

PL/22/2678/OA – Appendix A

Consultee Comments

Environmental Health Contaminated Land

I have reviewed the Desktop Study Report prepared by Your Environment (Report ref. YEX3047).

The preliminary risk assessment has identified a number of plausible contaminant linkages that require further investigation. The Environmental Consultant has recommended that an intrusive investigation be carried out.

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

The application requires the following condition(s):

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority
 - i. A site investigation, based on the Desktop Study Report prepared by Your Environment (Report ref. YEX3047) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments.
 - ii. The site investigation results and the detailed risk assessment (i) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 - iii. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (ii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

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

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

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

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 1.

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

Environmental Health Noise Officer

I have no fundamental objection to this proposed residential development.

However, given the scale and likely duration of the associated construction phase, should it proceed, and the proximity of nearby dwellings I would ask that the Local Planning Authority minimises the impact of noise, dust, etc., on the local community by way of the following

Condition:

No part of the development hereby approved shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall set out, as a minimum, site specific measures to control and monitor impacts arising in relation to noise and vibration (with particular regard to piling and power floating activities), dust and fumes. It shall also set out arrangements by which the developer shall maintain communication with local stakeholders in the vicinity of the site, and by which the developer shall monitor and document compliance with the measures set out in the CEMP. The development shall be carried out in full accordance with the approved CEMP at all times.

Please note this memo does not include comments relating to air quality and contaminated land, where relevant, these comments will be provided separately.

Heritage Officer

As the NPPF states, heritage assets are an irreplaceable resource and it is important to conserve them in a manner appropriate to their significance. In heritage terms this proposal is unacceptable since it fails the requirements of s. 16 and 66 of the P (LB&CA)A 1990, the requirements of the heritage policy requirement of the Local Plan and guidance set out in Section 16 of the NPPF

This is my second consultation response and follows on from the submission of amended drawings.

The site affects the setting of a Grade II listed building (Thorney House) located to the east of the site.

Following on from comments received, the applicant has now amended their proposal with an area of public open spaces along the eastern boundary and the use of street planting to soften the development.

Thorney House lies 30m east of the site at its closest point. The building was listed in 1955 and the description describes a 18th century brick property with string course at first floor, of two storey

and an old tile hipped roof. The description also notes five sash windows at first floor level set under eaves and with glazing bars and a central open porch with paired Tuscan columns, entablature and flat roof and two French windows.

The original estate of Thorney House was far greater than today. The first edition OS map shows Thorney House by the 1870's. It had the same plan as today, with access as now from the north west and the main frontage facing north, as indicated by the porch. The ground's were well wooded at that time and orchards lay south of the house.

The development site was part of a larger rectangular field running southwards from Richings Way and defined to the west by what is now Oldslade Lane. The field boundaries were lined in trees. Richings Park is marked as a designed landscape to the west and St Leonard's Church appears to have been Thorney House's private chapel.

The site today is mainly grass with boundary tree and shrub planting including trees to the east and western boundary. Whilst this largely screens the intervisibility between Thorney House and the site in summer months, in winter months this vegetation coverage would be significantly less and the proposed houses would be seen in the setting of the listed building.

Whilst the proposed layout has now been amended to include an area of open space to the east of the site in order to provide a landscape buffer, I still consider that the development as proposed would have a harmful effect to the historic open farmland landscape nature of the designated heritage asset and would further erode and compromise its setting.

I am also concerned at the likely significant increase in noise and light pollution which would also intrude in the setting of the designated heritage asset.

Para 199 of the NPPF confirms that great weight should be given to the asset's conservation and Para 200 requires that any harm to the significance of a designated heritage asset (from its alteration or development within its setting) should require clear and convincing justification.

The development proposed is considered to cause less than substantial harm to the designated heritage asset. In such circumstances, Para 201 of the NPPF states that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Planning (Listed Building and Conservation Areas) Act 1990

The proposals would due to the inter-visibility, loss of openness and additional noise and light pollution would not preserve the architectural and/or historic interest of the listed building and does not comply with sections 16/66 of the Act.

NPPF

The proposal due to the inter-visibility, loss of openness and additional noise and light pollution would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202 therefore applies. Paragraph 189/197/199 of the NPPF should also be considered in determining the application.

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

That the application does not comply with the relevant heritage policy and therefore unless there are sufficient planning reasons, it should be refused for this reason.

Iver Parish Council

The parish council object on the grounds that the site is in the Green Belt and the proposal is inconsistent with objective 5.2 (to protect the semirural environment and the Green Belt) in the

Ivers Neighbourhood Plan. The parish council supports the comments submitted by the Urban Designer. If minded to permit, the parish council requests mitigation funding for the construction of walkways and a cycleway to Iver rail station from the development. The parish council also request that the proposed 40% affordable housing for local residents must be guaranteed within the development.

Housing Officer

Thank you for requesting comments on affordable housing.

This application falls within the South Bucks Local Plan area and also the Iver Neighbourhood Plan area. Attention should be paid to the relevant policies with reference to the South Bucks Core Strategy and the Affordable Housing Supplementary Planning Document.

Number and tenure of affordable homes

We note that the proposals for affordable housing on the site are as follows:

- Up to 30 homes to be provided on the site.
- 13 (43%) of the dwellings will be offered as Affordable Housing units.

The current South Bucks Affordable Housing Supplementary Document (SPD) states that at least 40% of all dwellings in schemes of 5 units and above (gross), or on sites of 0.16 hectares and above (where there is a net gain in the number of dwellings) should be affordable, unless it is clearly demonstrated that this is not economically viable.

Therefore, we are satisfied that a sufficient number of affordable homes will be provided on this site.

Tenure Mix and Property Type

We note that the proposed breakdown of both tenure and property size among the affordable homes will be as follows:

| Tenure | Property size and type | Number to be provided | Size percentages |
|------------------|------------------------|-----------------------|------------------|
| First Home | 1 bedroom flat | 2 | 16% |
| First Home | 2 bedroom flat | 2 | 46% |
| Affordable Rent | 2 bedroom flat | 2 | |
| Shared Ownership | 2 bedroom house | 2 | |
| Affordable Rent | 3 bedroom house | 4 | 38% |
| Shared Ownership | 3 bedroom house | 1 | |

The Housing and Economic Development Needs Assessment 2016 for South Bucks recommends an affordable housing tenure split, for Affordable Rent and Intermediate, of 80% Affordable Rent and 20% Intermediate. Therefore, we recommend that on a scheme of 13 affordable homes the tenure split should be as follows:

- 3 First Homes
- 8 Affordable Homes for Rent
- 2 Intermediate (including other low cost home ownership options such as shared ownership)

The Buckinghamshire Housing and Economic Needs Assessment 2019 recommends that the size mix for affordable housing in South Bucks is as follows:

- 1 bedroom 15%
- 2 bedroom 38%
- 3 bedroom 34%
- 4 bedroom 13%

Therefore, we recommend that an affordable housing development which contains 13 consists of the following size mix: 1 bedroom = 2 homes; 2 bedroom = 5 homes; 3 bedroom homes = 4 homes; 4 bedroom home = 2 homes.

Lead Local Flood Authority – 16th January 2023

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

- Flood Risk Assessment and Surface Water Drainage Strategy (AEG0198_SL09DE_IVER_07, 20/12/2022, Aegaea)
- SW Drainage Arrangement (198-D001, 14/12/2022, Aegaea)

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

Surface water drainage

The applicant is proposing to manage surface water runoff generated by the proposed development by attenuating runoff in an attenuation basin at the south of the site, prior to pumping it to an attenuation tank at the north of the site. From the attenuation tank, runoff will be pumped to the northern site boundary, where it will be discharge to the public foul sewer at a maximum rate of 3.7l/s (equivalent to the 1 in 100 year +40% climate change allowance storm event). It is also noted that Type C permeable paving has been included to provide additional attenuation and water quality benefits. Due to the use of a pump onsite, where necessary we request that sufficient storage is provided and the inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station.

Discharge Rates

The applicant has provided calculations for the greenfield runoff rates up to the 1 in 100 year +40% climate change storm event. Calculations of the greenfield rate plus an urbanised factor of 14.79% have also been provided to gain an understanding of the current runoff. Whilst brownfield rates were requested, it is understood that the site is predominately greenfield with only a small area of hardstanding, therefore these calculations are acceptable to the LLFA. These demonstrate that for the Qbar event, current runoff rates are approximately 3.1l/s, and for the 1 in 100 year, rates are approximately 8.8l/s. The proposed discharge rate is 3.7l/s, therefore betterment has been provided.

Drainage Hierarchy

The applicant has provided sufficient justification for the proposal to discharge to the foul network at this stage of the planning process, as infiltration has been discounted following ground investigations and third-party permission to connect to the nearest watercourse has not been obtained. Discussions with the applicant have highlighted that the third-party landowner may be willing to grant permission to connect to the watercourse once planning permission has been granted. It has also been discussed that Thames Water may undertake updating works to allow a connection to the surface water sewer should planning permission be granted. These options must be investigated further at detailed design and pursued prior to commencement of the connection to foul. Sufficient justification must be provided should these options be exhausted.

Calculations

The applicant has provided summaries of the critical storm durations per item of the proposed drainage system up to the 1 in 100 year +40% climate change storm event, including a 10% urban creep allowance. The calculations demonstrate that the system does not flood up to the 1 in 100 year +40% climate change storm event. It is noted that permeable paving has not been included in the calculations, therefore additional storage will be available in the scheme. In response to the LLFAs previous comments, the freeboard of the proposed attenuation basin has been increased to 300mm.

The proposed attenuation basin will provide a total of 217.17m³, and the attenuation tank will provide 316.66m³.

Drainage Layout

An indicative drainage layout has been provided. The attenuation volumes illustrated match those in the calculations. At detailed design, a detailed surface water drainage layout is required to show the location of the proposed components and the connectivity of the system. The layout must also show pipe numbers, gradients, and pipe sizes complete, together with storage volumes of all SuDS components

Construction Drawings

Construction drawings of all SuDS and drainage components included in the drainage strategy must be provided. Where applicable, this must also include any flow control device. All construction details must include cover and invert levels, depths/diameters of pipes, along with details of construction materials and demonstration of anticipated water levels for the calculated storm durations up to the 1 in 100 + 40% climate change allowance storm event.

Water Quality Assessment

Water Quality Assessment The applicant has provided a Water Quality Assessment based on the proposed scheme. This demonstrates that the proposed attenuation basin provides sufficient water quality treatment. This, however, should not stop the applicant from seeking to provide additional above-ground SuDS such as rain gardens/platers and tree pits to provide further benefits.

Maintenance

The applicant has provided an indicative maintenance schedule for the proposed scheme. At detailed design, this must be updated to reflect any revisions made to the scheme. The applicant is proposing to utilise the existing connection to the foul network. As stated in Table 3 of the FRA and SuDS Strategy, this will require a CCTV survey to assess the condition of the connection at a later stage in planning, and details of any necessary updating works must be provided. We will also require a maintenance plan for the pumping station at detailed design.

I would request the following condition be placed on the approval of the application, should this be granted by the LPA:

Condition 1

No works (other than demolition) shall begin until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- All SuDS components agreed at outline

- Assessment of SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary
- Demonstrate that water quality, ecological and amenity benefits have been considered
- Existing and proposed discharge rates and volumes
- Topographic survey including details of the existing connection to the foul sewer
- Ground investigations including:
 - Infiltration in accordance with BRE365
 - Groundwater level monitoring over the winter period
- Subject to infiltration being inviable, the applicant shall demonstrate that an alternative means of surface water disposal is practicable subject to the drainage hierarchy as outlined in paragraph 056 of the Planning Practice Guidance.
- The applicant must seek to obtain permission to discharge to the watercourse or surface water sewer. Sufficient justification for exclusion must be provided if these discharge receptors are not viable
- 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 40% climate change storm event should be safely contained on site.
- CCTV survey of existing drainage infrastructure, including the existing connection to the public foul sewer
- Detailed drainage layout with pipe numbers, gradients, and pipe sizes complete, together with storage volumes of all SuDS components
- Full construction details of all SuDS and drainage components
- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- 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.
- Flow depth
- Flow volume
- Flow velocity
- Flow direction
- Maintenance schedule for the drainage system
- Maintenance plan for the pumping stations and details of a warning system in the event of pump failure

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

Lead Local Flood Authority 7th November 2022

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

- Flood Risk Assessment and Surface Water Drainage Strategy (AEG0198_SL09DE_Iver_07, 22.07.2022, aegaea)
- Groundwater Monitoring Report (YEX3295, April 2022, Your Environment Ltd)
- Soil and BRE Report (YEX3012, December 2021, Yor Environment Ltd)
- Site Location Plan (SLP-01, 14.07.2022, Insitu Design Ltd)
- Concept Masterplan (CMP-02, 15.07.2022, Insitu Design Ltd)
- Response to LLFA Comments (13.10.2022, aegaea)

The LLFA requires additional information prior to the determination of the application.

Surface water drainage

The applicant is proposing to manage surface water runoff generated by the proposed development by attenuating runoff in an attenuation basin at the south of the site, prior to pumping it to an attenuation tank at the north of the site at a rate of 50l/s. From the attenuation tank, runoff will be pumped to the northern site boundary, where it will be discharge to the public foul sewer at a rate of 5.1l/s. The LLFA are satisfied that the applicant has shown compliance with the drainage hierarchy at this stage. Further conversations to allow the connection to a watercourse will be held at detailed design. At this stage, the LLFA request that the applicant provides a topographical survey demonstrating the existing connection to the sewer network to demonstrate the viability of the scheme.

Discharge Rates

Section 4.6 of the FRA states that the greenfield runoff rate for the proposed impermeable area has been calculated. The Qbar rate calculated is 1.6l/s, and the 1 in 100-year rate is 5.1l/s. However, the applicant is required to use the total site area to calculate the greenfield runoff rate. Updated calculations and greenfield rates must be provided.

The applicant is proposing to discharge at the 1 in 100-year greenfield rate. We would encourage the applicant to lower the proposed rate of discharge to the Qbar rate. It is unlikely that most storm events will be equivalent to the 1 in 100-year storm, and therefore allowing runoff to drain at the 1 in 100-year rate may lead to increased runoff for smaller storm events and increase flood risk downstream of the site. There are now vortex flow control devices which can achieve rates of 1l/s with a 600mm shallow design head and still provide a more than 50mm orifice diameter.

The applicant is also required to provide calculations of the existing (brownfield discharge rate) for the 1 in 1, 1 in 30 and 1 in 100 year calculated using the Modified Rational Method to ensure that the proposal provides betterment to the existing scheme in accordance with S3 of the Non-Statutory Technical Standards for SuDS.

Ground Investigations

Infiltration Rate Testing

Infiltration rate testing was undertaken onsite in December 2021 in 10 trial pits across the site to depths of 1.3mbgl. None of the tests across the site achieved the required 25% effective depth. None of the tests achieved even the 75% effective depth, therefore indicating that infiltration is not a viable option for surface water disposal onsite. Provided trial pit logs demonstrate the encountered geology, with clay being the predominant geology onsite.

Groundwater Monitoring

Groundwater monitoring was undertaken in 6 boreholes across the site over in January and February 2022. Results of this testing indicate that the highest recorded groundwater level was 1.8mbgl in the southernmost borehole (WS1), and the lowest was 3.38mbgl in WS5 in the north/centre of the site.

Calculations

The applicant has provided summaries of the critical storm durations per item of the proposed drainage system up to the 1 in 100 year +40% climate change storm event. The calculations demonstrate that the system does not flood up to the 1 in 100 year +40% climate change storm event critical storm duration.

It is noted that the freeboard for the pond/attenuation basin feature has been given a value of 0. It should be noted that ponds and basins must have a freeboard of at least 300mm as per Section 23.9 of the CIRIA SuDS Manual (2015). Based on the inputs for Cellular Storage 1 (the larger of the two attenuation tanks), it appears that the tank provides 750.75m³ of attenuation, however, the tank is shown to provide only 741.75m³ on the provided Drainage Layout. The LLFA request clarification regarding this discrepancy, and request that the Drainage Layout and calculations are updated to reflect the correct volume.

Additional SuDS Components

As discussed with the applicant and addressed in their response, Type C permeable paving should be incorporated for the road and parking areas onsite as these provide water quality treatment benefits and can provide additional attenuation. Additional above-ground SuDS such as rain gardens/planters and tree pits should also be investigated.

The applicant may also wish to investigate the creation of a reed bed in the proposed attenuation basin to increase the biodiversity and water quality benefits of the proposed surface water drainage scheme.

The Environment Act 2021 sets out a requirement of 10% biodiversity net gain in all new developments.

Whilst not mandatory at this time, the LLFA would strongly recommend utilising the opportunities this site presents to meet this figure. Paragraph 174 (d) of the NPPF also stipulates the requirement to provide biodiversity net gains.

Drainage Layout

The applicant has provided an indicative drainage layout. This must be updated in line with any revisions made to the scheme.

Water Quality Assessment

The applicant has provided a Water Quality Assessment based on the proposed scheme. This demonstrates that the proposed attenuation basin provides sufficient water quality treatment. This, however, should not stop the applicant from seeking to provide additional above-ground SuDS such as rain gardens/platers and tree pits to provide further benefits.

Maintenance

The applicant has provided an indicative maintenance schedule for the proposed scheme. At detailed design, this must be updated to reflect any revisions made to the scheme. The applicant is proposing to utilise the existing connection to the foul network. As stated in Table 3 of the FRA and SuDS Strategy, this will require a CCTV survey to assess the condition of the connection at a later stage in planning, and details of any necessary updating works must be provided. We will also require a maintenance plan for the pumping station at detailed design.

Outstanding Information

The following information is required in support of the application at this stage of the planning process. Please note, this summary does not constitute an exhaustive list and should be read in conjunction with the LLFAs formal response.

- Topographical survey detailing the connection to the sewer network
- Updated greenfield runoff rate using the total site area rather than impermeable area
- Calculations of the brownfield runoff rate using the modified rational method

- Clarification regarding the discrepancy between the storage volume of Cellular Storage 1 within calculations and the drainage layout, and updated calculations and/or drainage layout to support
- Updated freeboard allowance of 300mm for ponds and attenuation basins.

Advice to LPA

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

Lead Local Flood Authority 23rd August 2022

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

- Site Location Plan (SLP-01, 14.07.2022, Insitu Design Ltd)
- Concept Masterplan (CMP-02, 15.07.2022, Insitu Design Ltd)
- Flood Risk Assessment and Surface Water Drainage Strategy (AEG0198_SL09DE_Iver_07, 22.07.2022, aegaea)
- Groundwater Monitoring Report (YEX3295, April 2022, Your Environment Ltd)
- Soil and BRE Report (YEX3012, December 2021, Yor Environment Ltd)

The LLFA objects to the proposed development due to insufficient information regarding the proposed surface water drainage scheme.

Flood Risk

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the site lies in an area of very low risk of surface water flooding (meaning there is less than 0.1% likelihood of flooding occurring in a given year). An online version of this mapping data is available to view through the Environment Agency's Long term flood risk information mapping.

The Infiltration SuDS Map provided by the British Geological Survey 2016, indicates that the water table is anticipated to be within 3m of the ground surface. This means that there is a high risk of groundwater flooding, and this may have implications on both surface and sub-surface assets; as such, further investigations must be undertaken, and suitable measures implemented.

Surface water drainage

The applicant is proposing to manage surface water runoff generated by the proposed development by attenuating runoff within an attenuation basin at the south of the site, prior to pumping it to an attenuation tank at the north of the site at a rate of 50l/s. From the attenuation tank, runoff will be pumped to the northern site boundary, where it will be discharge to the public foul sewer at a rate of 5.1l/s. It is not clear to the LLFA how the surface water runoff will be captured to be conveyed to the attenuation tank. Further clarification must be provided. The LLFA would recommend using Type C (tanked) permeable paving to capture runoff. Further information regarding permeable paving is included below.

The applicant has, however, not demonstrated the viability of the scheme. Having reviewed the site plan, it appears that the applicant's ownership covers most of the distance between the land and watercourse south of the site, leaving approximately 20m of third-party land to cross. The LLFA request that the applicant investigates obtaining third party permission to connect to the watercourse. If permission is granted, the surface water drainage scheme must be revised to discharge runoff into the watercourse.

Drainage Hierarchy

The LLFA does not consider the Foul network to be a drainage system for surface water and does not consider the foul network to feature on the drainage hierarchy. This is not considered a

sustainable form of drainage. To comply with paragraph 080 of the Planning Practice Guidance (PPG) 'the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer.'

Additionally, in accordance with the Water Industry Act 1991 (as amended by the Water Act 2003); a surface water connection may not be connected to a foul water sewer without consent of the sewerage undertaker. Therefore, the applicant is required to demonstrate permission from Thames Water for a connection and Thames Water retain the right to not permit a connection of surface water to a foul network.

Ground investigations have deemed infiltration to be inviable onsite (further information below), and the applicant has discussed that a connection to the ordinary watercourse approximately 220m south of the site is unfeasible due to the requirement of third-party agreement. As aforementioned, the applicant is required to investigate obtaining third party permission to connect to the watercourse. If permission is granted, the applicant must revise the scheme to discharge to the watercourse.

Pumping Stations

The Drainage Strategy proposes to utilise pumping stations in order to make a connection with the existing sewer network. The installation of a surface water pumping station is the last resort and only allowable in situations where guaranteed maintenance of the pumps can be ensured (The SuDS Manual, 2015). The Non-Statutory Technical Standards for sustainable drainage systems (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. The Drainage Strategy does not provide information on pump maintenance and details of exceedance routes (volume, depth, and direction) in the event of failure, blockage or a rainfall event that exceeds the provided storage.

We discourage the use of a surface water pumping station, however where necessary we request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station.

Ground Investigations

Infiltration Rate Testing

Infiltration rate testing was undertaken onsite in December 2021 in 10 trial pits across the site to depths of 1.3mbgl. None of the tests across the site achieved the required 25% effective depth. None of the tests achieved even the 75% effective depth, therefore indicating that infiltration is not a viable option for surface water disposal onsite. Provided trial pit logs demonstrate the encountered geology, with clay being the predominant geology onsite.

Groundwater Monitoring

Groundwater monitoring was undertaken in 6 boreholes across the site over in January and February 2022. Results of this testing indicate that the highest recorded groundwater level was

1.8mbgl in the southernmost borehole (WS1), and the lowest was 3.38mbgl in WS5 in the north/centre of the site.

Discharge Rates Section 4.6 of the FRA states that the greenfield runoff rate for the proposed impermeable area has been calculated. The Qbar rate calculated is 1.6l/s, and the 1 in 100-year rate is 5.1l/s. The applicant is required to use the total site area to calculate the greenfield runoff rate and updated calculations and greenfield rates must be provided.

In addition, the applicant is proposing to discharge at the 1 in 100-year greenfield rate of 5.1l/s. Whilst this is demonstrating a reduction in flows to the greenfield rate, we would encourage the applicant to lower the proposed rate of discharge to the Qbar rate of 1.6l/s. It is unlikely that most storm events will be equivalent to the 1 in 100-year storm, and therefore allowing runoff to drain at 5.1l/s may lead to increased runoff for smaller storm events and increase flood risk downstream of the site. There are now vortex flow control devices which can achieve rates of 1 l/s with a 600mm shallow design head and still provide a more than 50mm orifice diameter.

Calculations

The applicant has provided summaries of the critical storm durations per item of the proposed drainage system up to the 1 in 100 year +40% climate change storm event. The calculations demonstrate that the system does not flood up to the 1 in 100 year +40% climate change storm event. Within the FRA, the applicant has stated that the critical storm duration is the 960-minute winter storm, however, it is not clear how this has been calculated. The applicant is required to provide further information regarding the inputs used to calculate the aforementioned critical storm duration. Presently, only a summary has been provided. The calculations must also demonstrate the required storage volume, or "Max Volume (m³)" for the critical storm duration to show that the proposed system provides sufficient attenuation.

It is noted that the freeboard for the pond/attenuation basin feature has been given a value of 0. It should be noted that ponds and basins must have a freeboard of at least 300mm as per Section 23.9 of the CIRIA SuDS Manual (2015) Based on the inputs for Cellular Storage 1 (the larger of the two attenuation tanks), it appears that the tank provides 750.75m³ of attenuation, however, the tank is shown to provide only 741.75m³ on the provided Drainage Layout. The LLFA request clarification regarding this discrepancy, and request that the Drainage Layout and calculations are updated to reflect the correct volume.

Drainage Layout

The applicant has provided an indicative drainage layout. This must be updated in line with any revisions made to the scheme.

Additional SuDS Components

As mentioned above, the applicant is encouraged to investigate the use of Type C permeable paving for the road and parking areas onsite as these provide water quality treatment benefits and can provide additional attenuation.

The applicant may also wish to investigate the creation of a reed bed in the proposed attenuation basin to increase the biodiversity and water quality benefits of the proposed surface water drainage scheme. The Environment Act 2021 sets out a requirement of 10% biodiversity net gain in all new developments. Whilst not mandatory at this time, the LLFA would strongly recommend utilising the opportunities this site presents to meet this figure. Paragraph 174 (d) of the NPPF also stipulates the requirement to provide biodiversity net gains.

Tree pits, rain gardens and rain planters are all excellent small SuDS which should be investigated for inclusion at this site. These will provide additional water quality, quantity, amenity, and

biodiversity benefits, thus further meeting the 4 Pillars of SuDS as stipulated in Section 2.1 of the CIRIA SuDS Manual (2015).

Water Quality Assessment

The applicant has provided a Water Quality Assessment based on the proposed scheme. This demonstrates that the proposed attenuation basin provides sufficient water quality treatment. This, however, should not stop the applicant from seeking to provide additional above-ground SuDS such as rain gardens/platers and tree pits to provide further benefits.

Maintenance

The applicant has provided an indicative maintenance schedule for the proposed scheme. At detailed design, this must be updated to reflect any revisions made to the scheme. The applicant is proposing to utilise the existing connection to the foul network. As stated in Table 3 of the FRA and SuDS Strategy, this will require a CCTV survey to assess the condition of the connection at a later stage in planning, and details of any necessary updating works must be provided. We will also require a maintenance plan for the pumping station, as mentioned above.

Outstanding Information

The following information is required in support of the application at this stage of the planning process. This summary does not constitute an exhaustive list of the outstanding detail required and it should be read in conjunction with the content of the LLFA's formal response.

- CCTV survey of existing connection to the sewer network
- Clarification as to how surface water runoff will be captured to be conveyed to the attenuation basin. The LLFA would recommend the use of Type C permeable paving.
- Pre-Planning Enquiry from Thames Water confirming capacity to accommodate flows in sewer network Investigation into obtaining third party permission to connect to the watercourse south of the site. If this permission can be obtained, the drainage scheme must be updated to discharge to the watercourse
- Updated greenfield run-off rate calculations using total site area
- Reduction of proposed runoff rate to Qbar or 1 in 30-year greenfield runoff rate
- Information on pump maintenance and details of exceedance routes (volume, depth, and direction) in the event of failure, blockage or a rainfall event that exceeds the provided storage
- Maintenance plan for the pumping stations
- Further calculations demonstrating how the 960-minute winter storm critical storm duration has been calculated. Calculations must also provide the "Max Volume (m³) to show that the proposed scheme provides sufficient storage
- Revision of the freeboard value for the attenuation pond to at least 300mm
- Clarification of the attenuation volume of the larger attenuation tank and revision of calculations and drainage layout to reflect the correct volume
- Investigation of inclusion of Type C permeable paving in the scheme.

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

Advice to LPA

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

Buckinghamshire minerals and Waste

The proposed site is situated within the Buckinghamshire Minerals Safeguarding area for sand and gravel as set out in Policy 1 of the Minerals and Waste Local Plan. With the information provided in the Environmental Report phase 1 report ref YEX3047 and the Soil Report Bre Report and Appendices ref YEX3012 I can confirm that a minerals assessment report is not required as there is evidence of previous extraction on the site.

Tree Officer 9th January 2023

The revised layout on drawing CMP-03 is a considerable improvement in tree terms. The AMS included in the tree report/AIA is based on the old layout so as previously mentioned the AMS would need to be updated for finalised scheme to ensure it fully considers ground protection measures, underground services and no dig construction required with arboricultural supervision.

I have no objection in arboricultural terms and if planning permission is permitted I recommend planning condition ST17.

Tree Officer 11th August 2022

As this is an outline application my only concern is the juxtaposition of some of the dwellings (self-build plots) shown on the plans to a number of trees situated on the boundaries which are obviously important for screening/privacy between neighbouring properties. In my opinion there should be 10m distance from these boundary trees to successfully retain them without causing significant conflict with future occupiers.

If this was an application I would be objecting to this scheme as not fully compliant with BS 5837 guidance.

Amendments are required in future applications as outlined above. An AMS would need to be updated for finalised scheme to ensure it fully considers ground protection measures, underground services and no dig construction required with arboricultural supervision.

Historic England

Thank you for your letter of 3 January regarding the above application for planning permission. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

Buckinghamshire Waste Services

I have looked at the amended plans and the amendments do not impact the swept path analysis found in the transport statement.

Therefore, Waste services have no objections towards the proposal for waste and recycling provisions at property.

Residents to present their waste and recycling at the property boundary. All collections to take place in accordance with Council policies.

The property developer is required to complete a 'Request Waste Assessment for New Development'. This form should be completed at least 6 weeks prior to the first date of occupation. This allows time for invoice to be raised and waste containers to be ordered and delivered ready in time for the new occupants.

Buckinghamshire Highways

Richings Way is an unclassified road which in this location is subject to a speed restriction of 30mph.

Within the vicinity of the site, I note that there is a continuous footway to the left of the site leading towards Langley on both sides of the road, however this is not replicated on the southern section of Richings Way to the right upon exit.

Introduction

Proposals seek outline planning consent for the demolition of the existing residential properties and buildings and the erection of up to 33 residential units. I note that this is an outline application for access matters only. The proposed 33 units would comprise of 25 houses and 8 flats and would be broken down into 2 x 1 bed units, 10 x 2 bed units, 14 x 3 bed units, 4 x 4 bed units and 3 x 5 bed units.

Trip Generation

In terms of trip generation, I note that the site currently comprises of 2 residential dwellings and an equestrian use. Whilst I appreciate that turning counts have been undertaken at the access point in both the AM and PM peak periods which indicate that the site would not generate a significant number of vehicular movements, empirical evidence has not been provided to demonstrate that this would be the case throughout the day. However, as a worst-case scenario, I will assume that the site would be subject to an intensification in use.

For the proposed dwellings, I note that the applicant has undertaken their own TRICS® (Trip Rate Information Computer System) database assessment. This TRICS® assessment indicates that each dwelling would have the potential to generate in the region of 6 vehicular movements each, two-way, per day. As the site currently houses two residential dwellings on site, the site would effectively be subject to a net gain of 31 dwellings. This would result in a total of 196 vehicular movements (two-way) per day, with 15 two-way movements expected in the AM peak hours and 14 two-way movements expected in the PM peak, respectively. As the site would be subject to an intensification in use, the access arrangements serving the site will need to be assessed in order to determine their suitability to accommodate the level of vehicular movements anticipated. I consider that the additional movements associated with the site would be within a 5% daily variation of the vehicular movements already experienced on North Park/Richings Way, I do not consider that the site would necessitate a junction capacity assessment in this situation.

In terms of visibility splays, whilst I acknowledge that the ATC data submitted by the applicant within the Transport Statement indicates that the 85th percentile of vehicles are travelling in excess of the posted speed limit in this location, the Highway Authority can only assess visibility splays based on the posted speed limit and any speeding that occurs along Richings Way is a matter for the Local Policing Authority to enforce against. As this is the case, visibility splays of 2.4m x 43m are applicable, commensurate with current Manual for Streets guidance. I can confirm that these splays are achievable from the proposed access point.

The proposed access comprises of a right/left stagger arrangement. The right/left stagger (where minor road traffic crossing the major road first turn right, proceeds along the major road and then turns left), as per DMRB guidance, is preferred to a left/right stagger because traffic turning between the minor roads is less likely to have to wait in the centre of the major road. The stagger distance between the two minor arms (Site Access and Wellesley Avenue) is short of the 50m distance required within the DMRB Guidance (18m), which could result in some sharp manoeuvres for vehicles potentially using Wellesley Avenue, however it is noted and is of relevance that this precedent already exists on Richings Way, at the junctions of Old Slade Lane and Syke Cluan. Whilst this is the case, there appears to be sufficient space within the carriageway to allow for a low number of vehicles to carry out turning manoeuvres into the junction.

Sustainability

The site is located on the southern side of Iver. The site is within 2km of local amenities in Iver and Langley town centre, such as, leisure facilities, schools, and shopping opportunities, which is considered by the Institution of Highways and Transportation (IHT) Guidelines to be the maximum 'acceptable' walking distance for pedestrians without mobility impairments.

The site is approximately 650 metres from the nearest bus stops on Bathurst Walk, which provides four services a day to Uxbridge, between the hours of 9am to 3pm Monday to Friday. Having consulted the Councils Passenger Transport Team, it is considered that the quantum of development proposed would not be sufficient to require financial contributions in this particular circumstance.

Conclusion

Mindful of the above, I have no objections to the proposals, subject to the following conditions being included on any planning consent that you may grant:

Condition 1: Within one month of the new access being brought into use all other existing access points not incorporated in the development hereby permitted shall be stopped up by raising the existing dropped kerb or removing the existing bellmouth and reinstating the footway and highway boundary to the same line, level and detail as the adjoining footway and highway boundary.

Reason: To limit the number of access points along the site boundary for the safety and convenience of the highway user.

Condition 2: No other part of the development shall begin until the new means of access has been sited and laid out in accordance with the approved drawing and constructed in accordance with the Buckinghamshire Council guide note "Commercial Vehicular Access Within the Public Highway"

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

Condition 3: No other part of the development shall begin until visibility splays have been provided on both sides of the access between a point 2.4 metres along the centre line of the access measured from the edge of the carriageway and a point 43 metres along the edge of the carriageway measured from the intersection of the centre line of the access. The area contained within the splays shall be kept free of any obstruction exceeding 0.6 metres in height above the nearside channel level of the carriageway.

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

Condition 4: No other part of the development shall commence until the off-site highway works shown in principle on drawing 8210854/6104 which includes tactile crossing points on North Park and pedestrian footpath improvements have been laid out and constructed in accordance with details to be first approved in writing by the Planning Authority in consultation with the Highway Authority.

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

Informatives:

The applicant is advised that the off-site works will need to be constructed under a section 278 of the Highways Act legal agreement. This agreement must be obtained from the Highway Authority

before any works are carried out on any footway, carriageway, verge or other land forming part of the highway.

A minimum period of 8 weeks is required to draw up the agreement following the receipt by the Highway Authority of a completed Section 278 application form. Please contact Highways Development Management at the following address for information:

Highways Development Management (Delivery team)
Buckinghamshire Council
6th Floor, Walton Street Offices
Walton Street,
Aylesbury
Buckinghamshire
HP20 1UY
highwaysdm@buckinghamshire.gov.uk

Urban Design Officer 3rd October 2022

Thank you for asking for Specialist Support on this application which has been passed onto me for comment (urban design).

Please note that I have not forwarded these comments to Admin for uploading to the portal however I am happy for these to be made available on public access.

I have reviewed the application material and note that approval is sought for access only, for up to 33 homes.

I consider that a number of key opportunities have been missed, which are critical at this stage because they have implications for the point of access and the number of new homes I consider would be contextually responsive here.

Heritage: I note comments from Fiona; and also note the applicant's Heritage Statement. The latter appears to refer to the impact of proposed development as neutral. Does positioning, scale and height of any new buildings not influence the degree of impact? On the assumption it does, surely (at the least) a more responsive approach would be to limit the impact of new development by virtue of the layout of the development; which in turn is influenced by the position of the access?

Trees: Richard has made observations about trees along the perimeter and I consider that a different layout (and in turn access) would be more sensitive to existing trees.

Character: The site falls outside the character areas set out in the Townscape Study by virtue of its being Green Belt. If we were to place the Green Belt issue to one side and look at how the design of new development should come forward (if the principle of development were acceptable), I would use the Green Suburban Road character area (immediately adjacent to the site) as a key design cues, specifically: linear streets, rectangular and deep plots and lots of structural planting (trees and hedges) within the street environment. Again, using these cues would impact on the proposed access, illustrative layout and quantum of development. Bearing in mind the need to make efficient use of land, I consider that the quantum of homes needs to be more reflective of adjacent plot character and less than the 33 proposed. The rationale for this is attached in the form of notes on a copy of the illustrative layout plan.

Storm water management: piped to a basin on the lowest part of the site. Is there an opportunity for any future applications to explore using rills or swales within the public realm? The proposed basins are (Flood Risk and Drainage Report) reported to have a volume of 228m³ (para 5.6). Side

slopes are recommended to be no more than 1:3 (para 6.2) which is positive as this reduces the risk of them needing to be fenced off. It is assumed that the concept masterplan submitted and shown in the report is based on 1:3 side profiles. Should the application be approved, this should be safeguarded by way of a condition or informative.

On the basis of the comments above, I am not of the view that the proposed access would facilitate a contextually appropriate layout. Referring to the Transport Statement I am unclear whether it is possible to secure an access in a slightly different location; if not, the proposed access needs to sweep to the east and get along the eastern boundary of the site to respond to the prevailing plot character. Perhaps 3.5 precludes the access in the vicinity of where it currently is; although 3.4 refers to the low volume of anticipated movements?

Site access drawing – I expect Highways colleagues to refer to this issues however I note that corner radii appear to exceed those prescribed in Manual for Street at between 7.5 and 8.0m. I also note an uncontrolled crossing, however these are not inclusive for those who are blind or partially sighted.

Off-site walking provision is compromised in places by narrow paths and inconsiderate car parking, perhaps developer contributions might be appropriate to improve walking and cycling provision between the site and the shops/station?

Below – parking on tactile paving.



At this outline stage, I would expect an access and illustrative layout to come forward as follows unless there are robust reasons why this is not deliverable. The sketch below proposed a couple of plots along the site frontage with on plot turning allowing for vehicles to leave plots in forward as opposed to reverse gear. A much smaller number of plots are illustrated, whilst there might be some scope to increase the number of homes by, for example, sub-dividing occasional plots or using housing typologies such as semis and perhaps maisonettes.

Ecology Officer

No Objection subject to conditions

Document References

The Application is supported by the following document:

- Ecological Impact Assessment – Windrush Ecology – July 2022 (and associated appendices, including revised Appendix 8)

Comments:

The information provided in the Ecological Impact Assessment (Windrush Ecology, July 2022) provides a sufficient assessment of the existing baseline conditions on the site including the habitats present and the presence or potential presence of protected species. It identifies the potential impacts the proposals could have on the existing ecology value of the site and makes a series of recommendations for measures to offset specific impacts on habitats and species.

An existing dwelling on the site that would be lost to the proposals contains a bat roost and appropriate mitigation measures are provided in the report, including the need for a Natural England licence. Proof of the granted licence would be required by this local authority prior to works commencing on site. Any lighting proposals for the site would also need to have been designed to limit the potential impacts on bat activity.

The report identifies the potential for nesting birds, reptiles, amphibians and hedgehogs to be present and makes recommendations for precautionary working methods to be followed to ensure their protection.

The report also makes recommendations to ensure badgers are protected from harm during the construction phase. A disused badger sett was reported as being present on the site in the EclA and therefore a follow-up badger survey should be undertaken within 12 months of works commencing.

Badgers can frequently change their centres of activity and quickly create new setts so the survey should determine the current status of the sett and identify whether levels of activity across the site have changed or whether new setts had appeared. The findings of the survey should be reported in the Construction Environment Management Plan (CEMP) - Biodiversity.

A biodiversity net gain assessment has also been completed which shows the proposals have the potential to deliver a net gain of 57.36% for habitats and 25.82% for hedgerows. The proposals for the site are ambitious with large areas proposed to be 'other neutral grassland' in moderate condition. A Habitat Management Plan would be required to show how the creation of new habitats would be achieved and their long-term success guaranteed.

The application is for outline planning permission and therefore conditions will be needed to secure the delivery of the mitigation and enhancement measures proposed and these are detailed below.

Control to implement development in accordance with agreed document/plans

Condition: The development shall be implemented in accordance with the agreed mitigation, compensation and enhancement plans provided in Section 6 of the EclA (Windrush Ecology, 2022). Any variation to the agreed plan shall be agreed in writing with the local planning authority before such change is made. The condition will be considered discharged following; a written statement from the ecologist acting for the developer testifying to the plan having been implemented correctly.

Control to ensure EPS licence is provided ahead of commencement

Condition: The following works [demolition of Dwelling 1 known to contain an occasional day roost site used by common pipistrelle and as identified in in the EclA (Windrush Ecology, 2022)] shall not in any circumstances commence unless the local planning authority has been provided with either: a) a licence issued by Natural England pursuant to Regulation 53 of The Conservation of Habitat and Species Regulations 2017 (as amended) authorising the specified activity/development to go ahead; or b) a statement in writing from a suitably qualified ecologist to the effect that they do not consider that the specified activity/development will require a licence.

Lighting design strategy for light-sensitive biodiversity

Condition: Prior to occupation, a "lighting design strategy for biodiversity" for the site (including boundary features and replacement roost features) shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

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

Construction Environmental Management Plan

Condition: No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) Risk assessment of potentially damaging construction activities to the habitats and species identified as being present or potentially present, including (but not limited to) nesting birds, bats, reptiles, badger and hedgehog.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

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

Securing On-site Biodiversity Net Gains

Condition: Before any construction works hereby approved are commenced, a Habitat Management Plan (HMP) detailing, in full, measures to protect existing habitat during construction works and the formation of new habitat to secure a habitat compensation and biodiversity net gain of no less than 10% for both habitats and hedgerows, shall be submitted to and approved in writing by the Local Planning Authority. Within the HMP document the following information shall be provided:

- a) Current soil conditions of any areas designated for habitat creation and detailing of what conditioning must occur to the soil prior to the commencement of habitat creation works (for example, lowering of soil pH via application of elemental sulfur);
- b) Descriptions and mapping of all exclusion zones (both vehicular and for storage of materials) to be enforced during construction to avoid any unnecessary soil compaction on area to be utilised for habitat creation;
- c) Details of both species composition and abundance where planting is to occur;
- d) Proposed management prescriptions for all habitats for a period of no less than 30 years;
- e) Assurances of achievability;
- f) Timetable of delivery for all habitats; and

g) A timetable of future ecological monitoring to ensure that all habitats achieve their proposed management condition as well as description of a feed-back mechanism by which the management prescriptions can be amended should the monitoring deem it necessary. All ecological monitoring and all recommendations for the maintenance/amendment of future management shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken and thereafter maintained in accordance with the approved HMP.

Archaeology Officer

Thank you for consulting the Buckinghamshire Council Archaeological Service on the above application. We maintain the local Historic Environment Record and provide expert advice on archaeology and related matters. As you will be aware, Paragraph 199 of the National Planning Policy Framework (NPPF) states that information held in the relevant historic environment record should be consulted and expert advice obtained where necessary. The NPPF recognises that the effect of an application on the significance of a heritage asset (including its setting) is a material planning consideration.

Historic Environment Record (HER) information

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

| HER reference | Designation Status* | Description |
|---------------|---------------------|---|
| 0482001000 | HER | Richings Park: Late Bronze Age to Iron Age pits, ditches, and gullies identified during trial trench evaluation |
| 0482100000 | HER | Sutton, Iver: Possible Neolithic or Bronze Age ring-ditch visible as a cropmark on aerial photographs. |
| 0024301000 | SAM | Thorney, Tower Arms Hotel: Late prehistoric double ring-ditches seen on aerial photographs near the Tower Arms Hotel |
| 0239400000 | HER | Richings Park, Purser's Pit: Lower to Middle Palaeolithic flint artefacts found in brickearth working at Purser's Pit |

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

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

Archaeological and related interests

Ground works associated with this development may impact buried archaeological remains from a number of periods and the underlying gravels/brick earth may provide evidence of Palaeolithic or Mesolithic activity which was recorded at Purser's Pit. If planning permission is granted for this development, then it may harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of

the results in conformity with NPPF paragraph 205. With reference to the NPPF we therefore recommend that any consent granted for this development should be subject to the following conditions:

Prior to a reserved matters application, no development shall take place, unless authorised by the local planning authority, until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in form of a geophysical survey and trial trenching in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. The trial trenches will include sondages to assess Palaeolithic/Mesolithic potential. Where significant archaeological remains are confirmed, these will be preserved in situ, following further assessment where appropriate.

Where significant archaeological remains are confirmed, no development shall take place until the applicant, or their agents or successors in title, have provided an appropriate methodology for their preservation in situ which has been submitted by the applicant and approved by the planning authority.

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

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

Thames Water

Waste Comments

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-yourdevelopment%2FWorking-near-or-diverting-ourpipes&data=05%7C01%7Cplanning.csb%40buckinghamshire.gov.uk%7Ccdac8b9f408f4f77d47808da7ba92795%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958263693045285%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=FIB%2BH1NHgSyjPQiJUopfLvc0viqCFLbudDtdHdb20WE%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further

information please refer to our website. [o.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-near-ourpipes&data=05%7C01%7Cplanning.csb%40buckinghamshire.gov.uk%7Ccdac8b9f408f4f77d47808da7ba92795%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958263693045285%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=tKWg6buXkTLlz%2BkXXvRp86XcFEv%2BqnOh0Hnbl9eKuSU%3D&reserved=0](https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-near-ourpipes&data=05%7C01%7Cplanning.csb%40buckinghamshire.gov.uk%7Ccdac8b9f408f4f77d47808da7ba92795%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958263693045285%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=tKWg6buXkTLlz%2BkXXvRp86XcFEv%2BqnOh0Hnbl9eKuSU%3D&reserved=0)

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk Application forms should be completed on line via

<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C01%7Cplanning.csb%40buckinghamshire.gov.uk%7Ccdac8b9f408f4f77d47808da7ba92795%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958263693045285%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=MknPumzR2urO25WrsFL85iJPmVPhwDxqyBikhq6hqS1%3D&reserved=0> Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-near-ourpipes&data=05%7C01%7Cplanning.csb%40buckinghamshire.gov.uk%7Ccdac8b9f408f4f77d47808da7ba92795%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958263693045285%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=tKWg6buXkTLlz%2BkXXvRp86XcFEv%2BqnOh0Hnbl9eKuSU%3D&reserved=0>

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is:

Affinity Water Company

The Hub
Tamblin Way
Hatfield
Herts
AL10 9EZ
Tel: 0845 782 3333

Environmental Health- Air Quality

Air Quality Comments

An air quality neutral assessment has been undertaken to fulfil the requirements of the Ivers Neighbourhood Plan. Using the methodology contained within Air Quality Neutral Planning Support Update: GLA 80371, as currently local guidance is not available in Buckinghamshire a Transport Emissions Benchmarks (TEB) and Building Emissions Benchmarks (BEB) have been calculated for the proposed development. The TEB has concluded that the development is not Air Quality Neutral.

There are concerns about the potential air quality impacts of cumulative developments in the Ivers as many individual schemes, deemed insignificant in themselves, are potentially contributing to a “creeping baseline”. There is a concern that in combination the emissions of local planning developments and the National Infrastructure Projects could result in a significant increase in NO₂ concentrations in Iver and also contribute towards an increase in particulate matter. The Air Quality Action Plan for the Iver contains a number of measures that should reduce NO₂ concentrations in Iver Parish. The council are requesting a financial contribution from all developments that increase concentrations within the Iver area regardless of magnitude to offset the increase and prevent baseline creep. As per previous developments the s106 contribution from operational transport emissions will be calculated using Defra’s damage costs calculation.

Recommendation:

A condition requesting a Dust Management Plan (DMP) including mitigation measures to control dust emissions from the construction phase is recommended as outlined in section 9.4. Step 3 – Site Specific Mitigation of the Air Quality Assessment.

A s106 contribution calculated by Defra’s damage costs calculator is requested to enable the implementation of measures outlined in the Air Quality Action Plan. A copy of the plan can be found on the Council’s website. [South Bucks Area Air Quality Action Plan](#). A copy of a study looking at the impact of a number of measures in the action plan is attached to this memo for information.

Neighbour Representations

21 Comments in Support (as summarised):

- Positive use of site
- Benefit of new homes
- Affordable housing
- Mix of housing sizes
- Poorly performing Greenbelt land
- Sustainable location- close to Iver Crossrail station, Elisabeth Line, HS2 and shops
- Economic growth to area
- Visually in-keeping with local area
- Traffic in local area is unrelated to development
- Greenery of local area retained
- Reduce crime through natural surveillance

39 comments in Objection (as summarised):

- Increase in traffic
- Increase in HGV movements
- On-street parking
- No regular bus service
- No footpath or cycle route serving both sides of Richings way, Old Slade Lane, The Ridings and The Poynings
- Insufficient infrastructure- GPs, schools, nurseries, dental practices, police, pharmacies
- Limited existing services and shops
- Impact to highway safety and operation at junction at Wellesley Avenue, North Park, Syke Cluan, Old Slate Lane and Richings Way.
- Noise pollution
- Air pollution
- Loss of high performing Green Belt land
- Homes to be built on brownfield land
- Light pollution
- Loss of view
- Visual intrusion
- Loss of property value
- Rise in crime
- Loss of privacy
- Loss of daylight and sunlight
- Discordant with visual appearance of area
- Loss of countryside
- Loss of farmland
- Harm to setting of Listed Building at Thorney House
- Disruption during construction
- Loss of historic setting of Richings Park
- Traffic survey took place during Covid, with lower traffic levels
- No special circumstances to warrant development
- Sets a precedence for further development in the Green Belt
- More affordable housing should be provided
- No social-rented homes provided
- Harm to wildlife
- Loss of trees
- Increased fluvial flood risk
- Increased surface water flood risk
- Further phases of development in the future- increase building footprint
- Affordable homes will not be affordable
- Not enough affordable homes proposed- 70 to 80% needed
- Other new homes in local area- Hurricane Court on Parlaunt Road
- Enough homes in local area
- Loss of paddocks
- Previous landfill use of site on adjacent land, unsafe for proximity to homes
- The Visibility Splays of 45 meters don't comply with the guidelines for large scale Developments. The guide for 30 mph is 90 meters and can be reduced to a minimum of 60 meters.