



Report to Strategic Planning Committee

Application Number:	22/06910/R9FULE
Proposal:	Creation of 750m two lane, single carriageway link road between Picts Lane, near junction with Goodearl Place to its termination point to north of the former Sumitomo Electric Hardmetal site, incorporating existing adopted highway with improvements, new section of road through former Whiteleaf Furniture Site and W.E Blacks development site and a connection point for the future Princes Risborough Expansion Area. Demolition of existing buildings within former Sumitomo Electric Hardmetal site, new signalised junction at Station Approach/Summerleys Road/Station Road, construction of new underpass (bridge) under Princes Risborough to Aylesbury railway line to north of Firs Court with new priority junction to north and other associated engineering, drainage and landscaping works including a 2.0m footway and 3.5m shared footway cycleway, surface water detention basin and swales, foul and surface water drainage and pumping stations, sections of reinforced embankment and retaining wall structures and pedestrian crossings
Site Location:	Princes Risborough Southern Link Road Princes Risborough Buckinghamshire
Applicant:	Mr Josh Tomlinson - Buckinghamshire Council
Case Officer:	Lucy Bellinger
Ward(s) affected:	The Risboroughs
Parish-Town Council:	Princes Risborough Town Council
Date valid application received:	21st July 2022
Statutory determination date:	10th November 2022. Extended to 30 December 2022.
Recommendation	That the application is delegated to the Service Director of Planning and Environment for APPROVAL subject to:

- 1) **The completion of a Memorandum of Understanding to secure:**
 - a) **a scheme to deliver 10% biodiversity net gain;**
- 2) **Any further conditions/measures necessary arising from the officer consideration of the comments of the Environment Agency;**
- 3) **If the Environment Agency have not commented by whichever is the later of 2nd December 2022 or the date when the Local Planning Authority is otherwise able to issue the planning permission, then the permission shall be issued without waiting for the Environment Agency to comment.**
- 4) **If an objection on flood risk grounds, which cannot be resolved after discussions with the Local Planning Authority, is received from the Environment Agency, by whichever is the later of 2nd December 2022 or the date when the Local Planning Authority is otherwise able to issue the planning permission, then the application shall be referred to the Secretary of State for their determination as to whether the application should be called in (in accordance with The Town and Country Planning (Consultation) (England) Direction 2021).**

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The planning permission is for a two lane, single carriageway road approximately 750m in length. The majority of the development consists of improvements to existing adopted highway but includes a new section of road running through vacant land near Princes Risborough railway station.
- 1.2 The proposal is known as the Southern Road Link (SRL) and forms the first part of the Princes Risborough relief road that will serve the Princes Risborough expansion area. The Princes Risborough expansion area is a housing allocation within the Wycombe Local plan for approximately 2,500 homes and supporting infrastructure including schools, a local centre, sports facilities and public open space.

- 1.3 The principle of the housing allocation, need for the new relief road and phasing of infrastructure is established by the adopted Wycombe District Local Plan and the Princes Risborough Expansion Area Supplementary Planning Document (SPD).
- 1.4 The planning application would accord with the development plan and infrastructure delivery phasing set out within the SPD. The approval of planning permission is recommended subject to a number of planning conditions and the completion of a Memorandum of Understanding to secure a 10% biodiversity net gain.
- 1.5 The application is being considered at Strategic Committee because Buckinghamshire Council is the applicant and, the application is of a strategic nature given its linkages to implementation of the Princes Risborough Expansion Area housing allocation within the adopted Wycombe District Local Plan.

2.0 Description of Proposed Development

- 2.1 Planning permission is sought for the construction of a new road, known as the Princes Risborough Southern Road Link (SRL) which would be the first phase of the Princes Risborough relief road. The relief road will come off a new junction with the A4010 Wycombe Road just south of Princes Risborough and run to and through the main expansion area and connect with the B4009 Grove Lane at Little Kimble.
- 2.2 The relief road is to act as complete alternative to the existing A4010 and is needed to mitigate the impact of allocated new housing. The implementation of the Princes Risborough Expansion Area is dependent upon its provision.
- 2.3 This phase of the road would run from Picts Lane and include a new section of road through land at Princes Risborough Station and improvements to the existing highway along Summerleys Road, ending at its northernmost extent on land of the former Sumitomo Electrical Hardmetal site.
- 2.4 The new road would be a two lane single carriageway with a new railway bridge underpass under the Princes Risborough to Aylesbury railway line. At the southern end of Summerleys Road a new signalised junction would be created with Station Approach and Station Road. The development also includes the provision of a 2m wide footway and 3.5m wide shared footway cycleway. There would also be a number of associated ancillary aspects including:-
 - Demolition of existing buildings at the Sumitomo site
 - Surface water detention basin and swales (de-culverting of the stream)
 - Foul and surface water pumping stations
 - Landscaping, reinforced embankment and retaining wall structures
- 2.5 The extent of the application site is 4.05 hectares. The majority of the site comprises existing adopted local road network which is flanked by houses. Part of the application site also includes areas of gardens and driveways of 10 properties along

Summerleys Road. A section of the National Cycle Route (NCR 57), which is also part of the Phoenix Trail (a route between Thame and Princes Risborough) runs along Picts Lane. The Chilterns AONB borders the south eastern side of Picts Lane.

- 2.6 The Princes Risborough Expansion Area SPD sets out the phases for the relief road which along with other key infrastructure is linked to housing delivery. The SRL is identified as phase 1 within the SPD. Phase 2 of the relief road would head north east through the main expansion area where it will connect with Longwick Road, Mill Lane and Lower Icknield Way. Phase 3 comprises changes to existing roads and junctions (Lower Icknield Way (B4009) and Grove Lane junction) and a new section of road known as the Culverton Link (from Picts Lane, heading south east to join with the Wycombe Road (A4010)).
- 2.7 The SPD is clear that the bulk of strategic infrastructure needed to support the expansion area will be provided directly by developers. Viability appraisal work which formed part of the Local Plan evidence base, shows that the overall Princes Risborough expansion area scheme is viable but suffers from a cash flow issue early on. To help address the cash flow issue, the Council secured £12m Housing Infrastructure Funds (HIF) from Homes England, towards accelerating housing delivery by facilitating the early construction of the SRL, and hence access to the main expansion area through the Sumitomo site.
- 2.8 The HIF grant will not fund the full cost of the SRL. As such construction of the SRL by the Council is dependent upon funding being secured from developers, via Section 106 Agreement to ensure that development proposals provide equitable contributions towards and direct delivery of the infrastructure requirements of the expansion area consistent with policy PR17 of the Wycombe District Local Plan.
- 2.9 The application is accompanied by:
 - a) Planning Statement
 - b) Design and Access Statement
 - c) Statement of Community Involvement
 - d) Flood Risk Assessment
 - e) Surface Water Drainage Strategy
 - f) Hydraulic Modelling Report
 - g) Ground Contamination Assessment
 - h) Habitat Survey
 - i) Ecological Survey Reports
 - j) Tree Survey Report
 - k) Heritage Assessment
 - l) Lighting Assessment
 - m) Transport Assessment

2.10 The applicant has provided additional technical information in response to issues raised by consultees. This includes information relating to ecology, flood risk, drainage and highway matters.

3.0 Relevant Planning History

3.1 There is no planning history of direct relevance to the proposal. However, there are a number of planning applications relevant to the delivery of the wider Princes Risborough Expansion Area through which other parts of relief road will run through.

18/06916/OUTEA, Land between Mill Lane and Longwick Road, Princes Risborough. Outline application (including details of access only, with all other matters reserved) for the erection of up to 360 dwellings, provision of land for a primary school, public open space, landscaping, sustainable drainage system and vehicle, pedestrian and cycle access points from Longwick Road and Mill Lane, pending determination.

22/05651/OUTEA, Land off Longwick Road, Princes Risborough. Outline planning application (including details of access only) for up to 1,100 homes including land for a 2-form entry primary school, associated landscaping and amenity space provision, with access from Longwick Road (with matters relating to appearance, landscaping, layout and scale reserved), pending determination.

Environmental Statement

3.2 The planning application is accompanied by an Environmental Statement. The local planning authority issued a scoping opinion in August 2020 which established the technical scope and topic areas to be considered as part of the Environmental Impact Assessment process.

Habitat Regulations Assessment

3.3 The local planning authority has carried out a Habitats Regulations Assessment (September 2021) which concludes that the development, either alone or in combination, will not result in any adverse effect on the integrity of the Chilterns Beechwoods Special Area of Conservation (SAC).

Statement of Community Involvement

3.4 During the course of drawing up the application the applicant has undertaken community engagement. This has included:

- Pre-application discussions by Planning Performance Agreement with the planning, drainage and highway authority
- Landowner engagement (in relation to temporary and permanent acquisition of land)
- Stakeholder briefings and meetings
- Public and community engagement

3.5 In addition to the above there has also been stakeholder and community engagement as part consultation for both the Wycombe District Local Plan and Princes Risborough Supplementary Planning Document.

3.6 Commentary of the responses received as part of the applicants community engagement prior to planning application submission are contained in the applicant's Statement of Community Involvement. The applicant has also provided a summary document in response to various comments received on the planning application, which is available on the web site.

3.7 The Council has also consulted on the planning application and the responses are summarised in Appendix A of this report and are available in full on our web site.

4.0 Policy Considerations and Evaluation

Planning policy framework

4.1 In considering the application, regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

4.2 The development plan to which this application relates comprises of:

- Wycombe District Local Plan 2019 (WDLP)
- Wycombe District Delivery and Site Allocations Plan 2013 (DSAP)
- Buckinghamshire Minerals and Waste Local Plan 2019 (BMWLP)

4.3 The adopted Princes Risborough Expansion Supplementary Planning Document (PRESPD) is of particular relevance.

Principle and Location of Development

WDLP: CP4 (Delivering Homes), CP7 (Delivering the Infrastructure to Support Growth), PR3 (Princes Risborough Area of Comprehensive Development Including Relief Road), PR4 (The Main Expansion Area Development Framework), PR7 (Development Requirements), PR8 (Provision and Safeguarding of Transport Infrastructure), PR16 (Land at Princes Risborough Station), PR17 (Princes Risborough Delivery of Infrastructure)

DSA: DM3 (Transport Improvement Lines)

Princes Risborough Expansion SPD

4.4 The principle, alignment and need for the SRL is established by the Princes Risborough expansion area allocation (Policy PR3) within the Wycombe District Local Plan. The PR3 allocation includes "a new relief road as complete alternative to the existing A4010 to be provided by the development: for the proper planning of the area, as the development is dependent upon its provision; to mitigate the impact of the development."

- 4.5 Policy PR8 sets out the transport infrastructure needed and safeguards land required for both new and improved transport infrastructure as part of the Princes Risborough expansion area. The application will deliver a number of elements identified within policy PR8, namely:
- di) a new link to connect the Main Expansion Area road to Summerleys Road between under-bridges of the Birmingham and Aylesbury railway lines;
 - dii) a new link connecting Summerleys Road to Picts Lane, via the land at Princes Risborough Station site;
 - e) enhanced capacity of the railway under-bridges of the Aylesbury railway line at ... Summerleys Road to safely accommodate all classes of traffic, with a minimum horizontal capacity of 12m and minimum headroom of 5.3m
- 4.6 The land allocated at Princes Risborough Station (policy PR16) is specifically required to provide “a new route through the site to accommodate the new road infrastructure, and associated signal controlled junction with Station Road/Station Approach.”
- 4.7 It is therefore clear that the principle and location of the planning application fits with the development plan. Secondly that the scheme is an important first part of transport infrastructure that is necessary to serve and mitigate new housing within the expansion area.

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), DM35 (Placemaking and Design Quality), PR 8 (Provision and Safeguarding of Transport Infrastructure)

DSA: DM2 (Transport requirements of development sites), DM3 (Transport Improvement Lines)

Princes Risborough Expansion SPD

- 4.8 The Highway Authority have confirmed that they are happy with all aspects of the scheme subject to the imposition of a number of planning conditions to ensure that the development is appropriately implemented & construction stage impacts are minimised.

Modelling assessment

- 4.9 The planning application is accompanied by appropriate modelling assessment at both the strategic and local junction model levels. The scheme facilitates the movement of traffic around the network but does not generate traffic itself. Regard has been had to cumulative impacts of other current planning applications within the expansion area. The modelling assessment is sufficiently robust and demonstrates that the scheme would not lead to a severe impact on the highway network or exceed anticipated impacts envisaged within the Wycombe District Local Plan.

4.10 Assessment of the junctions at either end of Shootacre Lane are shown to be operating with low demand and there is ample capacity remaining at these junctions. Local junction modelling evidences that the development does not have negative impacts on assessed junctions in a stand-alone or cumulative scenario.

Route alignment and railway underpass

4.11 The local plan shows an indicative alignment for the relief road and the SRL would generally fit with this. The new Summerleys Road rail bridge underpass would not align with the indicative route, being marginally further to the west but detailed technical work & consultation with Network Rail has informed the application submission.

4.12 The extent of the new road is limited such that it does not connect up with the next development site within the southern corner of the expansion area. The reasons are that it allows flexibility of road alignment for connection to the adjacent site and limits unnecessary tree and habitat loss adjacent to the water course in the interim period. Connection to the SRL would be required and secured by the adjacent development site.

4.13 The existing Summerleys Road rail underpass provides signal controlled single lane access under the railway track which is height restricted at 4.1m. This would be retained and ensure that vehicle access is maintained to a handful of properties on Summerleys Road.

4.14 A new bridge underpass is proposed that would provide two lane vehicle access and an increased height clearance of 5.3m (the minimum height clearance required by Network Rail & Design Manual for Roads and Bridges (DMRB)). This would accord with the minimum headroom specified in policy PR8.

Design speed

4.15 The road has been designed for a speed limit of 30 mph, which the Highway Authority has confirmed is the appropriate design speed given the future purpose of the road.

Carriageway width

4.16 The scheme would have a carriageway width of 6.5m. Although policy PR8 references a minimum carriageway width of 7.3m for new or improved road links, the Highway Authority are satisfied that the SRL road width is sufficient in light of predicted traffic flows and is appropriately designed for both now and in the future having regard to HGV proportions.

Road safety

4.17 A Stage 1 Road Safety Audit has been completed and the Highway Authority has confirmed that there are no road safety matters of concern that would result in the scheme being unacceptable.

Junction design

4.18 The scheme will change the existing Station Approach junction to a signal controlled cross roads with pedestrian crossings and a new priority junction will be formed at the northern end of the scheme. The design, visibility and arrangement of new junctions has been reviewed by the Highway Authority whom do not raise concern. The Highway Authority have confirmed that geometry of new junctions is acceptable and would not hinder the safe movement of HGVs.

Public transport

4.19 The proposal would not impede existing public transport provision and the new signalised junction would serve to improve pedestrian and cycle access to the railway station.

Footways and cycleways

4.20 A 3.5m wide shared footway cycleway will be provided along the length of the scheme and there will also be a 2m wide footway to the opposite side. The scheme will maintain access to the Phoenix Trail cycle route. The Highway Authority has confirmed that footway and cycleway dimensions are acceptable.

4.21 The development would not impact on the local rights of way network, nor any designated common land or village green. The Rights of Way Officer has confirmed that walking, cycling and horse riding traffic would be adequately accommodated within the scheme. They have however highlighted that it would be preferable if the new short connection from the end of Picts Lane to the new road were 3m rather than 2m wide. There is limited space in this location to create a wider path and the road provides an alternative 3.5 m wide shared footway cycleway along its length connecting to the national cycle route which is considered to be sufficient.

Parking

4.22 A parking layby will be provided to serve an existing parade of commercial premises on Summerleys Road. This level of parking provision would be sufficient to meet need. Properties that currently have on plot parking/garaging accessed from existing roads will not lose the ability to access private parking. Picts Lane will be severed by the scheme but with access retained for residential properties and a turning head provided. The existing Summerleys Road underpass bridge will be retained and a section of road shall be available for residential access.

Street lighting

4.23 A preliminary lighting design has been provided and a lighting assessment accompanies the planning application. The lighting design has served to balance the requirements for highway safety, ecology, amenity and visual sensitivity given the relationship with the setting of the Chilterns AONB at the southern extent of the road. A planning condition securing the final lighting design and its control is needed to protect the relevant planning considerations.

Road drainage

4.24 A planning condition is needed to ensure final details are submitted on how the road will be drained. Such a condition is necessary to ensure that the development does not increase the risk of flooding or impede highway safety.

Construction traffic

4.25 A construction traffic management plan will need to be secured by planning condition to ensure that the development is constructed in a manner which minimises inconvenience, obstruction and danger.

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), DM35 (Placemaking and Design Quality)
Air Quality SPD

4.26 The Environmental Health Officer has not identified any concerns relating to contaminated land or pollution issues, including air quality and noise. Supporting technical application information and the environmental statement, evidence that the development would not raise pollution issues nor result in adverse impacts on the amenity of adjacent occupiers/land and the local environment.

4.27 A planning condition securing approval of a construction environmental management plan (CEMP) will serve to mitigate the impacts of aspects such as dust, noise and vibration during the construction phase. Such a planning condition is necessary to ensure that the construction phase is appropriately mitigated and managed.

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), PR16 (Land at Princes Risborough Station), PR3 (Princes Risborough Area of Comprehensive Development Including Relief Road)

4.28 The development is acceptable in respect of managing flood risk and the incorporation of sustainable drainage systems. As such it would accord with development plan policy.

Flood Risk

4.29 An unnamed ordinary watercourse, which is a chalk fed stream runs partly within the application site. The majority of the watercourse is culverted through the southern part of the application site and the application proposal would de-culvert the watercourse and include swales.

4.30 Environment Agency flood zone maps show that the majority of the new road lies in flood zone 1 (low probability) but the southern element adjacent to the watercourse is located within flood zones 2 and 3 (medium and high probability). The Wycombe

District Strategic Flood Risk Assessment (SFRA) shows that the area of flood zone 3 in which the site is located is classified as flood zone 3b “functional floodplain” (comprises land where water from rivers has to flow or be stored in times of flood)

- 4.31 The SRL is part of the relief road, which has already been sequentially tested as part of allocations within the Wycombe District Local Plan (site allocations policy PR3 and PR16). As such, it is not necessary to apply the sequential test to the planning application because the proposed development is consistent with the use for which the site(s) were allocated.
- 4.32 The SRL would be classified as “essential infrastructure” under the flood risk vulnerability classification (as per the Planning Practice Guidance (PPG)). Therefore the Exception Test has to be carried out because part of the development is located within flood zone 3b. The Exception Test requires development to show that it will:-
- provide wider sustainability benefits to the community that outweigh flood risk; and
 - be safe for its lifetime, without increase flood risk elsewhere and where possible reduce flood risk overall.
- 4.33 In this instance the Princes Risborough Expansion Area allocation of which the SRL forms part of, will have a positive effect through the delivery of housing and significant improvements to community & highways infrastructure (e.g. provision of new schools, local centre, sport & recreation places & nature conservation areas). The PPG highlights that evidence of wider sustainability benefits to the community should be provided through sustainability appraisal. The Sustainability Appraisal of the Wycombe District Local Plan evidenced that the site allocation scored positively against sustainability topics and objectives. On this basis, the proposed development is considered to satisfy the first part of the Exception Test in demonstrating the wider sustainability benefits to the community that outweigh flood risk.
- 4.34 The road has been designed to remain operational and safe for users in times of flood; result in no net loss of floodplain storage and would not impede water flows nor increase flood risk elsewhere. Therefore the second element of the Exception Test has been demonstrated.
- 4.35 In addition to the above, the Strategic Flood Risk Assessment, carried out as part of evidence base for the Wycombe Local Plan, concludes that both the Princes Risborough expansion area and land at Princes Risborough station site allocations would pass the exceptions test.
- 4.36 As stipulated within the SFRA, the applicant has undertaken detailed hydraulic modelling of the watercourse to confirm the extent of flood risk (including allowance for climate change), demonstrate how any encroachment/loss of floodplain would be mitigated via compensatory floodplain storage to ensure the development would not increase flood risk.

4.37 The Environment Agency have failed to provide a consultation reply within the statutory 21 days consultation period. On the 14th October (over 8 weeks beyond the statutory consultation period) the Environment Agency advised that they wish to undertake a review of the applicant's hydraulic model in order to advise on the development. The Environment Agency have been requested to provide a timeline for this technical work to be undertaken but no reply has been forthcoming. The Environment Agency have been advised that if no reply is received by 21st October then the Local Planning Authority will proceed to decide the application in the absence of their advice. The Lead Local Flood Authority has reviewed the flood modelling and is satisfied that the development would not increase flood risk. A number of planning conditions to secure the final detail of the drainage scheme are necessary in order to ensure that the development appropriately manages flood risk.

Surface water

4.38 The application is accompanied by a surface water drainage strategy. The existing watercourse will be de-culverted and run alongside the new southern section of road and swales would also be incorporated to collect surface water runoff. The development would be served by an appropriate sustainable drainage system which has been designed to provide water quality, ecology and amenity benefits.

4.39 The Lead Local Flood Authority has no objection and seeks a number of detailed planning conditions which would secure the final details, implementation and future maintenance of the surface water drainage scheme. Such conditions are necessary to ensure that the development does not increase risk of flooding.

4.40 Thames Water have raised no objection and highlight that the development may require diversionary works to their apparatus.

4.41 In summary, the development would accord with national and local planning policy and guidance relating to the avoidance and management of flood risk and the incorporation of sustainable drainage systems.

Archaeology

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

4.42 The development would not affect the significance of heritage assets. The Archaeology Officer has confirmed that it is not necessary to impose any planning conditions in order to safeguard archaeological interest.

Mineral safeguarding

Buckinghamshire Minerals and Waste Local Plan (July 2019): Policy 1 (Safeguarding Mineral Resources)

4.43 The site is located within a wider area that designated as a minerals safeguarding area for alluvium. However, the development is exempt from the policy

requirements relating to mineral safeguarding areas because it involves development on a site over a hectare within an urban area.

Landscape and visual Impact

Wycombe District Local Plan (August 2019): CP7 (Delivering the Infrastructure to Support Growth), CP9 (Sense of Place), DM30 (The Chilterns Area of Outstanding Natural Beauty), DM32 (Landscape Character and Settlement Patterns)

4.44 The application is accompanied by a landscape and visual impact assessment. The assessment extent and conclusions therein are considered to be sound.

4.45 The majority of the application site is part of the existing local road network, therefore comprising tarmac roads, footways, drives and grass verges while the element near the railway station is undeveloped derelict land. The southern end of the site at Picts Lane lies adjacent to the Chilterns AONB and is settlement edge in its character and nature.

4.46 There will be landscape effects that arise from construction activities, including tree removal and from the development itself by creation of new highway, signage and lighting and a new railway bridge. The design of the new scheme is acceptable in relation to the townscape character and a number of planning conditions, particularly those relating to landscaping, materials and lighting, will serve to appropriately minimise and mitigate the impact upon the character and appearance of the locality and ensure a high quality finish.

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), DM30 (The Chilterns Area of Outstanding Natural Beauty), 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), DM15 (Protection and Enhancement of River and Stream Corridors)

Biodiversity Net Gain SPD, Canopy Cover SPD

4.47 Subject to the imposition of planning conditions, the development would achieve appropriate tree canopy cover, enhance biodiversity and deliver a 10% net gain in biodiversity and not harm protected species or designated nature conservation sites.

Designated nature conservation sites

4.48 The Chilterns Beechwoods Special Area of Conservation (SAC) is approximately 1.6km to the east of the site, which includes the Windsor Hill SSSI.

- 4.49 The Preliminary Ecological Appraisal takes account of these designed sites of nature conservation. Natural England has confirmed no objection and that they consider the development will not have significant adverse impacts on statutory designated sites.
- 4.50 The site lies adjacent to the Chilterns AONB and therefore consideration needs to be given to the potential impact upon the setting of the AONB. The Chilterns Conservation Board have provided neutral comments, as their key interest lies in later phases of the relief road, namely phase three Culverton Link which would be located within the Chilterns AONB.
- 4.51 Street lighting along the new road especially to Picts Lane adjacent to the boundary with the AONB, has the potential to impact upon the natural beauty of the AONB. The application includes a street lighting layout which has evolved with consideration to highway safety, ecology and dark skies environment of the AONB. A planning condition is recommended to secure the final details of the lighting scheme which is necessary for visual amenity, highway safety and ecological reasons. Such a planning condition would echo the request from the Chilterns Conservation Board.

Protected species

- 4.52 Appropriate ecology and protected species surveying and reporting has been undertaken as part of the planning application. Protected species surveys have concluded that the development would not be harmful to badgers, reptiles, bats, and great crested newts. A number of planning conditions are necessary to ensure the retention, enhancement and management of ecological features as part of the development to accord with development plan policy.

Biodiversity

- 4.53 A biodiversity net gain assessment supports the planning application. This evidences that the scheme design has been ecologically informed by way of a hierarchy of avoidance and mitigation measures. Biodiversity metric calculations show that there will be a small loss of habitat biodiversity value but a gain in hedgerow biodiversity value on site. As such, in order to ensure that the development delivers a net gain in biodiversity, an offset scheme will be required. In this instance the applicant is proposing to deliver 10% biodiversity net gain which would exceed the planning policy requirement. Given that the Council has a substantial landholding there is scope to deliver the required offset on land within the county. The exact detail of the biodiversity offsetting scheme can be secured by planning condition and via a Memorandum of Understanding (MOU).
- 4.54 A number of planning conditions are necessary to ensure that proposed on-site biodiversity enhancements are appropriately created and managed in the future.

Landscaping

- 4.55 The application is accompanied by an Environmental Mitigation Plan which details retained and proposed landscaping. The scope and type of landscaping elements are acceptable and would soften the appearance of the new road and enhance green

infrastructure features. Planning conditions are however necessary to secure the final detail & implementation of the landscaping scheme to ensure a high quality finish.

Tree and canopy cover

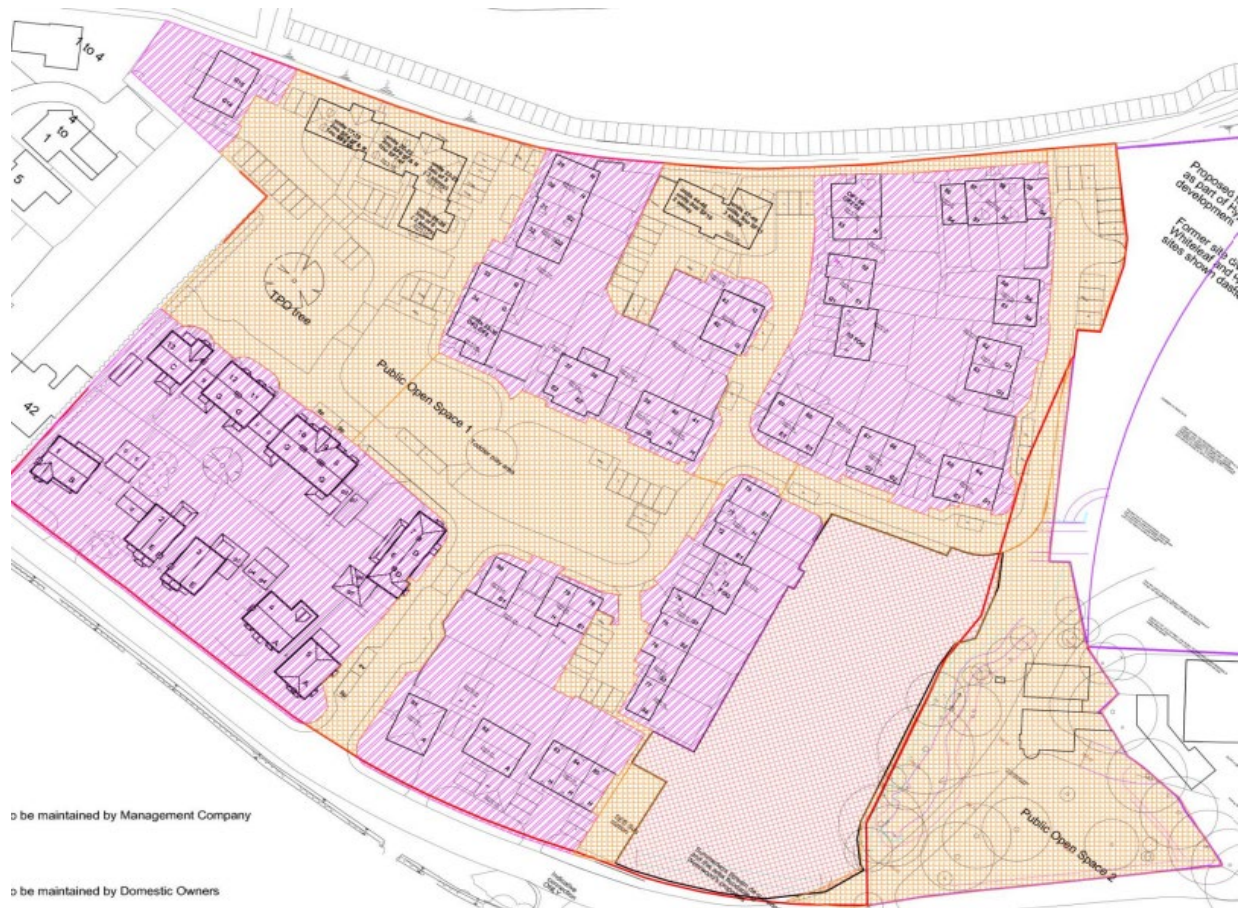
4.56 The development would accord with policy DM34 in that it would achieve a future canopy cover in excess of the 25% target of the site area – 38% is proposed. This would be achieved by the retention of existing trees and new tree planting. Some existing trees and tree groups would be removed to facilitate the new road which includes the loss of a handful of protected trees. Mitigation for the loss of these trees is proposed through new tree planting.

4.57 The Tree Officer is satisfied with the development, however a number of planning conditions are necessary relating to tree protection during construction and the implementation and future management of the tree/landscaping scheme.

Loss of public open space

Wycombe District Local Plan: CP7 (Delivering Infrastructure to Support Growth), PR7 (Development Requirements), PR17 (Princes Risborough Delivery of Infrastructure), DM35 (Placemaking and Design Quality)

4.58 A small section of the application site at the southern extent adjacent to Picts Lane was earmarked as an element of public open space provision to serve the adjacent housing development at Goodearl Place (see figure below). There is an area of public open space within the housing development, which includes an equipped play area, however the second area of open space has never been created and no action has been taken against this. The construction of the road will mean that the land is no longer available for this open space provision. This is a material consideration in the determination of this application. However, substantial areas of public open space will be delivered in time as part of the expansion area housing allocation which would more than compensate for this very marginal loss of public open space.



Infrastructure and Developer Contributions

Wycombe District Local Plan: CP7 (Delivering the Infrastructure to Support Growth), DM34 (Delivering Green Infrastructure and Biodiversity in Development)

4.59 The development is not a type of development where CIL would be chargeable.

4.60 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 is required to be secured within a Memorandum of Understanding:

- Biodiversity offsetting scheme to deliver 10% net.

Other matters/considerations

4.61 The Planning Practice Guidance (PPG) sets out the process for efficient consultation on planning applications. In this instance the Environment Agency are a statutory consultee on the planning application, so are required to be consulted. The Environment Agency was consulted on the planning application and the statutory period by when a “substantive response” (as defined by Article 22 of the Development Management Procedure Order) should have been provided was 16th August 2022. The PPG highlights that statutory consultees must inform the local

planning authority without delay if they require additional information and that it is not acceptable to wait until the 21 day period to do so. Given that local planning authorities are expected to determine planning applications within a time period (16 weeks in this instance), statutory consultees are made aware by the PPG that should they fail to respond within a specified time period, a local planning authority may proceed to decide the application in the absence of their advice.

- 4.62 In this instance the Environment Agency requested additional information way beyond the statutory consultation period and they have also been informed that if a consultation reply is not received by 21st October then the local planning authority will decide the application in the absence of their advice.
- 4.63 Despite this, the requested additional information was provided to the Environment Agency on 24th October (and re-sent on 11th November) but no indication has been given as to when consultation advice will be provided.
- 4.64 The Lead Local Flood Authority has reviewed the technical flooding information submitted with the planning application and is satisfied that the development would not increase flood risk. The applicant has undertaken their own flood modelling which provides a more robust, up-to-date and detailed basis than relying upon Environment Agency modelling data.
- 4.65 We are lawfully able to issue a decision on the planning application in the absence of a consultation reply from the Environment Agency. Should they however, raise an objection, consultation with the Secretary of State would be required before planning permission is granted.
- 4.66 The officer recommendation to members is that if the Environment Agency do not provide a consultation reply by 2 December then planning permission should be issued in the absence of their comment. This would be a period of 5 weeks since the additional information was provided which is a reasonable timeframe.
- 4.67 If in the event that the Environment Agency raise an objection by this deadline, which cannot be resolved by discussion, then the application would be referred to the Secretary of State for his determination as to whether to call in the application.
- 4.68 The approach set out above is considered to be robust and would not set a precedent for future planning decision making given the particulars of the scenario and planning application.

5.0 Weighing and balancing of issues / Overall Assessment

- 5.1 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.
- 5.2 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
- 5.3 As set out above it is considered that the proposed development would accord with development plan policies.
- 5.4 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.
- 5.5 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 a new 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.
- 5.6 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.

6.0 Working with the applicant / agent

- 6.1 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.
- 6.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 6.3 In this instance:
- Pre-application advice was provided
 - The applicant was provided the opportunity to submit additional technical information to address issues.

- The application was considered by the Planning Committee.

Recommendation: That the application is delegated to the Director of Planning and Environment for Approval subject to:

- 1) The completion of a Memorandum of Understanding to secure:**
 - a) A scheme to deliver 10% biodiversity net gain;**
- 2) Any further conditions/measures necessary arising from the officer consideration of the comments of the Environment Agency;**
- 3) If the Environment Agency have not commented by whichever is the later of 2nd December 2022 or the date when the Local Planning Authority is otherwise able to issue the planning permission, then the permission shall be issued without waiting for the Environment Agency to comment.**
- 4) If an objection on flood risk grounds, which cannot be resolved after discussions with the Local Planning Authority, is received from the Environment Agency, by whichever is the later of 2nd December 2022 or the date when the Local Planning Authority is otherwise able to issue the planning permission, then the application shall be referred to the Secretary of State for their determination as to whether the application should be called in (in accordance with The Town and Country Planning (Consultation) (England) Direction 2021).**

Subject to the following condition(s):

1. The development hereby permitted shall be begun before the expiration of five year(s) from the date of this permission.
Reason.
To comply with the requirements of Section 91 of the Town & Country Planning Act 1990 (as amended).
2. The development hereby permitted shall be built in accordance with the details contained in the planning application hereby approved and plan numbers PRSRL-STN-PH1-XX-DR-P-0005 REV P03, PRSRL-STN-PH1-XX-DR-P-0007 REV P03, PRSRL-STN-PH1-XX-DR-P-0008 REV P03, PRSRL-STN-PH1-XX-DR-P-0009 REV P03, PRSRLSTN-PH1-XX-DR-P-0010 REV P02, PRSRL-STN-PH1-XX-DR-P-0011 REV P02, PRSRL-STNPH1-XX-DR-P-0012 REV P02, PRSRL-STN-PH1-XX-DR-P-0013 REV P02, PRSRL-STN-PH1-XXDR-P-0014 REV P02, PRSRL-STN-PH1-XX-DR-P0016 REV P03, PRSRL-STN-PH1-XX-DR-P-0017 REV P03, PRSRL-STN-PH1-XX-DR-P-0021 REV P02, unless otherwise first agreed in writing by the Local Planning Authority.
Reason.
In the interest of proper planning and to ensure a satisfactory development of the site.
3. Prior the commencement of development, details evidencing that the development shall be built to adoptable standard shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The adoptable road and associated works shall not be opened to public use unless the adoptable

roads and associated works have been laid out and constructed in accordance with the approved details. The development shall thereafter be retained as approved unless altered for routine maintenance purposes.

Reason.

This is a pre-commencement condition in order to ensure that the highway is built to an adoptable standard and to minimise danger, obstruction and inconvenience to users of the highway and of the development.

4. Prior to the commencement of development, 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 in consultation with the Highway Authority. Thereafter, the development shall only 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.

5. Prior to the commencement of development, a fully detailed landscaping scheme for the site informed by drawing PRSL-STN-PH1-XX-DR-P-0013 REV P02 Environmental Mitigation Design shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include but not limited to;
 - Tree planting adjacent to the boundary with Goodearl Place to soften the appearance of exposed rear garden boundaries without creating conflict with existing properties and to provide a high quality environment
 - Structural planting of a scale and size relative to the development to soften the appearance of the development and to provide a high quality environment
 - Habitat creation that is suited to the existing townscape and adjacent development site.
 - Detail of all screen and boundary walls, fences and other means of enclosure.

Thereafter the development shall be implemented in accordance with the approved details.

Reason. This is a pre-commencement condition in order to ensure a satisfactory standard of landscaping and in the interests of amenity.

6. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following completion of the development. Any trees, plants or areas of turfing or seeding which, within a period of five 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. Reason.

In the interests of amenity and to ensure a satisfactory standard of landscaping.

7. Prior to the commencement of development, a scheme for the protection of the retained trees, woodland and hedgerows in accordance with BS 5837:2012, including an updated tree protection plan(s) (TPP) and a fully detailed arboricultural method

statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include (but not limited to):

- 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 root protection areas (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, footways, cycleways and parking areas including details of the no-dig specification and extent of the areas to be constructed using a no-dig specification. Details shall include relevant sections through them.
- 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) Schedule of arboricultural monitoring and supervision (which includes visits by the arboricultural consultant during installation of protective measures and structures within the RPAs of retained trees) with associated feedback in the form of photographic evidence showing compliance with the AMS and TPP to the Local Planning Authority and client via email following each arboricultural visit.
- j) Methods to improve the rooting environment for proposed trees and landscaping. Thereafter the development shall be implemented in strict accordance with the approved details.

Reason.

This is a pre-commencement condition to ensure that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site, in accordance with policy DM34.

8. Notwithstanding any indications illustrated on submitted drawings, prior to the commencement of development a canopy cover implementation plan produced in line with the Canopy Cover SPD shall be submitted to and approved in writing by the Local Planning Authority. The plan will include the following:
 - a) Tree pit design informed by adjacent grey infrastructure, underground services, street lighting and drainage.
 - b) Details of the required soil volume and how the required volume will be achieved in both hard and soft landscaped areas.
 - c) The locations of other underground infrastructure to demonstrate that there are no clashes.
 - d) Details of monitoring and supervision of the tree planting process including provision to take photographs of each tree pit/soil volume space, prior to filling with soil.
 - e) Details of maintenance and management (and replacement procedure if necessary) of trees for at least 5 years after planting.

Thereafter the development shall only be carried out and completed in accordance with the approved scheme unless otherwise first agreed in writing by the Local Planning Authority.

Reason.

This is a pre-commencement condition to ensure the canopy cover requirements for the site can be met and that the development complies with the requirements of policy DM34 and the Canopy Cover Supplementary Planning Document.

9. Prior to the commencement of development a scheme to ensure that the development delivers a biodiversity net gain shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall only be implemented in accordance with the approved scheme.

Reason.

This is a pre-commencement condition to ensure that the development delivers measurable net gains in biodiversity, in accordance with policy DM34.

10. Prior to the commencement of development (including ground works, vegetation clearance) 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) Reasonable Avoidance Measures Method Statement (RAMMS) for species known to be present on site (including reptiles, badgers and nesting birds)
 - d) 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).
 - e) The location and timing of sensitive works to avoid harm to biodiversity features.
 - f) The times during construction when specialist ecologists need to be present on site to oversee works.
 - g) Responsible persons and lines of communication.
 - h) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person when necessary.
 - i) 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 first agreed in writing by the Local Planning Authority.

Reason.

This is a pre-commencement condition to ensure that development is undertaken in a manner which ensures residential amenity and wildlife is not adversely impacted.

11. Prior to the commencement of development a landscape and ecological management plan (LEMP) shall be submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.

- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) 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).
- h) 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).
- i) Details of the body or organisation responsible for implementation of the plan. 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.
- j) 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 development shall be implemented in accordance with the approved details.

Reason.

This is a pre-commencement planning condition 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.

12. Prior to the commencement of development, an ecological design strategy (EDS) shall be submitted to and approved in writing by the Local Planning Authority. 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/or working methods to achieve stated objectives.
 - d) Extent and location/area of proposed works on appropriate scale maps and plans.
 - e) Specification and source of materials (plants and otherwise) 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 the implementation of the Landscape and Ecology Management Plan.
 - i) Details for monitoring and remedial measures.
 - j) Details for disposal of any wastes arising from works.
 - k) Details for the removal of invasive non-native species.
 - l) Detailed design and specification of the stream corridor.
 - m) Detailed design and specification of the SuDS ponds and native planting.
 - n) Retention and protection of retained existing habitats during construction.
 - o) Provision for wildlife corridors, linear features and habitat connectivity.
 - p) Soil handling, movement and management.
 - q) Creation, restoration and enhancement of semi-natural habitats, including those areas to replace the value of the lost open mosaic habitat.

r) Creation of new wildlife features, including bat boxes attached to the bridge, bird boxes hedgehog domes, reptile hibernacula and features for the benefit of invertebrates. The EDS shall where appropriate be cross referenced in other relevant details (e.g. landscape plans, construction environmental management plan). The development shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason.

This is a pre-commencement condition to ensure that wildlife value is appropriately retained, mitigated, compensated and enhanced and ensure a net gain in biodiversity in accordance with policy DM34.

13. Notwithstanding any indication of materials which may have been given in the application, a schedule and/or samples of the materials and finishes to be used for the new railway bridge, vehicle restraint system and hard surfaced areas for the development shall be submitted to and approved in writing by the Local Planning Authority before any work to the surface finish of the development takes place. Thereafter, the development shall only be carried out in accordance with the approved details.

Reason.

To ensure a high quality appearance and design appropriate to the character and appearance of the locality.

14. Notwithstanding submitted information, prior to installation a detailed lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be informed by submitted application drawing PRSL-STN-PH1-XX-DR-P-0014 REV P02 Proposed Street Lighting Layout. Such details shall include location, height, type and direction of light sources, intensity of illumination and management controls. Lighting shall have a colour temperature of no more than 3000 Kelvin. Thereafter the development shall be implemented in accordance with the approved details. Any lighting which is so installed shall not thereafter be altered without the prior written agreement of the Local Planning Authority other than for routine maintenance which does not change its details.

Reason.

In the interest of highway safety, visual amenity and ecology.

15. The development shall be carried out in accordance with the finished ground levels and alignment illustrated on approved drawings PRSRL-STN-PH1-XX-DR-P-0010 REV P02, PRSRL-STN-PH1-XX-DR-P-0011 REV P02, PRSRL-STN-PH1-XX-DR-P-0012 REV P02, unless otherwise first agreed in writing by the Local Planning Authority.

Reason.

To ensure that the proposal is constructed at suitable levels in relation to the surrounding area.

16. A complete traffic signals controlled junction at the junction of Summerleys Road, Station Road and Station Approach shall be provided including a communications link and CCTV camera(s) compatible with and connected to the Highway Authority UTM control room. The junction shall be sited and constructed in general accordance with approved drawing PRSL-STN-PH1-XX-DR-P-0017.

Reason.

To ensure that the appropriate junction form is provided with sufficient control to allow the Highway Authority to comply with their duties under the Traffic Management Act 2004 part 2 section 16 to secure expeditious movement of traffic on the authorities network.

17. Prior to commencement of development a Construction Environmental Management Plan (CEMP) having regard to residential amenities (to include addressing air quality, dust, emissions, traffic noise and vibration) shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved CEMP.

Reason.

This is a pre-commencement condition in order to safeguard residential amenity during the construction process and minimise pollution issues.

18. Prior to the commencement of development, excluding demolition, blockage analysis of the conveyance structures which form part of the proposed fluvial mitigation measures detailed in the approved Flood Risk Assessment (ref. PRSRL-STN-PH1-XX-R-HY-0003-P03, December 2021, Stantec) and Hydraulic Modelling Report (ref. PRSRL-STN-PH1-XX-R-HY-0002-P02, 24/10/2022, Stantec) shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

Reason.

This is a pre-commencement condition is to ensure that the fluvial mitigation measures detailed in Flood Risk Assessment have been agreed prior to construction in accordance with Paragraph 167 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

19. Prior to the commencement of development, excluding demolition, a surface water drainage scheme for the site including disposal of surface water from the highway, based on the Surface Water Drainage Strategy (ref. PRSRL-STN-PH1-XX-R-C-0002 Rev. P02, October 2022, Stantec), shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority and Highway Authority. The development shall be implemented in accordance with the approved details and the development shall not be operational until the surface water drainage scheme has been constructed. The scheme shall include:

- Full construction details of all SuDS and drainage components Discharge rates should be limited to or less than those stated on the Proposed Drainage Layout (drawing nos. PRSRL-STN-PH1-XX-DR-p0016 REV P03)
- Ground investigations including:
- Infiltration rate testing in accordance with BRE365 in the locations of proposed SuDS storage features
- Groundwater level monitoring from November to March
- Floatation calculations based on observed groundwater levels encountered during winter groundwater monitoring
- 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.

Reason.

This is a pre-commencement condition as development cannot be allowed to take place which could cause flooding, danger, obstruction and inconvenience to users of the highway and to ensure that a sustainable drainage strategy to manage flood risk has been agreed prior to construction in accordance with Paragraph 167 and 169 of the National Planning Policy Framework.

20. Prior to the development being opened to public use, a "whole-life" drainage maintenance plan for the surface water drainage scheme and flood risk mitigation measures 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) during and following construction, and include details of who is to be responsible for carrying out the maintenance. The development shall thereafter be maintained in accordance with the approved details.

Reason.

To ensure that long-term maintenance arrangements have been put in place and to reduce risk of flooding.

Informative(s)

1. You are advised that a Memorandum of Understanding has been entered into in respect of this planning permission.
2. In accordance with paragraph 38 of the NPPF2 Buckinghamshire 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. Buckinghamshire Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
3. Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority is required for any proposed works or structures in the watercourse. After planning permission has been granted by the LPA, the applicant must apply for Land Drainage Consent from the LLFA, information and the application form can be found on our website. Please be aware that this process can take up to two months.
4. Southern Gas Networks have apparatus within the planning application boundary. In advance of any works near that apparatus the Applicant will need to enter into an Asset

Protection Agreement with Southern Gas Networks and any associated costs for this will be met by the Applicant.

5. The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against prosecution under these acts. Ponds, other water bodies and vegetation, such as grassland, scrub and woodland, and also brownfield sites, may support great crested newts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England or opt into Buckinghamshire Council's District Licence. If a great crested newt is encountered during works, all works must cease until advice has been sought from Natural England, as failure to do so could result in prosecutable offences being committed.
6. It is an offence under S151 of the Highways Act 1980 for vehicles leaving the development site to carry mud onto the public highway. Facilities should therefore be provided and used on the development site for cleaning the wheels of vehicles before they leave the site.
7. Traffic signals installations within Buckinghamshire must as a minimum have fault monitoring enabled and installed to link to the Council's monitoring systems including the developer providing an approved communications link.

For traffic signals junctions CCTV cameras are required (unless the authority notifies the developer of an exception), these must be compatible with our existing systems. Early engagement with the Council's ITS team is recommended.

All signals equipment must be capable of being monitored through the council's existing remote monitoring systems, any equipment that is outside the current contracted maintenance schedule may incur a requirement for an increased commuted sum for maintenance.

All traffic signals installations require ducting throughout the extents of the works to incorporate two spare orange ducts and one purple communications duct, where reasonably possible these should also connect into the authorities existing duct network.

Design checks require a copy of the model as well as a copy of the output reports to be provided to the authority.

Designers of traffic signals installations should request a copy of the authorities guidance notes on the design of traffic signals installations at the commencement of any design process, this sets out the general requirements of the design and complements the appendix 12/5 which is also provided.

At the point of commissioning the following documents must be provided: A current as built drawing (any updates subsequently will require these to be updated and provided) in both Auto CAD and PDF formats, and a full set of electrical test certificates.

8. Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority is required for any proposed works or structures in the watercourse. After planning permission has been granted by the LPA, the applicant must apply for Land Drainage Consent from the LLFA, information and the application form can be found on our website. Please be aware that this process can take up to two months.

APPENDIX A: Consultation Responses and Representations

Councillor Comments

Cllr Carrington – Raises two questions following on from comments received from Bledlow Ridge Parish Council which raise concerns about Shootacre Lane being used by construction traffic given lack of road width and weight of vehicles. Asks:

- 1) When will CTMP be released and have these points been considered?
- 2) Has the cost of re-building Shootacre Lane (assuming it will fail) been taken into account?

Project Team provided a reply:

1) The CTMP will need to be approved before construction can commence. However it is not required to be submitted as part of the application. This is to ensure the views and responses received by the Authority are taken into consideration. We expect the planning authority to make the CTMP a pre-commencement condition. The CTMP will be drafted after the planning consultation and approved after determination. The CTMP is linked to the construction programme and is developed as part of the detailed design phase which is due to be completed next summer. The project team will take into account the type of road and what goods vehicles need to deliver the materials to site. Crucially the PRSL scheme needs to take into account the bridge height restrictions on Summerleys Road which means some traffic will have to use alternative routes.

2) No. The cost of reconstructing the whole of Shootacre Lane is not included as part of the PRSL

Parish/Town Council Comments

Princes Risborough Town Council – Support the application provided there is adequate planning for the continuation of traffic management during the period of construction to ensure public safety.

Bledlow Parish Council – Object. We endorse the views of the Princes Risborough Bypass Action Group (BANG). The grounds of our objection were previously stated during the Princes Risborough Southern Road Link consultation.

1. Although none of the road changes are in the Parish of Bledlow-cum-Saunderton, the southern end of the link road would join Picts Lane opposite the new housing estate at Goodearl Place, this is just north of Shootacre Lane and Bledlow Road, both of which are in our parish. In the future this part of the link road is expected to join up with the Culverton Link at Picts Lane, which leads behind Poppy Road onto the A4010 without any need to pass along Shootacre Lane or Bledlow Road. At the moment this is only likely to occur with Phase 3 of the development and as such is unfunded. The problem for this parish is - where will the traffic go at the southern end of this link road until the Culverton Link is built? It seems likely traffic will either go along Shootacre Lane or Bledlow Road via Lee Road to the A4010.
2. Volume I of the Main Report says in Para 3.2.25 that "As part of the proposal improvements will be delivered to the Picts Lane/ Shootacre Lane junction". However, it

also says that "The original proposals included temporary improvement measures around Picts Lane between Shootacre Lane and Goodearl Place ahead of the construction of Phase 3 (the Culverton Link) of the PRSRL. However, following discussions with Buckinghamshire Council on the delivery timings of the PRSRL, the timescales between the implementation of Phase 1 and Phase 3 have been reduced and the Picts Lane improvement measures will no longer be required." These two statements are contradictory. We understood at the consultation stage that no improvements were to be carried out on the junction of Shootacre Lane and Picts Lane, and we supported this situation and still do.

3. The predicted increase in traffic volumes and percentage of heavy vehicles along Picts Lane and Shootacre Lane and other neighbouring roads due to the first phase of the relief road will result in a decrease in safety during Phase I. The 2021 version of the NPPF says in para 110 that developments should "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas", but increased traffic movements along Shootacre Lane will prevent this from happening. Shootacre Lane only has a pavement for about half of its length, and is used by cyclists, runners, horse riders and walkers. It is signposted at the Icknield Way/Shootacre Lane junction as the Icknield Way Riders Route and a cycleway to Princes Risborough Railway station. Your own documentation describes Shootacre Lane as having a rural nature and low traffic volumes which are suitable for cycling.
4. Increasing traffic volumes will have a detrimental effect on road safety but some improvement could be caused by decreasing the speed limit and possibly adding a cycle lane to the road.
5. In Paragraph 5.4.2, the Main Report says that "Construction traffic will be routed to the Site via Wycombe Road A4010, Summerleys Road/B4444 and Shootacre Lane, Picts Lane and Summerleys Road to the Site compound" The width of Shootacre Lane has been measured at an average of 5.2m, which is narrower than government guidelines which state that a width of 5.5m is needed for 2 trucks to pass safely (or greater than 5.5m if wing mirrors are taken into account). Vehicles parked on the road would further reduce the width. We are therefore concerned that Shootacre Lane is being designated as a route for construction traffic without being suitable, and consider that the construction traffic should use another route for safety reasons as set out in Para 3 above. Any construction traffic traveling along Upper Icknield Way, Bledlow Road or Lee Road, which are similarly narrow and in some cases winding, would also have problems. In addition, this would conflict with the construction traffic now anticipated from the redevelopment of the Cherry Tree Nursing Home in Bledlow Road.
6. If the increase in traffic and the construction traffic route is to go ahead, additional safety measures should be applied which could include:
 - Reducing the speed limit for Shootacre Lane to at least 30mph or even 20mph if HGV use was high. This could also help reduce accidents at the Shootacre Lane/Upper Icknield Way junction which have sometimes been a problem in the past. The speed limit at the junction of the A4010 should also be investigated.

- Applying conditions to the movement of construction vehicles along Shootacre Lane.

Consultation Responses

Archaeology Officer – No objection. The proposed works are not likely to significantly harm the archaeological significance of any assets. We therefore have no objection to the proposed development and do not consider it necessary to apply a condition to safeguard archaeological interest.

Chilterns Conservation Board – Neutral comments. Aware that this is phase one only. A key part of our interest rests with phase three and the link to Culverton Crossroads. Comments in relation to phase one as follows:

Biodiversity net gain - As there will need to be an extensive AONB land take within the next (phase three) element, it would be interesting to know if any net gain corridors can be assigned to land alongside or within that wider curtilage, i.e., beyond the road and within the wider area to be acquired. We have assumed, consistent with the Local Plan allocation policy and the supplementary planning document, that a landscape mitigation buffer will be designed into the link to Culverton. Biodiversity net gain could readily be built into this landscape buffer, to create a very meaningful mitigation strategy. We acknowledge this may be a matter for future planning but seek to advance discussion of this at this stage.

Lighting - No details are provided for the key futures phases, as will impact directly on the AONB including taking AONB land. The planning statement, D&A and ES all accept the sensitivity of the junction from peri-urban to rural (AONB) at Picts Lane. We assume no roundabout would be proposed or designed for the Picts Lane/AONB land take because this results in pressure for a 'top lit' design that would be highly intrusive and harmful to the AONB and contrary to national and local policy. The drawing submitted as an 'Environmental Mitigation Design Plan' (PR SRL-STN-PH1-XX-DR-P-0013/Rev PO2) denotes a future connection to the Culverton link but does not model any design as linked to phase 3 works.

The ES moots mitigation in the operational lighting design with dimming lighting technology as deployed by a 'control management system' (ES lighting appendix, 6.3.6) and the potential use of 'back shields' (7.3.9). These are essential measures. We recommend that they are controlled by planning conditions that stipulate the design detail and the delivery of management protocols/management plan details, to deal with dimming and so forth.

ES Lighting Assessment 8.3 mentions landscaping as a mitigation mechanism. We would ask for more details on that and how it can be applied to the Picts Lane / AONB boundary. The 'Environmental mitigation design plan' does not show any real mitigation planting to the south and southeast of the Picts Lane / AONB boundary (i.e., at the very edge of the phase one design). We note that the lighting design proposes 6 and 8 metre top mounted columns with LED technology at a colour temperature of 3,000 kelvin. 3,000 should be a maximum as new technologies are now producing colour temperatures at 2,700 kelvin. Any planning condition here should seek a periodic review, as further technologies improve. The denoted lux contours are very useful. These should also be included in an appropriate planning condition and such details would be enforceable.

Cycle paths - are best delineated and defined by the systems such as the Solar Eye 'intelligent' road studs or similar. These need to be built into the cycle routes as wayfinders that also help promote cycling at dusk/evening periods. Looking towards future phases we are interested to

know how these cycle routes, promoting active travel and recreational benefits, can promote further links to the Chilterns Cycleway and other low trafficked or off-road routes, such as the National Cycle Network Phoenix trail and the A4010 cycle path to Saunderton. Further cycle links here would be hugely beneficial and would assist in promoting the recreational benefits of a nationally protected landscape.

Construction routing – We seek a rigorous construction and environmental management plan that would control and limit HGV routing. We could not find such details in the papers and have assumed that these are to be included in a planning condition. Either way, it would be useful to have some details and assurances at this stage.

In summary:

- a) An assurance that no future roundabout is planned for (in the design) at the Picts Lane/AONB boundary. Greater landscape mitigation around this boundary (in the phase one scheme).
- b) Further details on 'back shields' and low lighting management, with reference to a planning condition(s).
- c) Details regarding cycle lighting (Solar Eye way markers) and wider links to the Chilterns networks.
- d) Details on routing and construction management controls and mitigations, to protect the Chilterns and its villages and communities.

Environment Agency - The Flood Risk Assessment prepared for this proposal is based on flood risk modelling undertaken by the applicant. It has been decided that we will need to undertake a review of the model itself, in addition to the model report that has been submitted to support the application, in order to fully advise you on this proposal.

Environmental Heath – No objection. There are considerations for mitigation of increased noise from this proposed development. These are designed to offset and mitigate any significant increases which may result at noise sensitive receptors. These should be utilised to ensure that the potential increases in background levels do not have a detrimental impact upon the amenity of those effected by the development.

Highway Authority – Final comments: No objection subject to planning conditions relating to approval of detail for disposal of surface water from the highway and a construction traffic management plan.

Following my previous comments on this application, further information has been supplied to the Highway Authority, in the form of a technical note setting out a cumulative assessment of the impacts of the scheme, with the addition of the application received for land off Longwick Road, for up to 1100 homes and a school.

This cumulative assessment is required in order to demonstrate that the impacts of the two applications will not result in a severe impact on the local highway network.

The additional tests that have been undertaken are for the road scheme of this application with the 1100 homes off Longwick Road with and without a connection between the two schemes.

It is noted that the Local Plan, and Supplementary Planning Document identify that the development of the Princes Risborough Expansion area are to be served off the Southern Link Road of this application, however at present this connection is not shown in either application. This is the reason for the two additional tests.

The additional testing undertaken since the previous comments were supplied shows that the scheme does not cause lead to a severe impact on the tested highway network, or exceed the local plan anticipated impacts.

The additional tests show that with the cumulative development scenarios and the connection between this application and the development off Longwick Road there will be reassignment of traffic away from the A4010 and the Longwick Road onto the upgraded and new sections of the highway.

It has been noted that concern has been raised regarding the Strategic model performance on Shootacre Lane, and the 'sensitivity testing' that has been undertaken to address this. The Transport Assessment identified that the Strategic Model outputs did not reflect the findings of the more recent survey results. Therefore the local junction models were created using only the survey data and not the outputs of the Strategic Modelling. Therefore 'sensitivity testing' was not implied as the presentation of additional model results, rather the corrected model input data from the surveys.

It should be noted that the assessment of junctions at either end of Shootacre Lane are both shown to be operating with low demand and ample capacity remaining at these junctions.

First comments: Additional information required regarding the cumulative impacts of the development with other current planning applications. Once received final comments will be provided.

This application seeks permission for the upgrading of existing carriage way on Summerleys Road in Princes Risborough, the creation of a new link between the junction of Summerleys Road and Picts Lane as well as the diversion of the road under a new rail bridge on the Risborough to Aylesbury line.

The development comes forward as part of the delivery of the local plan in order to facilitate and enable the Princes Risborough Expansion Area (PREA) to be delivered. The need for the scheme has been demonstrated through the Local Plan development and adoption process, and the timing for the delivery of this piece of infrastructure identified by the Supplementary Planning Document (SPD) that accompanies the Local Plan. I therefore do not intend to comment on these matters further, as the Council has previously set out the case on this through Policy.

The existing conditions on Summerleys Road are best described as a single carriageway road with footways in parts on the eastern side of the road, and residential properties on both sides. At the northern end of the section of road under this application there is a bridge over the road carrying the railway line. This bridge does not allow two way traffic to pass under and is controlled by traffic signals. At the southern end of the link there is an oblique T junction serving Station

Approach and Princes Risborough station. The southern section of the proposal crosses as yet undeveloped land between Summerleys Road and Picts Lane to make a connection through and on to a future phase of development as identified within the Local Plan.

Pedestrian Routes along Summerleys Road currently serve residential properties on the road itself, and possible leisure connections, however they do not serve as a primary walking route for the majority of the population of Princes Risborough.

Picts Lane forms part of the National Cycle Route number 57 and forms the most southerly section of the application route. This cycle route then progresses through the town as it connects into the town centre.

Traffic count data submitted as part of the application shows that Summerleys Road carries 546 movements (two way) in the AM peak and 493 movements (two way) in the PM peak. The busiest routes in the area lay on the existing A4010 in the order of 1100 movements (two way) in both the peak hours. The other two most heavily trafficked roads in the area are Lower Icknield Way (B4009) and the Longwick Road (A4129). This shows that the existing Summerleys Road corridor is relatively lightly used at present.

The Road Safety analysis of the network as it currently stands demonstrates that the highway network in this area does not suffer from highway design or layout issues that lead to a pattern in road safety incidents. Those accidents and incidents that have taken place are not attributed to the highway design or layout and there are no clusters present. I am therefore satisfied that this scheme is not required in order to resolve an intrinsic highway safety issue within the network in this area.

The application sets out the existing public transport provision in the area and sets out the bus provision as well as the rail services. As this application does not seek to provide additional residential units in its own right, or any trip generating uses it is sufficient to view the proposals with respect to their impact of the existing use and operation of these services. The proposed improvements to the network, which I shall describe and assess presently, do nothing to impede the existing provision, and serve to improve access to the station through betterment of pedestrian and cycle provision on Summerleys Road and controlled crossings accessing the Station Approach through a signalised junction. These changes are likely to make accessing public transport more attractive and therefore represent a potential for positive impact on mode choices and the uptake of sustainable travel.

The scheme is described within the Transport Assessment as being a two lane single carriageway link road, stretching from just north of Goodearl Place to the land currently occupied by Sumitomo Electrical Hardmetal factory. Picts Lane is to be severed by the scheme with access retained for residential properties and a turning head provided. There will be shared footway/cycle ways provided along the length of the scheme. A new junction shall be formed to the north of a new underpass bridge between the future link road to be provided through the PREA and the remainder of Summerleys Road.

It should be noted that the existing underpass bridge is to be retained and a section of road shall be available for residential access with controlled turning movements at each end as it joins the

main route of the replaced carriageway. The Highway Authority have confirmed with the applicants through the pre application processes that visibility and movements can be achieved relating to this aspect of the development. The road has been designed for a speed limit of 30mph which the Highway Authority agrees is the appropriate design speed given the future purpose of the road as an alternative route for the A4010 as set out in the Local Plan, the form of the road through residential streets and providing primary access for all modes to Princes Risborough Station. The Highway Authority is satisfied that the lane widths proposed are appropriate now and in the future as the HGV proportions on the existing A4010 are not sufficient to require 3.65m lanes within this area. The footway and cycleway dimensions are also considered to be acceptable. It is noted that this scheme has not been designed to the guidance set out within LTN 1/20 for separation of pedestrians and cyclists. However, I note that this scheme is constrained by the available land and highway corridor, and the timing of the issue of the updated guidance. I am therefore satisfied that the scheme has given appropriate consideration to the needs of pedestrians and cyclists and made the highest level of provision for them within the constraints of the site and the scheme.

With respect to the Road Safety Audits of the proposed scheme I am happy that following the stage 1 review, designers' response and Highway Authorities review of that document that the scheme does not come forward with road safety matters that are of concern that lead the scheme to be unacceptable, or that cannot through a detailed design process be addressed appropriately.

The scheme will change the existing Station Approach junction to a signal controlled cross roads with pedestrian facilities. This is in keeping with the Local Plan assessment of how this junction will operate and will be considered presently during the junction assessments. A new junction is to be formed at the northern end of the scheme as a priority junction. This is acceptable and a suitable junction form for this location. The visibility and arrangement of these junctions has been reviewed and the Highway Authority does not raise concern with these junction arrangements subject to the detailed design process.

I have assessed the swept path assessments submitted for both the junctions, and am satisfied that the geometry of the junctions is acceptable and HGV's will be able negotiate these junctions in a safe manner.

Turning now to the modelling assessment of the scheme, it has been assessed at both a strategic model level and a local junction model level. At the time of the application being submitted the modelling scenarios undertaken at a strategic level were appropriate. However, since that point a further application has been submitted by a consortium of parties within the PREA and so further strategic modelling comparisons are required in order to fully assess the cumulative impacts of the developments as they are within the planning system at present. This requirement has been verbally passed on to the applicants through engagement. Whilst this response shall deal with the matters remaining within the Transport Assessment final comments and any conditions will be supplied once this additional assessment has been submitted to the Highway Authority.

It should be noted that the new application that requires inclusion within this assessment and this application do not at present show connection between them, and therefore the assessment carried out within the SPD document does not allow for the development in this form.

Connectivity between the two applications is a matter that will need to be resolved as part of the later application. This application seeks only to facilitate the development within the local plan.

The strategic and local junction models assess the junctions at a 2020 base year point and a future year of 2033 which coincides with the end of the Local Plan period and the expected completion of the PREA within the SPD. This future year assessment is considered to be correct and appropriate.

The Strategic modelling outputs demonstrate that the scheme shows some reallocation of traffic away from the A4010 to the B4009 in the AM and PM peaks, however these volumes are modest and their impacts on local junctions will be addressed within the local junction modelling.

The cumulative impact of the scheme and the development between Longwick Road and Mill lane, demonstrates modest increases on the A4010 and parts of Longwick Road, Mill Lane and Crowbrook Road, and in the final scenario in the current Transport Assessment traffic is shown to move away from the existing A4010 and reallocate to the Lower Icknield Way and Thame Road. However, this scheme facilitates the movement of traffic around the network but does not generate traffic in its own right.

As mentioned further comparisons are required to demonstrate the interim cumulative impact of the three applications currently under consideration, before final conclusions can be made regarding the strategic modelling.

The local junction modelling uses survey data collected in 2019, this would ordinarily be considered to be too old for robust assessment or approaching an age to which it cannot be considered to be acceptable. However, given the impacts of the COVID-19 pandemic between 2020 and 2022, this data is acceptable as it is not possible to reliably say how traffic patterns are changing as a result of the past two years. Until such time as a stable trend pattern is established it is considered by the Highway Authority that it remains robust to use this slightly aged data.

Local junction modelling shows that the development does not have negative impacts on the assessed junctions in the stand alone situation, or the cumulative scenarios. The new signals junction at Station Approach remains within capacity up to the full build of the PREA, whilst having excess capacity at the point of opening within the assessment. The greatest delay predicted at this location is approaching two minutes in the PM peak in the future year on Station Road. These signals are likely to have uneven demand due to the nature of uneven demand caused by peaks when passengers disembark from trains. It is therefore crucial that in order to accommodate this well, the signals design takes this into consideration, and as a standalone signals installation it is expected that this junction will be required to operate on MOVA control. This method of control is able to adapt rapidly to changes in demand and return to balanced operation quickly after a perturbation in the arrival distribution of traffic.

The other junctions that have been assessed at a local junction level are all showing that they will remain within capacity under all scenarios tested as a result of this scheme.

As has been mentioned before, final conclusion on these elements shall be made on receipt of the required cumulative assessments.

Turning now to construction matters. A Construction Traffic Management Plan (CTMP) is proposed as part of the Transport Assessment, this is an item that will be conditioned when the

Highway Authority is able to issue final comments. Prior to that initial information has been provided as to the topics to which this document will address. I am satisfied that the topics presented are acceptable, however this will require expansion when the full plan is submitted for review.

Lead Local Flood Authority – No objection subject to planning conditions relating to technical detail of surface water drainage scheme, blockage analysis of the conveyance structures and future maintenance.

Surface water flood risk: The Flood Risk Assessment (FRA) states that the site is at a very low risk of surface water flooding, with some areas in the central and northern parts of the site indicated to be at greater risk. An extract of the mapping is provided in Figure 3.2. The FRA does not provide any further analysis of the cause of surface water flood risk or detail the areas at greater risk.

The Risk of Flooding from Surface Water mapping shows that there is an area of low to high risk within land between Picts Lane and Station Road, this area of risk follows the alignment of an ordinary watercourse which flows through this section of the application area. Land in north of the former Sumitomo Electric Hardmetal site lies at high risk, again this appears to be associated with the presence of the ordinary watercourse which flows east to west in this area.

As identified in the FRA, the surface water mapping is produced by routing rainfall over a digital terrain model (DTM), the mapping picks out depressions in the ground surface and simulates some flow along these topographical low points, in this case highlighting the general path of the ordinary watercourse mentioned above. The Environment Agency (EA) guidance sets out that although the maps appear to show flooding from ordinary watercourses, they should not be taken as definitive mapping of flood risk from these as the conveyance effect of ordinary watercourses or drainage channels is not explicitly modelled. Therefore, in this case detailed hydraulic modelling of the ordinary watercourse has been carried out.

Ordinary watercourse flood risk: As detailed in the FRA and mentioned above there is an ordinary watercourse that flows through the site, the watercourse has small reaches of open channel but through much of the site it is in a culvert. The EA Flood Map for Planning indicates that part of land within in the site lies within Flood Zone 2 and 3 and therefore is at medium to high risk of fluvial flooding. There is no detailed modelling available from the EA for this reach of the watercourse. The proposals will create a new link road connecting Summerleys Road and Picts Lane and crossing the watercourse and its floodplain. Therefore, to understand the fluvial flood risk in this location in more detail and the need for mitigation, a hydraulic modelling exercise has been carried out, details of which are contained in the Hydraulic Modelling Report (ref. PRSRL-STN-PH1-XX-R-HY-0002-P01, December 2021, Stantec).

The modelling report seeks to understand the flood mechanisms in the existing scenario in order to appropriately assess flood risk and develop a suitable mitigation scheme should the proposals increase flood risk. The existing scenario is shown on Baseline Modelled Flood Extents (drawing no.46146/4001/C1A) and shows the flood extents up to the 1 in 100 year (1%) annual probability event with an 80% climate change allowance. The FRA suggests that the flooding extents shown on the plans are caused by a series of undersized culverts, the first being the link between mill channel and watercourse, then an undersized culvert beneath Picts Lane and a further undersized

culvert at Station Road. Each of the structures restricts flow in the watercourse and in flood conditions (beginning between 1 in 10 and 1 in 20 year event) causes out of bank flow which moves overland in a downstream direction.

As mentioned above, the proposed link road is intended to be routed across the watercourse, thus altering the overland flow route if left unmitigated. It is not feasible to increase the size of the culverts as the FRA identifies this could carry more flow downstream without attenuation as the storage provided by the overland flow route is lost, this may result in increased flood risk downstream and is not acceptable. The FRA details that a high-level study for providing storage upstream of the site was carried out. However, this was not found to be feasible due to the large area required in third party land and that it did not fully mitigate the increase in flood risk downstream.

The proposed mitigation scheme sets out to 're-create the overland flow routes in a controlled manner' and 'maintain a balance between in-channel and overland flow', the proposals include the following elements as set out in Section 5.1.5 of the FRA and illustrated in Figure 5.2:

- Enlargement of the most restricted reach of the Picts Lane culvert
- Reduction in length of Picts Lane and Station Road Site culverts
- Creation of two new open channel reaches, one upstream and one downstream of the proposed road
- Creation of two swales to direct overland flow towards the new open channel reaches. These swales will also provide a link between the new open channels and the existing floodplain which would otherwise be cut off by the construction of the new road
- Provision of one box culvert (2.4m W x 1.5m H) under the proposed new road to link the two new open channel reaches
- Provision of a number of pipe culverts to link the swales to the new open channel reaches (4 no. 450mm diameter pipes laid in parallel per swale)
- Provision of a low bund across the top of the entrance to the remaining reach of the Station Road site culvert, extending upstream along the eastern boundary of the site to tie into higher ground.

The proposed mitigation scheme has been assessed to ensure that there were no offsite flood risk impacts during the design event of 1 in 100 year plus 80% climate change allowance. Figure 5.5 shows that the area downstream of the Station Road junction, there is a reduction in flood extent at Willow Way and Manor Park Avenue when comparing the baseline and post mitigation scenario. There are two areas of identified increase in flood risk, where the proposed road joins the Station Road junction and on Picts Lane. The FRA sets out that the change in risk at Station Road is due to levels on the new road being lower than the existing road as the road drops down to connect to Station Road. It occurs for events greater than 100 year plus 35% climate change allowance and lies within the red line boundary of the site.

The area at Picts Lane is associated with the new road alignment meaning that the overland flow route has moved northwards, a swale on the eastern bank of the road is planned to capture and

convey overland flow in this location. The FRA states that the flooding in this area is located within the red line boundary and does not increase risk to any properties.

In our previous response issued on 22nd August 2022, the LLFA raised several clarification points in relation to the Hydraulic Modelling Report, the report has subsequently been revised to address most of the points raised.

- The Hydraulic Modelling Report has been updated to include the most up to date NFRA Peak Flows dataset and the results are imbedded in a technical note (ref. PRSRL-STN-PH1-XX-R-HY_0004, October 2022)
- Clarification on the lumped and sub-catchments referred to in Table 3.2 has been provided within Section 3.10.1.
- Clarification on the manning's roughness coefficient used for the culverts has not been provided however, the proposed value of 0.025 is considered appropriate.
- As requested, a schematisation for the network arrangement around Park Mill has been provided within the technical note (ref. PRSRL-STN-PH1-XX-R-HY-0004, October 2022)
- Figure 5.3 includes flow direction arrows and meets the request made by the LLFA
- Figure 5.2 has not been amended to include the outlet to the ordinary watercourse at Station Road, however this is shown on drawing no. PRSRL-STN-PH1-XX-DR-P-0016 P03
- The request to include depth-difference maps to aid analysis has not been met
- Input and results files have been provided

The mitigation scheme incorporates several culverts which can be at risk of blockage should there be a failure to adequately maintain those structures. It is noted that the Hydraulic Modelling Report does not contain any analysis on blockage scenarios. If you are minded to approve the above proposals then I would expect that blockage analysis is undertaken at detailed design.

Groundwater flood risk: The FRA suggests that the site is at moderate risk of groundwater flooding, based on the Wycombe District Council Strategic Flood Risk Assessment. The Ground Conditions Assessment sets out a preliminary ground investigation was carried out in July 2020 and October 2020, the report of these investigations has not been included in the Ground Conditions Assessment or the FRA. There is a mention of observed groundwater levels within the Surface Water Drainage Strategy (Appendix F), which notes that groundwater levels were observed between 0.15m to 0.37m below the ground surface but no further information or evidence has been provided.

The LLFA holds information on groundwater flood risk from two data sources, the British Geological Survey Infiltration SuDS Map (2016) and the Jeremy Benn Associates Groundwater Flood Map (2016).

The Infiltration SuDS Map indicates that the water table is anticipated to be within 3m of the ground surface. The Groundwater Flood Map shows the groundwater level in the area of the proposed development to be between 0.5m and 5m of the ground surface for a 1 in 100-year return period. This means that there is a risk of flooding to subsurface assets, but surface

manifestation of groundwater is unlikely. Land at the former Sumitomo Electric Hardmetal site may be at higher risk, groundwater levels may be within 0.025m of the ground surface for the 1 in 100-year return period. This means that there is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at the ground surface and has the capacity to flow overland and/or pond within any topographic low spots.

It is therefore agreed that there is a moderate risk of groundwater flooding. In my previous response I highlighted that an assessment of the implications of the groundwater flood risk on the design of both surface and sub-surface assets had not been included in the FRA. The FRA (4.5.8) has been amended to state that geocellular storage crates and swales are to be lined, control manholes will have no return values. If you are minded to approve the application, at detailed design the applicant will be required to demonstrate that the subsurface drainage assets will not be subject to flotation.

Surface Water Drainage – The proposal: The highway and associated infrastructure will result in a total impermeable area of 1.248ha, to manage the surface water runoff generated, a surface water drainage strategy (ref. PRSRL-STN-PH1- XX-R-C-0002 Rev. P01, February 2022, Stantec) is provided. The Strategy sets out that surface water runoff will be captured by a system of gullies and pipes and conveyed to a geocellular tank, attenuation basin or to conveyance swales and finally discharged to the watercourse.

Method of surface water disposal: The surface water drainage strategy sets out that infiltration as a means of surface water disposal was discounted due to high observed groundwater levels. As mentioned above under the groundwater flood risk section, groundwater was encountered at depths between 0.15m and 0.37m. The specifics of the ground investigations carried out on site are not known as the reports have not been provided for review. Being mindful of this, the observed groundwater levels would suggest that a 1 metre freeboard between the base of any infiltration component and the water table is not achievable. On this basis, it is acceptable that infiltration is discounted in principle, but the applicant must provide the ground investigations to support the conclusions of the surface water drainage strategy.

In accordance with the drainage hierarchy, the next method of surface water disposal to investigate is to a nearby watercourse. This is the chosen method of surface water disposal set out in the strategy, this is due to the presence of the ordinary watercourse on the site and that the existing highway network discharges to this location.

Proposed discharge rates: The Strategy sets out that surface water runoff from the development will be controlled to existing brownfield rates, this in accordance with the Non-statutory Technical Standards for SuDS for previously developed sites.

The Proposed Drainage Layout (drawing nos. PRSRL-STN-PH1-XX-SK-C-0024 Rev. P02 and PRSRL-STN_PH1-XX-SK-C-0025, Rev. P02) illustrate the indicative surface water drainage system. The drainage system is split into three catchments, the extents of the north, middle and south catchments are shown on the Proposed Drainage Layout (drawing nos. PRSRL-STN-PH1-XX-SK-C-0024 Rev. P05). The proposed discharge rate for the 'north – Summerleys Road' catchment has been amended to 38.6l/s. The Strategy sets out that the catchments for the 'middle and south – Station Road junction and Picts Lane' has been combined as these catchments drain directly to the

conveyance swales. It is not proposed to match the 1 in 1 year brownfield rate for these catchments, instead different discharge rates have been calculated for the various return periods. The proposed discharge rates are all less than the calculated brownfield runoff rates for the equivalent return period. In my previous correspondence I highlighted some differences between the impermeable areas quoted on Existing and Proposed Impermeable Areas and Drainage plan (drawing no. PRSRL-STN-PH1-XX-SK-C-0023, P04) and details within the strategy, this has now been rectified. The Proposed Drainage Layout (drawing no. PRSRL-STN-PH1-XXDR-P-0016 Rev. P03) contains the proposed discharge rates for the surface water drainage scheme.

Runoff volume: Section 4.4 of the Strategy presents how the increase in runoff volume will be managed. It has been calculated that the proposals will increase impermeable area and therefore the runoff volume for the 1 in 100 year 6 hour storm event will increase by 110m³. The strategy also calculates a comparison of the site prior to the demolition of the commercial buildings, and this is estimated to have reduced runoff volume by 526m³ due to the overall reduction of impermeable area associated with the sites proposed use.

Attenuation requirements: The Strategy (4.5.1) states that the northern catchment will contain surface water runoff up to the 1 in 30 year event within the network and then events greater than this up to the 1 in 100 year plus 40% climate change event will be contained within the highway, as illustrated in Figure 4.1. This is in line with the Non-statutory Technical Standards for SuDS.

It is understood that the remaining networks lie within the middle and south catchments. The Strategy sets out that three sub-catchments use oversized pipes and geo-cellular storage to attenuate flows up to the 1 in 100 year plus climate change event. In the absence of a detailed catchment plan, it is presumed that one sub-catchment is located at the Station Road junction which shows the location of the tank. The two other sub-catchments are presumed to be in the south at Picts Lane, which have main pipe runs which have a diameter of between 300mm to 600mm discharging into watercourse two-stage channel section.

As mentioned above, the surface water drainage network discharges at numerous points to the watercourse. The Strategy has modelled surcharged outfalls on each of the networks to demonstrate that the proposed networks can continue to operate as designed in a flood event, the findings are summarised in Table 4.3. This table shows that four of the seven networks are unaffected. An increase in discharge rate of 0.3l/s is anticipated in the northern swale. The Station Road and Summerleys Road catchments are shown to have a reduction in discharge rate of 8.9l/s and 7.2l/s respectively. It is reported that the decrease in discharge at the Summerleys Road catchment will result in 3.6m³ of flooding at the attenuation basin and follow exceedance pathways to the watercourse.

Climate change allowances: New climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from surface water flooding. As mentioned, the applicant is required to submit calculations for the 3.3% AEP with an allowance for climate change, this information is contained in Appendix H of the Surface Water Drainage Strategy.

Advice from the Lead Local Flood Authority for Land Drainage Consent: Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority is required for any proposed works or structures in the watercourse. After planning permission has been granted by the LPA, the applicant must apply for Land Drainage Consent from the LLFA, information and the application form can be found on our website. Please be aware that this process can take up to two months.

Tree Officer – No objection. Planning conditions sought relating to approval of detailed arboricultural method statement (AMS) & tree protection plan, detailed planting scheme including tree pit design informed by adjacent grey infrastructure, underground services, street lighting and drainage. Planting scheme to include soil improvement in soft landscaped areas to ensure that the highly-disturbed soil is amended to provide suitable growing conditions.

Canopy cover calculations: The canopy cover calculations in the submitted documents indicate a retained canopy of 24% and proposed canopy from new tree planting of 15%, 13% greater than the minimum canopy cover of 25% required by policy DM34 of the Wycombe Local Plan.

Partial removal of G68 & G69 is identified on the Arboricultural Impact Assessment (AIA), but not accounted for in the canopy calculations or the accompanying maps. The understanding is that this is due to the trees being included within the red edge, but beyond the scope of Phase 1. It is acknowledged that these trees are retained for the time being, therefore their inclusion as retained canopy is acceptable. However, it is also recognised that these trees will be lost to subsequent phases and their mitigation will need to be considered at that time. In the interim they will continue to contribute to ecosystem services and serve as habitat.

The Tree Protection Plan (TPP) refers to partial loss of G94 (Group 2), but it is not clear whether this is reflected in the canopy cover calculations.

With these points in mind, every opportunity for suitable canopy creation should be exploited and the final amount should not be overly reliant on canopy which is not going to be retained long-term.

If there are no clashes with Suds, Highways or ecological objectives, it may be possible to increase the amount of proposed new plantings in the larger green spaces and adjacent to the highway.

There are few minor discrepancies/areas for clarification between the tree surveying the AIA and the Removal/Retention Plan (listed below) but the impact of these differences is likely to be absorbed in the projected canopy cover without the proposal dropping below the policy requirement. The finalised retention/removal of trees could be confirmed as an amended canopy cover calculation. If the result is a significant drop in canopy cover, this may need to be revisited as part of the landscaping/mitigation.

Remedial tree work and removals: The AIA states that none of the retained trees require remedial tree work to facilitate the development or to reduce the likelihood of any excessive pressure after the completion of the development. This can be confirmed as part of a fully detailed AMS/TPP.

Several trees proposed for removed are subject of Tree Preservation Orders (TPOs). T57 (EM Horse chestnut), T197 (EM ash) and G201 (2 x EM ash, 2 x EM Field maple) are proposed for

removal as part of Phase 1 works. The loss of protected trees is not a decision to be taken lightly, but it is acknowledged that the loss of these trees will be mitigated by new tree planting.

Hedgerows were assessed in accordance with BS5837:2012 as opposed to the Hedgerows Regs. Nevertheless, the hedgerows would not have been considered 'important' under the Regs and their loss can be satisfactorily mitigated as part of the landscaping.

Tree Protection: Where the Root Protection Area (RPA) of retained trees conflicts with the works, special methods will be necessary to ensure that these trees are not damaged. Positioning of fencing may vary at different phases of development and supervision for this will be key. These measures can be detailed within a detailed Arboricultural Method Statement and updated TPP.

Species Selection/Tree planting: For the most part, the species section looks acceptable. It is noted that there are several large-growing species with spreading habits reasonably close to the main vehicular/pedestrian route. In my previous experience with an urban local authority, previous management to maintain clearance to carriageways and pedestrian routes is not an unsurmountable task. But, if Highways have particular/persistent concerns, this could be revisited and more upright, large-growing species could be substituted.

There are a number of large-growing species close to hard-surfaced routes and the tree pit design will need to be designed with the (long term) potential for displacement as roots grow.

The inclusion of *Betula pubescens* in the SuDS will need to be substituted for a species more tolerant of waterlogging if the area anticipated to be submerged for long periods.

The location of the *Quercus robur* close to the boundary with 12 Goodearl Place may place a burden on the resident long term with regards to overhanging branches (although the tolerance of encroachment is subjective and could be addressed through common law rights). This could be avoided by a slight adjustment in planting location.

Options may be limited, but ideally areas of currently undeveloped soil which are now identified for new tree planting should be protected/fenced off to help avoid compaction. As an alternative, some soil amendments may need to be included in the landscaping scheme to improve growing conditions.

Re: Planting locations, there may be some clashes between planting locations and position of street lights/furniture and underground services. This should be reviewed by the retained arboriculturalist in close communication with the relevant disciplines.

Ecology Officer - Planning conditions will be needed to address mitigation, compensation and enhancement issues. The BNG calculations show a net loss. It is suggested that this is addressed by a biodiversity net gain offset scheme.

The need for a very wide shared use path is questioned. More space could be made in the road width to accommodate cyclists and this could leave more of the verge intact to help with the biodiversity calculations, tree planting and making a more attractive scheme.

Further clarification/information is required relating to:-

- Bat surveying and tree roosting potential
- Assumptions made about badgers

- Small size of slow worm population
- Appropriateness of “open mosaic habitat” within the landscape design scheme

The new lengths of watercourse need to be more natural than what is shown on the plans. The proposed plans constrain the appropriate design of the watercourse and so more detailed designs should be put forward now which amend the form of the watercourse and its banks.

Newt Officer – No further information is required. The provision of a precautionary working statement in the form of reasonable avoidance measures/non-licenced method statement is recommended.

Natural England – No objection. The proposed development will not have significant adverse impacts on statutory designed sites.

Planning Casework Unit (DLUHC) - No comment to make on the environmental statement.

Rights of Way Officer – The footprint of the development would not impact upon local rights of way network, nor any designated common land or village green. Overall, the proposed new network of footway and cycleways within the application would compliment existing footpaths linking ultimately with the wider housing allocation.

Turning to the southern end of the link road, the Ickniel Way is a regional promoted route for walkers, horse riders and cyclists spanning 170 miles, between The Ridgeway near Chinnor and the Peddars Way, Thetford. The route passes along the roadside verges or footways of Shootacre Lane, Picts Lane, Station Road, Poppy Road and Wycombe Road, before joining the Ridgeway National Trail. In addition, National Cycle Network NCN 57 passes along Picts Lane from the railway bridge, turns left onto Station Road and right onto Manor Park Drive.

With this in mind, the short connection A to B from the link road to Picts Lane would benefit from being 3m (rather than 2m) wide to adequately accommodate these users, though I appreciate space is limited at this location. It may be that confident cyclists will be content using the link road and turning right onto Station Road, but others will prefer the quieter length of Picts Lane with reduced traffic.

Therefore, to allow free-flowing cycle and horse traffic along Picts Lane a 3m width is recommended along the 13m or so length between A and B.

Southern Gas Networks Plc - SGN have apparatus within the planning application boundary. The actual location and details will need to be determined on site. SGN request that should planning permission be granted an informative note is appended to the decision notice stating that in advance of any works near that apparatus the Applicant will enter into an Asset Protection Agreement with SGN. SGN expects that any associated costs for this will be met by the Applicant.

Thames Water – The proposed works could affect our apparatus and may need diverting. Please review our guidance on our website.

Representations

Amenity Societies/Residents Associations

Princes Risborough Bypass Action Group (BANG) – Object. Detailed comments provided summarised as follows:

- Increased traffic and highway safety - Shootacre Lane and Picts Lane are widely used by pedestrians, cyclists and equestrians. We have obtained expert evidence which identifies multiple safety issues with the existing infrastructure on Shootacre Lane and Picts Lane and which confirms that increased traffic will result in more conflict with these non-motorised users and more danger. This worsening of highway safety in the neighbouring areas of Shootacre and Picts Lane is incompatible with both national and local planning policy.
- Unknown duration – future planning applications and developer contributions are anticipated which will eventually result in the new infrastructure in phases 2 and 3 being built. As we move into a predicted recession there is no guarantee that these future planning applications will ever be made. The duration of the increase traffic levels on Shootacre Lane and Picts Lane is therefore unknown and could even be permanent. This would be contrary to the local plan which only envisages additional traffic on Shootacre Lane for a limited period.
- Local Transport Plan – the proposed PRSRL development conflicts with policies in the Local Transport Plan as the effect on Shootacre lane and the unimproved sections of Picts Lane will be to discourage walking and cycling and to crease road safety.
- Community severance/lack of safe crossing – the PRSRL proposals will create a new road with increased levels of faster flowing traffic. This will create a barrier effect for residents of Shootacre Lane and southern parts of Picts Lane, discouraging journeys on foot or by cycle. This is exacerbated by the lack of safe pedestrian crossing place on the improved section of Picts Lane.
- Construction traffic – Shootacre Lane and the unimproved sections of Picts Lane are not suitable for use by construction traffic because the carriageway is not wide enough to allow two trucks to pass safely. In any event, use by construction traffic would cause an unacceptable increase in highway safety risk in itself, due to the increased conflict between this type of traffic and pedestrians, cyclists and equestrians.
- Unreliable traffic modelling on Shootacre Lane – we have obtained further expert evidence which demonstrates that the traffic modelling for Shootacre Lane is not fit for purpose and should not be relied upon.
- Junction changes – The current application contains references to possible future changes to the Shootacre Lane/Picts Lane junction. We have multiple objections to any such future proposal.

Other Representations

The following summarised comments have been received objecting to the proposal:

- The development is unnecessary as there are already adequate roads.
- Air, light, noise and vibration pollution and impact. Impact upon health and well-being.
- Disturbance during construction.
- Safety concerns from increased traffic and HGVs especially upon walkers, cyclists, horse riders.

- Junction of Shootacre Lane and Picts Lane is already dangerous.
- Inadequate provision for pedestrians to cross the new road when going into town.
- Access from driveways will become dangerous.
- The whole road will cut through the AONB and rural Chiltern lanes will be destroyed.
- The locality has a high water table & underground springs so building a road and more houses may increase risk of flooding. Mitigation measures need to be put in place to prevent flooding during construction phase.
- Construction of the road will cause major disruption and inconvenience to local residents. Shootacre Lane should not be used for routing construction traffic as it is not wide enough or safe for non-motorised users.
- Speed limit to Shootacre Lane should be reduced from 40 to 20 mph and traffic calming introduced.
- Assurance needed about mitigation to ensure structural integrity of homes is protected from construction and vibrations. Concerned about subsidence.
- Topographical survey is inadequate.
- This first phase should not go ahead until plans, dates and funding for other phases and the Culverton Link are confirmed. There is no certainty whether developers will deliver funding for the later phases. The Culverton Link should be delivered early so that increase in traffic on unsuitable roads is avoided.
- Do not agree to land being taken and property would be blighted. Property depreciation due to blight.
- Infringement of human rights by taking land that is privately owned. Limited information about compensation.
- Unclear why a section of land is included within application site boundary when no development is proposed to be carried out on it at this stage. Lack of clarity about case for compulsory purchase.
- Loss of privacy and communal amenity area around property.
- Extent of land required is excessive and the scheme can be more efficiently designed so as not to impact upon future development of adjacent land at railway station site.
- The scheme would be out of keeping with the rural setting which has limited street furniture.
- Query whether traffic modelling should be revisited following the pandemic's impact on travel behaviour.
- Inadequate public consultation.

APPENDIX B: Site Location Plan

