> May 2021:

- *Illustrative Landscape Strategy (edp3757\_d008f)*  
*NB Layout changed due to 08/11/21 amendments*
- *Arboricultural Impact Assessment and Method Statement (Rev A) (prepared by ACD Environmental)*
- *Tree Report (Rev A) (prepared by ACD Environmental)*
- *Transport Assessment Addendum (prepared by Vectos)*  
*NB Layout details changed due to latest amendments*
- *Landscape and Visual Impact Assessment (prepared by EDP)*
- *Ecological Impact Assessment (Rev E) (prepared by ACD Environmental)*
- *Biodiversity Impact Assessment Metric*
- *Design and Access Statement (dated May 2021 prepared by OSP)*
- *Addendum Geo-Site Assessment (dated March 2021 prepared by WDE Consulting)*
- *Micro Drainage Hydraulic Model*
- *Addendum Flood Risk Assessment and Drainage Strategy (dated 26<sup>th</sup> April 2021 prepared by ADAMA Consulting)*
- *Supporting Letter dated 18<sup>th</sup> May 2021 (prepared by Nexus Planning)*

Plans/Documents Received 25<sup>th</sup> June 2020:

- *Site Character and Context Plan (dp3757\_d005b prepared by EDP)*

Plans/Documents Received 10<sup>th</sup> December 2018:

- *Geo-Environmental Phase II Report (prepared by WDE Consulting)*

Plans/Documents Received 31<sup>st</sup> August 2018

- *Application Form*
- *Location Plan (18083 S101 Rev B)*
- *Topographical Survey (15022-TOPO-1-2D Sheet 1 of 4)*
- *Topographical Survey (15022-TOPO-1-2D Sheet 2 of 4)*
- *Topographical Survey (15022-TOPO-1-2D Sheet 3 of 4)*
- *Topographical Survey (15022-TOPO-1-2D Sheet 4 of 4)*
- *Flood Risk Assessment and Drainage Strategy (prepared by ADAMA Consulting)*
- *Planning Statement (prepared by Nexus Planning)*
- *Transport Assessment (dated July 2018 prepared by Vectos)*
- *Draft Travel Plan (dated July 2018 prepared by Vectos)*
- *Statement of Community Involvement (dated June 2018 prepared by BECG)*

#### **4.0 Relevant Planning History**

- 4.1 CH/1987/3297/FA – Extension to cul-de-sac to provide access drive for land at “Tralee Farm” – Refused – 21/01/1988. This application relates to land adjacent to the application site and was refused due to the impact on the amenity of residents of Dean Way, and increased traffic hazard and highway danger in the locality.
- 4.2 21/08364/FUL - Demolition of existing buildings on site including Inkerman House and redevelopment for residential use comprising construction of 290 dwellings with hard/soft landscaping, parking including garaging and associated infrastructure – Undetermined. This application relates to land to the south of the application site within the wider HW8 allocation
- 4.3 21/08660/FUL - Construction of new site access and a new section of footway on the northern side of Amersham Road and associated highway works – Undetermined. This application relates to an access off Amersham Road to serve housing development in the southern parcel of HW8.
- 4.4 22/05015/TPO - Fell all fallen trees that are still physiologically alive within the area marked W1 due to no long-term arboricultural merit; and, 22/05014/TPO - Fell all trees of whatever species within the area marked W1 due to having insufficient amenity value to merit protection by TPO. Both these applications relate to works to TPO trees within the off site orchard adjacent to the site. The applications remain undetermined at the time of report writing.

## **5.0 Policy Considerations and Evaluation**

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Section 85 of the Countryside and Rights of Way Act 2000 requires that in exercising a function affecting land in an AONB, the County Council shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB.
- 5.2 The development plan to which this application relates comprises of:
- Wycombe District Local Plan 2019 (WDLP)
  - Wycombe District Adopted Delivery and Site Allocations Plan 2013 (ADSAP)
  - Chiltern District Local Plan 1997 (CDLP)
  - Core Strategy for Chiltern District 2011 (CSCD)
  - Buckinghamshire Minerals and Waste Local Plan 2019 (BMWLP)

The following policies are considered relevant to the proposed development:

### **Wycombe District Local Plan (WDLP)**

- CP1 (Sustainable Development)
- CP2 (Overall Spatial Strategy)
- CP3 (Settlement Strategy)
- CP4 (Delivering Homes)
- CP7 (Delivering the infrastructure to support growth)
- CP9 (Sense of Place)
- CP10 (Green Infrastructure and the Natural Environment)
- CP11 (Historic Environment)
- CP12 (Climate Change)
- HW8 (Land off Amersham road including Tralee Farm, Hazlemere)
- DM20 (Matters to be determined in accordance with the National Planning Policy Framework)
- DM21 (The location of new housing)
- DM22 (Housing Mix)
- DM24 (Affordable Housing)
- DM30 (The Chilterns Area of Outstanding Natural Beauty)
- DM31 (Development affecting the Historic Environment)
- DM32 (Landscape Character and Settlement Patterns)
- DM33 (Managing Carbon Emissions: Transport and Energy Generation)
- DM34 (Delivering Green Infrastructure and Biodiversity in Development)
- DM35 (Placemaking and design quality)
- DM38 (Water quality and supply)
- DM39 (Managing flood risk and sustainable drainage systems)
- DM40 (Internal Space Standards)
- DM41 (Optional Technical Standards for Building Regulation Approval)

### **Wycombe District Adopted Delivery and Site Allocations Plan 2013 (WDSAP)**



- DM1 (Presumption in Favour of Sustainable Development)
- DM11 (Green Networks and Infrastructure)
- DM12 (Green Spaces)
- DM13 (Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance)
- DM14 (Biodiversity in Development)
- DM16 (Open Space in New Development)

#### **Chiltern District Local Plan 1997 (saved Policies)**

- GC1 (Design of Development Throughout the District)
- GC3 (Protection of Amenities Throughout the District)
- GC4 (Landscaping Throughout the District)
- GC9 (Prevention of Pollution Throughout the District)
- H9 (Loss of Existing Dwellings and Land in Residential Use Throughout the District)
- TR2 (Highways Aspects of Planning Applications Throughout the District)
- TR3 (Access and Road Layout Throughout the District)
- NC1 (Safeguarding of Nature Conservation Interest Throughout the District)

#### **Adopted Core Strategy for Chiltern District 2011**

- CS5 (Ensuring that Development is Sustainable)
- CS20 (Design and Environmental Quality)
- CS24 (Biodiversity)
- CS25 (Dealing with the Impact of New Development on the Transport Network)
- CS26 (Requirements of New Development)
- CS31 (Infrastructure)
- CS2 (Green Infrastructure)

5.3 The following documents SPD's and SPG's are also relevant for the determination of the application:

- Wycombe District Council Air Quality Supplementary Planning Document 2020
- Wycombe District Council Residential Design Guidance 2017
- Wycombe District Council Canopy Cover Supplementary Planning Document 2020
- Wycombe District Council Planning Obligations Supplementary Planning Document 2020

#### **Principle and Location of Development**

Wycombe District Local Plan (August 2019): CP1 (Sustainable Development); CP2 (Overall Spatial Strategy); CP3 (Settlement Strategy); CP4 (Delivering Homes); DM21 (The location

of new housing); DM33 (Managing Carbon Emissions, Transport and Energy Generation); HW8 (Land off Amersham Road including Tralee Farm, Hazlemere)

Wycombe District Adopted Delivery and Site Allocations Plan (July 2013): DM1 (Presumption in favour of sustainable development)

- 5.4 This application seeks outline planning permission with matters relating to access and layout for approval. Other matters relating to appearance, scale and landscaping remain reserved. As an outline application it is therefore necessary to consider whether the principle of residential development, in this instance 101 dwellings, is acceptable.
- 5.5 The site lies within HW8 which is an allocated site for residential development as set out by Policy HW8 (Land off Amersham Road including Tralee Farm, Hazlemere) of the Wycombe District Local Plan. Following appropriate assessment and justification through the evidence base and adoption of the Development Plan, the site has been taken out of the Green Belt. Green Belt policies are therefore not relevant to the determination of this application. A large number of objections have been received with regard to the Development Plan making process and that the site (HW8) should not have been removed from the Green Belt and allocated for housing. The route for challenging purported issues with the adoption of the Local Plan should be through Judicial Review in the High Court. No challenge was made within the prescribed time frame and therefore it is not appropriate, through the planning process, to revisit whether the site should have been allocated/removed from the Green Belt.
- 5.6 HW8 has an indicative capacity of 350 dwellings. The application site forms the northern part of the allocation and would deliver a total of 101 dwellings which is considered to be a proportionate quantum of development for the total size of the allocated site.
- 5.7 The justification to Policy HW8 states that a development brief should be used to coordinate the detailed planning of the site and should inform any planning application submitted for future development. There is currently no adopted development brief for the HW8 allocation. Notwithstanding this, any application ought to be considered on its merits and consideration of whether the proposals would achieve the place making, transport and green infrastructure aspirations for HW8 as set out in that Policy, amongst other considerations.
- 5.8 As discussed in subsequent sections of this report, it is considered that the scheme is compliant with the requirements of Policy HW8 and other policies of the Development Plan, and therefore achieving sustainable development. It is not considered that the proposals would compromise the delivery of the remainder of HW8, and the proposals would integrate satisfactorily with any acceptable future development that could forward for that site. It is not considered that harm would arise from the proposals being considered in advance of the adoption of any development brief. It is considered that there is no reason to delay the determination of the application in the absence of a development brief for the site.

- 5.9 It is also important to note that the WDLP was adopted in August 2019, and in the subsequent 2 ½ years since adoption, no adopted Development Brief has been forthcoming. Whilst some initial progress had been made on the brief, matters have not progressed and any adopted brief in the near future remains uncertain. A material change that taken place since August 2019 is that Bellway Homes have assembled the majority of the remainder of the HW8 site and are proposing a development within their ownership. The land has therefore gone from being in multiple fragmented ownership where a brief would be important to achieving comprehensive development to one where there are now few landowners. Therefore, further delays to the determination of the current application on an available, developable and deliverable allocated site, which achieves sustainable development would be counter to the objectives of the NPPF and Development Plan, when considered as a whole.
- 5.10 Concerns have been advanced that the proposals are premature, in the absence of a Development Brief and Neighbourhood Plan. Hazlemere Parish has been designated a Neighbourhood Plan area and it is understood that they are seeking to advance and prepare a Neighbourhood Plan for the area. Paragraphs 48-50 of the NPPF provides guidance on prematurity. Paragraph 48 advises that weight can be attached to emerging plans a) according to their stage of preparation; b) the extent to which there are unresolved objections to relevant policies; and c) the degree of consistency of relevant policies within an emerging plan to the Framework. As there is no draft Hazlemere NP for consideration, and policies to consider, no weight can be attached to its designation.
- 5.11 Paragraph 49 states that in the context of the Framework and the presumption in favour of sustainable development arguments that an application is premature are unlikely to justify a refusal of a planning application, other than in limited circumstances where both:
- (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
  - (b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
- 5.12 Paragraph 50 goes on to state that *“refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan.”* Again, given the stage of the Hazlemere NP, the arguments of prematurity would not meet the tests set out in the NPPF.
- 5.13 Furthermore, in this context, the site falls within an allocated site for residential development within an adopted Local Plan and as such it is not considered that arguments relating to prematurity can be justified.
- 5.14 The development would deliver new homes, including affordable housing, and would contribute towards the council’s 5-year housing land supply. These are both matters of significant weight when considering this planning application.

5.15 Given that this is an allocated site for housing, the principle of residential development is acceptable, subject to compliance with the overarching site policy and other policies contained within the Development Plan.

### **Affordable Housing and Housing Mix**

Wycombe District Local Plan (August 2019): DM22 (Housing Mix); DM24 (Affordable Housing); DM41 (Optional Technical Standards for Building Regulation Approval) Planning Obligations Supplementary Planning Document (POSPD)

5.16 WDLP Policy DM22 requires all developments of 10 units or more to provide for a mix of dwellings in size, type and tenure. DM24 requires that all developments of 10 or more dwellings, or 1000sqm of residential floorspace, shall provide on-site affordable housing at 48% of the total number of units. DM24 also requires for a mix in the type of affordable dwellings and also tenure.

5.17 The scheme proposes 101 dwellings in total of which 49 would be affordable. This complies with the requirements of DM24 in terms of number of affordable housing units proposed.

5.18 The table above at paragraph 3.3, demonstrates that there would be a mix of 2, 3 and 4 bed units across the scheme of 101 dwellings. The proposed affordable housing is predominantly 2 and 3 bed units. The scheme has evolved significantly from its earlier initial iteration which provided a greater degree of 1 bed units within the development. The evolved scheme has resulted in the reduction of 1 bed units which has been to the betterment of achieving good urban design which now achieves the desired relationships with existing dwellings and existing green infrastructure on/off the site, and a pattern and form of development which is sympathetic to its context. In this context, and the requirement to deliver much needed affordable housing, the proposed mix of affordable units is deemed acceptable, on balance.

5.19 A tenure mix of *at least* 80/20 is required for affordable rent and intermediate dwellings respectively. The applicants have confirmed tenure will be split 39 units rented, and 10 units intermediate (79.6/20.4), which when rounded, would meet the 80/20 split as required by policy. Details of the affordable housing scheme would be secured through legal agreement. The applicants have provided a letter from a registered provider (Rosewood Housing) who have expressed a strong interest in the housing proposed.

5.20 Policy DM41 requires developments to include accessible dwellings in accordance with Building Regulation Standards M4(2) and M4(3). All developments that are required to provide on-site affordable housing are also required to provide 30% of affordable homes and 20% of market homes in accordance with the Building Regulation Standard M4(3) and the remainder of the dwellings in accordance with the Building Regulation Standard M4(2). The M4(3) standards relate to wheelchair user dwellings. The M4(2) standards relate to accessible and adaptable dwellings (similar to lifetime homes). The submitted housing schedule indicates 15 units (30%) of affordable homes to meet M4(3) standards, although there is no indication of

market homes meeting M4(3). Nonetheless, this can be secured by condition (as required by Building Regulation Standards).

- 5.21 Policy DM22 also requires schemes which deliver 100 houses or more to include 5% of the proposed dwellings to be self-build plots. The applicants have confirmed their intention to deliver 5 self-build plots on the site, which would equate to (4.95%), and is deemed to be acceptable. The delivery of the self-build plots can be secured through Legal Agreement, to include mechanisms for appropriately advertising of the plots.
- 5.22 With the necessary conditions and planning obligations in place, it is considered that the scheme would deliver an appropriate mix, type and tenure of dwellings.

### **Transport matters and parking**

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth); CP12 (Climate change); DM33 (Managing Carbon Emissions: Transport and Energy Generation); HW8 (Land off Amersham Road including Tralee Farm, Hazlemere); DM35 (Placemaking and Design Quality)

DSA: DM2 (Transport requirements of development sites)

Chiltern District Local Plan (1997): TR2 (Highways Aspects of Planning Applications Throughout the District); TR3 (Access and Road Layout Throughout the District)

Adopted Core Strategy for Chiltern District 2011: CS25 (Dealing with the Impact of New Development on the Transport Network); CS26 (Requirements of New Development)

Interim Guidance on the Application of Parking Standards

Buckinghamshire Countywide Parking Guidance

#### *Site Access*

- 5.23 The application is in outline with matters of access for determination. The scheme proposes the demolition of the existing property, No.20 Wycombe Road, with an access and access road into the site being created from Wycombe Road. Policy HW8, at 2a) states that access to the site should be provided from A404 and the Wycombe Road. The principle of an access off Wycombe Road is therefore acceptable (the Bellway Homes application shows that development accessing from the A404).
- 5.24 The positioning of the proposed access junction is considered to be of sufficient distance from existing junctions in the area and as such would create a safe access in terms of proximity to junctions. The access would be in the form of a standard bellmouth junction with 4m radii which has been determined to be acceptable to ensure safe manoeuvre into/out of the application site. The application demonstrates that visibility splays of 43m can be achieved which is considered to be sufficient to allow for appropriate visibility and safe egress from the site, as confirmed by the Highways Authority.
- 5.25 It will be necessary, for safety reasons, to provide waiting restrictions at the site access to ensure that vehicles can safely access and egress the site access. This can be secured through a Legal Agreement.

### *Highway Network Capacity*

- 5.26 The TA includes vehicle trip generation data using TRICS® database which sets out that there will be 58 movements in AM peak and 51 in the PM peak (based on 103 units). The Highways Authority are satisfied that these are realistic estimates of movements expected from the development. Of these trips 43% would be to the east with the remainder to the west which are also considered to be realistic.
- 5.27 The Highways Authority have reviewed the submitted Transport Assessment and considered the impacts that the development would have on junctions and network capacity. The submission includes an assessment of junctions, including the site access, Wycombe Road/Sawpit Hill, Holmer Green Road/Western Dene/Sawpit Hill mini roundabout, Pond Approach/Earl Howe Road, and Earl Howe Road/A404. The HA are of the view that the appropriate network has been considered.
- 5.28 The HA are satisfied that the modelling demonstrates that the surrounding network has sufficient capacity to accommodate the expected traffic increase generated by the development.
- 5.29 With regard to comments received relating to the robustness of the Transport Assessment and its age. The Highways Authority have confirmed that the junction assessments were factored up using TEMPRO to 2023, and remain valid. The junction analyses showed that junctions will operate within capacity in the 2023 scenario. The Highway Authority have not accepted traffic flow data since March 2020 due to the Covid pandemic.
- 5.30 The Highways Authority advise that extensions to Holmer Green Senior School are unlikely to lead to sufficient traffic movements to materially impact upon junctions at peak hours. Residential and school peak periods do not necessarily occur simultaneously.
- 5.31 The four recent collisions cited in the Highways Planning Ltd statement have been reviewed and the causes and contributory factors for each was either inattention, inappropriate behaviour or reckless driving. There is no evidence to support intensification on the network to increase collisions at these locations. Additionally, the personal injury accident at Copners Drive was “slight” not “serious”. Collisions in the area are therefore generally down to driver error rather than junction/highways configuration.
- 5.32 The distribution of traffic towards Hazlemere crossroads has no direct correlation to the claim that the development will increase collisions at these junctions.

### *Parking Provision*

- 5.33 The scheme proposes a total of 224 parking spaces to serve the development. This includes 195 allocated parking spaces, including on plot garages for some of the larger units, and an additional 29 unallocated visitor parking spaces.

- 5.34 Based on bedrooms the proposed development would result in an under provision of parking of 18 spaces (14 allocated and 4 unallocated). Notwithstanding this, the Countywide Parking Guidance allows for parking to be based on habitable rooms within each dwelling. While internal layouts have not been provided with the application (as scale and appearance remain reserved matters), the applicants have confirmed that the dwellings would be designed in line with the habitable room standards set out so that the car parking provision accords with the Council guidance and as such would be policy compliant. To ensure that the dwellings are appropriately laid out internally in this respect, a condition will be necessary.
- 5.35 Concern has been raised that the level of parking to serve the development is inadequate and would lead to parking issues in the area. Notwithstanding this, in the absence of any objection from the Highways Authority, who deem the parking provision to be satisfactory, it is not considered that this can be substantiated.
- 5.36 The layout drawing shows that some car dwellings have one allocated parking space and a shared space with a neighbour. These occur in blocks of spaces. A planning condition is recommended to ensure a scheme is provided for the marking of the spaces on site to identify which dwelling they relocate to or whether they are visitor parking. The spaces that have 2 plot numbers on them should be marked as private spaces to avoid conflicts between neighbours.
- 5.37 There will also be opportunities to provide cycle parking within the development, the details and delivery of which can be secured via condition.

#### *Connectivity*

- 5.38 Policy HW8 2b) requires the provision of walk/cycle connection through Tralee Farm and on to Wycombe Road and to improve access to existing bus routes. The submitted scheme includes three pedestrian/cycle routes through the open space which would connect to the wider HW8 allocation to the south. Legible pedestrian and cycle routes are available through the site while a footpath link up to the Wycombe Road will be provided. These routes would allow for the necessary connectivity through the allocated site and would allow occupants of the southern HW8 parcel to access the Wycombe Road and the bus routes available.
- 5.39 The eastern route, adjacent to the off-site orchard, is likely to be the most important of the three routes as this is likely to be the most accessible and desirable link for the remainder of the HW8 site due to the shape of HW8 and the location and positioning. This runs adjacent to the existing Green Infrastructure so it is likely that this would also provide the most attractive route available subject to further measures to be secured by condition (discussed in the next section).
- 5.40 The vehicular access to the application proposals would be solely from Wycombe Road with no through route proposed to the wider HW8 allocation. The remainder of HW8 would be accessed via vehicular access(es) from Amersham Road. There would

be no vehicular through route between the two parcels of land, with the exception of an emergency access as requested by BC Highways.

- 5.41 Policy HW8 requires connectivity improvements to bus services. The majority of the site is located within reasonable walking distance of a bus stop on Sawpit Hill which has a frequent service to High Wycombe and Chesham. It is considered that the bus stops on Sawpit Hill could be upgraded with Real Time Passenger Information which would enhance their desirability. This can be secured by Legal Agreement as confirmed by the Highway Authority.

#### *Internal Layout*

- 5.42 The internal layout has been amended to address the concerns which the Highway Authority had with regard to detailed design. One area of concern has been maintained with regard to the lack of a turning head on the spur serving plots 5, 6, and 7. The absence of which may result in delivery vehicles reversing onto the estate road. Notwithstanding this, given the number of units which are served off this road and its limited length it is unlikely to cause any inconvenience. The Highway Authority are therefore satisfied that the development is acceptable in terms of its layout

#### *Conclusions*

- 5.43 The Highways Authority is satisfied that the development would not cause undue harm to highway safety. Subject to conditions and a legal agreement, the proposals would be acceptable in highways terms.

### **Raising the quality of place making and design**

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth); CP9 (Sense of place); HW8 (Land off Amersham Road including Tralee Farm, Amersham); DM32 (Landscape character and Settlement Patterns); DM34 (Delivering Green Infrastructure and Biodiversity in Development); DM35 (Placemaking and Design Quality) DSA: DM11 (Green networks and infrastructure); DM16 (Open space in new development) Residential Design Guide

- 5.44 The application is in outline with the matters of layout and access for consideration. Details of scale, appearance and landscaping are reserved matters for later consideration.

#### *Pattern of development*

- 5.45 The scheme includes back to back housing with the existing dwellings to the west and north which provides for an appropriate relationship in urban design terms. The remainder of the site would be laid out in four perimeter blocks which reflect the shape of the site and provide appropriate relationships with the retained green infrastructure components on and off the site and the proposed public open space to the south of the site.
- 5.46 In terms of dwelling design (based on the layout), the proposals include a mix of detached, link-detached, semi-detached, terraced and flats which provide an



appropriate variation in terms of design to add interest to the scheme, subject to details of scale and appearance being satisfactory.

#### *Policy HW8*

- 5.47 Policy HW8 identifies a number of place-making, transport and green infrastructure criteria which dictate expectations relating to site layout. Some criteria are not relevant or relate to the wider allocated site.
- 5.48 HW8 1a) requires the development to maintain a sense of separation between Hazlemere and Holmer Green through the layout of the site. With the exception of the access road, the application site and therefore all dwellings proposed, would lie within Hazlemere. The indicative map for HW8 and the justification to that policy provide more clarification in terms of the expectations in this regard.
- 5.49 Paragraph 5.1.71 states that *“although the site in Wycombe District physically adjoins Hazlemere, the likely access points onto the site mean that residents are more likely to use the facilities in, and feel part of, Holmer Green.”* 5.1.72 goes on to state that a *“green infrastructure corridor can provide the sense of separation between the two communities of Hazlemere and Holmer Green.”* This is reflected in Figure 14 of the Local Plan which identifies Green Infrastructure/Open space between two distinct parcels of development to the north and south of the allocation.



*Extract from Local Plan (Figure 14)*

- 5.50 The proposed development achieves this degree of physical separation between the two parcels of development by providing a distinct and meaningful area of open space to the south of the site, which also provides green infrastructure and required on site strategic open space. The degree of open space provided in this location is greater than that depicted in the indicative HW8 plan.
- 5.51 HW8 2b) requires the provision of walk/cycle routes through the allocation. The proposed layout includes the necessary pedestrian and cycle links (3 in total) which would connect with the remainder of the allocation to the south and allow for access to Wycombe Road. The most attractive route for pedestrians and cyclists is likely to be the easternmost link which would be sited adjacent to the off-site orchard. It would be necessary by condition to seek the feasibility of extending this link adjacent to the orchard, or to distinguish the surfacing colour/material of the easternmost road to provide for greater legibility (should arboricultural or highways issues arise), this can be secured by condition. Consideration will need to be had to the delivery of these connections to ensure that they are available for use in a timely manner for the remainder of the HW8 development. It is recommended that a planning obligation should enable a route (either permanent or temporary until other routes are provided) to be capable of being provided between Wycombe Road and the southern site boundary if required by the needs of the HW8 development that will gain its vehicular access from Amersham Road. This should include a step in right for the route to be constructed even if the Tralee development does not proceed as fast as the remainder of the HW8 development.
- 5.52 HW8 3a) requires that access to the existing orchard at the north east of the site be provided. This orchard falls outside of the HW8 allocation and as such access cannot be facilitated into the orchard through this scheme. Notwithstanding this, the proposals would provide access to the retained woodland at the north eastern corner of the site which would contribute towards the recreational offering of the site.
- 5.53 HW8 3d) requires the delivery of a Green Infrastructure corridor linking the orchard to the north east and the woodland at Badger Way. As identified earlier, this proposal would provide a meaningful and necessary contribution towards this GI corridor within the application site. Any development to the south would need to deliver the remainder of the corridor as part of its GI and open space provision.

#### *General Layout observations*

- 5.54 The scheme proposes a mix of on street and off street parking areas. Trees would be interspersed throughout the scheme which would help to break up and soften the on street parking areas and communal parking areas. The submitted layout indicates varying hardsurfacing materials and which would create interest in street design, details of which can be secured by condition.
- 5.55 The proposed dwellings would be provided with suitable private amenity space or, in the case of the flats, have access to shared amenity space. Pockets of open space and or incidental open space would be provided throughout the development. While the

primary areas of open space include the Green Infrastructure to the south and the retained woodland to the north west of the site. The open space, along with additional landscaping, including within the street and gardens, would contribute towards the creation of an attractive layout adhering to the overarching principles of placemaking. The level and locations of open space would ensure that the proposals would not lead to a cramped or over intensive form of development.

- 5.56 A pumping station is to be provided within the designated open space area. Consideration has been had to the location of this pumping station and, for technical reasons, can only be provided in limited locations. Further design of the pumping station can be secured by condition, while landscaping would help to screen this structure. Details of other ancillary structures can also be secured by way of condition.
- 5.57 Also located within the open space would be the SUDs attenuation basin, located within the south eastern corner. Provided this feature is appropriately landscaped and not over engineered in its design it is considered that this could contribute positively as a feature to the open space area. Matters of its detailed design can be secured by condition.
- 5.58 The proposed access would be from Wycombe Road. The access road design includes a footway on the eastern side of the access road with a strip of landscaping along the western side. It is considered that the proposed landscaping along one side of the road is important to ensure that an appropriate and attractive entrance to the site can be achieved. There may also be scope for additional planting adjacent to the proposed footway which would further enhance the opening to the site.
- 5.59 A number of comments have been raised by Thames Valley Police with regard to the proposed layout in respect of designing out crime. The comments received can largely be dealt with by way of condition or within any subsequent reserved matters application. It is noted that a network of rear access alleys are proposed to serve units 92 -101 which is undesirable, however any alteration to the layout would be minor and can be secured by way of condition.
- 5.60 Conditions will be necessary for matters relating to boundary treatment, hardsurfacing areas, ancillary structures and site levels to ensure that the scheme achieves high quality design.

#### *Impact on Landscape*

- 5.61 The application has been supported by a Landscape and Visual Impact Assessment which reviews the impact that the development would have on the wider landscape setting. It is noted that the site is located outside but within the setting of the Chilterns AONB which lies approximately 340m to the south of the site at Amersham Road.
- 5.62 Views of the site from the AONB will be limited and where they are available would be in the context of existing built form and landscape features. The proposals have

been reviewed by the Councils Landscape Officer who has raised no concerns with regard to the impact that the development would have on the wider landscape.

- 5.63 From the adjoining public realm the proposals would be seen intermittently between existing residential properties, and provided the development is of appropriate scale, it is not considered that the proposals would unduly cause harm to the character and appearance of the streetscene or area. It is acknowledged that the proposals would inevitably be more prominent and apparent from private properties which adjoin the site. Given the spacing between existing and proposed properties it is not considered that these relationships would cause unacceptable harm in terms of design while, again, scale and appearance would be considered at the subsequent reserved matters stage.

### **Heritage Considerations**

Wycombe District Local Plan (August 2019): CP9 (Sense of place); CP11 (Historic Environment); DM31 (Development Affecting the Historic Environment)

- 5.64 There are no designated heritage assets within the application site which would be affected by the proposed development. Furthermore, it is considered that the proposals would not affect the setting of any designated heritage asset.
- 5.65 Buckinghamshire Council Archaeology have identified that there are number of records of the Buckinghamshire Historic Environment Record (off site) which are relevant. It has been identified that the site lies within a landscape which has undergone minimal archaeological investigation but note that prehistoric artefacts have been found, suggesting early human settlement in the area. It is also observed that the site lies within 500m of the medieval Holmer Manor suggesting the site may lie within the grounds of the manor. The development therefore has the potential to affect archaeological deposits. BC Archaeology have therefore suggested conditions for appropriate investigation, recording, publication and archiving to be carried out. This will require a pre-development written scheme of investigation to include a geophysical survey and trial trenching.

### **Amenity of existing and future residents**

Wycombe District Local Plan (August 2019): CP9 (Sense of Place); DM35 (Placemaking and Design Quality); DM40 (Internal space standards)  
Residential Design Guide

- 5.66 Matters of scale and appearance are reserved matters and as such elements of considering amenity would be left for any subsequent reserved matters application(s). Notwithstanding this, layout is for consideration under this application and therefore the positioning of dwellings and their relationship with neighbouring properties can be assessed.

- 5.67 The proposed layout includes a back to back relationship with existing properties on Wycombe Road, Lacey's Drive, Kestrel Drive and Inkerman Drive. The spacing between facing elevations of the proposed dwellings and existing dwellings on Wycombe Road would be in excess of 40m, which exceeds back to back spacing guidance to ensure adequate privacy. Furthermore, the spacing between the dwellings and the rear boundary would be 12m which is sufficient to ensure no adverse overlooking arises, notwithstanding the position of any openings.
- 5.68 With regard to Lacey's Drive, back to back distances would exceed 45m, while the distance to the boundary would be approximately 11m. These are acceptable spacing distances. In addition there are a number of existing trees which would be retained along this boundary, while further landscaping is also proposed.
- 5.69 With regard to existing dwellings on Kestrel Drive and Inkerman Drive, the back to back spacing would be 32m at its closest while first floor openings would be 12m from the shared boundary. Again, these are acceptable spacing distances to ensure an acceptable level of amenity. Additional landscaping is indicatively shown to be proposed along this boundary.
- 5.70 No.3 Kestrel Drive represents an anomaly in the pattern of development, as it is sited immediately adjacent to the application site boundary. The property contains a number of openings within its rear elevation which face directly onto the site. To ensure that the amenity of this property is not significantly compromised the scheme proposes that no dwelling is proposed adjoining this property and that the area immediately adjacent to this dwelling is left to open space.
- 5.71 The internal separation standards largely satisfy the Residential Design Guidance spacing of 25m, however there is one separation, between units 25 and 54 which falls slightly below this standard at 21m. The details of scale and appearance, which would dictate the positioning of openings, remains a matter for later consideration. The applicants have provided a section of these units which suggests that rooms could be dual aspect with the use of obscure glazing if necessary. In the context of the overall scale of the scheme and measures which could be considered at reserved matters, it is considered that the reduced separation distance for this one relationship is not considered to be a significant issue. Therefore, it is considered that the separation distances within the layout would provide future occupants a good standard of amenity.
- 5.72 The dwellings benefit from an appropriate level of private amenity space, while shared amenity spaces are proposed for the flats. An appropriate level of private amenity space would be provided within the development.
- 5.73 Concerns have been raised with regard to noise and disturbance, and lighting from the site. While change is inevitable as a consequence of development, it is considered, based on the layout for consideration, that the proposed development would not give rise to amenity issues arising from noise or light, however a condition relating to lighting would be necessary in the interest of amenity, dark skies and

ecology. With regard to issues relating to scale, overbearing or outlook, these would be dictated by the scale of the development which is a reserved matter. Nonetheless it is considered that the layout would not give rise to significant issues in this regard, on or off site.

### **Flooding and drainage**

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth); CP12 (Climate Change); DM39 (Managing Flood Risk and Sustainable Drainage Systems); HW8 (Land off Amersham Road including Tralee Farm, Hazlemere)

- 5.74 The application site lies within Flood Zone 1 as defined by the Environment Agency indicative flood map for planning. However, there is a narrow channel of identified surface water flooding which runs in a north-south direction at the south-eastern corner of the site within the small valley.
- 5.75 The application has been supported by an FRA, plus a subsequent addendum, which consider the impact of the development to/from flooding. The submissions demonstrate that the no dwellings or land within their boundaries would be located within the identified flow path. A small section of highway would be located within this area which will be designed to follow the existing topography. The FRA specifies suggested finished floor levels of those properties closest to the surface water flooding area. Detailed levels can be secured by condition.
- 5.76 The LLFA initially raised some concern with regard to the relationship between the surface water overland flow interacts with the proposed infiltration basin. An additional technical note identified that there is an area of 1.77m<sup>2</sup> of low risk depth which encroaches into the basin. However it has been demonstrated that the proposals have sufficient capacity to accommodate this negligible inflow, which relates to an extreme flood risk scenario. They advise that additional landscaping around the basin would assist with interception flows, and conclude that the development will not give rise to flood risk on/off the site.
- 5.77 A surface water drainage strategy has also been presented as part of the submission. The proposed strategy includes a number of SUDs techniques. The drainage strategy includes a geo-cellular soakaway and infiltration basin which would be the primary surface water strategy for the majority of the site. Deep bored soakaways would also be utilised. The scheme also includes permeable paving for hardstanding in shared and private parking areas, while raingarden hydro-planters for highway run-off are also proposed.
- 5.78 Following the submission of additional information regarding infiltration components, the LLFA are satisfied that the submitted scheme advanced is satisfactory and would be an appropriate drainage strategy which reflects the ground investigations, infiltration rates and local geology. The principle of the drainage strategy presented is therefore considered to be acceptable. Further conditions will

be necessary to secure details of the scheme and to ensure that all components have been provided.

### **Green networks and infrastructure, biodiversity and ecology**

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth); CP9 (Sense of Place); CP10 (Green infrastructure and the Natural Environment); DM34 (Delivering Green Infrastructure and Biodiversity in Development), DSA: DM11 (Green networks and infrastructure); DM13 (Conservation and enhancements of sites, habitats and species of biodiversity and geodiversity importance); DM14 (Biodiversity in Development)

5.79 The application has been supported by a detailed ecological report to assess the biodiversity value of the site including an assessment and necessary surveys of the impact on protected species. A Biodiversity Impact Assessment metric has also been provided.

#### *Impact on Designated Sites*

5.80 There are no statutory designated sites within the application site. There are 2 SSSI's (Sites of Special Scientific Interest) and 3 LNR's (Local Nature Reserves) within a 5km radius of the site, the nearest being 2.6km from the site. Given the distance of the application site from designated sites, and the nature of the proposed development, the LPA is satisfied that the proposed development would not have any adverse direct or indirect impact upon designated sites. The LPA is also satisfied that the proposals would not have any direct or indirect impact on non-designated statutory sites. No concern has been raised through consultation with regard to impact on designated sites.

#### *Impact on Protected Species and Habitats*

5.81 The application has been supported by the necessary surveys to consider the impact on protected species and/or their habitats. The Ecological Appraisal identifies that the proposed development, with appropriate mitigation, would have no direct adverse impact on protected species including great crested newts, badgers and bats.

5.82 With regard to great crested newts, 3 ponds have been identified within 500m of the site. Pond 1 is separated from the site by A404 which presents a significant barrier. Ponds 2 and 3 would be connected to the site. However the habitat surrounding these ponds is good terrestrial habitat for newts and it is likely that they would remain in that area.

5.83 Other amphibians have been recorded at the site and the appraisal recommends phased vegetation clearance and buffering to protect the woodland and hedgerows on site.

5.84 A badger sett is located within the site, and given its connectivity to wider green infrastructure and retention of green space on site and within the adjacent site, the retention of the badger sett is achievable.

5.85 A 10m buffer is proposed around the outer edge of the sett where no construction works will be permitted. The submitted report acknowledges that the proposed pumping station *may* impact on the southernmost tunnel depending on the exact location of excavations. However, the potential impacts are considered to be low and

a development licence for disturbance/sett closure is not deemed necessary. Prior to works commencing an updated site walkover is recommended to determine the status of the sett. Appropriate fencing around the sett (within the application site) will also be necessary during construction to ensure that badgers do not enter the construction site. Additional good practice measures will be necessary during construction. The provision of open space and retention and enhancement of wildlife corridors would ensure that the proposed development would not have an adverse impact on badgers.

- 5.86 Surveys have been carried out with regard to bats and the buildings scheduled for demolition and trees for removal have provided no evidence of roosting bats being present. Removed trees will need to be inspected immediately prior to felling. Those trees with cavities must be felled using soft-fell techniques. Emergence and activity surveys have identified that the site is used by navigating/foraging bats. The mitigation proposed through the layout and retention of/new habitat corridors would retain connectivity, while conditions relating to lighting will be necessary.
- 5.87 With appropriate mitigation, precautionary measures and enhancements, no adverse impacts on birds, hazel dormouse, or reptiles are anticipated.
- 5.88 The findings of the surveys and mitigation measures proposed with respect to protected species and their habitats are accepted by the Councils Ecology Officer.
- 5.89 Biodiversity enhancements, related to protected species and fauna, while ensuring that the recommendations and mitigation measures within the Ecological Appraisal are carried out, can be secured via condition.

#### *Habitats and Biodiversity Net Gain*

- 5.90 The Biodiversity Impact Assessment provided uses the Warwickshire metric which remains to be considered to be an acceptable means of calculating the gain/loss of biodiversity.
- 5.91 The calculations contained within the BIA metric identify that the proposals would result in the loss of on-site habitats, of varying value, which includes inter alia 2.55ha of poor semi-improved grass land; 0.28ha of semi-improved natural grassland and 0.39ha of orchard.
- 5.92 The proposals include the enhancement of the existing woodland which is to be retained on site. New habitats will be created, each with varying values, including gardens, orchards, amenity grassland, marshy grassland and scattered trees which would be provided throughout the site.
- 5.93 With regard to hedgerows, the BIA metric acknowledges the loss of existing hedgerows within the site, which are identified to be species poor. New hedgerows and hedgerow enhancements proposed within the layout would result in a net gain of 2.59 units. The submitted Ecological appraisal indicates that this would result in a non-significant positive impact on this habitat.
- 5.94 The loss of the remnant orchard is acknowledged within the Ecological Appraisal. To mitigate for the loss of the remnant orchard the Ecological Appraisal considers that two new community orchard areas should be provided within the scheme. These are provided adjacent to No.3 Kestrel Drive and adjacent to the proposed SUDs basin. These should be appropriately maintained and managed, which can be secured via condition. The impact on the remnant orchard, as indicated within the Ecological



Appraisal, with new orchards and off site biodiversity offsetting would be non-significant negative.

- 5.95 Notwithstanding the habitat creation and enhancements on site, and the hedgerow net gain, according to the Warwickshire metric the proposals would result in a net loss of habitat biodiversity of 7.33 units. Therefore, the proposals would not deliver a net gain in biodiversity on site. The loss of habitats units, plus requirement to deliver a net gain, would therefore need to be compensated for off-site through a financial contribution. The indicative contribution identified within the BIA amounts to £237,780 (note this figure is still under consideration by the Councils ecologist). The applicants have an in principle agreement with the Milton Keynes and Buckinghamshire Natural Environment Partnership to deliver off site net gain.
- 5.96 However, it should be noted that the scheme remains in outline and there may be further enhancements available through the detailed design and landscaping of the site which could alter the score to some degree and therefore future Reserved Matters applications could explore further enhancements to be delivered on site, and as such should be accompanied by updated BIA metrics.
- 5.97 In considering the mitigation hierarchy and sequential approach with regard to biodiversity it is considered that compensation as proposed, the last resort, is acceptable in this instance, particularly given that this is an allocated, and predominantly greenfield, site (with the exception of some buildings to the north of the site). The scheme should deliver the on-site enhancements and mitigation measures set out in the Ecological Appraisal.

#### *Trees and canopy cover*

- 5.98 Landscaping of the site is a Reserved Matter, notwithstanding this the outline application needs to demonstrate that the proposed layout can achieve adequate canopy cover in accordance with the 25% Policy requirement set out in DM34.
- 5.99 The application proposes the removal of some trees on site, including the majority of orchard trees within the north west corner of the site. The majority of these trees are of low arboricultural value being of category U or C. The group does contain two category B trees (T17 and T39) which are trees of moderate quality in arboricultural terms. Given the overall quality of this group of trees, which are not specified for retention within Policy HW8, their removal to facilitate development is acceptable. Particularly in the context of the retention of the existing woodland and boundary trees.
- 5.100 The existing woodland in the north east corner of the site will be retained which would contribute towards canopy coverage, while the more established and mature trees along the site boundary (to the west) would also be retained. The majority of existing mature and established trees would therefore be retained within the site.
- 5.101 The scheme proposes to compensate for the loss of the existing orchard trees with a new orchard which would be sited along the western boundary of the scheme (adjacent to No.3 Kestrel Drive). Given the arboricultural value of the existing trees, the principle of this approach is accepted.
- 5.102 The indicative landscaping shown on the site layout demonstrates that trees can be provided within the street, within rear gardens, within parking courtyards, and within the areas of open space. The submitted canopy cover calculator summary indicates that 26% canopy cover could be achieved through the indicative landscape proposals

presented. It is possible that this figure could be exceeded through more detailed design, however the submission demonstrates that at least a 25% canopy cover can be achieved.

5.103 A TPO has recently been placed on the orchard which lies adjacent to the site to the east. The scheme proposes an appropriate landscaped buffer adjacent to the orchard which would ensure that these protected trees are not unduly impacted by the proposals. Tree protection measures and method statements can be secured by condition. This buffer is also important in the context of the orchard being a priority habitat.

5.104 The LPA is therefore satisfied that the proposed development can achieve a policy compliant level of canopy cover the precise details of which can be secured through condition and demonstrated in the subsequent reserved matters application for landscaping.

#### *Green Infrastructure*

5.105 A key policy objective of HW8 is to deliver a Green Infrastructure route through the valley of the site connecting the orchard (off site at North East), and the woodland at Badger Way (South West of the HW8 allocation). The proposed layout includes an area of open space which would adjoin the substantial southern hedgerow boundary. This open space, following amendments, adjoins the length of this hedgerow and would provide for a meaningful necessary Green Infrastructure link through the application site which the policy seeks to achieve. The expectation for any acceptable development on the southern parcel of land within HW8 would be for it to deliver further substantial open space on the other side of the hedgerow. Cumulatively this would deliver a substantial green corridor through the HW8 allocation ensuring connectivity between the off-site orchard and the woodland at Badger Way.

#### **Public Open Space**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth); HW8 (Land off Amersham Road including Tralee Farm, Hazlemere)  
DSA: DM16 (Open space in new development); DM19 (Infrastructure and delivery)

5.106 Policy DM16 of the DSA states that the development of strategic sites will be expected to meet all local and strategic space requirements on site as a minimum. These are set at a standard of 1.15ha Local Open Space/1000 population, and 3.3ha Strategic Open Space/1000 population. The open space requirement for the site would equate to 1.078ha.

5.107 The scheme proposes the total open space provision of 1.09ha of Open Space across the site which is a sufficient quantum of open space to meet the cumulative requirements of local and strategic open space requirements for the development in this instance.

5.108 The open space is primarily focussed on the southern parcel of land which varies in depth and would contribute towards creating a buffer and separation between the

application site and the remainder of the HW8 allocation. The extent of open space proposed here exceeds that which is indicatively shown between the two development parcels within the Local Plan figure. This along with the required open space for any development on the southern parcel will provide the necessary Green Corridor through the site to provide a sense of separation between the two communities as expanded on by paragraph 5.1.72 of the WDLP and discussed earlier in this report.

5.109 The open space area includes the provision of a SUDs basin which would be provided within the south eastern corner of the site. It will be necessary to ensure that this provides a feature which contributes positively to the overall recreational function of the open space and details of its final design, and margin landscaping can be secured through condition, and through subsequent reserved matters applications.

5.110 Further open space would be provided within the retained woodland where it is proposed to provide access to and a circular walk. This would provide an attractive alternative area of open space. It is noted that this woodland does require initial and long term management and maintenance to make it an attractive proposition for leisure, which can be secured by condition and as part of the legal agreement.

5.111 The scheme includes other small pockets of open space, including the introduction of an orchard which is a nod towards a previous land use of part of the site, and provides further interest in the open space package.

5.112 It will be necessary for the scheme to deliver play space and there is sufficient space within the larger area of open space to provide for this. Details of which can be secured through condition and Legal Agreement.

5.113 It is expected that the HW8 development will require the provision of a MUGA and NEAP on site, or contributions towards these off site. In either scenario, a proportionate financial contribution based on the cumulative number of dwellings/persons provided can be secured by way of Legal Agreement.

5.114 Discussions are ongoing with Communities and Leisure with regard to any other obligations that may be required. They have indicated that contributions towards sports facilities for improving changing and sports facilities at Hazlemere Recreation Ground would be required. Additionally, contributions have been requested for off-site community facilities. With regard to both of these matters there is an absence of any scheme and costings. They are not referred to in policy HW8 as matters that need to be funded by the development. These requirements would not meet the relevant tests to include them within a section 106 agreement and they are therefore not pursued.

5.115 It is considered that the proposed development meets the requirements of Policy DM16 in terms of open space delivery, in isolation, and also meets the aspirations of HW8 in its provision of part of a green infrastructure corridor across the site.

## **Environmental issues**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth),  
DM20 (Matters to be determined in accordance with the NPPF)

5.116 The Environmental Health Officer has not identified any concerns other than the inclusion of electric vehicle charging points in order to reduce the impact on air quality; although the site is not located within an Air Quality Management Area. The Environmental Services Officer has requested that one allocated car parking space serving every dwelling is provided with a charging point. The SPD states that:

“Residential (C class uses): 1 charging point per dwelling with dedicated parking (32 amp) or 1 additional dedicated charging point per 10 spaces (unallocated parking) or part thereof and ensure appropriate cabling is provided to enable increase in future provision.”

5.117 This aspect can be adequately addressed by planning condition. The inclusion of EV charging points would also meet policy objectives towards reducing carbon emissions.

### **Building sustainability and climate change**

Wycombe District Local Plan (August 2019): DM33 (Managing Carbon Emissions: Transport and Energy Generation), DM41 (Optional Technical Standards for Building Regulations Approval).  
Air Quality SPD

5.118 Development is required by policy DM33 and CP12 to mitigate for climate change by the incorporation of renewable technologies into development. The application does not set out which renewable features would be incorporated into the development but there will be opportunities for the use of PV panels, solar thermal collectors and air or ground source heat pumps within the scheme. To ensure that appropriate renewable technologies are included a planning condition is necessary to secure the detail of a renewable technologies scheme.

5.119 As outlined above the proposals would also deliver on site EV charging points to serve the development which would also help to mitigate the impacts on climate change.

5.120 It is necessary to condition water efficiency in accordance with Policy DM41 and that the dwellings are built to achieve the standards in Building Regulations Approved Document M4(2) regarding accessible dwellings.

5.121 As the scheme includes provision of affordable housing, policy DM41 requires that a proportion of the homes are built to achieve category M4(3) wheelchair user dwellings. The applicant has identified which these units are and they have been designed to achieve this standard. Therefore a planning condition is necessary to ensure that these homes are built as such in order to accord with policy DM41.

### **Infrastructure**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth); HW8 (Land off Amersham Road including Tralee Farm)  
DSA: DM19 (Infrastructure and delivery)

## *Education*

- 5.122 Policy HW8 acknowledges that development of this site will be required to meet the needs arising from the development for additional primary school places. The WDLP was drafted at a time whereby the adjoining site was being considered for allocation in a new Chiltern and South Bucks Local Plan. The policy justification acknowledges this and states that should both sites come forward for development then a new primary school would be required to serve both HW8 and the adjoining site within the former Chiltern area. The Chiltern and South Bucks Local Plan is no longer progressing and as such that site is not allocated.
- 5.123 Paragraph 5.1.69 of the WDLP states that *“Alternatively, a commensurate financial contribution (via a S106 planning obligation) will be required for the provision of additional school places if the adjoining Chiltern site is not allocated or if it can be demonstrated to the satisfaction of the Local Education Authority that these needs will be better met through the expansion of existing schools”*. As the adjoining site is not advancing at this stage there is no justification for the provision of a new school to be provided on site.
- 5.124 The Local Education Authority have provided comment on the application and have advised that primary schools across High Wycombe (inc Holmer Green) are projected to be close to capacity in 5 years. They have confirmed that it would be necessary to secure financial contributions towards the school expansions programme for High Wycombe.
- 5.125 With regards to secondary schools, the Infrastructure Delivery Plan confirms that in the majority of cases the Council will not seek specific s.106 contributions for secondary school provision. There is no specific reference to deliver secondary funding within the HW8 policy through financial contributions by way of S106. The IDP confirms that funding will be sourced from capital funding, Government grants, as well as funds from the Community Infrastructure Levy.

## *Health facilities*

- 5.126 Policy CP7, which relates to Delivering Infrastructure to support growth, states that where justified, development will be required to provide or contribute towards the delivering key infrastructure requirements for the district. This includes, inter alia, new primary care facilities where required, and facilities which promote healthy living including open space and recreation. There is no specific requirement identified within Policy HW8 for the delivery of health facilities.

## *Primary Care*

- 5.127 The CCG have been consulted and have advised that the increase in population will have an effect on Chiltern House, Carrington, Desborough and Cressex Health Centre surgeries. This increase in pressure would amount to further pressure on GP practices through accessing clinic team based on capacity versus demand for appointments; car parking; and physical infrastructure within the surgeries. Therefore, in order to

cope with the additional pressure the CCG have requested appropriate s.106 contributions to support health service infrastructure.

5.128 In considering any request for a financial contribution, the council would need to be satisfied that the CCG has provided evidence and adequate justification to demonstrate in accordance with the CIL Regulations how the sums are necessary to make the development acceptable in planning terms or how they are directly related to the development or fairly and reasonably related in scale and kind to the development. (CIL Regulation 122).

5.129 No details of the contribution, calculation, methodology or delivery mechanism has been provided by the CCG. It is also unclear from the comments made whether the request is for contributions towards capital projects or service costs. In order for the request to demonstrate that it is directly related to the development, how the sums are necessary to make the development acceptable in planning terms and is reasonably related in scale and in kind, it is necessary for evidence and a detailed methodology to be provided and in the event of contributions towards a capital project there is a reasonable degree of certainty that a project is in hand to deliver the capacity to meet the needs to meet the CIL requirements. The information provided is considered inadequate to satisfy the council that CIL Tests are met for S106 contributions to be sought.

5.130 In any event there is a CIL charging schedule in place in this area. CIL Regulations prevent s106 planning obligations being entered into for infrastructure being funded by CIL after the Charging Schedule takes effect. The development is liable for CIL charge and the CCG can bid for CIL funding for primary healthcare infrastructure.

5.131 In light of the above factors it is not considered that the contributions towards health care facilities has been fully justified.

*Acute and community health care*

5.132 Buckinghamshire Healthcare Trust have been consulted but have not provided comment on the application.

*Utilities*

5.133 Concerns have been raised with regard to existing utilities infrastructure including matters relating to sewerage and water. It is proposed that surface water will not connect to the network, and the LLFA is content with the principles of the scheme presented. Thames Water have highlighted that there is insufficient capacity in the network to accommodate sewage from the development and have therefore suggested that a condition be attached to any approval for network upgrades or an infrastructure phasing plan to be provided.

**Developer Contributions**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth); HW8 (Land off Amersham Road including Tralee Farm)  
DSA: DM19 (Infrastructure and delivery)

5.134 The development is a type of development where CIL would be chargeable. With the exception of education contributions, Policy HW8 does not identify other specific contributions towards other social infrastructure to be provided.

5.135 Having regard to the statutory tests in the Community Infrastructure Levy Regulations and the National Planning Policy Framework it is considered that the following planning obligation(s) are required to be secured within a section 106 agreement:

- a) Provision of a minimum 48% on-site affordable housing (and related controls)
- b) Provision of 5 custom/self-build dwellings
- c) Provision of on-site public open space, including play equipment and its future management and maintenance, including on site woodland and delivery of pedestrian/cycle connections
- d) Financial contribution towards a MUGA and NEAP within HW8 as necessary
- e) Future management and maintenance of on-site sustainable drainage system
- f) Provision of a scheme of biodiversity off-setting to provide a net gain in biodiversity
- g) Financial contributions towards off site highways works including RTPI upgrades to bus stops and waiting restrictions within Highway
- h) Provision of a pedestrian route (either permanent or temporary until other routes are provided) to provide access between Wycombe Road and the southern site boundary if required by the needs of the HW8 development that will gain its vehicular access from Amersham Road including a step in right for the route to be constructed if the Tralee development does not proceed as fast as the remainder of the HW8 development.
- i) Removal of any ransom opportunities relating to other development of the HW8 site.

5.136 The applicant has confirmed willingness to enter into a legal agreement to secure all of the above aspects.

### **Other Matters**

5.137 Comments have been made that the application should be refused as a “departure” to the Local Plan, citing Article 32 of the Development Management Procedure Order 2015. Article 32 of the DMPO states that *“A local planning authority may in such cases and subject to such conditions as may be prescribed by directions given by the Secretary of State under this Order, grant permission for development which does not accord with the provisions of the development plan in force in that area in which the land to which the application relates is situated”* (emphasis added). As detailed in the DMPO a “departure” relates to approving developments which do not comply with the Development Plan and as such is not relevant to requests to refuse applications.

- 5.138 Various comments have been made with regard to the cumulative total of dwellings proposed with an undetermined application to the south, amounting to 391 units across HW8. The Local Plan identifies an indicative capacity of 350 dwellings to be provided on HW8. While that application (which also includes land outside of HW8) would result in a cumulative total exceeding 350 dwellings, the proposals will ultimately be determined on its merits. This current application for determination, at 101 units, proposes a proportionate quantum of development within the allocated site. Matters and concerns relating to a separate application are not for consideration under this application.
- 5.139 Comments have been received with regard to climate change, reducing carbon emissions and targets, and the climate emergency. Consideration has been had to the requirements to reduce carbon emissions as dictated by the Development Plan and NPPF. The development is considered to be in accordance with the Development Plan and national guidance in this regard and would deliver measures through design and condition to help to reduce the impacts. While this is a largely greenfield site, it remains an allocated site within the Development Plan whereby its redevelopment has been accepted.
- 5.140 With regard to the best interest of the child and vulnerable children. It is acknowledged that there are vulnerable children (and adults) throughout society within all communities who may ultimately be concerned by any development which affects them through change. Planning practice guidance advises that a proportionate approach be taken and that the LPA need to consider the case before them and acknowledge that the best interests of a child may not always outweigh other considerations. It is difficult to quantify the impact that the development would have on a child in any balance, however in this instance it is within the wider public interest to allow development on an allocated site within the Development Plan, which would bring with it wider benefits, as a matter of principle.

## **6.0 Weighing and balancing of issues / Overall Assessment**

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



- c. Any other material considerations
- 6.3 As set out above it is considered that the proposed development would accord with the development plan policies taken as a whole to deliver sustainable development in the environmental, social and economic context.
- 6.4 The development would bring the following benefits:
  - a. The provision of housing on an allocated site for which there is a need and which will count towards the Council's 5-year housing land supply.
  - b. The provision of affordable housing for which there is a significant need in the area.
  - c. The provision of self-build housing.
  - d. The provision of wheelchair user dwellings and accessible and adaptable dwellings.
  - e. The provision of new open space, recreation and play equipment to serve the community.
  - f. Enhancement to on site woodland and delivery of 25% canopy cover on site
  - g. Community Infrastructure Levy will be paid which will fund local infrastructure.
  - h. In the short term employment in the construction industry.
- 6.5 It is acknowledged that the application is being considered in advance of the application that has been submitted on the southern part of the HW8 site and is being considered in advance of a Development Brief (cited in the justification to policy HW8). Notwithstanding this, it is considered that the proposals would not compromise the wider delivery of HW8 and, crucially, the scheme would deliver the aspirations of that policy and achieve a high quality sustainable development. It is not considered that "harm" in planning terms can be attributed to the development being considered in advance of a development brief and as such there is no reason to delay the determination of the application with the presumption of sustainable development in mind.
- 6.6 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.
- 6.7 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 101 dwellings at land at Tralee Farm, off Wycombe Road. The development would be accessible to those with and without the relevant protected characteristics stated above and no discrimination or inequality would arise from the proposal.
- 6.8 The Human Rights Act 1998 Article 1 the protection of property and the peaceful enjoyment of possessions, and Article 8 the right to respect for private and family life, have been taken into account in considering any impact of the development on

residential amenity and the measures to avoid and mitigate impacts. It is not considered that the development would infringe these rights.

## 7.0 Working with the applicant / agent

7.1 In accordance with paragraph 38 of the NPPF (2019) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.

7.2 In this instance the applicant

- was provided with pre-application advice,
- The applicant was provided the opportunity to submit amendments to the scheme/address issues.
- The application was determined without undue delay following receipt of an acceptable scheme.
- The application was considered by the Strategic Sites Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

## 8.0 Recommendation

8.1 The recommendation is that the application be delegated to the Director of Planning and Environment for **APPROVAL** subject to the satisfactory completion of a legal agreement to secure the following:

- j) Provision of a minimum 48% on-site affordable housing (and related controls)
- k) Provision of 5 custom/self-build dwellings
- l) Provision of on-site public open space, including play equipment and its future management and maintenance, including on site woodland and delivery of pedestrian/cycle connections
- m) Financial contribution towards a MUGA and NEAP within HW8 as necessary
- n) Future management and maintenance of on-site sustainable drainage system
- o) Provision of a scheme of biodiversity off-setting to provide a net gain in biodiversity
- p) Financial contributions towards off site highways works including RTP1 upgrades to bus stops and waiting restrictions within Highway
- q) Provision of a pedestrian route (either permanent or temporary until other routes are provided) to provide access between Wycombe Road and the southern site boundary if required by the needs of the HW8 development that will gain its vehicular access from Amersham Road including a step in right for the route to be constructed if the Tralee development does not proceed as fast as the remainder of the HW8 development.
- r) Removal of any ransom opportunities relating to other development of the HW8 site.

subject to the receipt of no new material representations and conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused for such reasons as the Director of Planning and Environment considers appropriate.

It is anticipated that any permission would be subject to the following conditions:

1. Details of the appearance, scale and landscaping (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.  
Reason. That the application is expressed to be an outline application only
2. Application for approval of reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.  
Reason. To comply with the requirements of Section 92 of the Town & Country Planning Act 1990 (as amended)
3. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.  
Reason. To comply with the requirements of Section 91 of the Town & Country Planning Act 1990 (as amended).
4. Unless otherwise approved under subsequent applications for reserved matters or detail reserved by a condition contained within this permission, the development hereby permitted shall be carried out in accordance with the approved plans referenced:  
Required Site Access Alignment (141278/A/A07 Rev A dated 18/05/20) received 19/01/22  
Amended Coloured Site Layout (18083 – C201B) received 19/01/22  
Amended Proposed Site Layout (18083 – P202M) received 19/01/22  
Site Section – Western Boundary (18083 P207) received 08/11/21  
Site Section D-D (18083 P206 Rev A) received 08/11/21  
Swept Path Analysis – Refuse Vehicles (141278/A/02/AT01 Rev A) received 08/11/21  
Location Plan (18083 S101 Rev B) received 31/08/18  
Reason: In the interest of proper planning and to ensure a satisfactory development of the site.
5. The development hereby permitted shall be restricted to a total of 101 units in accordance with the housing mix identified within the Indicative schedule of accommodation (P202) dated 14/01/22 unless otherwise agreed by the Local Planning Authority.

Reason: To define the permission and to ensure that housing mix numbers remain in accordance with the details considered in the outline application.

6. The first reserved matters for scale and/or appearance shall include full details of any ancillary structures including substation and pumping station. The development shall be carried out in strict accordance with the approved details.

Reason. In the interest of the character and appearance of the development.

7. The first reserved matters application shall include a revised layout of rear alley access routes serving plots 92-101 as detailed on the approved plans. The revised layout shall minimise the number of units accessible by alley and reduce permeability to the rear of dwellings. The development shall be carried out in accordance with the revised details.

Reason: In the interests of designing out crime and the fear of crime.

8. The first reserved matters application for scale and/or landscaping shall include drawings of the site identifying the following shall be submitted to and approved in writing by the Local Planning Authority before any development takes place;

- (a) Existing ground levels on site (spot heights) including a datum point that is located off site. Levels should be Above Ordnance Datum (AOD).
- (b) The level of the road outside the site. (AOD).
- (c) The proposed levels on site following completion of the development (for each existing height a proposed height should be identified).
- (d) The location and type of any retaining structures needed to support ground level changes.
- (e) The Finished Floor Level for every building that is proposed.
- (f) Cross sections within the site taken up to the site boundaries. The information supplied should clearly identify if land levels are being raised or lowered.
- (g) In the case of residential development, sections showing the level of the proposed garden(s) and retaining structures.
- (h) Detailed levels and section information relating to the design and shape of SUD's basin to incorporate the feature more naturalistically into the open space

The development shall be carried out only in accordance with the approved details.

Reason. It is necessary to ensure accurate information can be provided regarding the levels for the development and thereby to ensure that the work is carried out at suitable levels in relation to adjoining properties and highways, to ensure that the impact on surrounding views is as assessed and in the interests of the street scene.

9. The Reserved Matters application for landscaping shall include a fully detailed landscape scheme which shall include:
  - a) A scaled plan showing all existing vegetation and landscape features to be retained and trees and plants to be planted;

- b) The design of all boundary treatments and enclosures;
- c) Details of all play equipment and any other structures to be placed in the open space (e.g. litter bins, seating);
- d) Location, type and materials to be used for hard landscaping including specifications, where applicable for:
  - a. permeable paving
  - b. tree pit design, fully demonstrating how the soil volume in the canopy cover calculations will be achieved in hard landscaped areas and how underground services will be incorporated into the design where required
  - c. underground modular systems
  - d. Sustainable urban drainage integration
  - e. use within tree Root Protection Areas (RPAs)
- e) A schedule detailing sizes and numbers/densities of all proposed trees/plants;
- f) Tree pit designs including details of soil volumes. For street tree pits to include where appropriate a cellular confinement or other system for tree pits that are fit for purpose and suitable for vehicles and pedestrian usage.
- f) Specifications for operations associated with plant establishment and maintenance that are compliant with best practise
- g) A report to demonstrate how the Councils 25% canopy cover policy is being complied with, based on the detailed landscaping scheme;
- h) Management and maintenance of the landscape scheme including details of how trees in back gardens will be protected from removal in the longer term
- i) Ecological/biodiversity enhancements (flora) as so required by other conditions
- j) Revised plans to extend the length of footpath/cycleway along the eastern boundary of the site, or where this is demonstrated to not be feasible for highways and/or arboricultural reasons, details of measures to improve the legibility of the route through hardsurfacing materials/design
- k) Landscaping measures to screen the proposed pumping station and other ancillary utility structures
- l) Access road boundary treatment and landscaping

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

Reason: This is a pre-commencement condition required to safeguard and enhance the character and amenity of the area, to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces within the development. This is in accordance with policy DM34 of the Wycombe Area Local Plan.

10. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the buildings or the completion of the development, whichever is the sooner. Any trees, plants or areas of turfing or seeding which, within a period of 3 years from the completion of the development, die are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority first gives written consent to any variation. With the exception of any pruning, tree surgery or felling specifically shown in an approved tree report or landscaping scheme, no tree, shrub or hedge shall be pruned, felled or removed without the prior approval of the Local Planning Authority. If during construction of the development, or within a period of

three years of its completion, any such tree, shrub, hedge dies or becomes damaged, destroyed, diseased or dangerous, it shall be replaced during the following planting season by another healthy, tree, shrub or hedge as the case may be of a similar size and species, unless otherwise approved in writing by the Local Planning Authority. Thereafter any such replacement planting shall be maintained or further replaced as necessary for three years after replacement.

Reason: In the interests of amenity and to ensure a satisfactory standard of landscaping and To ensure the satisfactory retention of existing trees, shrubs and hedges and in the interests of visual amenity.

11. Prior to occupation, a “lighting design strategy for biodiversity” (which follows the Bat Conservation Trust and Institute of Lighting Professionals Guidance Note 08/18 ‘Bats and artificial lighting in the UK’) shall be submitted to and approved in writing by the local planning authority. The strategy shall:
  - a identify those areas/features on site that are particularly sensitive for wildlife and that are likely to cause disturbance in or around their breeding sites and resting places or along important movement corridors; and
  - b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) and detail how timing of lighting will be controlled, so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

C ensure that lighting shall have a colour temperature of less than 2700 Kelvin.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: Many species active at night are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed and/or discouraged from using their breeding and resting places, established movement corridors or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation. Limiting negative impacts of light pollution is also in line with paragraph 180 of the NPPF.

12. No development shall take place, unless authorised by the local planning authority, until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in the form of a geophysical survey and trial trenching in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority. Where significant archaeological remains are confirmed these will be preserved in situ.

Where significant archaeological remains are confirmed, no development shall take place until the applicant, or their agents or successors in title, have provided an appropriate methodology for their preservation in situ which has been submitted to and approved in writing by the local planning authority and the approved methodology shall be complied with. Where archaeological remains are recorded by evaluation and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place until the applicant, or their agents or successors in title, have secured the

implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. The development shall thereafter take place in accordance with the approved scheme.

Reason: This is a pre-commencement condition in order to control the potentially harmful effects on historic assets. To ensure any archaeological remains that may be present are preserved in situ and/or recorded for future generations as appropriate. To comply with the requirements of policy CP11 and the NPPF.

13. No phase of the development shall take place until such time as a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, as set out by the approved Flood Risk Assessment and Drainage Strategy (ref. Acl300/17038/FRA, 04.07.2018, ADAMA Consulting) and supporting Addendum to the Flood Risk Assessment and Drainage Strategy (ref. Acl558/20012/FRA/DS, 26.04.2021, ADAMA Consulting). The scheme shall also include:
- Soakaways are to be situated a minimum of 10m away from any building.
  - Assessment of the suitability of tree pits for tree planting adjacent to the highway and/or parking areas
  - Infiltration rate testing in accordance with BRE365 in the specific locations of infiltration components
  - Full construction details of all SuDS and drainage components
  - Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
  - Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
  - Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.

The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason: The reason for this pre-start condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 167 and 169 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

14. Prior to the occupation of the development a whole-life maintenance plan for the site must be submitted to and approved in writing by the Local Planning Authority. The plan shall set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each drainage/SuDS component), with details of who is to be responsible for carrying out the maintenance. The plan shall also include as as-built drawings and/or photographic evidence of the drainage scheme carried out by a suitably qualified person. The plan shall subsequently be implemented in accordance with the approved details.

Reason: The reason for this prior occupation condition is to ensure that arrangements have been arranged and agreed for the long-term maintenance of the drainage system as required under Paragraph 169 of the NPPF.

15. The development shall not be occupied until confirmation has been provided that either: 1) All wastewater network upgrades required to accommodate the additional flows from the development have been completed; or 2) A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plane.

Reason: Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

16. No development shall take place until a fully detailed scheme for the protection of the retained trees (including within the retained woodland), in accordance with BS 5837:2012, including a tree protection plan (TPP) and an Arboricultural Method Statement (AMS) have been submitted to and approved in writing by the Local Planning Authority. Specific issues to be dealt with in the TPP and AMS:
- a) Location and installation of services/ utilities/ drainage that may impact on retained trees or areas of new planting.
  - b) Methods of any construction-related activities within the root protection area (RPA as defined in BS 5837: 2012) of the retained trees.
  - c) A full specification for the installation of boundary treatment works that may impact on the retained trees.
  - d) A full specification for the construction of any roads, parking areas, driveways and pathways including details of the no-dig specification and extent of the areas of the roads, parking areas and driveways to be constructed using a no-dig specification. Details shall include relevant sections through them. Tree protection and AMS
  - e) A specification for protective fencing to safeguard retained trees during both demolition and construction phases.
  - f) A specification for scaffolding and ground protection within tree protection zones where necessary.
  - g) Details of site access, temporary parking, on site welfare facilities, loading, unloading and storage of equipment, materials, fuels and waste as well concrete mixing and use of fires
  - h) Methodology and specification for any facilitation pruning, including root pruning in accordance with BS3998:2010
  - i) Arboricultural supervision and inspection by a suitably qualified tree specialist
  - j) Methods to improve the rooting environment for retained and proposed trees and landscaping

The development thereafter shall be implemented in strict accordance with the approved details.

Reason: This is a pre-commencement condition which is required to satisfy the Local Planning Authority that the trees to be retained not be damaged during construction and to



protect and enhance the character of the site, in accordance with Policy DM34 and pursuant to section 197 of the Town and Country Planning Act 1990.

17. The development shall not begin until details of the estate road (including matters such as the longitudinal sections of the roads, the details of the materials intended for use in construction and whether the road would be adopted) have been approved in writing by the Planning Authority (in consultation with the Highway Authority) and no dwelling shall be occupied until the estate road which provides access to it from the existing highway has been laid out and constructed in accordance with the approved details.

Reason: This is a pre-commencement condition that is required in order to ensure that the estate road is of an appropriate design to minimise danger, obstruction and inconvenience to users of the highway and of the development.

18. The development shall not begin until details of the disposal of surface water from the estate roads have been approved in writing by the Planning Authority in consultation with the Highway Authority and no dwelling shall be occupied until the works for the disposal of surface water have been constructed in accordance with the approved details.

Reason: This is a pre-commencement condition as development cannot be allowed to take place, which in the opinion of the Highway Authority, could cause danger, obstruction and inconvenience to users of the highway and of the development should the discharge of surface water enter or interfere with the adjacent highway network.

19. No other part of the development shall be occupied until the new means of access has been sited and laid out in accordance with the approved drawing and constructed in accordance with the Buckinghamshire Council guide note "Commercial Vehicular Access Within the Public Highway".

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

20. Notwithstanding the provisions of Part 2 of the Second Schedule to the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that Order) no gates shall be erected upon the development's estate road.

Reason: To prevent vehicles reversing out onto Wycombe Road and enable vehicles to draw off clear of the highway, turn within the site and re-enter Wycombe Road for the safety and convenience of all highway users.

21. No dwelling shall be occupied until

- (a) The car parking serving that dwelling has been provided. The unallocated car parking shall be provided before the occupation of any flat hereby approved.

- (b) A scheme showing how each communal parking space will be marked to identify whether it is intended for use by a dwelling or visitors to the development shall be submitted to and approved in writing by the local planning authority. The scheme shall be implemented as approved. For the avoidance of doubt where a car parking space is identified on the layout plan as being available for use by two dwellings, such a space shall be marked out as a private (i.e. not a visitor) space
- (c) The scheme for manoeuvring and the loading/unloading provisions for refuse and delivery vehicles shown on the submitted plans has been laid out.

The car parking, manoeuvring space and loading/unloading provisions for refuse and delivery vehicles shall not thereafter be used for any other purpose.

Reason: To ensure that adequate car parking is provided in the interests of the amenities of the area.

22. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order), the garage car parking spaces hereby permitted shall be kept available for the parking of motor vehicles at all times. The garages shall be solely for the benefit of the occupants of the dwelling of which it forms part and their visitors and for no other purpose and permanently retained as such thereafter.

Reason: To ensure that the development has adequate car parking provision.

23. No wall, fence, hedge or other means of enclosure to be provided along the site frontage shall exceed a height of 0.6 metres above the level of the centre line of the access within land under the control of the applicant.

Reason: To provide adequate intervisibility between the access and the existing public highway for the safety and convenience of users of the highway and of the access.

24. With the exception of the emergency vehicular access here shall be no other means of vehicular access to the development other than from Wycombe Road as approved.

Reason: To avoid potential vehicular movements from Amersham Road through to the Wycombe Road in the interest of highway safety and to avoid inconvenience .

25. Prior to first occupation, details of facilities for the storage of refuse bins and cycles shall be provided to the local planning authority for approval. The approved details shall be provided before the dwelling(s) that they relate to is first occupied and shall thereafter the facilities shall be permanently retained for their purpose.

Reason: To ensure a satisfactory appearance and in the interests of the amenities of the occupiers and adjoining residents.

26. Prior to the commencement of any works on the site, a Construction Traffic Management Plan detailing the management of construction traffic (including vehicle types, frequency of visits, expected daily time frames, use of a banksman, on-site loading/unloading arrangements and parking of site operatives vehicles) shall be submitted to and approved in

writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with such approved management plan.

Reason: This is a pre- commencement condition as development cannot be allowed to take place, which in the opinion of the Highway Authority, could cause danger, obstruction and inconvenience to users of the highway and of the development.

27. Prior to occupation of the development hereby permitted, electronic vehicle charging points with a minimum rating of 32amp must be installed so that one carping space per dwelling is served by an electronic vehicle charging point.

Reason: To manage carbon emission generation and mitigate for climate change in accordance with local plan policy CP12 and DM33 and to comply with the Council's air quality SPD to reduce carbon emissions and the impact on health arising from Nitrogen Dioxide emissions from the development.

28. No above ground construction shall take place until a scheme to integrate renewable technologies (e.g. heat pumps, photo voltaic cells) into the development has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be designed to comply with Local Plan Policy DM33 and Policy C12. The development shall be implemented in accordance with the approved scheme and no dwelling shall be occupied until the measures within the scheme relating to that house or flat have been provided. The scheme shall remain operational for the lifetime of the development unless otherwise first agreed in writing by the Local Planning Authority.

Reason: In the interests of managing carbon emissions and mitigating climate change as required by Local Plan Policy CP12 and DM33.

29. The reserved matters application(s) for scale and appearance shall demonstrate 30% (rounded) affordable dwellings and 20% (rounded) market dwellings as designed to meet the standards set out in Building Regulations Approved Document M4(3) and the remaining dwellings as designed to achieve the standards in Building Regulations Approved Document M4(2), unless otherwise first agreed in writing by the Local Planning Authority.

Reason: To meet the need for accessible, adaptable and wheelchair user dwellings as required by policy DM41.

30. The dwellings shall all achieve the higher water efficiency standard set out in the appendix to Building Regulations Approved Document Part G.

Reason: In order to meet the requirements of Local Plan policy CP12 and DM41 in the interests of water efficiency.

31. The reserved matters application(s) for scale and appearance shall demonstrate, through floorplans and an updated schedule of accommodation, the number of habitable rooms proposed for each dwelling which demonstrate an overall optimum level of parking provision for the site can be achieved in accordance with the Buckinghamshire Countywide Parking Guidance. The dwellings shall be laid out in strict accordance with the approved details.

Reason: To ensure that the development delivers an appropriate quantum of parking provision as detailed in the approved layout in the interest of highway safety.

32. Subsequent reserved matters applications shall be supported with an updated Biodiversity Impact Assessment metric which reflects the detailed design of the scheme. Further BIA metrics shall demonstrate no greater loss to biodiversity than demonstrated in this permission.

Reason: To ensure that the required off site compensation for the loss of on site habitats is minimised and that detailed design provides no greater loss.

33. No development shall take place until an ecological design strategy (EDS) addressing mitigation compensation enhancement has been submitted to and approved in writing by the local planning authority.

The EDS shall be produced in coordination with the urban design layout of the site in an iterative process with the intention of maximising on site biodiversity value as will be evidenced through an updated biodiversity metric. The EDS shall include the following:

- a. Purpose and conservation objectives for the proposed works.
- b. Review of site potential and constraints.
- c. Detailed designs and working methods to achieve stated objectives.
- d. Extent and location/area of proposed works on appropriate scale maps and plans which cross reference with an updated Warwickshire metric.
- e. Specification and source of materials (including plants and soil) to be used where appropriate, e.g. native species of local provenance.
- f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g. Persons responsible for implementing the works.
- h. Details of initial aftercare prior to implementation of the Landscape Ecology Management Plan (LEMP).
- i. Details for monitoring and remedial measures.
- j. Details for disposal of any wastes arising from works.
- k. Provision for wildlife corridors, including hedgehog holes in fences, native hedgerows and other linear features for habitat connectivity.
- l. Tree, hedgerow, shrub, wetland and wildflower planting and establishment.
- m. Proposed new landforms associated with habitat creation, e.g. water bodies/SuDSs features.
- n. Soil handling, movement and management.
- o. Creation of new wildlife features, including bird and bat boxes integrated into buildings (at least one per building), wildlife ponds, insect hotels/bee bricks, places of shelter for reptiles and hedgehogs, hedgehog holes in fences, etc.

The EDS shall where appropriate be cross reference in other relevant details (e.g. landscape plans, LEMP, detailed building design, construction environmental management plan), and it shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To ensure that the biodiversity value of the site will be in line with the submitted Biodiversity Metric and Proposed Habitat Plan and maximised in line with policy DM34.

34. No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.
- a. Risk assessment of potentially damaging construction activities.
  - b. Identification of “biodiversity protection zones”.
  - c. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
  - d. The location and timing of sensitive works to avoid harm to biodiversity features.
  - e. The times during construction when specialist ecologists need to be present on site to oversee works.
  - f. Responsible persons and lines of communication.
  - g. The role and responsibilities on site of an ecological clerk of works (ECOW) or similarly competent person.
  - h. Use of protective fences, exclusion barriers, escape ramps from trenches/holes and warning signs (including their specification, location and timing for erecting and dismantling).

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that development is undertaken in a manner which ensures important wildlife is not adversely impacted.

35. No development shall take place until a landscape and ecological management plan (LEMP) has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following.
- i. Description and evaluation of features to be managed.
  - ii. Ecological trends and constraints on site that might influence management.
  - iii. Aims and objectives of management.
  - iv. Appropriate management options for achieving aims and objectives.
  - v. Prescriptions for management actions.
  - vi. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
  - vii. Details of how work schedules will be reviewed on a five yearly basis for at least 30 years (to ensure long term biodiversity net gain is achieved).
  - viii. Details of the timing and structure of Biodiversity Net Gain Audit Reporting to be produced in line with the CIEEM Guidance document: Biodiversity Net Gain Report and Audit Templates (July 2021).
  - ix. Details of the body or organisation responsible for implementation of the plan.
  - x. The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.
  - xi. The plan shall also set out (*where the results from monitoring show that conservation aims and objectives of the LEMP are not being met*) how contingencies and/or

remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The approved plan will be implemented in accordance with the approved details.

Reason: To ensure appropriate protection and enhancement of biodiversity, to make appropriate provision for natural habitat within the approved development and to provide a reliable process for implementation and aftercare.

36. Prior to occupation of the 90<sup>th</sup> dwelling hereby approved a post construction Biodiversity Net Gain Audit Report must be submitted to and approved in writing by the Local Planning Authority. It must to be produced in line with the CIEEM Guidance document: Biodiversity Net Gain Report and Audit Templates (July 2021) and the details set out in the approved Landscape and Ecology Management Plan.  
The Audit report must also be passed to a named management company along with the Landscape and Ecology Management Plan.

Reason: to ensure the habitats which are to be relied upon to ensure that the biodiversity value on site is achieved, have been correctly created so that they can establish correctly and be managed.

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

### Councillor Comments

**CLlr Ron Gaffney** – As I have made it clear on numerous occasions, I am totally against this development on Green Belt Land. Everything about the plan has numerous problems.  
(25/07/2021)

**CLlr Ron Gaffney** - As a County Councillor for Hazlemere I take a great deal of interest in Planning Applications in my Ward. I listen to my electorate who inform me in large numbers that they are very much against the development at "Tralee Farm". As a considerably large development has now been agreed 1 mile down the road "Terriers Farm" Hazlemere is becoming over developed and will cause traffic chaos as the infrastructure will not be able to cope. Yes, development is important, but so is our countryside. Tralee Farm is a beautiful open space (the border between WDC & Chiltern DC's) and should be preserved in my opinion and that of 100's of other residents. If a much smaller tasteful development was proposed instead, then this might be acceptable...but only might be!

My final Comment:- this application should be strangled at birth or at least until the traffic problems at Terriers Farm are resolved. (07/09/2020)

**CLlr Jonathan Waters** - I would like to confirm again my original Call In to the Planning Committee for decision if the Officers Recommendation is for Approval. My concerns remain unchanged on Highways, Density, Infrastructure, and Impact on the Green Belt. (14/07/2021)

**CLlr Jonathan Waters** - I would like to request that this application is called in for decision to the Planning Committee if the Officers Recommendation is for Permission.

I am concerned about highways impact both at the access junction to the site and impact on the wider road system.

I am concerned that the number of dwellings proposed would create a very high density development, leading to private amenity space being significantly less than the neighbouring properties particularly in Holmer Green, making it out of character with the area.

I am concerned that no natural open space corridor will remain, ensuring a clear demarcation between Holmer Green and Hazlemere.

I am concerned that no affordable housing is included in a proposed development of this size.  
(28/08/2020)

**CLlr Catherine Oliver** - In the event that this application is recommended for approval I would like to call this into the Strategic Sites committee. It should be considered with all the other applications that make up HW8. Additionally, the Strategic Site Committee meeting should be held in the Council Chamber, in High Wycombe so that it is easier for local residents to attend. Whilst I understand that the principal for residential development has been agreed, there are several issues in respect of this planning application.

1. Prematurity - as per 5.1.67 HW8 should be planned as a whole and not through separate applications, therefore on this basis I object to this application on the grounds being premature.
2. Place-making - this is a huge issue not least for the fact the Inland Homes don't seem to have grasped the fact that these homes will be part of Hazlemere and not part of Homer Green. It is

important that this development does not fall into the trap of being neither part of Hazlemere or Holmer Green and I fear this is where it will end up, to the detriment of its future residents. Therefore, until a comprehensive approach is made for the whole site, I object to this application as it fails to achieve this important point. It is not for the developers to tell us which village this development should be in.

3. Sense of separation between Hazlemere and Holmer Green - this plan totally fails to achieve this objective in anyway.

4. Parking - although technically within Buckinghamshire Council parking guidance the number of spaces is far too low. The guidance states that visitor spaces should be 20% of the number required for the site. Therefore, I suggest that situation is corrected. This is allowed to happen because on the number of unallocated spaces which equals a reduced number. This will lead to disputes between neighbours going forward and lead to inappropriate parking both on and off the development. We must learn lessons from other developments.

5. Transport - As this site has not had the benefit of a development brief I believe there are issues. I am concerned about the visibility splays on exiting to Wycombe Road, especially as often there are cars parked on that side of the road. I don't like these shared surfaces within the development as I think it causes for all road users. It also means that the roads are somewhat narrower as there is no need to provide a pavement which gives a sense of an overbearing street scene. Much of the data being relied on here is very out of date (2015) and does not take account of the 2 other developments of HW7 (Terriers Farm) and HW10 (Highbury Works). More up to date data is required to model the change in habits of drivers in and around Hazlemere and High Wycombe.

6. Green space - the orchard situated in the NE corner of the site is to be retained but it needs to be protected, managed, and improved. It could be great source of improving the biodiversity of the site. It also needs to be clear as to how this space will managed going forward.

7. Flooding - as there is much flooding in Hazlemere - both at Cosy Corner and on the A404 at the junction with Eastern Dene - it is important that we are 100% sure that the flood risks are not just mitigated but ensure they just don't happen.

8. Boundary treatments with existing dwellings - it is important that boundary treatments with existing dwellings must not be allowed to be changed and should be mature from the start. Therefore, there must be TPO on all trees within the site and restrict the ability for residents of the development to remove hedgerows.

9. Infrastructure - although not a planning consideration the area is suffering with insufficient school places, doctor surgeries, and other gaps in local services and these need to be addressed. This piecemeal approach does not allow this to be done.

10. Water pressure - there is real concern within the local area about the stresses on the water supply system as residents are already suffering with low water pressure.

11. Climate change - not enough is being done to combat climate change within this development. Hedgerows are not being retained, trees being felled, and not being replaced with similar age trees. There is a biodiversity loss which is unacceptable. (01/02/22)

**Cllr Catherine Oliver** - If the planning team are minded to approve this amended application please ensure it goes before the Strategic Site Committee. It would be a great plan if the meeting if the meeting is held locally within the West Area planning area.

The main reason for the call in is on the basis of prematurity, in advance of the supplementary planning document covering the whole of HW8. (28/01/22)



**Clr Catherine Oliver** - Given the strength of local feeling with regard to this development I feel that if the Council are minded to approve this application it should be decided by the relevant planning committee.

The Wycombe local plan makes it very clear in HW8 - under 5.1.63 that this whole site (including any adjoining land within the previous Chiltern District) should be the subject of a development brief (such as was undertaken for Terrier Farm). This would allow a coordinated approach to the provision of much needed local infrastructure and overall a better development(s).

I think this application has come forward too early for it to be considered properly. (04/09/2020)

**Clr Ed Gemmell** - I object to the application for the following reasons related to the Wycombe Local Plan (section numbers below from the plan)

According to section 5.1.60 The site is allocated for 350 homes and the combined applications considerably exceed this.

Under 5.1.63 A comprehensive approach to the development of the land in Wycombe District is essential for good planning on this site. Preparation of a development brief for the site will be essential to coordinate the detailed planning of the site and this should be used to inform any planning application submitted for the future development of the site.

This application is this "premature" as the 'essential development brief' has not yet been created and must predate the applications.

In addition the application is "premature" as Hazlemere is engaged in creating a neighbourhood plan which will also be essential to ensure a comprehensive and appropriate approach to this and other developments in Hazlemere.(28/01/2022)

**Clr Ed Gemmell** - I object to this development. If the planning officer is minded to approve it then I would like the officer to call me as I will wish to discuss calling it in to the Strategic Sites committee.

There have been numerous challenges to this not least by Hazlemere Parish Council whose conclusions I support.

In addition this application should be dismissed on the basis of the material considerations set out below:

- As stated in the government guidance online "Determining a Planning Application" "the courts...have taken the view that planning is concerned with land use in the public interest."

- In this case the "public interest" would be served by preserving this land as green open space/preserving every single mature tree that would be felled if this application would be successful. This has become an even more important imperative recently with the publication of the government report 'UK Climate Change Risk Assessment 2022' presented on 17 January to Parliament pursuant to Section 56 of the Climate Change Act 2008. In the opening paragraph of this report "Climate change is happening now... has already begun to cause irreversible damage to our planet and way of life. We have clear evidence (of) ... the impacts we will face should this continue. As we redouble our efforts to achieve net zero, we must also continue to raise ambitions on adaptation..."

- An essential attribute for successful adaptation in Hazlemere is retaining our biosphere and especially our mature tree cover Trees and mature hedgerows to provide protection against heatwaves and the deaths that will be caused by them. The 2018 heatwave is anticipated by the Climate Change Committee to become our annual weather by 2050. The extreme once in a thousand years' Canadian heatwave is now projected by scientists to be probable every 6.5 years and can occur here with the same frequency. The Environmental Audit Committee projects 7,000

deaths by 2040 caused by extreme heat and considerable weight should be given to the need to protect lives and the health of people in Hazlemere (especially a large proportion of older and more vulnerable people) through land use on the public interest by preserving trees and natural green spaces.

- The NPPF section 153 states "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account ... long-term implications for ... biodiversity ... and the risk of overheating from rising temperatures" This site does not do this and will considerably increase the risk of overheating from rising temperatures and should be rejected
- All existing mature trees and hedgerows on the site should be preserved. If this development did go ahead then it must be done around the current trees and hedgerows preserving them
- Climate change mitigation and adaptation are material considerations with great weight in the case of this application. Hazlemere Parish Council has declared a Climate Emergency, set a net zero target, as has the UK Government. NPPF s 152 states "The planning system should support the transition to a low carbon future in a changing climate (and) ... contribute to radical reductions in greenhouse gas emissions". Radical reduction in GHGs is required to stay under 1.5 degrees C
- for Hazlemere this is a material consideration of great weight. The need to stay under 1.5 C is of overriding importance/overwhelming weight. The proposed houses on this development plus services will cause up to 12,000 T of carbon emissions. Together with other HW8 and Terriers Farm developments this will equate to 1/3 of Hazlemere's entire remaining carbon budget to stay under 1.5 C.
- The NPPF s. 154 requires "New development should be planned (to) avoid increased vulnerability to ... climate change (and) ... to reduce greenhouse gas emissions". There is no evidence in the proposal from the developer of this site that this development will reduce vulnerability or Hazlemere's GHG and thus should be rejected
- There is not a local demand for housing but there is for protection from heatwaves, floods and other consequences climate change and therefore to ensure that planning supports land use in Hazlemere in the public interest this development should be refused
- There are known issues about errors in the process to remove this area from Green Belt. It was seen as 'semi urban' in the WLP but a recent review showed the building cover to be under 1% (even if all Coachworks included >9%) this should be seen as a material consideration in rejecting development on the undeveloped part (around 95%).
- Also the LPA can depart from the local plan under article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Departure would clearly be in the public interest to prevent development on the open green area
- More details are given in a submitted document I sent by email to Bucks Planning.

**ClIr Ed Gemmell** - Children's Interests - Government guidance on the NPPF states that 'Local authorities need to consider whether children's best interests are relevant to any planning issue under consideration' and they 'need to be mindful that the best interests of a particular child will not always outweigh other considerations including those that impact negatively on the environment or the wider community'.

There is at least one particularly vulnerable child known to me to be living in an adjacent property who would be badly and detrimentally affected by the proposed development.

The state of health of this child is a material consideration under the NPPF and should be given great weight especially as in this case the best interests of this child align with the vital environmental considerations as I have set out in a previous objection as well with those of the wider community and on this basis I request the planning officer to reject this development.

I cannot provide details of the child in question herein due to issues of confidentiality but would request the planning officer to contact me to progress this. (28/01/22)

### Parish/Town Council Comments

**Hazlemere Parish Council – Further Comments (17/08/21)** - Hazlemere Parish Council has carefully reviewed the documents making up this application and is grateful for the opportunity for a site visit and the extra time allowed for us to read and digest the many technical accompanying documents. However, the application is being put forward before the expected Development Brief for the HW8 site as a whole. Therefore, it is impossible to take an informed view on key questions such as whether the road infrastructure overall will be adequate: the access to amenity land; the overall look and feel of what will be a large area of housing; and the environmental impact. In addition, Hazlemere is in the process of developing a Neighbourhood Plan. The Parish Council therefore believes that this application is premature and will be prejudicial to the design of the rest of HW8. It urges the Buckinghamshire Council Planning Authority to reject it, pending decisions on the Development brief for the whole of HW8 land, and the development of the Hazlemere Neighbourhood Plan.

This application also fails many of the tests set out in the Wycombe Local Plan, as shown below. We believe it will cause demonstrable harm to the local sense of community; to biodiversity; and the local residents through excess pressure on local infrastructure and services. The Parish Council therefore oppose the application as it stands and also requests that the application is called in to the Strategic Sites Committee as it spans two villages, two wards and two planning areas and is of great concern to the whole community.

#### 1 Place-making

The Wycombe Local Plan requires the HW8 site to:

- a) Maintain sense of separation.
- and c) Be planned comprehensively with surrounding land

The 'separation' in this application relies on a narrow green corridor across the steepest part of the site, which is inadequate and also highly likely to flood. The 'corridor' is also set on a diagonal which means that if you stand virtually anywhere on the site the vista will be of housing – there will be no visual break in the landscape. In the north, the site will abut up to Holmer Green properties, with no break at all. The green corridor should be re-considered and considerably expanded in area.

Even should the 'green corridor' be expanded it would be impossible under the current scheme to 'maintain a sense of separation' as the housing proposed under this application is effectively filling in all the existing green area between the two communities. When a comprehensive plan is produced for the whole HW8 it is almost certain that the area subject to this application will be required in its entirety as a 'green corridor' between the communities. This application should be rejected as it is in complete contravention of the requirement in the plan to 'maintain a sense of separation' and the land which is subject to this application will all be required to maintain any sense of separation.

While the Parish Council understands that the land is allocated for housing in the Wycombe Local Plan, it is extremely concerned that applications for development of the HW8 land are being brought forward in a piecemeal way and take no account of the impact of other current applications (eg Land South of Orchard Farm, Terriers Farm) on Hazlemere and the surrounding neighbourhood. This is one reason why Hazlemere Parish Council have embarked on the process of developing a Neighbourhood Plan. Paragraph 5.1.66 of the Wycombe Local Plan also said that as the land was taken out of green belt it was 'essential' that planning should take into account green belt land previously in the old Chiltern District – where no decision was made. This application, which relates to land previously in the green belt, should be rejected pending decisions on the HW8 site as a whole and the development of a Neighbourhood Plan for Hazlemere. These decisions should be informed by updated data on current education, transport, and local services and utilities, rather than relying on data some of which is out-of-date.

#### Other place-making issues

- Harm to a local sense of community Because of the lack of comprehensive planning over the HW8 site as a whole, and the lack of adequate separation with Holmer Green, it will be difficult to form any sense of community. This is apparent throughout the application where land which is in Hazlemere is regularly and incorrectly referred to as being in Holmer Green. The only part of the application which is within Holmer Green is the access road through 20 Wycombe Road, which is not covered by the Wycombe Local Plan.
- Lack of amenity land In this application there is no playground, nowhere to kick a ball (as the green spaces are either 'orchard' or on a steep slope), few places to walk a dog. Across the HW8 site the Parish Council needs to see proper access to land for leisure and exercise, including playgrounds and larger green areas, with further information on who will be responsible for maintenance.

Poor access to essential services The Parish Council notes that the Design and Access statement contains a number of inaccuracies relating to local facilities and services: eg references to Dragon Cottage GP surgery which closed a couple of years ago, a 'school' on Earl Howe Road which is actually a pre-school that appears to have closed. Paragraph 5.1.68 of Wycombe plan also says that 'In the event that land to the north east in Chiltern District (off Earl Howe Road) is allocated for development in the Chiltern and South Bucks Local Plan, a new primary school will be required'. The Parish Council notes that the 'school' would potentially be on either site. There is no mention of this requirement in the design and access statement. This application should not even be considered until comprehensive planning across the whole area is available. The Parish Council understands from Inland Homes that '*a significant financial contribution has nonetheless been agreed in principle to be directed towards improvements to existing local schools.*' While this is welcome, the Parish Council needs further details on what these improvements might be, to which schools, and what the knock-on impact might be to, for example, transport. For example, if the need is met through further expansion of Gomm Valley schools it would have a major impact on traffic going through Hazlemere.

- Impact on power supply It is unclear what will happen to the overhead power cables running along the back of the Kestrel Drive Gardens.
- Harm to health and wellbeing The Parish Council notes that para 130 of the NPPF requires development to promote health and wellbeing. This application does not meet this requirement, with poor access to primary care (Dragon Surgery having closed, there is considerable pressure on the alternatives, Highfield Surgery and Hazlemere Surgery), low amenity space and no playgrounds. The Parish Council would like to see much greater attention placed on health and wellbeing in any application.
- Housing mix It is particularly difficult to comment on the housing mix proposed in the absence of any development brief for the rest of the HW8 site. The Parish Council would want to see more evidence on what housing mix is needed for this development, particularly given changes in demographics and housing use post-covid.
- Lack of clarity over status and management of affordable housing Listed in the P202 schedule appears to be all affordable housing for rent. While rented housing is needed in Hazlemere, it is important to know how this will be owned and managed. It also means that the affordable housing is clustered together and will not achieve the aim of tenure-blind development. The lack of any affordable housing for purchase will also disappoint many of the younger generation seeking to buy locally. More information on the tenure and management of affordable housing is required.
- Inadequate accessible housing The wheelchair accessible housing is all two-bedroomed. This will effectively bar the development to any families with mobility issues. The Parish Council would like to see wheelchair accessible housing for larger properties too.
- Over-reliance on parking courts The road layout is an improvement on the previous version, but there is still unwelcome reliance on parking courts, with their associated problems of potential for crime and mess (eg from communal bins).
- Concerns about crime prevention The Parish Council notes the concerns raised by Thames Valley Police in their representation. There is also concern that the green area in the SW of the application could increase the risk of crime against existing properties. The application should be refused until these concerns have been mitigated.
- Risk of un-neighbourly development in future Hazlemere has recently seen several problematic applications that effectively increase building heights, for example through the use of large box dormers. The ridge height of houses adjoining existing homes should be no higher than those of the existing properties. To reduce the risk of un-neighbourly development in future, the ability to add further floors or large dormers should be excluded from the scope of permitted development in roads adjoining existing properties (eg Lacey's Drive, Kestrel Drive).

## 2 Transport

The Wycombe Local Plan requires that development across the HW8 site as a whole should:

- a) Provide access from the A404 and Wycombe Road
- b) Provide walk/cycle access

This application only provides access from Wycombe Road, which is in Holmer Green, not Hazlemere. However, the Parish Council notes the concerns about limited surveillance raised in the representation from Thames Valley Police.

The Parish Council questions whether the proposed access through 20 Wycombe Road Holmer Green gives enough visibility when cars are parked outside the dentist in Wycombe Road and near to the Dragon Sensory Babies and Children's Centre.

The Parish Council has concerns about pedestrian safety given that the roads towards the SE end of the development are shared surfaces between pedestrians and cars, particularly as the roads are quite curved, with potentially limited visibility. What happens when people start parking on these shared surfaces, reducing visibility further. There is no detail on the improvements to road infrastructure that would be need to facilitate access through the site. Footpaths are shown between Tralee Farm and the eastern part of the site, but without knowing where these will emerge on the A404 it is impossible to comment. The A404 at that point is highly dangerous, with a high accident rate, no footway, and very fast (60mph). It will need a proper footway, speed restrictions and proper crossing points. Visibility coming out of Hazlemere is particularly challenging as the entry would be just after the brow of a steep hill (1 in 6). There is also a question of where cyclist and pedestrians would go, on the A404. There is no amenity land (eg Penn Wood) accessible on foot from the eastern side of the HW8 site that does not require walking on the carriageway itself. Pedestrian safety needs to be addressed more fully across the whole HW8 site.

### Other transport issues

Inadequate parking provision. Although 227 parking places are proposed, this includes 47 garage places and our experience from recent planning applications is that garage spaces locally are rarely used for cars. The 227 places also includes 3 displaced from the Wycombe Road access and visitors' parking at the bottom of the site. Excluding 46 garage spaces and 37 for visitor parking, the resulting 1.5 spaces per house are not enough given the likely demographics of the residents. Outside the site, any increase in school places in Holmer Green will exacerbate the already dangerous congestion in Watchet Lane at school closing time.

Electric vehicle charging points The Parish Council welcomes the proposal to have one EVCP per allocated space, in line with local policy. However, as the Parish Council has identified, the proposed allocated parking is inadequate. Therefore for unallocated spaces, more than one per 10 spaces should be provided.

Vehicle trip generation The Parish Council does not think the application takes account of recent changes in road use, likely to be exacerbated by a major HW8 development, for example increase in school trips to the recently expanded local school. Updated data is required.

Local highway network The amended transport assessment refers to potential improvements, such as capacity improvement at Hazlemere crossroads and a new roundabout near Park Lane/Eastern Dene/A404. The Parish Council are not aware of a commitment to these improvements, and they need to be in place before any development in HW8.

### 3. Green infrastructure environment

The Wycombe Local Plan requires that the site should:

- a) Retain existing orchard

- b) Provide protection and future management for the orchard
- d) Provide green infrastructure link
- f) Flood risk

#### Maintenance and protection of the orchard

Orchards (particularly cherry orchards) are an important part of the area's history and character. The Parish Council does not think the current proposals reflect this adequately. The tree survey suggests that what is called an 'orchard' in the NE corner of the site is actually holly, hazel, elder and willow. The highest concentration of existing orchard trees in the site appears to be on the NW, and although many of these trees have limited remaining lifespan, this area will be lost to housing. The proposed mitigations are wholly inadequate:

- use of fruit trees in road planting – occasional fruit trees do not constitute an orchard
- proposal for a new 'orchard' in the western green area. This area is very small, probably equivalent to only an eighth of the orchard that will be lost
- 'informal orchard' as it is called in the South of the site. This is the only significant amenity land in the whole site, and it is on a very steep slope, and includes a SUDS, footpaths, visitor parking and some form of drainage pump. This cannot be regarded as an orchard.

The so-called orchard in the NE corner will be very hard to protect, as the plans include paths, bins and notices. Apart from the steep slope in the south of the site, and the small patch on the western side, this will be the only place to exercise or walk your dog that doesn't involve getting in a car or crossing the extremely busy A404. So the 'orchard' is likely to be heavily over-used, unlikely to provide valuable habitat for wildlife, and hard to maintain as an orchard. Nor is it clear who will manage the site, or how. Any application for this site needs to include clear proposals to plant a much larger area of new orchard than currently proposed, with clarity over who will manage any 'community orchard' and protection from degradation by over-use for general leisure purposes.

#### An improved green corridor

This wholly fails, for the reasons shown under A1) above. A large part of the proposed 'green corridor', including the SUDS and the drainage pump, will actually be needed to manage the flood risk. There will also be 3/4 footpaths through the hedgerow so it is difficult to see how this will provide much wildlife habitat.

#### Flood risk

Paragraph 5.1.74 of the Wycombe Local Plan highlights that the site contains critical drainage areas. The Parish Council are seriously concerned about the flood risk posed by the site overall. Within the site, the run-off from the 103 houses plus any development on the A404 side all seems to drain into one area. The Parish Council also notes the representation by Thames Water highlighting concerns about wastewater. Looking outside the site itself, the Parish Council would want to see special consideration of any potential impact on:

- The bottom of Sawpit Hill (down by Park Parade) which regularly floods and for which Transport for Bucks has already informed us that a special drainage scheme is already required.

- The junction of Eastern Dene with the A404, which has also experienced flooding.
- Lacey's Drive, which we understand floods at one end.
- Inkerman Drive is also experiencing flooding into resident's gardens

The Parish Council needs to see a fuller flood risk assessment, taking into account the impact on Sawpit Hill and any potential wastewater impacts.

### Children's Best Interests

Under government guidance the planning authority needs to consider "children's best interests". The application under consideration is harmful to the thousands of children in the local area for the following reasons:

- It will cause overcrowding in the local schools which will detrimentally effect learning
- It will significantly increase the number of cars on the local streets making them more dangerous, decreasing the safety of cycling and walking by children and increasing the air pollution in the local area
- It will remove vital trees necessary for oxygen production and CO2 sequestration and to help prevent flooding that would be dangerous to local children
- It will cause a net loss of biodiversity in the local directly effecting local children
- The development itself will cause hundreds if not thousands of tonnes of CO2 emissions detrimentally affecting the future of all children

### Other environmental issues

#### Material Considerations

Under government guidance on determining planning applications, it is stated that the courts have taken the view that 'material considerations' in planning should be concerned with 'land use in the public interest'. In light of recent disastrous heatwaves in Canada, USA, Greece, Spain, Italy, Russia and other countries and the appalling floods in Germany, Belgium, Holland as well as in London it is clear that maintaining our green spaces and in fact improving them with measures such as comprehensive tree planting is vital. Climate change has meant that such extreme weather should now be expected (in Canada the 1000-year heatwaves are now expected every seven years) and the temperature of the planet is going up from the current 1.1 °C (likely to reach 1,5 °C around 2030 according the recent IPCC report). It is clear that the likely damage in Hazlemere and human casualties from future extreme weather conditions must now be considered a 'material consideration' and 'land use in the public interest' in Hazlemere must take into account prevention of and adaptation to such likely scenarios. The Parish Council asks, accordingly, for this application to be refused on the basis that this area of green space is vital to protect the public in all of Hazlemere and Holmer Green and this is a material consideration of the highest public interest.

The same government guidance also states that "The local planning authority may depart from development plan policy where material considerations indicate that the plan should not be followed". This power is contained in article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Parish Council would respectfully propose that the current huge number of climate disasters all around the World and the certainty that similar disasters will befall the UK, and therefore Hazlemere, in the very near future is a material consideration of the utmost importance. It would follow, that this would allow the local planning



authority to decide not to follow the Local Plan and to determine there should be no development in the area subject to the application.

It is also a material consideration that in 2019 Hazlemere Parish Council declared a climate emergency and committed to action to address this. In addition, the recently updated NPPF (paragraph 11a) now requires decisions to 'mitigate climate change... and adapt to its effects'. The current application is inadequate in its proposals around climate change and biodiversity, for the reasons shown below, and should be rejected on that basis.

- Unclear/inadequate mitigation for loss of biodiversity. The ecological impact assessment says that 'it will not be possible to achieve net gain onsite in habitats and deliver the scheme, and there is a net loss of 7.33 units accordingly. In order to address this, the proposed development will deliver a financial contribution to a suitable off-site biodiversity offsetting scheme.' There is no further information on how this will be achieved, and the developer will presumably have no responsibility for delivery – it is not clear who will. The Parish Council assumes that the reason a net gain of Biodiversity cannot be achieved in the current application is that there are simply too many buildings proposed under the application not leaving enough space to create a biodiversity gain. This application must not be considered for approval without a proper mitigation plan, with clear responsibilities. Should this application be considered at all for approval then the planning authority should require it to deliver its net biodiversity gain on site and to reduce the number of dwellings to be built to achieve this if required.
- The loss of mature tree cover. The applicant has stated that 42 mature trees will be cut down to make way for this development. Even if new trees are planted, they will take time to grow and will not compensate for the mature trees lost in this application. It is a material consideration in the public interest that no trees should be cut down. The applicant has sourced an arboricultural report which suggests most of these trees are poor quality and thus need to be cut down. The Parish Council questions whether this is accurate given the overall environmental impact and need for all trees to remain in place in the public interest
- Excessive dependence on private gardens for tree cover Even the largest properties (see, for example, the 4 bedroomed houses adjoining homes in Kestrel Drive) have gardens that seem to be considerably smaller than those they abut (see page 53 of the design and access statement). This will impact on privacy but even important on the possibility of achieving acceptable tree cover. With relatively small gardens, only small trees can be planted and they will also be vulnerable to removal. The overhead power lines running down the back of Kestrel Drive gardens will also make it difficult to plant larger trees. The Parish Council would want to see many more trees in the public spaces, in line with the amended NPPF (para 131).
- Harm to pollinators/loss of hedgerows Hazlemere is working to reverse the dangerous ongoing destruction of pollinators in the UK and has started to create a pollinator corridor. Although some hedgerows will be maintained, others will be lost. As a condition of the application, there should be a ban on any future removal of hedgerows. The Parish Council would also want to see specific planning for pollinator corridors. For example, creating a new hedgerow instead of/in addition to fencing for properties adjoining existing homes. This would also be in line with the existing Hazlemere identity of tree-lined walks.
- Building design The Parish Council notes that this is an outline application, with all matters reserved except access and layout. However, in line with the new requirements of the NPPF to mitigate climate change, all buildings should be designed to the highest possible standard and supported by universal renewable energy requirements, together with a commitment to ensure that buildings are easy to retrofit to new technology e.g. hydrogen.

- Lighting All lighting should be energy efficient, e.g. LED. Hazlemere Parish Council has already invested in LED for all its public lighting, and it would expect no less from any HW8 development.
- Water supply The Parish Council is concerned about the impact on water supplies of this and other local application and would like to see more information on where the water will be drawn from (will this be the Chiltern artisanal aquifers?) and seek further information on the environmental impact and sustainability.

***Hazlemere Parish Council – Initial Comments –***

Given that this land is still currently in the Green Belt, this application is speculative and pre-emptive. The Parish Council would prefer it to wait until plans are submitted for the adjoining (Orchard) site off the A404 and news on any adjoining land (in Chiltern District) which may be released from Green Belt under their Local Plan.

The Parish Council are concerned about the effect of so much extra traffic coming out on Wycombe Road and Sawpit Hill. Also normal concerns about lack of adequate schooling, doctors etc in the vicinity to cope with the extra population. (18/09/18)

**Little Missenden Parish Council – Further Comments (17/01/2022)**

Comments from Highways Consultant:



# Highway Planning Ltd

Highways & Transportation Consultants

Ms J Fallon  
Little Missenden Parish Council  
Council Offices  
38 New Pond Road  
Holmer Green  
Bucks  
HP15 6SU

17<sup>th</sup> January 2022

Ref: 21.123.02

Dear Ms Fallon,

## **APPLICATION 18/07194 – DEVELOPMENT OF TRALEE FARM, 20 WYCOMBE ROAD, HOLMER GREEN**

I refer to our recent discussions regarding the traffic impact considerations for the above planning application. You have asked me to review the submitted transport assessment (and addendum) and the consultation response from the highway officer at BCC.

The development is the subject of planning application 18/07194 which was submitted to Wycombe District Council on 21<sup>st</sup> August 2018. The site now also forms part of the allocated housing site HW8 in the Wycombe Local Plan 2019 – part of the allocation is within the former Chiltern District Council area and the local plan for that area is in an uncertain state of flux at present. The planning application is supported by a transport assessment and associated documents prepared by Vectos Consultants. The highway officer at Buckinghamshire County Council (BCC) has submitted a consultation response on the 2<sup>nd</sup> November 2018 and this follows pre-application consultations with Vectos in September 2016.

It appears from the transport assessment that various elements of the assessment were completed in advance of the pre-app discussions with BCC with a degree of updating following the pre-app. In particular, the main traffic surveys were undertaken in June 2015, the TRICS interrogation was prepared in July 2015 and the injury accident analysis was undertaken with data available up to April 2015. Following the pre-app discussions there was an additional traffic survey (Earl Howe Road/A404 junction) in April 2018, a parking survey in November 2016 and additional accident analysis with data available up to September 2017. The final transport assessment was dated July 2018.

The highway officer submitted his consultation response on 2<sup>nd</sup> November 2018. Following this Vectos prepared a Transport Assessment Addendum dated 9<sup>th</sup> June 2020 which reiterated the points that had been agreed with BCC within its consultation response and provided further support to the specific layout of the scheme. No additional traffic data was provided or referenced.

Clearly, considerable time has elapsed since the submission of the planning application and, inevitably, proposals for development in the vicinity have been approved and these will cumulatively alter the traffic conditions on the local highway network. The transport assessment states (para 6.7) that BCC had confirmed that there were no committed developments in the area that needed to be included within the transport assessment. In September 2016, this was probably correct. Since the submission of the application there have been a number of planning consents within the Holmer Green area that will have the effect of altering traffic conditions in the vicinity. The most notable examples are the expansion of Holmer Green Senior School and additional plots along Watchet Lane. The Senior School was granted planning consent (ref: CC/0059/19 – County application) for the demolition of a single storey building; Erection of new two storey Teaching Block, Sports Hall and Changing Facilities; Single storey extension to create Music Practise Rooms; together with internal and external refurbishments and minor works to existing buildings, landscaping and associated new parking spaces (including access from Watchet Lane). The programmed increase in the pupil role is 265 (which includes the provision of a sixth form) plus 15 members of staff. There can be no doubt that

this consented development will alter morning peak hour flows on Watchet Lane/Sawpit Hill from what was observed in 2015. Watchet Lane has been the subject of several planning consents for additional dwellings and, cumulatively, these will add to peak hour traffic on Watchet Lane and Sawpit Hill. Individually, these developments will not result in detrimental impacts to highway safety or traffic congestion but cumulatively, with the potential increase in network traffic growth over the past 6 years, there is every likelihood that peak hour traffic conditions will have changed materially to the effect that the assumptions and conclusions within the transport assessment are no longer valid. It is generally accepted that traffic survey data should be renewed after 3 years. The original traffic surveys were approaching the end of their acceptable period at the time the transport assessment was prepared. The age of the traffic data is compounded when the transport assessment proceeds to add traffic growth for 5 years post the date of the planning application (para 6.6). This is the correct approach to the traffic assessment although the 5 year's traffic growth was added to traffic surveys that were already 3 years old. The addition of 3 year's traffic growth to the 2015 survey data is a small addition but it compounds the lack of a comprehensive assessment.

The transport assessment cites the NPPF at paragraph 4.4. the NPPF has been revised since the submission of the planning application and paragraph 111 of the NPPF contains the relevant tests to be applied when a development proposal is being considered. In addition to the "severe" impact test, the highway authority must assess whether the proposals would have an "unacceptable impact on highway safety". In this regard, the transport assessment analysed the injury accident data from April 2010 to April 2015 and from April 2015 to September 2017. There were a number of accidents within the local network and the transport assessment considered that all of the accidents could be attributed to driver error or failing to look properly. Between September 2017 and December 2020 (latest data available on Crashmap) there have been a further 4 accidents on the local network (excluding the Haslemere crossroads). The accidents were:

23/07/2018	Eastern Dene/A404	Serious	3 cars
07/02/2020	Orchard Way/Browns Road	Serious	2 cars
19/05/2020	Holmer Green Rd/Cedar Ave	Serious	2 cars
29/05/2020	Browns Road, west of Copners Drive	Slight	2 cars

It is not sufficient to claim that accidents should not be taken into account because the causes cannot be attributed to problems of highway geometry. It is accepted that congestion and high traffic volumes can contribute to collisions as drivers are more likely to take risks in order to proceed. The continuing accident record across the local highway network could be indicative of congested traffic conditions.

The pre-app discussions with BCC included an agreement on the scope of the traffic assessment. This scope does not appear to include the double min-roundabout junction at the Haslemere crossroads. Appendix K of the transport assessment includes a diagram that indicates the distribution of the development traffic. The diagram shows that 51% of the traffic from the development will travel along Holmer Green Road to the Haslemere crossroads but no assessment of the traffic or safety impacts has been provided. The junction suffers from a poor accident record (due mainly to congestion).

In summary, the submitted transport assessment (& Addendum) do not accurately model the traffic and safety impact of the proposed development. The passage of time since the initial traffic surveys and pre-application discussions has, potentially, changed the prevailing traffic conditions through background growth and consented developments. The Local Planning Authority should seek clarification from the highway officer regarding the acceptability of the traffic data and the need for further assessments.

Yours sincerely,

### **Little Missenden Parish Council – Further Comments (03/09/20)**

Little Missenden Parish Council would like to strongly object to this development.

Little Missenden Parish Council would like to make it clear that although in theory the development is being built on Hazlemere Parish Council land the main entrance will be on Holmer Green land, it will be Holmer Green that will suffer from the increase in traffic and increase in use of our shops and infrastructure.

As you may be aware the Homer Green Doctors Surgery closed a few years ago, most of the existing patients did manage to change to other surgeries in Hazlemere and Hughenden, but these surgeries have all now closed their books as they are now all full, the new residents may find that they are not able to find a Doctors surgery locally

We also need to remember that our A&E is now closed at the local Wycombe hospital and the new A&E at Stoke Mandeville has already admitted it can't cope, that isn't even taking into account the extra houses already being built in Aylesbury

The traffic report is clearly out of date, from the report being collated and published Holmer Green Secondary school has had plans accepted to increase its number of pupils by nearly 300.

On their own independent transport plan it has already addressed the traffic situation around Holmer Green, it has noted that although ok for the school improvement the junction of Wycombe Road, Sawpit Hill and Watchet Lane will now be running at its maximum capacity, so in fact can NOT sustain any further increase in vehicle movements without being improved

It was also mentioned the junction with Watchet Lane, Beech Tree Road and Spurlands End Road although not to capacity the junction is not working to design, due to school traffic parking on Watchet lane and cars being restricted due to this, it did suggest double yellow lines being placed on Watchet lane and Beech Tree Road to allow the roundabout to work properly.

We are also forgetting the further afield traffic problems, as it is clear this development will be a commuter belt development and with 4 stations within 5 miles and the traffic will go in 4 directions

1./ Towards Hazlemere/High Wycombe on the A404, this is already congested at Hazlemere crossroads, Terriers Mini roundabouts and then queues into Wycombe and again back up the hill to pick up the M40 junction

2./ Towards the M40 at Loudwater, again this is sending extra vehicles through narrow lanes (gravelly way) and then down to the London Road Via Hammersley Lane, as we know the London Road is at capacity and hardly moves in high traffic times

3./ Towards Beaconsfield for the station and M40/M25, again will be using roads that were not designed or capable for heavy traffic (Gravelly Way) or through Hazlemere and out to the Penn road, again the cross roads is over congested, Beaconsfield you queue to enter the new town and through the new town then you queue from the old Town to the M40 junction

4./ Amersham Direction for M40, M25 and Stations, you will queue from Coleshill to Old Amersham and then on off queue all the way through.

All the above isn't taking into account the additional traffic that the construction of HS2 is going to bring to the area over the next 7-12 years

So as can be seen clearly from above the surrounding road system is already at capacity and no expenditure is planned to improve on this

Can it also be noted that although it says a bus service we do actually only have a bus on an hourly cycle with another bus arriving 15 minutes after the first so on average you have to wait 45 minutes for a bus.

Cycle Paths or Cycle ways, there are none in Holmer Green or the surrounding area, Cycling in Holmer Green itself is possible but due to the sharp incline on hills in and out of Holmer Green you find that this is too much for the average cyclist and thus no one will cycle say from Holmer Green to Hazlemere

Shops; the village does have a very good parade of shops a single convenience store and



takeaways, which would be in easy reach from the new development by foot or cycle, but to do a family shop you would need to travel further afield to Amersham, Beaconsfield or High Wycombe, there is no bus service to Beaconsfield and limited service to Amersham or Wycombe Local area

Schools; although the Holmer Green Secondary School has increased in size, Sir William Ramsay has spare space and Missenden secondary school also got permission to expand, where is it thought that lower years are to attend schools, all infant and junior schools in the surrounding area are full, as it is also now not policy that a school has to take a child due to locality this again will mean further traffic in the roads for parents taking youngsters to school

Green belt land; Tralee farm site was tested by Arup, a nationally recognised consultancy firm, as part of the development of the WDC Local plan, the site was judged to be medium in meeting the purpose of Green Belt, it did not fail the test so should remain as Green Belt, by taking the green Belt status and releasing for housing undermines the validity of the Arup assessment and sends the wrong messages to speculative developers who will be emboldened

Site Access is not in the best placed location, as per the traffic issues raised above but also the loss of privacy and noise pollution to the houses either side, also by having double yellow lines as your proposal states will prevent the dentist from having customer parking outside their property, and as they have limited parking this will effect there business

It is also noted that in 1988 Chiltern district council REFUSED permission of a development of 8 houses as the access onto this road was thought to have been too dangerous, so what has changed in that time, apart from traffic increasing and schools increasing so more pedestrians and cyclist.

The development itself; we feel the density of the development is too high, This application by Inland Homes to WDC perfectly demonstrates how a piecemeal approach to planning permits highly commercial developers to intensify site use while failing to adequately address the totality of the demands they place on local infrastructure. In our view this is a recipe for ill-considered unattractive development. Unless sufficient infrastructure is put in place to support developments, of which this is just one, it will adversely affect the existing community and risks overwhelming the lovely settlement of Holmer Green. In our view each development must bear its share of the infrastructure burden which this does not

The intensity of development on the site is too high. It is clear it is out of keeping with the surrounding area and Holmer Green as a whole, it is clear from the drawing there will be inadequate parking.

The plan showing the dust cart driving around the estate, this doesn't take into account real life, there are no cars parked on the roads, there are no vans delivering goods, it gives a completely misleading look on the estate, Some places will be less than a metre between the new houses and the existing boundaries, I know there is no requirement for a view in planning but there is a clear line for privacy, by building so close to the boundary not only are you taking away the existing privacy from the existing house but you are not allowing adequate space between old and new and thus not giving a buffer between areas, There must be a clear boundary between Holmer Green and Hazlemere to keep the historic villages separated, Amenity space is inadequate, there is not provision for a play area for children, no area for children to kick a ball around, the only area that has been left free is due to it being part of the flood plan and so need to be left free

We also note there is NO AFFORDABLE HOUSING, this is a must in an area of over average prices to allow our youngsters a chance to purchase their own house

I also note there still is no information in drainage, soakaways, road drainage, this needs to be agreed in full before any plans can be considered, it is also noted from the CPTED assessment that they feel the existing layout does not meet their requirements, for a Village of very low Crime rate this is not what we would like to see.

LMPC are also concerned over boundaries, the main entrance is from Holmer Green, services and facilities will all be used in Holmer Green, although as the Parish is Hazlemere they will see all the returns from the Sale fee and precept, whilst Holmer Green will have the added increase in costs, the boundary will need to be adjusted to correct payments

Although in principle LMPC is not against this development we strongly feel the infrastructure must be put in place before any developments are agreed or started, it is clear apart from the supply for secondary schools the remaining infrastructure is lacking, the roads are inadequate and were designed for 1970's traffic, the water and sewage, telecommunications, broadband, shops doctors and other services need to be upgraded before Holmer Green can accommodate a unsustainable increase in its housing and the added burden on its infrastructure

#### **Little Missenden Parish Council – Initial Comments - (20/09/18)**

Following a full Council Meeting on 17 September 2018 please find below our comments regarding the above application.

Little Missenden Parish Council (LMPC) object most strongly to the above proposed development. The grounds for this objection are as follows:

- LMPC was not advised of this application by yourselves until the Chairman spoke with the Case Officer. This is especially relevant as the access to the proposed development will involve the demolition of 20 Wycombe Road, Holmer Green which falls within our Parish boundary.
- An application for development should, as a matter of course, be advised to the relevant Parish Council. The fact that the majority of the area is within the WDC Local Plan area HW8 should not absolve you of this responsibility.
- You will be well aware that the only Drs Surgery in Holmer Green closed on 7 September 2018 with only one week's notice to patients. This now leaves over 3,500 patients in the village without access to local medical services. This lack of healthcare services will be compounded by the proposed development of 103 properties, especially as other local practices have now closed their books to new patients.
- Affinity Water stated to consumers in Spring 2018 that the fresh water supply in this area was 'under stress'. We are now in another period of drought with well below average rainfall, comparable to 1976. Fresh water supplies for additional homes in this area needs to be addressed.

- We notice from the letter on your website uploaded 12 September 2018 and copied below the comments made by Thames Water regarding lack of infrastructure regarding sewage flooding

11 September 2018

Dear Sir/Madam

Re: 20, WYCOMBE ROAD, HOLMER GREEN, HIGH WYCOMBE, BUCKINGHAMSHIRE, HP15 6RY

#### Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing foul water network infrastructure to accommodate the needs of this development proposal. Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either -> all wastewater network capacity required to accommodate the additional flows from the development have been completed; or -> a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents." The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water's Development Planning Department (telephone 0203 577 9995) prior to the planning application approval.

- If the inability of waste disposal for 103 new properties is seen to be a problem for Thames Water, what other problems will be caused to the locality?
- The Design & Access statements for this project are incomplete. Nowhere is there mention of infrastructure addressing healthcare and schooling within our Parish. Where/how will school places be found for children at the First, Middle and Senior Schools for 103 extra dwellings?
- Page 21 of the Design & Access Statement shows a marker for health services. As indicated above **this service no longer exists.**
- Access onto Wycombe Road from this proposed development will cause further traffic issues both towards Hazlemere and into Holmer Green, particularly at rush hour and school times when a large number of children are driven into Holmer Green from the Wycombe area to attend the Senior School. This is compounded at the end of the school day with cars parking in Holmer Green village centre and along the Wycombe/Browns Road area waiting to collect children.
- Who will be responsible for :
  - Upkeep of the access road
  - Street lighting
  - Waste collection



- Green area maintenance

- What post code will this development use?
- Who will receive the council tax payments?
- We note that CDC refused permission in January 1988 for access onto the Tralee Farm site via access through Dean Way in Wycombe Road on the following grounds.

‘.....bearing in mind the size of the site to which access is to be provided the Council considers that the proposed access would be bound to lead to a considerable intensification of traffic using the access road. This would be unacceptable as it would:

a. result in a serious loss of amenity to the occupiers of the six houses fronting Dean Way by reason of increased noise and general disturbance, and

b. result in an increased traffic hazard and highway danger in the locality generally.’

- This reason has not changed since 1988 and in fact is even more relevant bearing in mind the higher volume of traffic in 2018.
- Parking in Holmer Green village shopping areas is already under pressure.
- There is little employment opportunity locally which will therefore increase commuter traffic within the village and onto the A404 both towards Amersham and towards Wycombe. The amount of traffic on this road is already very heavy both ways all day and especially during rush hour periods. Hazlemere Cross Roads already suffers from near standstill at these times.
- This proposed development is only part of the HW8 Local Plan. Together with further WDC proposals and the proposals that are still awaited from Chiltern & South Bucks for Option 2, Holmer Green will be conjoined with Hazlemere and become a satellite of High Wycombe.
- The proposed development will rely heavily on the District and Parish Councils outside the Wycombe area of responsibility for services. Please advise exactly who will provide for this.

### **Inland Homes Design & Access Statement 1: 3.0 Site Context.**

All the amenities mentioned in this section are within Holmer Green and are not within WDC area of responsibility. Statements in the D&A are shown as:

3.1 Local Facilities and Connections It is considered that the site is a sustainable location with good access to local facilities and schools within walking and cycling distance. The nearby shops on Pond Approach/ Lynford Parade are only 700 metres along Wycombe Road to the north-east and Park Parade is just 600 metres to the south-west. The village centre of Holmer Green (The Common) is located less than 1km to the north-east around which are clustered the village hall, churches, pubs and school.

3.2 Surrounding Context The original village centre is located around The Common which is today surrounded by the school, churches and pubs. A selection of shops are located to the south-west of

the village green near to the village pond, at the junction with Pond Approach and Turners Place. Other amenities and facilities, including Holmer Green Senior School, are scattered around the village.

The remainder of the village is predominantly residential, extending along the main roads with later in-fill development between. The areas around the application site are residential, consisting predominantly of bungalows and 2 storey detached houses. Due to its location on the periphery of the village, most development is recent, from the late twentieth century varying in style and appearance, but there are examples of individual older properties. To the south and east of the site is undulating farmland and woodland backed onto by surrounding dwelling houses.

All photographs shown on the D&A Statement are of Holmer Green village, the largest Ward in Little Missenden Parish Council's area of responsibility.

At no time has LMPC been consulted regarding this development by Wycombe District Council. Holmer Green cannot sustain this amount of development within the village and Little Missenden Parish Council wishes to place on record our objections to this proposal.

*[Officer comment: Sections of the text above are difficult to read – the original comments can be viewed on the Councils idox planning application record system.]*

#### Adjoining Parish Council Comments

##### **Penn Parish Council (25/09/18)**

I am responding on behalf of the Penn Parish Council to the outline planning application to put more than 100 new houses on the Tralee Farm site.

It is important at the start to emphasise that we recognise three realities :

- a) that there is an urgent national need for housing ;
- b) that WDC faces unrelenting pressure from Government and potential developers to build more houses,
- c) that WDC has to be able to justify its Local Plan to a critical Inspectorate.

Nevertheless, it is important also, we believe, that we draw your attention to our concern at the impact of the development on the village of Homer Green and particularly as regards infrastructure and traffic congestion. We are also concerned about the lack of co-ordination and consultation between the WDC and CDC Local Plans, the consequences of the preferred options sites in Holmer Green will have devastating consequences on traffic flows in the locality. It is our firm view that this uncoordinated and piecemeal approach can result in neither sensible responses nor properly weighed decisions.

This application by Inland Homes to WDC perfectly demonstrates how a piecemeal approach to planning permits highly commercial developers to intensify site use while failing to adequately address the totality of the demands they place on local infrastructure. In our view this is a recipe for ill-considered unattractive development. Unless sufficient infrastructure is put in place to support both CDC and WDC developments, of which this is just one, it will adversely affect the existing community and risks overwhelming the lovely settlement of Holmer Green.

In our view each development must bear its share of the infrastructure burden which this does not.

To be more specific:-

#### *Green Belt*

Tralee Farm Site was tested by Arup, a nationally recognised consultancy firm, as part of the development of the WDC Local Plan and the site was judged 'medium' in meeting the purpose of Green Belt. It did not fail the Green Belt test and in our view the site's release for housing undermines the validity of the Arup assessment and sends the wrong message to speculative developers who will be emboldened.

#### *Intensification of use of the site*

The intensity of development on the site is too high. It is our firm view that it is out of keeping with neighbouring properties and too 'urban' for the locality of Holmer Green. Penn Parish further believes there is inadequate onsite parking to support the proposed volume of houses without resorting to parking on the roads and verges, incompatible with such a village setting. What percentage of the development will be offered on an affordable basis?

#### *Access into the site is inadequate*

We note CDC refused planning permission for site access via *Dean Way* in 1988 owing to the impact on neighbours' quiet amenity and on other safety grounds. Inland Homes alternative access is between two houses off *Wycombe Road* which will affect fewer neighbours, but the corner houses either side of the access lie closer to the new road than those on *Dean Way*. Their owners will face several hundred traffic movements a day passing their homes where there are currently none. In our view this is unacceptable as it will result in an equal loss of amenity and increase traffic and highways hazards just as the previous proposal did. It should be rejected for the same reasons CDC established.

The additional cars will compound the traffic issues at *Hazlemere Crossroads* and into *Wycombe*, particularly at peak times. As it is *Hazlemere Crossroads* is often at a standstill. Traffic is drawn into *Wycombe Road* because there are a large number of traffic movements to and from the popular *Holmer Green Senior School* but no impact assessment is provided. Overall, we are particularly concerned about the cumulative impact of the WDC/CDC local plan developments at *Holmer Green* on traffic through *Penn Parish*, notably along *Gravelly Way* and into *Beaconsfield*, as traffic along the B474 is already acute at peak times, waiting times of 20-30 minutes are not unusual. No assessment is provided.

#### *Health Services*

Following the recent closure of the *Dragon Surgery* it is unclear how health services will be provided even to existing residents. We understand other practices have closed their lists to new patients. Will *Inland Holmes* fund a new surgery?

#### *Education*

What education provision is planned for the 100+ new homes? Where will these places be provided and what impact will this have on children and parents in Penn. We note here that Holmer Green Senior School is a preferred school for most non-grammar children from Penn Parish. No detail is provided.

### *Water and waste water security*

The Parish Council's Planning Committee echoes the concerns of neighbouring Little Missenden Parish Council about the security and adequacy of ground water supplies to this development and the detrimental impact of the volume of waste water on the existing water infrastructure. Once again, the impact on local infrastructure has not been adequately assessed.

It is the view of the Penn Parish Council that infrastructure should be put in place to support the new development, before the new development occurs because any other approach will adversely affect the existing community and risks overwhelming the integrity and character of the settlement of Holmer Green and neighbouring settlements.

## **Consultation Responses**

### **Buckinghamshire Council Ecology Officer – Final Comments (15/02/22) -**

#### DOCUMENT REFERENCES:

Updated Warwickshire CC Biodiversity Metric  
Amended Colour Site Layout 18083-C201B

#### COMMENTS:

Previous comments made on 13/07/2021 repeated recommendations which had been made in previous comments whilst also recognising that some of those previous recommendations had been addressed.

The five key issues are repeated here for ease of reference:

1. Update ecology surveys,
2. Produce a BIA using the Warwickshire metric,
3. Analyse the GI of the site and surrounding area,
4. Respect priority habitats and protected species.
5. Use the above, in combination with the mitigation hierarchy, to amend the layout.

Of these:

1 had been addressed through the submission of updated surveys.

2 had been addressed through the submission of the Warwickshire metric.

3 had not been addressed through any analysis of GI in the surrounding area. This is an important as green infrastructure networks can only be addressed if they are understood. The Wycombe District Local Plan includes policy DM34 which states:

'1. All development is required to protect and enhance both biodiversity and green infrastructure features and networks both on and off-site for the lifetime of the development.

2. Developments proposals are required to evidence a thorough understanding of context through the preparation of a proportionate assessment of existing and planned green infrastructure, biodiversity and ecological features and networks both on the site and in the locality, and demonstrate how:

a) Through physical alterations and a management plan for the lifetime of the development:

i. Existing green infrastructure and biodiversity assets will be maximised;

ii. Opportunities to enhance existing and provide new green infrastructure and biodiversity assets will be maximised;

iii. Development will deliver long lasting measurable net gains in biodiversity;

iv. Where appropriate, a monitoring plan will be put in place to review delivery of i - iii.

b) The mitigation hierarchy has been applied by following a sequential approach to avoid, minimise, mitigate, and finally compensate for (on, then off-site) any harm to biodiversity. If significant harm cannot be avoided in this way, development will not be permitted.'

These proposals have not attempted to carry out a proportionate assessment or evidence an understanding of the green infrastructure and ecological networks in the locality. However, it is the case that some of the information which would have been used in an assessment has been collected by the developer and has been responded to some extent. I cannot be certain how the layout of the site might be different if a proper analysis of the green infrastructure of the area had been undertaken. It might be assumed that the broad distribution of development might have been similar but I would have expected that analysis would have led to slightly less interruption of the valley at the south of the site (the pumping station might be in a different location) and perhaps better retention and protection of priority habitats. The removal of two houses on the edge of the valley does mean that the latest iteration is slightly better from a green infrastructure perspective.

4 Respect priority habitats and protected species. This has only been partly responded to.

On the plus side, the wooded area which occupies the north corner of the site has been retained (however only a relatively small buffer is being left around it) and the badgers set is being avoided, although development is proposed quite close to it.

However on the negative side, the priority habitat of Traditional Orchard (as identified by Natural England on <https://magic.defra.gov.uk/magicmap.aspx>) which is adjacent to the north east boundary of the site has only been given a relatively small buffer. There is no statutory guidance on appropriate size buffers for this kind of habitat but it is known that buffers to valuable habitats are able to reduce potential impacts. Point 3. a) of policy DM34 makes it clear that adequate buffers should be secured to valuable habitats and I would have hoped to see a larger buffer but without further research or guidance it is not possible to say that the extent of buffer which will be provided (circa 4 metres) is insufficient. The onsite Traditional Orchard which is a priority habitat (this was identified in para 4.36 of the Ecological Impact Assessment submitted 18th August 2018) is shown as being destroyed and so are two lengths of relatively small and partially incomplete hedgerow in the southern part of the site. This destruction of these two habitats can be in conflict with paragraph 2 of the Development and Site Allocations policy DM13 which states:

*'2. Development proposals which would harm directly or indirectly other designated sites of nature conservation or geological interest or protected species including those shown on the Policies Map will only be permitted where it has been demonstrated that:*

*a. there is no suitable alternative site for the proposed development, and*

*b. the impact can be mitigated or compensated to achieve a net overall gain in biodiversity or geodiversity, and*

*c. it has been clearly demonstrated that the benefits of the development outweigh the harm to the biodiversity or geological conservation interests.*

The supporting text for this paragraph lists priority habitats amongst the other designated habitats.

I would suggest that (in relation to DM13 2. a.) loss of the relatively small areas of priority habitat could be avoided, although this would require a slight decrease in housing numbers. In relation to DM13 2. b. (and DM34) Some compensatory hedgerow planting is proposed, but there is not onsite compensation for the loss of the orchard. The use of the biodiversity metric has resulted in a calculated figure of £237,780 to ensure that the development results in no net loss. However, this does not secure a net gain as is required by policy DM13 for the loss of priority habitat, nor a measurable net gain in accordance with policy DM34. The metric does take into account the loss of the area of orchard, but priority habitats are given a greater weight in planning than non-priority habitats and therefore if their loss is expected, it would be likely to require greater compensation.

In relation to DM13 2. c. I have not seen any attempt to justify why the development outweighs the loss of biodiversity. However this may need to be considered on balance against other competing objectives by the council.

5 The final point has not been addressed through any analysis of how the development layout could be amended in line with the mitigation hierarchy. However, it is clear that some changes have been made with regards to the layout on the 'Amended Colour Site Layout' and these do have some small positive impacts. The change to reduce the numbers of houses in the southern corner has resulted in slightly more publicly accessible green space, this has meant that the scale of loss (as calculated by the updated Warwickshire metric) has reduced slightly. It also means that the valley which would have an onward connection to the woodland habitat to the north beyond the site would be more easily accessible.

#### RECOMMENDATIONS:

I would not support the approval of this application in its current iteration for the following reasons:

The design and layout of the site still needs to be justified through proper analysis of the surrounding green infrastructure and ecological networks (as per DM34).

The loss of onsite priority habitats appears to be unnecessary, unjustified and inadequately mitigated/compensated for. This is particularly relevant with regard to the area of Traditional Orchard, the loss of the sections of hedgerow are more easily compensated for.

The retained priority habitats on and off site have only been given minimal buffering.

The overall biodiversity loss, as calculated by the Warwickshire calculator is substantial and limited attempts have been made to reduce this. The financial contribution suggested by the metric does not address net gain, it only covers biodiversity net loss, and therefore the financial contribution it suggest would not deliver the measurable net gains required by policy DM34.

If it were decided that the application was to be approved I would suggest that the scale of the financial contribution would need to be increased from that suggested by the metric. The reasons for this are as follows:

The latest version of the Warwickshire metric was released on 15/10/2019. The consumer price index since then has been 0.8% in 2020 and 4.84% in 2021. The calculated sum must therefore be increased by this or another suitable rate to bring the sum close to being up to date. An additional uplift will be required to account for the time between the s106 being agreed and the payment being made.

The Warwickshire metric only calculates the sum to compensate for a net loss, however, policy requires a measureable net gain. The level at which this is to be set from November 2023, will be a minimum of 10%, but at present, the level of biodiversity net gain to be provided it is still open to negotiation.

As the value of priority habitats is greater than other habitats, if they are lost, it would be appropriate to ensure that additional measures are put in place to compensate for them. This might include additional payment, but it should certainly include greater provision for onsite compensation. Onsite compensation can be addressed through conditions whilst payments would need to be secured through a s106 agreement.

As this is an outline application it will also be necessary for the biodiversity metric to be redone alongside details which come in with reserved matters. The maximum amount of biodiversity loss must be set through the s106 or conditions as that in the most recently submitted matrix to ensure that the loss does not increase.

Model s106 wording for biodiversity offsetting may be available.

The following suggested conditions should be applied if permitted.

#### CONDITIONS/INFORMATIVES:

Conditions will be required for:

- (a) Ecological design strategy
- (b) Construction Environmental Management Plans (Biodiversity)
- (c) Landscape and ecological management plan (LEMP)
- (d) Lighting design strategy for light-sensitive biodiversity
- (e) Biodiversity Net Gain Audit Report

#### **Buckinghamshire Council Arboricultural Officer – *Final Comments* –**

The majority of trees are located to the northern part of the site in two distinct compartment opposite each other with the first being a woodland area block to the north east which then adjoins a larger area of woodland to the east and outside the scope of this outline application. To the north west opposite the small woodland is a former orchard enclosed by some hedgerow.

There are also some mature trees within the hedgerow along the top end of the western boundary long the field boundary backing on to residential gardens of Lacey's Drive.



The indicative plans show that the wooded area to the north eastern part of the site is to be retained while the north western area would see the loss of a significant number of trees for the indicative developed.

Referring to the Revised Arboricultural report the following statement at Para 4.0 Woodland W1.

4.1. An assessment of the woodland section of the site was conducted and found it be densely overgrown and therefore not individually plotted. The majority of the vegetation is understory plants such as Holly (*Ilex aquifolium*) and Elder (*Sambucus nigra*) and are heavily ivy-clad. Scattered throughout the woodland are several over-mature cherry trees (*Prunus* spp.) These trees were planted when this area was once a commercial orchard, however, now are in a poor condition with some of them structurally failing. Along the southern edge of this area are several large goat willows (*Salix*). Overall this woodland area is of little arboricultural value.

The woodland may in the opinion of the agent be of little arboricultural value nevertheless, if that is the case any development should also look to deliver a woodland management plan to counter climate change and enhance the amenity

Referring to The Orchard Para 5

5.1. The orchard consists of thirty-one trees, originally planned to produce a commercial crop, they show little signs of recent management. The trees were surveyed and categorised within accordance to BS5837, eight were recorded as Category U due to their diminished vitality or poor structure. However, if this area is to be retained as an open space careful arboricultural management plan should be implemented to aid in their longevity in a safe condition.

Despite this statement the area will be cleared for development with the loss of what may remain of the old orchard. Mitigation will be required with the creation of a new orchard or with other tree species that also have the potential to provide good tree cover and interest. in particular, to ensure that the street scene in that area has a strong sylvan character

Referring to the Arboricultural Impact Assessment at Para 3.4. Trees proposed for removal & surgery

3.4.1. The following is a breakdown of the trees proposed for removal:

- o 9 trees of category U (poor quality)
- o 31 trees and groups of category C (low quality)
- o 2 trees of category B (moderate quality)

At 3.4.5. Of the trees listed, T10, T15, T20, T23, T34, T35, T36, T40, & T43 are to be removed as good arboricultural practice regardless of any development.

And at 3.4.6. Following the preliminary recommendations made at the time of the survey and works necessary to facilitate construction of the proposed development, tree works are recommended and listed in the method statement. This work includes:

- 1) Pruning back of G2, G3, H4 & H5 by the way of pruning or selective removals

Referring to the indicative coloured site lay out with regards to W1 that is to be retained while the former orchard is to be entirely removed. It may be reasonable that those tree identified as



Category U within the BS5837:2012 and would be removed regardless of development.

Nevertheless, in their current location they pose no threat. And may provide some niche habitat value. However, this would be subject to any ecological details regarding particular orchard species.

In addition, without exception the majority of the 31 Category C trees including 1 Category B with the majority being removed for the indicative proposed development.

Given this is an established feature and notwithstanding the overall condition of the trees is not of the best in terms of its vitality and from as an alternative that are could be retain and managed with a programme of new and replacement planting thus keeping the feature for a longer period as would have been the case if the orchard had remained commercially viable albeit that some old varieties may have fallen out of favour.

The applicant has also an opportunity to have a draft canopy cover calculation which can show how much the wooded area W1 and the Orchard contributes to achieving the 25% canopy cover as in accordance policy DM34 and establish the current canopy cover and would also indicate any shortfall even for an outline application to offer assurance that the minimum is achievable.

The overall revised indicative site layout does offer sufficient opportunity for good tree planting scheme for streets, gardens and open spaces

In addition, the offsite adjoin larger woodland is now the subject of a woodland Tree Preservation Order and subject to confirmation.

Recommendations.

Given former orchard status and the potential loss and subject to any ecology comments that the orchard should be retained where practicable. (15/12/2021)

### **Buckinghamshire Council Landscape Officer – Final Comments -**

Proposed hard and soft landscaping is to be a reserved matter, therefore no detailed comments are made at this time. However, comments are made on specific aspects where changes will be needed in the reserved matters application.

#### **1 ISSUE Landscape and visual impact**

There are no concerns regarding landscape and visual impacts on the basis of the information submitted. The conclusions of the submitted LVIA and the likely landscape and visual effects arising are acceptable. Separation and orientation of new buildings in relation to existing houses is satisfactory and the scope for retaining and improving boundary planting within private gardens, to mitigate private views, is also mostly satisfactory.

#### **1 RESPONSE Landscape and visual Impact**

The use of hedging along the existing residential boundary should be included in subsequent detailed landscape proposals.

#### **2 ISSUE Landscape structure**

The landscape principles set out in the Design and Access Statement are acceptable. Retention of woodland/orchard, trees and hedgerows where practical are to be welcomed.

As noted in urban design comments it would be beneficial to use existing Green Infrastructure and create new GI to provide an attractive route for the key pedestrian corridor from the south to Wycombe Road.

Much of the new tree planting is provided in rear gardens, and this needs to be secured in the long term as the limited size of rear gardens will put pressure on removal of these trees to release more space for amenity.

Tree planting in streets has been improved in the revised layout. This will need further attention when reserved matters are submitted to make the most of opportunities for soft landscape in the street and frontages of properties. (RDG B10, GI5 & GI6)

## 2. RESPONSE Landscape Structure

Use and develop Green Infrastructure to provide corridors for the key pedestrian route.

Demonstrate how trees in rear gardens will be retained for the long term.

In future submissions amend streetscape to provide more opportunities for soft landscape. Where this is not possible use climbers and hedges/ green walls to soften the street character.

## 3 ISSUE SUDs

Although the detail will be submitted as part of a future application the information shown shows a lack of imagination and integration with the layout and the detention basins are not naturalistic in shape and form. RDG GI3

## 3 RESPONSE SUDs

As part of the reserved matters submission, review SUDs design approach so that it is more integrated into the residential layout and design using features such as swales, rills and channels and bio-retention areas within planting areas and tree pits. This may result in a reduced need for storage basins. Revise the design of storage basins that are needed and consider combining with use of swales so they integrate with the landscape structure and existing landform and are naturalistic in shape and appearance and contribute rather than detract from the quality of open space.

## 4 ISSUE Open Space

Some of the open space is dominated by SuDS features, this will limit its functionality and contribution it can make to the recreational needs of the development. SuDS features that for functional reasons cannot be designed in a way to form a meaningful and attractive Open Space component should be discounted from Open Space area calculations. (RDG GI1, GI3)

## 4. RESPONSE Open Space

Revise SuDS as described in 3 response

## 5. ISSUE Access road

The access road appears to only have room for trees and landscape treatment on one side reducing its visual amenity.

#### 5. RESPONSE Access Road

The boundaries of the access road need soft landscape on both sides to ensure the visual quality of this access is appropriate as an entrance to this new residential area. Close boarded fences along this access should be avoided.

(RDG B9 and HISPD Q2.2)

#### 6. ISSUE PUMPING STATION

The pumping station could impact the quality of Open Space.

#### 6. RESPONSE Pumping Station

Provide space for sufficient landscape treatment to mitigate its impact.

#### SUMMARY

The Landscape and Visual Impact and the landscape principles suggested are acceptable.

Future reserved matters applications will need to resolve landscape treatment, tree planting, boundaries, integration of SuDS, and the design of the open space.

#### CONDITIONS

If minded to approve this application, it is recommended that the following details be controlled through an appropriately worded condition:

Standard Landscape and maintenance/ management establishment conditions including details of soft and hard landscape, levels and boundary treatments.

And specific issues identified above:

- Protection of rear garden trees
- street trees and use of climbers, hedges and landscape treatment along street frontages
- review/ redesign of SuDS to further integrate into the landscape and minimise impact on function of open space
- access road boundary treatment and landscape
- landscape treatment to screen pumping station

(10/02/2022)

#### **Buckinghamshire Council Archaeology (14/07/21)**

The Buckinghamshire Council Archaeological Service notes that the above application may have an impact on the historic environment. We maintain the local Historic Environment Record and provide expert advice on archaeology and related matters. As you will be aware, Paragraph 194 of the National Planning Policy Framework (NPPF) states that information held in the relevant historic environment record should be consulted and expert advice obtained where necessary.

The NPPF recognises that the effect of an application on the significance of a heritage asset (including its setting) is a material planning consideration.

#### Historic Environment Record (HER) information

We have consulted the Buckinghamshire Historic Environment Record (HER) and note that the following records are relevant:

HER reference	Designation Status*	Description
0613100000	HER	Field NE of Grange Farm Several scatters of Neolithic to Bronze Age flint flakes found in fieldwalking survey
0576600000	HER	Holmer Green Neolithic to Bronze Age flints and later artefacts found in fieldwalking survey at Holmer Green
0587100000	HER	Wycombe Heath Eighteenth century records of brick and lime kilns at Wycombe Heath
0082600000	HER	Holmer Manor Historical records of medieval Holmer manor

\* COA = conservation area; LB = listed building; RPG = registered historic park; SAM = scheduled monument; PLN = planning notification area (undesignated area of archaeological interest); HER = historic environment record

Note: some records relate to extensive areas such as historic landscapes, historic towns and villages or areas of high archaeological potential. For full HER information and a licence for commercial use please contact the Bucks HER Officer.

#### Archaeological and related interests

The proposed site is located within a wider landscape that has undergone minimal archaeological investigation and as such there is a low understanding of the archaeological potential of the area. Despite this, both to the east and the west of the site, archaeological fieldwalking has recovered numerous artefacts of prehistoric date suggesting the area may have been a focus for early human activity. In addition, the site of the medieval Holmer Manor is believed to have been located approximately 500m to the north east, suggesting the application site may lie within the grounds of the manor. The large footprint of the application area, and the limited open space proposed in the application suggests that if archaeological deposits are present within the site, that they will be adversely impacted upon by the proposed development. If significant archaeological deposits are encountered, it is

possible they will need to be preserved in situ, which may result in the need to redesign either the layout of the development or the construction methodology.

If planning permission is granted for this development then it is likely to harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 205. With reference to the NPPF we therefore recommend that any consent granted for this development should be subject to an archaeological evaluation condition.

Whilst we would not object to these works being undertaken as a staged condition, we would highly recommend these works are undertaken pre determination, so that the results can inform the masterplan, which is likely to be beneficial to the applicant.

The archaeological investigations should be undertaken by a professionally qualified archaeologist working to the agreed written scheme(s) of investigation.

#### ***Buckinghamshire Council Highways – Final Comments (10/02/22) –***

You will be aware that that the Highway Authority has provided three previous consultation responses pertaining to this development (in letters dated 2<sup>nd</sup> November 2018, 8<sup>th</sup> December 2020 and 24<sup>th</sup> September 2021). Consequently principle and detailed matters such as local network safety, access to sustainable transport, expected vehicle trip generation and general network and junction capacity have already been discussed and agreed insomuch as the development will not lead to a detrimental impact on highway safety, capacity or convenience of use.

That said, and in the consultation response dated 24<sup>th</sup> September 2021, the Highway Authority requested several amendments to the submitted layout and a request for further information relating to parking and the level of habitable accommodation throughout the proposed development. In response, the applicant has:

- Removed a superfluous raised table between Plots 56 and 66
- Extended a raised table adjacent to Plots 51 and 52
- Clarified the location of the Emergency Vehicle Access (EVR) that would provide walking and cycling access (as well as an alternate access in an emergency) between the application site and the larger southern portion of the HW8 site.
- Submitted a Schedule of Accommodation, demonstrating bedrooms per unit

A final issue raised by this Authority was not accepted by the applicant, specifically the lack of a turning area at the end of a spur terminating at Plot 7. In support of their stance, they have quoted Manual for Streets guidance on refuse/recycling access and haul distances. Whilst this is not disputed, the reason behind the request for a turning head was based upon the increasing prevalence on home shopping delivery and the assertion as to why emerging housing developments should provide turning opportunities that minimise reversing distances for larger transit vans and 7.5 tonne delivery vehicles. Whilst we maintain that such schemes should aspire

to adhere to this design ethos, it is nonetheless accepted that the spur in question is still relatively short and thus any reversing vehicles fitting the aforementioned description should cause the minimum of inconvenience to other highway users. As a result, the Highway Authority believe that the lack of a turning feature in this instance is would not support sufficient grounds on which to lodge or sustain an objection.

In terms of the Schedule of Accommodation, and whilst understandable for an Outline application seeking to secure matters of Access and Layout, it did not feature the requested level of habitable accommodation per unit (upon which the Buckinghamshire Countywide Parking Guidance [BCPG] policy document bases parking provision requirements). Consequently, there arises a deviation in determining the optimum provision for this application when compared with similar developments in the previous six years since the adoption of the policy.

The site lies within the previous Hazlemere North Ward, meaning that the parking space requirements for this development should adhere to those attributed to Zone B (as defined by the BCPG). Table 1.1 below demonstrates and compares both the parking provision featured within the proposed development and that required by the BCPG, based upon bedrooms per unit:

	4-bed	3-bed	2-bed	1-bed
Amount of houses/flats	25	19	56	1
BCPG-required parking spaces per unit	2.5	2	2	1.5
BCPG-required total allocated spaces for unit type	50	38	112	1
Half-spaces that can be subtracted and used toward total unallocated provision	12.5	–	–	0.5
<b>Total parking provided by the development</b>	187 (allocated) 37 (unallocated – inclusive of 13 half-spaces) 224 (Total)			
<b>Total parking required by the BCPG</b>	201 (allocated) 41 (unallocated – inclusive of 13 half-spaces) 242 (Total)			
<b>Shortfall between BCPG requirements and that provided by development</b>	14 (allocated spaces) 4 (unallocated spaces) 18 (Total)			

**Table 1.1 – Comparative parking provision (Proposals vs. BCPG requirements)**

As can be seen, when using bedrooms without the level of habitable space per unit, there arises a total shortfall of 18(no) spaces between the provision featured within the proposed development and what the BCPG would require

However, should the dwelling types (and their respective level of habitable accommodation) not be an element that is for determination as part of this planning application, a definitive parking calculation is difficult to ascertain. Therefore, I will assume that the Local Planning Authority is already satisfied that the parking featured will be appropriate when a future Reserved Matters application is submitted to acquire full planning permission (on the proviso that the current application receives consent).

In terms of the site access, it is noted that the radii have increased in size to the point where they may conflict with an existing adjacent vehicular access. However, an earlier permutation of the development's access with smaller radii has already been accepted and will be secured by a standard condition requiring it to be built to our specifications without further submissions necessary at the planning application stage.

The Highway Authority are also aware that a transport consultant was contracted by Little Missenden Parish Council to provide its highway/transport objection to this application. However, on review, no issues have been raised that cast doubt on this Authority's evaluation of the development's impact upon the highway network. Namely:

Junction assessments contained within the originally submitted Transport Assessment were factored up using TEMPRO to the year 2023, and therefore have a high degree of validity, especially in consideration that the Highway Authority have not accepted traffic flow data collected since March 2020 due to the Covid pandemic.

The same junction analyses showed that all local junctions will operate well within capacity in the 2023 scenario.

The extensions to Holmer Green Senior School are unlikely to generate sufficient movements that lead to a material impact upon the local junctions at peak hours, whilst also noting that respective residential and school peak periods do not necessarily occur simultaneously.

The confidential interpreted listings for each of the four more recent collisions quoted within the Highway Planning Ltd statement have now been reviewed. The causation or contributory factors for each collision were either inattention, inappropriate behaviour or reckless driving. Therefore, there is no evidence to support a position that the vehicular intensification on the network generated by the proposed development will increase collisions at these locations or exacerbate their severity. It should also be noted that the recorded Personal Injury Accident (PIA) to the West of Copners Drive was rated as 'Slight' and not 'Serious'.

Furthermore, the distribution of traffic toward the Hazlemere crossroads has no direct correlation to the claim that the development will increase collisions at these junctions. There is no inherent negative design issues to the network in this area and, as with all junctions, they

will always attract particular collisions to their configuration (it is also worth bearing in mind that around 96% of all crashes are due to driver error).

Mindful of these comments, the Highway Authority repeat our previous assertion that the proposed development will not negatively impact upon the highway network or any users of it. Therefore I have no objections to this application with regard to highway issues subject to the following conditions and S106 contributions:

Section 106 funding:

- Upgrade of two bus stops (bucdjtg and bucdjtd) on Sawpit Hill, approximately 45m south of the Sawpit Hill/Wycombe Road junction, to have one solar powered e-paper display each (two in total)
- Waiting restrictions on Wycombe Road on order to protect highway safety when accessing and exiting the site

***Buckinghamshire Council Highways – Initial Comments (02/11/18) to PL/18/3121/OA -***

Summary

The proposals seek to demolish the existing property at 20 Wycombe Road and replace with an access to the new development of 103 dwellings on land behind the property. To facilitate the access the construction of a new priority junction is proposed.

Summary of pre application discussions

The developers transport consultants have engaged with Buckinghamshire County Council (BCC) Highways Development Management team through the pre application process. From those engagements the following principles have been established.

- The site has been allocated within the Wycombe DC draft local plan.
- It was acknowledged that the site is within a sustainable location.
- BCC agreed that the principle of a priority junction was acceptable.
- It was agreed that a 2.0m footway was to be provided and that given suitable crossing points an single footway was likely to be considered acceptable.
- It was confirmed that visibility splays of 43m were acceptable.
- It was noted that a telegraph pole is located within the visibility splay, confirmation of any requirement to move to the back of footway was to be provided.
- It was noted that Wycombe DC have adopted the BCC parking standard, and that Wycombe DC operate 10.3m refuse vehicles.
- It was confirmed that the plans would make provision for pedestrian and cycle access to the site to the south.
- Full journey to work data was requested for review.
- Calibration details for the modelling of Sawpitt Hill/ Holmer Green Road mini roundabout were requested for review.
- Parking survey was requested to confirm that parking restrictions can be implemented in the vicinity of the access.
- Financial contributions for the implementation of parking restrictions were to be addressed as part of any future application, with a contribution to a Traffic Regulation Order.



### Site access layout

The proposed site access layout shows a simple priority junction with a minor arm with a carriageway width of 5.5m and a 4m radius at the junction, in accordance with Manual for Streets, to encourage low speed manoeuvres. A footway is proposed to the east of the carriageway and landscaping to the west.

The theoretical visibility splays demonstrate that visibility of 43m is achievable and Wycombe Road is a straight road without undue hazard.

The proposed site access point is approximately 48m from the nearest junction, and so is acceptable in relation to this junction. However it falls immediately adjacent to the neighbouring driveway accesses. No detail or statement has been given as to how these will be managed in relation to the junction.

A visual inspection of the site shows a telegraph pole that is within the bell mouth of the junction at the front of the existing footway. In keeping with the pre-application advice this pole will be required to be moved to the back of the footway and away from accesses to other properties along Wycombe Road.

Within the masterplan drawing planting and landscaping is shown along the West side of the access road, this should not be permitted to encroach in any way on the footways and the visibility of the junction. This can be secured by condition to be outlined during a final response.

Given the tight radius proposed due to the site constraints and the impact that this has on the tracking of a 10.3m refuse vehicle it is considered that a 6m approach road would be a more favourable option as the minor arm approaches the junction to prevent over running of the centre line. This can then be reduced down to 5.5m within the site. This can be secured by condition to be outlined during a final response.

The tracking drawing provided within Appendix D of the Transport Assessment shows all the tracking on a single drawing. From this it is possible to determine that there are difficulties in achieving the turning movements in and out of the access. However due to the scale and the overlaid nature of the drawing the severity of this is not possible to determine. Further drawings are required showing each movement individually for review.

The master plan drawing shows a constriction to be created within the access road, with no detail as to what the form of this is to take and the carriageway width to be left between the kerb lines. If this is for the purpose of controlling speeds then the Highway Authority request information as to why it is considered to be required. In addition the tracking shows that within the space either side of the access point the length of carriageway required for a refuse vehicle to return to the correct position on the road is liable to cause conflicts at the junction with Wycombe Road and are of the view that this should be removed from any design.

Parking bays have been shown on the access road; these are not considered acceptable as they may encourage turning movements in the width of the carriageway at this point, and further parking along the carriageway edge. In addition the only available space to access vehicles would be into

the carriageway. It is considered that these spaces can be accommodated within the main site to allow for this parking provision.

It is noted that the proposed access road will pass through between the existing plots on Wycombe Road with no natural surveillance from neighbouring properties. While this situation is undesirable it is not a consideration that can be objected on in Highways terms.

The drawings currently presented do not set out in sufficient detail the interaction between the pedestrian movements and the junction to give comfort that a suitable solution has been presented to allow for all road users, particularly given the relationship between the junction and the neighbouring properties. This concern is amplified due to the use of one of those properties being used as a dental surgery. It is considered that this relationship can be improved through the detailed design process.

It is observed that while there is an existing access at this location, the proposed development would represent a significant intensification of the access location. The junction will have very little in the way of feature to identify it to drivers using Wycombe Road, any detailed junction design should address this. The Highway Authority believes that this could be achieved by a range of options that the applicant should consider. These may include the use of a raised table, adjustments to kerb lines, signage and lining. It should be noted that this is not an exhaustive or prescriptive list of the options available.

Due to the tight radius, and the concerns outlined above, it is also considered that it would be appropriate to implement a localised parking scheme around the junction itself and the access road to ensure that the highway is maintained in a clear and accessible manner to prevent conflicts occurring. This can be secured by condition to be outlined during a final response.

It is noted that there are pedestrian/cycle links proposed to the south of the site. It is not considered that the access proposed would be suitable for any future increase in demand, and it should be secured by condition, to be outlined during a final response, that no vehicular linkages to any future developments may be permitted to use the access proposed.

There appears to be an inconsistency between the drawings provided around the narrowing feature, a revised set of drawings is requested showing this feature being removed as it is not considered a requirement.

In summary notwithstanding the above observations the Highway Authority believe that an acceptable access can be achieved through the detailed design and approval process with the Highway Authority. This can be secured by condition to be outlined during a final response.

#### Safety and Collision History

The proposed access sits between two existing access points for the neighbouring properties with dropped kerbs. Further details are requested showing the interaction between the radius and the dropped kerb sections for the driveways.

The Highway Authority has concerns relating to the interaction between the proposed junction and the property to the east of the site. This property forms the dental surgery and will have a number of vehicle movements each day.

The Highway Authority believes that improvements to the design are possible.

It has been noted from a site visit to the location at approximately 15:30 that Wycombe Road is heavily used by pedestrians from the local schools and that there are a significant number of parents who collect children by stopping in arbitrary locations and in existing side road accesses. It is a concern given the width of the proposed access point that this would take place at this location with a new junction. It is considered that it would be appropriate to consider the requirement for parking restrictions around the junction to maintain the safety of the new junction. This could be secured by condition.

The Transport Assessment draws attention to the collision history on the network around the location of the site access. This history shows the collisions that have taken place in the area to be as a result of driver error rather than due to the highway configuration. The Highway Authority does not consider therefore that these have a significant bearing on this application.

### Sustainability

The site as proposed is positioned within the village of Holmer Green and is close to a number of local amenities as outlined within the Transport Assessment. The site is also served by two bus routes using Sawpit Hill, the service one operates between High Wycombe and Chesham at a frequency of every 15 minutes Monday to Saturday. The stop is approximately 160m from the site access and the back of the site is approximately 330m from Wycombe Road. This would put the extremity of the site in the region of 490m from the nearest stop location. While this is greater than the recommended maximum distance of 400m it is noted that the majority of the site would fall within this desired distance.

The second service also serves Sawpit hill on an hourly frequency between Stokenchurch and Great Missenden, however this stop is located 700m from the site making much of the site over 1km from the stop. Given the distance and the frequency of the service it is unlikely to be considered a desirable service.

Improvements to the stops have previously been identified through the pre-application process, for which Real Time Passenger Transport Information at stops on Sawpit Hill were identified. These would serve to enhance the desirability of using these stops and could be secured by condition.

It is noted that the bus service 1 serves both High Wycombe and Amersham stations providing a public transport link to London to the south, Aylesbury, Oxford and Birmingham to the north providing good sustainable regional connectivity.

With respect to walking and cycling the whole of the village of Holmer Green falls within a 2km catchment of the site making walking to local services a viable option to residents. There are no major routes within the village that would be of concern with regards to pedestrian permeability of the village, this includes to local schools and shops.

With regard to cycling, it is noted that parts of High Wycombe fall within the 5km cycle catchment from the site, and while this may be within the accepted radius for cycle journeys the topography of the area makes this unlikely to be an appealing option for replacement of motorised journeys for all but the most enthusiastic cyclists. It is therefore considered to be of greater importance to

enhance the desirability of public transport options. Measures to meet this would be considered within a reserved matters application.

A number of pedestrian cycle routes are proposed to the south of the site, without indication given of how these will link to the development footpaths or be constructed. Further detail on these is required.

#### Vehicle trip generation

The Transport Assessment provides information on the trip generation, using data from the TRICS® database. This sets out that there will be a total of 58 movements in the AM peak and 51 in the PM peak.

The trip generation presented is broadly in agreement with my own interrogation of the TRICS® database. These figures are considered to be a realistic estimation of the movements that will be expected by this development.

To follow from this the Transport Assessment has outlined the expected trip distribution and suggests that 43% of the trips would be to the east of the site with the remaining 56% to the west. Again these figures are considered to be a suitable assessment of the likely destinations.

#### General network and specific junction capacity

I am satisfied that an appropriate network has been considered in relation to the junction capacity assessments and appropriate growth rates have been applied, at 1.0646 for the AM peak and 1.0662 for the PM peak.

I am satisfied that the trip rate presented is a reasonable representation of the trips that would be expected from this development.

The assessed junctions are;

- Site Access/Wycombe Road
- Wycombe Road/Sawpit Hill
- Holmer Green Road/Western Dene/Sawpit Hill Mini Roundabout
- Pond Approach/Earl Howe Road
- Earl Howe Road/A404

The modelling demonstrates that the surrounding network has sufficient capacity to accommodate the increase in traffic expected to be generated by the development.

#### Parking provision

The parking provision for the site has been calculated in accordance with the Buckinghamshire County Council parking standard. This states that for this site the required level of parking would be 221 spaces, with a provision of 225 spaces and 3 additional visitor spaces on the access road. This is considered to be an appropriate level of parking provision for this location. However as has previously been stated the three spaces on the access road are not considered to be in a suitable location, and should be repositioned within the site.

It is noted that cycle parking is to be provided in the rear gardens of the houses and within secure stores for the apartments. It should be demonstrated that this can be accessed from the highway without obstruction.

A plan incorporating an accommodation schedule and showing the position of all the parking spaces is required in order to make a full assessment of the location and suitability of this parking. It is noted that the Transport Assessment excludes garages from the parking allocations.

In advance of receiving this plan, it should be noted that the County Wide parking guidance sets out that parking spaces in front of a garage or vertical feature should be 5.5m in length to allow access to the car boot. In addition if properties are to have tandem parking then the width should be a minimum of 2.8m. Where spaces are adjacent to a wall then the space may need to be larger to allow effective access and use.

While it is not within the County Wide Parking guidance or mentioned in the Transport Assessment the 2018 NPPF within Para 110 e) that *“applications for development should: be designed to enable charging of plug in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

It is considered that this application as it stands does not meet this requirement of the NPPF 2018.

A schedule of electric charging provision should be provided, this can be secured by condition.

It is observed that the parking area behind plot 89 is a large area of parking with no relief between ranks of parking bays. This is contrary to Wycombe District Council parking guidance, and should be revised. A similar situation occurs outside plots 18 to 22.

It is observed that the garage block between plots, 10 and 11, 44 and 54 are a long way from the fronts of the properties and therefore present a risk of residents opting to use inappropriate parking locations for ease of access to dwellings. It is considered that the provision of these can be located in a more suitable position.

#### General Layout.

It is noted that the layout follows the general principles set out in Manual for Streets, however it is observed that there are a number of areas where permeability is limited. Notably this occurs between the three cul-de-sacs off the main spine road to the west boundary of the site.

There is an undefined structure immediately behind number 18 Wycombe Road with access opening out behind the corner of the fence. If this is not a private garage then it is likely to be used for unallocated parking and is not considered to be a suitable location for parking given the visibility available between the access and the main thoroughfare to the site entrance.

It is noted that the footway in front of plots 63 to 67 is less than the minimum of 2m and this requires revision.

Plots 89 to 93 have no pedestrian access provided, and this should be allowed for.

There are a number of locations where there is less than 6m provision behind parking spaces, this is unacceptable and should be revised.

The carriageway between plots 25 and 69 is below 4.8m in width, this is unacceptable and it should be noted that a minimum of 4.8m should be provided in order to make this acceptable.

Amended plans should be provided to address the issues outlined above.

#### Conclusion.

As it stands the application requires further information to be provided to the Highway Authority in the following areas,

- Detailed drawings showing the proposed access and the relationship with the neighbouring driveways.
- Expanded tracking drawings.
- The reason for traffic calming being put forward.
- Further detail and explanation of the proposed footways and cycle ways to the south of the site.
- A schedule outlining the provision of electric vehicle charging points.
- An accommodation and parking schedule.
- Revised site layout drawings showing revised footways and carriageway widths.

### ***Buckinghamshire CCG –***

There will likely be an increase in population of at least 103 new patients as a result of this housing growth which will have an effect on Chiltern House, Carrington, Desborough and Cressex Health Centre surgeries.

103 beds represents a large amount of new registrations and an increase to the existing practice list, putting further pressure on the practice in a number of ways:

- Accessing the clinical team based on capacity versus demand for appointments
- Car parking
- Infrastructure i.e. the need for more consulting space and larger / additional waiting areas.

Further development in the Holmer Green area will definitely create more pressure on GP services and put existing patients at risk if the current GPs are unable to cope with any additional workload. The CCG would also be looking for appropriate S106 contributions in order to help support the local health service infrastructure.

In light of the existing pressures already in place, Buckinghamshire CCG would be very concerned about the pressure to local health services of such a large development in this area. (27/01/22)

### ***Buckinghamshire Council LLFA – Final Comments (08/09/21) –***

The LLFA has no objection to the proposed development subject to the following planning conditions listed below being placed on any planning approval.

#### **Flood Risk**

Following my previous consultation response in July 2021, the Drainage Technical Note provides a detailed analysis how the existing surface water overland flow interacts with the proposed infiltration basin shown on drawing no. 20-012-002. The Technical Note identifies an area of 1.77m<sup>2</sup> where there is an encroachment of the low risk depth (associated with the 0.1% to 1% Annual Exceedance Probability) to enter the basin. The Technical Note suggests that a flood depth of 300mm would account for less than 1m<sup>3</sup> flood volume and therefore the basin proposals as designed have sufficient capacity to accommodate the negligible inflow from the area. Given that

this encroachment relates to an extreme flood risk scenario, I am satisfied that the proposals are adequate at this stage. The applicant may wish to investigate local landscaping measures, such as additional planting around the basin at detailed design to assist with the interception of flows.

#### Surface water drainage

The Drainage Technical Note addresses my concern regarding the siting infiltration components at the appropriate depth to reflect the findings of the ground investigations in relation to observed infiltration rates. It is confirmed that surface water runoff attenuated in the infiltration basin and the infiltration tank will discharge into suitable geology.

#### **Buckinghamshire Council Environmental Health – Further Comments (09/07/21) –**

As per the air quality SPD, 103 x 32 amp electric vehicle charging points (one per dwelling) must be provided prior to the occupation of the development.

#### **Buckinghamshire Council Housing Service officer**

I note that the indicative schedule of accommodation dated 14.01.22 shows 49 affordable homes in total. I understand you have been informed by the applicant that of these 49 dwellings, 39 are to be for Affordable Rent and 10 are for Intermediate tenure, with a size mix as set out below:

	Affordable Rent	Affordable Rent	Intermediate	Intermediate
	Number of Homes	Percentage (of 39)	Number of Homes	Percentage (of 10)
1 bed flats	0	0 %	1	10%
2 bed flats & houses	31	79.5 %	9	90%
3 bed houses	8	20.5 %	0	0 %
4+ bed houses	0	0 %	0	0 %
<i>Totals</i>	<i>39</i>	<i>100 %</i>	<i>10</i>	<i>100 %</i>

The housing service would usually expect to see the provision of a mix of affordable housing in accordance with Table 25 within Policy DM24 of the adopted Wycombe District Local Plan. However, I understand that there may be particular site constraints in this case and that the scheme mix and design are to take account of these issues, including the relationship with the site surroundings.

Although not a dwelling size mix which the housing service would usually expect to see, I can confirm that there is a need for affordable housing in the area and the proposed affordable homes will help to meet the local need.

## **Buckinghamshire Council Education – Final Comments (14/02/22) –**

Further to my previous representations on the above application for 101 dwellings two years ago, I am writing to provide an update.

Primary schools across the High Wycombe planning area (includes Holmer Green) are projected to be close to capacity in five years. The Wycombe Local Plan to 2033 adopted in August 2019 allocates up to 6350 homes within the High Wycombe Area over the period 2013-2033 which is projected to increase the pressure on school places.

The Wycombe Local Plan states that a ‘commensurate financial contribution (via a S106 planning obligation) will be required for the provision of additional school places if the adjoining site located in Chiltern is not allocated’. The Council previously developed a local plan for the Chiltern area which included allocating land off Amersham Road including Tralee Farm, Hazlemere - however, that plan was withdrawn in October 2020.

A financial contribution is therefore required towards the Local Authorities school expansion programme in the High Wycombe area in accordance with the Council’s adopted S106 guidance based on the following education infrastructure costs per dwelling type:

Flats			Houses			
1 Bed	2 Bed	3+ Bed	1 Bed	2 Bed	3 Bed	4+ Bed
£403	£1,298	£2,640	£1,715	£3,296	£5,787	£6,965

## **Thames Water – Further Comments (22/07/21)**

### **Waste Comments**

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

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



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

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

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

#### Water Comments

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

#### **Thames Valley Police – Further Comments – (22/12/21)**

Thank you for consulting with us again on the above application. Having reviewed the submitted plans we have no further comments to add however we urge the applicant to consider our previous comments to prevent any future objection.

#### **Thames Valley Police – Further Comments – (22/07/21)**

Whilst I do not wish to object to this outline application, there are aspects of the design and layout that could be problematic in terms of crime and anti-social behaviour. These could result in a development that does not meet the requirements of the National Planning Policy Framework 2020;

- paragraph 91(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion
- paragraph 127(f) which states that; 'Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'.

Therefore to mitigate concerns and avoid future objections from Thames Valley Police the following points must be considered and appropriately addressed in this and subsequent RM applications.

- There is limited surveillance provided to the approach road into the development. Potentially, only one dwelling has sightlines along the access road which may still be obstructed due to landscaping. This could be addressed through floor plans ensuring surveillance from active rooms is present but also the re-orientation of the initial plots. Landscape plans must ensure that sightlines from the dwellings overlooking this area are not obscured by planting.
- From the submitted plans courtyard parking has been provided on the western side of the development. This seems to incorporate a coach house style entry from either side. Whilst the roadway of the parking courts does not appear connected, their close proximity to each other would require robust landscaping to prevent vehicles crossing the green space between. Active windows (windows from rooms most likely to be occupied eg. kitchens and lounge areas) from the surrounding properties must oversee this parking court as well as out to the public realm to provide adequate surveillance and future floor plans must reflect this. Visitor parking should not be located in a private courtyard and should be positioned in the public realm again with a high level of surveillance from surrounding dwellings. A gated entry from both sides is appropriate to secure the parking area preventing vehicle damage, theft and anti-social behaviour but also ensuring that visitors present themselves to the front fascia of the building. Visitor access to both the front and rear communal entrances can cause issues with visitor entry systems and necessitate additional secure lobbies internally. Vehicle gates should be robust, visually permeable and electronically fob operated without the need to exit the vehicle.
- To the north of the site there are a number of houses with merged rear access routes. This has the potential to provide an informal route through this section of the development making it excessively permeable, with the surrounding dwellings particularly vulnerable to crime and anti-social behaviour. Rear access routes should provide access only to the occupant's private rear gardens. They should serve a small number (2- 3 dwellings maximum) and should not run in parallel or concurrently where overtime damage to the boundary treatment could create an unofficial footpath through a residential block. All rear access routes should be secured at the front fascia of the building with a robust gate 1.8m in height with self- closing hinges and key operable from either side.
- There are large clusters of vehicle parking shown next to the public realm. Communal parking should be broken up to smaller groups to allow for a sense of ownership over these areas with defensive space provided to the parking space. Parked vehicles should be visible from the dwelling they serve.
- It is good to see that generally a grid layout has been utilised across the development. However where dwellings have vulnerable side and rear boundaries exposed, defensive space must be provided in terms of future landscaping plans protecting privacy by providing 'stand-off' but also hindering unauthorised access. Corner plots must provide a high level of surveillance to the public realm and blank side elevations should be avoided.

- A lighting scheme should be provided to meet the general standards of BS5489:2020, this should include any courtyard /communal parking areas. There should be no differentiation between the quality of light provided to residents located along an adopted or un-adopted area of the highway. Therefore the applicant should be considered how lighting feeds are provided to un-adopted areas at the earliest opportunity. Particular attention should be provided to the access road where there is limited surveillance, lighting should ensure pedestrians have a clear view of the route ahead. Bollard lighting would not be appropriate.

### **Chilterns Conservation Board – 25/09/18**

We agree with the applicant that the site falls within the setting of the AONB, being some 365 metres away at the closest point, to the north-east of the site. We support the points made by WDC in the reported EIA screening assessment that impacts are potentially visual ones and by consequence of the increased recreational pressures impacted upon the AONB.

CCB would make the point here that the Local Plan process needs to run its course. The supporting planning statement justifies submission ahead of the Local Plan determination on the grounds of demonstrating deliverability of the site within the tests set out in the NPPF. This alone would not be a reason to determine ahead of the Local Plan outcome. We have outstanding points as regards site HW8 and the Inspector's recommendations following the examination in public should be allowed to run its course. We set out below our earlier Local Plan submissions and this includes amendments to HW8 that would need to be taken into account in any determination of the application.

For ease of reference CCB agree with the applicant that Policy L1 of the adopted Local Plan applies. Legislative duties attribute great weight and importance to the conservation of landscape and scenic beauty within an AONB and including its setting. These duties are given a particularly enhanced status in the determination of planning applications. That status requires that the application results in the conservation and enhancement of the special qualities and scenic beauty of the AONB. In respect of policy Wycombe consolidated Local Plan policy L1 applies (4) Development will not be permitted which, although not itself located within the AONB, would have a demonstrably detrimental effect on its special character or appearance). It is also worthy of note that the duty in section 85 of the CROW Act 2000 (in exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty) refers to the effect and not the origin (i.e. can be outside the AONB). CCB's point at the Local Plan stage relates to the wider conserving and enhancing duty within the frame of landscape character. Further, the AONB Management Plan can be given weight as a material planning consideration. The submitted landscape and visual impact assessment (LVIA) and supporting planning statement make similar points.

The new Local Plan to 2033 deals with the protection of the AONB at Policy DM 30 (3) *'Development in the setting of the Area of Outstanding Natural Beauty must not have a significant adverse impact on the natural beauty of the Chilterns Area of Outstanding Natural Beauty'* Some limited weight can be attributed to this emerging if advanced policy.

CCB would submit two key points as:

(1) That the applicant's LVIA deals with a newly planted orchard in mitigation of impact (its 5.2) but we consider that the Local Plan must be allowed to run its course before any determination can be made. If that is not to be the case we would ask that weight is given to our proposed policy amendments as set out below.

(2) The mitigation proposed in the LVIA does not include mitigation of additional recreational pressures, as was countenanced in the EIA screening undertaken by the Local Planning Authority. CCB Local Plan Submissions (HW8) Land off Amersham Road including Tralee Farm, Hazlemere This site is in the setting of the AONB and contains historically important habitat of significance to the AONB. The area of Traditional Orchard - a Priority Habitat on the site should be preserved and protected, not developed. There are also three areas of Traditional Orchard in the adjacent Chiltern District Council proposed allocation. Source of both: <http://magic.gov.uk/MagicMap.aspx> Traditional Orchard is a key focus for the Chalk, Cherries and Chairs Landscape Partnership Scheme, a current Heritage Lottery Funded project run from the Chilterns Conservation Board. This cherry orchard habitat should be restored and extended to contribute to the Chalk Cherries and Chairs project, there is good potential for net gain to 12 be delivered here. See <http://www.chilternsaonb.org/about-chilterns/landscapepartnership-scheme.html>. Research should be carried out on the history and culture of traditional orchards on this site using historical mapping and local history (see for example <https://www.holmergreen.info/history>).

Already orchard land has been lost near the site (evident in place names Orchard Way, Orchard Park). No more should be lost. The focus should be on joining up and restoring the orchards. The north eastern rectangular residential parcel should be reduced in size to allow a swathe of habitat restoration and connection with the parcel of traditional orchard next door on the site allocated in the emerging Chiltern Local Plan. This will provide a comprehensive approach to development and biodiversity net gains (NPPF para 109).

Traditional Orchards are addressed in the AONB Management Plan: (para 14) Decline of cherry orchards. The once large number of cherry orchards continues to decline to the point they are now a fast vanishing feature of the landscape. There is a growing interest in conserving and restoring some of the best examples to ensure this element of the traditional Chilterns rural scene is not lost and forgotten.

Policy L1 The overall identity and character of the Chilterns should be recognised and managed positively. The main characteristics of the Chilterns landscape have been created by human intervention. In most cases they need to be managed actively in order to retain those qualities or restore natural characteristics which are in decline e.g. chalk downland, hedgerows, ancient woodlands, chalk streams, traditional cherry and apple orchards.

Recommended changes HW8: On the illustrative layout, re-shape the north eastern rectangular residential parcel to allow a swathe of habitat restoration and connection with the parcel of traditional orchard next door on the site allocated in the emerging Chiltern Local Plan. Amend the policy text to read: 3. a) Provide access to, and retain and expand the existing traditional orchard within the north east of the site, connecting it to neighbouring area of priority habitat (25/09/18)

**Chiltern Society (19/01/22)**

The Chiltern Society object to this revised application.

The Society accepts reluctantly that following detailed consultation this site was removed from the Green Belt and allocated for housing under Policy HW8 of the Local Plan.

However this policy, if the Council doesn't ignore it, makes a number of statements that this development fails to comply with.

1) Paragraph 5.1.67 states a development brief is essential to coordinate detailed planning. This clearly has not been provided.

2) Paragraph 5.1.64 states the site is allocated for 350 homes, current applications are for a total of 399 homes, a significant overdevelopment of the site which has a serious impact on biodiversity on a sensitive site bounded by the Chilterns AONB

3) HW8 para 1, Place-making requires a sense of separation between Hazlemere and Holmer Green. This proposal tries to achieve that but other applications negate the separation due to being planned as a stand-alone development.

The Society is strongly of the view that the Council should act in accordance with its own policies and only consider this development as part of the whole HW8 site proposals. Until that can be achieved the proposal should be refused.

## **Other Representations**

A total of circa 635 representations (at 10/02/2022) have been received with regard to the application.

### Objections

50 representations of objection arising from initial consultation (received between 11/09/18 to 09/10/18)

285 representations of objection arising from further consultation (received between 15/08/2020 to 29/04/21)

87 representations of objection arising from further consultation (received between 18/06/2021 and 19/01/22)

152 representations of objection arising from final consultation (received between 20/01/22 and date of report writing (up to 10/02/22)

13 representations of objection on Chiltern Application Ref: PL/18/3378/ADJ and PL/18/3121/OA (now withdrawn)

The salient points can be summarised as being:

### Principle of Development

Development on Green Belt land/Inappropriate development

Need to assess with wider development in Chiltern District Council, collectively the impact would be considerable  
Priority should be given to brownfield land/Government directive to protect greenfield sites  
Should be a buffer between Hazlemere and Holmer Green/lack of separation  
Unsustainable development  
Concerns, issues and inaccuracies with supporting statements  
Application (pre adoption of WDLP) doesn't demonstrate its deliverable  
Should be considered with adjacent site  
Green Belt should not be downgraded  
Contrary to Local Plan  
Plan not fit for purpose, no confidence in WDLP  
Too much development with other applications  
Cumulative development with adjacent will be huge  
Incorrect to state extent of buildings on site  
Site not semi-urban  
Loss of open space will obliterate separation between two communities  
Application is premature/requires a development brief  
Contrary to levelling up agenda  
Removal from green belt based on false information  
Not 10% (existing) built form on site/buildings throughout, not semi-urban, no buildings throughout  
Exceptional circumstances did not exist to remove from GB/flawed assessment  
Should not be judged in isolation  
Significant increase in population of Holmer Green  
Ongoing appeal in HW8 which LPA is defending  
25% population increase  
Piecemeal development  
Will compromise the remainder of HW8  
Development brief is essential  
Needs to be looked at holistically

### Biodiversity and Ecology

Erosion of green space  
Loss of habitats and impact on protected species  
Loss of hedgerows  
No wildlife buffer with gardens  
Disturbance to badgers  
Loss of orchard which is valuable habitat  
Concerns over ecological surveys  
Green corridors should be maintained  
Proposed green link insufficient  
Climate emergency declared in Hazelmere

Buffer would provide ecology benefits

Document specifies payment to Warwickshire Council – should go to Hazlemere Parish Council

Not a carbon zero development

### Landscape features

Plans don't show significant trees

Impact on TPO's

Keep existing trees, hedgerows and woodland

Destruction of trees

Canopy cover takes time to establish/need trees now

Loss of trees impact on climate change

Loss of hedgerows

Impact on dark skies

Replacement saplings will not compensate for loss of trees

Loss of orchard/retention would maintain green boundary

Damage to tree roots

### Infrastructure

Incremental developments impact infrastructure which hasn't been upgraded

Oversubscribed/at capacity schools and surgery, nursery, lack of dentist, PO, A&E

No doctors surgery

Strained telephone exchange, water, gas, electricity

Foul water system will not be able to cope

Village cant sustain development

### Highways

Impact on roads, junctions and local network and congestion

Network/capacity issues at peak times

Existing congestion problems

Poor visibility from access

Risk to pedestrians and school children

People will travel by car, significant increase – impact on area

Existing bus services are overcrowded

Previous app for 6 dwellings refused due to access

Hazardous access onto busy/dangerous road

Insufficient parking (in scheme and in local area inc dentist), current parking issues

Topography in High Wycombe makes cycling unrealistic

Narrow roads within development – service issues

Disturbance from contractor vehicles

Car ownership higher than shown

Insufficient parking/Overflow of parking on Wycombe Road  
Inadequate public transport  
No continual footpath  
Inadequate access width  
Transport report out of date  
Vehicle tracking demonstrates incursion onto other carriageway  
Accident on local roads  
Poorly lit roads cars parked in highway  
No safe crossing on local roads  
Access from Wycombe Road should be pedestrian/cycle access only  
Anticipated daily additional trips is inaccurate  
Lack of cycleways and walkways

### Design

Development too close to residential boundaries, lack of screening  
Impact on environment using green belt land  
Development should enhance landscape, does not take into account existing landscape  
Urban sprawl/coalescence  
Too much development/overintensive  
Light pollution on dark skies  
Impact on AONB/setting of AONB  
Loss of village feel  
Development not if similar scale and design as existing  
No effective screening  
Overhead cables should be buried  
Lack of recreational areas, play park/equipment  
Should be more open space  
Car dominated streetview  
Lack of comprehensive tree planting  
No flats in area and housetypes out of keeping  
Scale unreasonable and create eyesore  
Infilling will overwhelm character of village/overdevelopment of site  
Development is too urban for locality  
Bland development  
Loss of village identity  
Impact on listed buildings and conservation area  
More open space needed  
No Green margin with Kestrel Drive  
Should be a 200m gap like HW6 and requirements of HW7/inconsistency in policies  
Does not enhance existing landscape  
Doesn't respect sensitive boundary with Kestrel Drive  
No front gardens



Inappropriately close to existing properties  
Design, scale and layout will fail to integrate satisfactorily  
Not enough open space/recreation space

### Amenity

Windows may look into adjoining properties  
Noise, dust and disturbance from development  
Lack of privacy  
Disturbance during construction  
Loss of outlook  
Development will overshadow and dominate adjacent dwellings  
Effect on air quality  
Lack of garden space  
Loss of light/overshadowing  
Light pollution  
Engine pollutants/impact on health  
Noise and disturbance from use of orchard (behind No.3 Kestrel Drive)  
Pollution and noise during development

### Other

Consider more affordable housing  
Affordable homes are not affordable  
No employment opportunities  
Dip in field is a bomb crater  
Development will cause flooding on adjacent properties/issues in wider area  
Local flooding issues  
Flood risk needs to be comprehensively managed  
Drainage not clear  
Will set a precedent  
Increase in crime and anti-social behaviour  
School drainage issues  
Impact on carbon footprint  
People searching for jobs  
No demand other sites empty  
No benefits to existing residents  
Impact on mental health  
No age friendly properties  
Solar panels/heat pumps must be a requirement  
Hazlemere and Holmer Green Neighbourhood Plans and Buckinghamshire Plan yet to be started/completed  
Overstretching Police force

Not in best interest of vulnerable

Not enough jobs in area to serve the development

### Support

16 representations of support arising from further consultation (received between 15/08/2020 to 29/04/21)

19 representations of support arising from final consultation (received between 18/06/2021 and 19/01/22)

13 representations of support arising from final consultation (received between 20/01/22 and time of report publication)

NB – A high proportion of comments of support identified in the numbers above have been flagged as “suspicious” and/or “fake” and as such have been removed from the public file. While the LPA cannot confirm or dispute whether such allegations are correct the action to remove from the public file is considered to be a proportionate response. No requests from individuals have been made to return to removed comments to the file.

The salient points can be summarised as being:

Support but Council should be looking at sustainable and zero carbon

Much needed housing

Land serves little purpose and will benefit community

Access fine

No significant traffic issues in area

Little disruption

Will be good for shops/businesses

Will bring affordable housing, green space and parking

Site well contained

Better than building in back gardens

GP in Hazlemere, not controlled by Council

High standard housing

Increase in cars not significant

Need for housing in area

More energy efficient homes

Buildings and stables already on site

Passed Inspectors assessment

Will contribute to local economy/support businesses

Close to schools

Poor quality scrubland

GP's will get funding

Logical place for new homes

101 dwellings more preferable than 290

The site has been found to be sound

Need homes for children to live close

Should have raised objections at time of local plan

New housing part of renewal

If removed from plan more housing will be required

# APPENDIX B: Site Location Plan

