



Report to Strategic Sites Planning Committee

Application Number:	23/05440/OUT
Proposal:	Outline application (including details of access and layout) for construction of 87 dwellings with associated landscaping, amenity space, infrastructure and parking following demolition of existing dwelling at 20 Wycombe Road with all other matters reserved
Site Location:	Tralee Farm 20 Wycombe Road Holmer Green Buckinghamshire HP15 6RY
Applicant:	Hawridge Strategic Land Ltd
Case Officer:	Adam Smith
Ward(s) affected:	Hazlemere Penn Wood and Old Amersham
Parish-Town Council:	Hazlemere Parish Council Little Missenden Parish Council
Date valid application received:	14.02.2023
Statutory determination date:	16.05.2023 (EOT 31.10.2023)
Recommendation	<p>The recommendation is that the application be delegated to the Director of Planning and Environment for APPROVAL subject to the satisfactory completion of a Legal Agreement.</p> <p>And the imposition of planning conditions broadly in accordance with the details set out in the report below as considered appropriate by the Director of Planning and Environment.</p> <p>Or, if these cannot be achieved, then for the application to be REFUSED for such reasons as the Director of Planning and Environment considers appropriate.</p>

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The application seeks outline planning permission for the construction of 87 dwellings with matters of access and layout for consideration. Details of scale, appearance and landscaping remain reserved. Vehicular access with a footway would be provided from Wycombe Road and the proposal also incorporates two pedestrian and cycle connections into the neighbouring development parcel to the south. The existing woodland to the northern corner of the site would be retained as open space incorporating a leisure route, with the layout also showing the reinstatement of an orchard in open space to the rear of properties on Wycombe Road and additional areas of open space adjacent to 3 Kestrel Drive and to the southern boundary of the site (the latter including a SUDS basin). The proposal would also incorporate off-site highway works including the provision of a pedestrian crossing on Wycombe/Browns Road and upgrades to bus stops.
- 1.2 Cllr Catherine Oliver and Cllr Ed Gemmell (representing Hazlemere ward), and Cllr Jonathan Waters (representing Penn Wood and Old Amersham ward) have all requested that the application be called-in to Committee. Representations have also been received by Cllr Ron Gaffney objecting to the proposed development. Full details of the reasons for call-in and objections raised can be found in Appendix A.
- 1.3 While the scale of the development would ordinarily be referred to an Area Planning Committee, the application site straddles two Committee areas and could not be considered at one Committee. Furthermore, the development is part of a larger HW8 development that requires a comprehensive decision (the southern part of the HW8 site is also the subject of a report to this committee meeting). Therefore, the application has been referred to Strategic Sites Committee for consideration.
- 1.4 The application site forms part of an allocated site for residential development within the Wycombe District Local Plan under Policy HW8 (Land off Amersham Road including Tralee Farm, Hazlemere).
- 1.5 The proposed development is considered to be in accordance with the Development Plan, taken as a whole, and would deliver sustainable development in the context of environmental, social and economic elements. In addition, the proposal is considered to be broadly in accordance with the emerging Hazlemere Neighbourhood Plan which has progressed to the referendum stage and the adopted Development Brief for the site. Paragraph 11 of the NPPF indicates that the decisions should apply the presumption in favour of sustainable development and where they accord with an up-to-date development plan, they should be approved without delay.
- 1.6 The application is recommended for approval subject to the completion of a legal agreement and planning conditions which are considered necessary to ensure the scheme accords with development plan policy and other material considerations.

2.0 Site Description

- 2.1 The application site straddles the former Wycombe and Chiltern districts and has an area of 4.1ha. The majority of the site is located in Hazlemere within the settlement boundary for the High Wycombe urban area as defined by the Wycombe District Local Plan (WDLP) Policies Map and a small part of the site is within the Holmer Green built up area as defined by the Chiltern District Adopted Proposals Map. Within the former Wycombe District area, the application site forms part of a larger site which is allocated for residential development under Policy HW8 of the WDLP (see below).
- 2.2 The application site contains 20 Wycombe Road, a two-storey detached residential property on its northern frontage with Wycombe Road, together with a driveway to the western site of No. 20 that leads to a number of parcels of land including a woodland, several buildings of agricultural character and associated hardstanding, and fields. The north-eastern parcel of land to the rear of properties on Wycombe Road and Dean Way is woodland the subject of a TPO which together with the neighbouring north-western parcel once formed part of a commercial woodland. Although, the fruit trees in the north-western parcel were felled in 2022 with only a few boundary trees remaining that have subsequently been protected by TPOs. The remainder of the site comprises a large rectangular field, with some incomplete sections of hedgerows. The topography of the land slopes towards a valley that cuts across the southeastern corner of the site.
- 2.3 A larger woodland area is located to the east of the site, which is a traditional orchard and priority habitat designated as a local Green Space under Policy DM12 that also benefits from a recent TPO. Residential properties and their curtilages are located to the northwestern and southwestern boundaries of the application site. To the south and south-east of the site is the wider HW8 allocation.
- 2.4 The site is located within Flood Zone 1 as defined by the Environment Agency indicative flood map for planning. However, the valley within the eastern corner of the site has been identified as being susceptible to surface water flooding.
- 2.5 The site has been removed from the Green Belt through the Development Plan process. The Chilterns AONB lies to the south of the site at Amersham Road. No public rights of way cross the site.
- 2.6 There are no designated heritage assets (Conservation Area or Listed Building) within the site or within the immediate setting of the site.

3.0 Description of Proposed Development

- 3.1 The application seeks outline planning permission for the construction of 87 dwellings. The application seeks approval for layout and access, with matters of appearance, scale and landscaping reserved.

- 3.2 Access is proposed to be provided from Wycombe Road. To facilitate this the existing property, No.20 Wycombe Road, would be demolished. A 4m radii bellmouth junction onto Wycombe Road is proposed. The plans demonstrate that visibility splays of 2.4m x 43m would be achieved from the access point. A footpath would be provided on one side of the access road (eastern side) with landscaping proposed on the western side.
- 3.3 The proposal includes 87 dwellings with the layout indicating a mix of detached, semi-detached, terraced, and apartment properties. Of the 87 dwellings proposed, 42 units are proposed as affordable housing. Whilst the application is in outline, the application submissions set out the following indicative housing mix:

No. Bedrooms	No. Affordable Units	No. Market Units	Total
1 Bedroom	4	1	5 (5.7%)
2 Bedroom	20	7	27 (31%)
3 Bedroom	15	22	37 (42.5%)
4 Bedroom	3	15	18 (20.6%)
Total	42	45	87

- 3.4 The layout details a single access road into the site from Wycombe Road that loops around 3 perimeter blocks. It has no vehicular through route to the remainder of the HW8 allocation other than an emergency vehicle access route in the southeastern corner of the site which connects with the neighbouring HW8 development parcel. The emergency vehicle access route also serves as a pedestrian and cycle connection to the neighbouring HW8 development parcel and this links a continuous footway to the Wycombe Road that runs along the northeastern side boundary of the site. In addition, there is a pedestrian and cycle connection towards the southwestern corner of the site which also connects into the neighbouring HW8 development parcel and this includes a continuous footway through the new residential development to the access road into the application site.
- 3.5 In addition to the three main perimeter blocks, the layout also shows two runs of new dwellings neighbouring the back gardens of dwellings on Laceys Drive, Kestrel Drive and Inkerman Drive to the southwestern side of the site. These runs of proposed dwellings would predominantly back onto these neighbouring properties, although three dwellings would be side on to this boundary of the site and there would also be three small parking courts (containing 4-6 allocated spaces) adjacent to the rear gardens,

- 3.6 Parking is proposed to be provided throughout the site in a mix of off-street parking on driveways and parking courts, carports, and on street parking. A total of 201 parking spaces are proposed, of which 155 would be allocated and 46 would be unallocated or visitor parking.
- 3.7 The existing woodland in the northeast of the site would be retained, managed and maintained with public access provided. The scheme also shows a replacement orchard in an area of open space adjacent to the rear boundaries of properties on Wycombe Road including a small play facility. In addition, a small area of open space would be provided to the western side of the site adjacent to No.3 Kestrel Drive and there would be a larger area of public open space running along the central and eastern part of the southeastern rear boundary of the site. Small pockets of incidental open space are also provided within the scheme. While landscaping is a reserved matter, the submitted layout indicates landscaping within the areas of open space, the street and within the rear gardens.
- 3.8 A SUDS basin is proposed within the southeastern corner of the site within the southern area of open space together with a pumping station. The emergency access and pedestrian and cycle connections to the neighbouring HW8 parcel (as detailed above) also run along the northeastern and southwestern sides of this open space.
- 3.9 As set out above, details of scale, appearance and landscaping are reserved matters and as such are not for consideration in this application.
- 3.10 The application has been amended since its submission. These amendments include a reduction in the number of dwellings from the originally proposed 95 units to 87 units; alterations to the pedestrian connections through the site to provide continuous routes and a buffer to the northeastern boundary; revisions to the northern and open space areas to increase their sizes with associated alterations to the SUDS basin, the retention of part of the hedgerow to the former orchard and introduction of a play facility; alterations to the apartments and their parking courts; the introduction of additional flat over garage and terraced units; and parking alterations to address accessibility and wheelchair user requirements.
- 3.11 The application is accompanied by:
- a) Planning Statement
 - b) Design and Access Statement
 - c) Indicative schedule of accommodation (amended)
 - d) Statement of Community Involvement
 - e) Transport Assessment and Transport Technical Note (amended)
 - f) Draft Residential Travel Plan
 - g) Drainage Strategy Addendum, including surface water and foul water drainage strategies, and additional Drainages Technical Notes (March, June and August 2023)

- h) Geo-Environmental Phase 2 Report
- i) Landscape and Visual Impact Assessment (LVIA) and Landscape Addendum (amended)
- j) Tree Survey
- k) Arboricultural Impact Assessment incorporating an Arboricultural Method Statement (amended)
- l) Canopy Calculator
- m) Ecology Impact Assessment Addendum accompanied by an Ecological Impact Assessment, Ecology Consultation Technical Note A and Rev B, and Ecology Statement of Case
- n) Biodiversity Net Gain Metric (amended)
- o) Zero Carbon by Design Statement
- p) Energy and Whole Life-Cycle Carbon Statement
- q) EV Charging Point Statement
- r) Emerging Hazlemere Neighbourhood Plan Compliance Statement

3.12 The development has been screened under the Environmental Impact Assessment Regulations and the local planning authority has concluded that an environmental impact assessment will not be required in this case.

4.0 Relevant Planning History and Background

- 4.1 **18/07194/OUT:** Outline application (including details of access & layout) for the erection of 101 dwellings with all other matters reserved. Appealed against non-determination; appeal dismissed. This appeal application covers an identical site area to the current proposal and is a key material consideration for the assessment of the current application; a summary of the Inspector's Decision Notice is set out below.
- 4.2 The Inspector's Decision Notice for application 18/07194/FA is clear that the site comprises part of an allocated housing site and consequently that it is *"a sustainable location suitable for the quantum of housing development proposed (101 units), subject to meeting the requirements of the policy criteria."* It also highlights that development of this site would *"unlock the wider delivery of the HW8 allocation"*.
- 4.3 The appeal scheme, however, was found to have two issues with non-compliance with Policy HW8. Firstly, the requirement to maintain a sense of separation between the settlements of Hazlemere and Holmer Green [part 1 a) of Policy HW8], and secondly the requirement to provide a comprehensive development of the site within the Wycombe district [part 1 c) of Policy HW8].
- 4.4 In terms of maintaining a sense of separation between the settlements of Hazlemere and Holmer Green, the Inspector highlights that the Parish boundaries run along the northern boundary of the site (save for the proposed access) and that the existing trees and woodland on site (including the removed orchard) separate the existing

residential development in Holmer Green from the open part of the site, with these features making *“a significant contribution to the separation of Hazlemere from Holmer Green.”* Furthermore, the Inspector states that that the policy sets out a *“clear requirement for separation on the northern boundary, (as) this is the only part of the appeal site where the two parish boundaries are contiguous.”* Moreover, the Inspector identifies that this separation must be tangible and recognisable and states that it is represented in the indicative layout in Figure 14 of the WDLP. Although, the Inspector is also clear that Figure 14 of the WDLP, an indicative plan, is not part of Policy HW8.

- 4.5 In concluding on the sense of separation matter, the Inspector details that the appeal scheme would not provide for the retention of existing vegetation on the northern boundary. Therefore, this would not allow for the retention of the trees nor would it make provision for the remnant orchard to be retained and restored. As such, the Inspector found that the layout would cause significant harm to the character and appearance of the area in conflict with part 1 a) of Policy HW8 as it would fail to maintain any sense of separation between Hazlemere and Holmer Green. In addition, the Inspector found consequential conflict with development plan policies CP9, CP10, DM11, DM14, DM34, and DM35.
- 4.6 Turning to the requirement to provide a comprehensive development of the site within Wycombe District, the Inspector states that, *“the importance of co-ordinated or comprehensive development stems from the need to ensure that Holmer Green facilities are accessible on foot from the southern part of the allocation through this appeal site. The appeal site also needs to provide for adequate pedestrian and vehicular connections for emergency vehicles. This underpins the need to ensure that such connections are fully considered and the relationship between the two is of relevance.”*
- 4.7 However, the Inspector found that the proposed pedestrian linkages to the southern HW8 parcel for the appeal development, one of which included access for emergency vehicles, did not match with the links shown on the scheme for the southern site and that this *“lack of synergy undermines the comprehensive development the overall allocation required by Policy HW8.”* This point was re-iterated in the Appeal Decision Notice, with the Inspector subsequently stating, *“comprehensive development of the overall HW8 allocation is not secured as the two layouts do not fully align”.*
- 4.8 The Inspector also refers to a lack of comprehensive approach means that opportunities were not taken to co-ordinate the provision of open space and recreation, meaning some provision would be duplicated rather than co-located in one scheme.
- 4.9 The Inspector is clear that HW8 policy does not require a single planning application to achieve comprehensive development and that the co-ordination need not be *“hugely complicated”*, but that it would involve a greater degree of certainty as to the

connection routes and the use of the central open space than evidenced in the appeal scheme.

- 4.10 The Inspector therefore concluded on the comprehensiveness issues that the appeal scheme would not secure the co-ordinated approach which is envisaged by the comprehensive development of the site as required by part 1 c) of Policy HW8.
- 4.11 Other matters such as vehicular access, informal surveillance along the proposed access, amenity of neighbouring residents along the western boundary of the site, infrastructure and facilities in the local area, and the neighbouring woodland to the east were also considered by the Appeal Inspector, however no objections were raised in any of these respects.
- 4.12 **21/08364/FUL**: Demolition of existing buildings on site including Inkerman House and redevelopment for residential use comprising construction of 290 dwellings with hard/soft landscaping, parking including garaging and associated infrastructure – Undetermined. This application relates to land to the south of the application site within the wider HW8 allocation and is also due to be considered at the Strategic Sites Planning Committee on 19th October 2023.

5.0 Policy Considerations and Evaluation

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 Section 85 of the Countryside and Rights of Way Act 2000 requires that in exercising a function affecting land in an AONB, a Council shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB.
- 5.3 The development plan to which this application relates comprises of:
- Wycombe District Local Plan 2019 (WDLP)
 - Wycombe District Adopted Delivery and Site Allocations Plan 2013 (ADSAP)
 - Chiltern District Local Plan 1997 (CDLP)
 - Core Strategy for Chiltern District 2011 (CSCD)
 - Buckinghamshire Minerals and Waste Local Plan 2019 (BMWLP)
- 5.4 The following development plan policies are considered relevant to the proposed development:
- Wycombe District Local Plan 2019 (WDLP)**
 - CP1 (Sustainable Development)
 - CP2 (Overall Spatial Strategy)
 - CP3 (Settlement Strategy)

CP4 (Delivering Homes)

CP7 (Delivering the infrastructure to support growth)

CP9 (Sense of Place)

CP10 (Green Infrastructure and the Natural Environment)

CP11 (Historic Environment)

CP12 (Climate Change)

HW8 (Land off Amersham road including Tralee Farm, Hazlemere)

DM20 (Matters to be determined in accordance with the National Planning Policy Framework)

DM21 (The location of new housing)

DM22 (Housing Mix)

DM24 (Affordable Housing)

DM30 (The Chilterns Area of Outstanding Natural Beauty)

DM31 (Development affecting the Historic Environment)

DM32 (Landscape Character and Settlement Patterns)

DM33 (Managing Carbon Emissions: Transport and Energy Generation)

DM34 (Delivering Green Infrastructure and Biodiversity in Development)

DM35 (Placemaking and design quality)

DM38 (Water quality and supply)

DM39 (Managing flood risk and sustainable drainage systems)

DM40 (Internal Space Standards)

DM41 (Optional Technical Standards for Building Regulation Approval)

Wycombe District Adopted Delivery and Site Allocations Plan 2013 (DSA)

DM1 (Presumption in Favour of Sustainable Development)

DM11 (Green Networks and Infrastructure)

DM12 (Green Spaces)

DM13 (Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance)

DM14 (Biodiversity in Development)

DM16 (Open Space in New Development)

Chiltern District Local Plan 1997 (Saved Policies) (CDLP)

GC1 (Design of Development Throughout the District)

GC3 (Protection of Amenities Throughout the District)

GC4 (Landscaping Throughout the District)

GC9 (Prevention of Pollution Throughout the District)

H9 (Loss of Existing Dwellings and Land in Residential Use Throughout the District)

TR2 (Highways Aspects of Planning Applications Throughout the District)

TR3 (Access and Road Layout Throughout the District)

NC1 (Safeguarding of Nature Conservation Interest Throughout the District)

Core Strategy for Chiltern District 2011 (CS)

CS1 (The Spatial Strategy)

CS2 (Amount and Distribution of Residential Development)

CS4 (Ensuring that Development is Sustainable)

CS20 (Design and Environmental Quality)

CS22 (Chilterns Area Of Outstanding Natural Beauty)

CS24 (Biodiversity)

CS25 (Dealing with the Impact of New Development on the Transport Network)

CS26 (Requirements of New Development)

CS30 (Reducing Crime and the Fear of Crime)

CS31 (Infrastructure)

CS32 (Green Infrastructure)

- 5.5 The local planning authority has recently published notice of intention to send the emerging **Hazlemere Neighbourhood Plan (HNP)** to referendum, subject to the Examiner's modifications and the further modifications consulted on in May – June 2023 to ensure that the plan meets the basic conditions. Therefore, the policies within the referendum version of the HNP are also a material consideration that are increasingly attracting weight, with the National Planning Practice Guidance advising that neighbourhood plans at the referendum stage can be given significant weight in decision making, so far as the plan is material to the application (Paragraph: 107 Reference ID: 41-107-20200925 Revision date: 25 09 2020). The following emerging HNP policies are considered relevant to the current proposal:

HAZNP2 (Protecting and Improving Green Infrastructure)

HAZNP3 (Delivering Zero Carbon Buildings)

HAZNP4 (Promoting Sustainable Transport)

HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

5.6 The following documents SPD's, SPG's and guidance/statements are also relevant for the determination of the application:

Wycombe District Council Air Quality Supplementary Planning Document 2020

Wycombe District Council Residential Design Guidance 2017

Wycombe District Council Canopy Cover Supplementary Planning Document 2020

Wycombe District Council Planning Obligations Supplementary Planning Document 2020

Buckinghamshire Council Biodiversity Net Gain Supplementary Planning Document 2022

Buckinghamshire Countywide Parking Guidance

Buckinghamshire Council First Homes Interim Position Statement

5.7 In addition, the "Land off Amersham Road including Tralee Farm Development Brief" September 2022 (hereafter referred to as the "Development Brief") is a relevant material consideration. It carries less weight than an SPD but provides guidance on how the requirements of Policy HW8 could be achieved in practice.

Principle and Location of Development

Wycombe District Local Plan (August 2019): CP1 (Sustainable Development), CP2 (Overall Spatial Strategy), CP3 (Settlement Strategy), CP4 (Delivering Homes), DM21 (The location of new housing), DM33 (Managing Carbon Emissions, Transport and Energy Generation), and HW8 (Land off Amersham Road including Tralee Farm, Hazlemere)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

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

Core Strategy for Chiltern District (November) 2011: CS1 (The Spatial Strategy) and CS2 (Amount and Distribution of Residential Development)

5.8 The application seeks outline planning permission with only matters relating to access and layout for approval. It is therefore necessary to consider whether the principle of residential development on this site, in this instance 87 dwellings, is acceptable.

5.9 The main part of the site lies within the former Wycombe District area on land which falls within the designated settlement boundary of High Wycombe and allocated for residential development under Policy HW8 (Land off Amersham Road including Tralee Farm, Hazlemere) of the Wycombe District Local Plan (WDLP). Following appropriate assessment and justification through the evidence base and adoption of

the WDLP, the site was taken out of the Green Belt. Green Belt policies are therefore not a relevant consideration to the determination of this application.

- 5.10 A large number of objections have been received regarding the plan making process for the WDLP and specifically detailing that the HW8 site should not have been removed from the Green Belt and allocated for housing. However, the only route for challenging purported issues with the adoption of a Local Plan is through a claim for Judicial Review in the Courts within the prescribed time frame immediately following the adoption of the Plan in 2019. No such legal challenge was made to the WDLP and, therefore, it is not appropriate at this stage to revisit whether the site should have been allocated for housing or removed from the Green Belt.
- 5.11 Given that the main part of the site is within a settlement boundary and allocated for housing, the principle of residential development on this land is acceptable, subject to compliance with the overarching site policy and other detailed policies contained within the Development Plan.
- 5.12 The Wycombe District Local Plan sets out an indicative capacity of 350 dwellings for the HW8 allocation. The application site forms the northern part of the allocation and would deliver a total of 87 dwellings which is considered to be a proportionate quantum of development for the total size of the allocated site.
- 5.13 Policy HW8 also sets out place making, transport and green infrastructure requirements for development on the site and a requirement to meet the needs arising from the development for additional primary school places.
- 5.14 As discussed in subsequent sections of this report, it is considered that the scheme is compliant with the requirements of Policy HW8, other policies of the Development Plan, and the guidance in the Development Brief covering the site, and therefore comprises sustainable development. It is considered that the proposal would not compromise the delivery of the remainder of HW8, and would integrate satisfactorily with and comprises a comprehensive form of development with the proposals on the neighbouring HW8 development parcel the subject of application 21/08364/FUL.
- 5.15 It is noted that Policy HAZNP5 of the emerging Hazlemere Neighbourhood Plan (HNP) is also a material consideration increasingly attracting weight (as detailed above). This policy covers the application site and supplements WDLP Policy HW8, including adding additional land parcels and further detail to the policy approach on the wider allocated site. Notwithstanding that at the time of drafting this report that Policy HAZNP5 does not form part of the development plan, it is considered that the proposal is in compliance with this policy and the other policies in the emerging HNP as detailed below.
- 5.16 The northern most part of the site (20 Wycombe Road and neighbouring access track) falls within the former Chiltern District area in the built-up area of Holmer Green. Therefore, Policies CS1 of the Core Strategy for Chiltern District and Policy H9

of the Chiltern District Local Plan (CDLP) are also relevant policy consideration regarding the principle of development on the site.

- 5.17 CS Policies CS1 and CS2 allow for limited residential development in selected villages excluded from the Green Belt, including Holmer Green, and thus the principle of development is acceptable under the Chiltern Core Strategy.
- 5.18 CDLP Policy H9, however, seeks to resist the net loss of existing dwellings and proposal requires the demolition of a dwelling (20 Wycombe Road) in the former Chiltern area to make way for the site access. Although, this loss of a single dwelling is more than outweighed by the gain of 87 dwellings within the HW8 allocation site. Furthermore, it should be noted that both settlements of Holmer Green and Hazelmere are within the same wider Housing Market Area (and therefore, the proposed development at Tralee Farm constitutes meeting the housing needs for both communities). The new Local Plan for Buckinghamshire will be based upon a wider HMA and as such new evidence on housing need that will be based on the whole new council area. As such, no objections are raised to the principle of development under Policy H9 of the Chiltern District Local Plan.
- 5.19 The development would deliver new homes, including affordable housing, and would contribute towards the Council's 5-year housing land supply. These are both matters of significant weight when considering this planning application.
- 5.20 Overall, no objections are raised regarding the principle of residential development on the application site.

Affordable Housing and Housing Mix

Wycombe District Local Plan (August 2019): DM22 (Housing Mix), and DM24 (Affordable Housing) and DM41 (Optional Technical Standards for Building Regulations Approval)

Planning Obligations Supplementary Planning Document (POSPD)

First Homes Interim Position Statement

- 5.21 Policy DM22 requires all developments of 10 units or more to provide for a mix of dwellings in size, type and tenure. DM24 requires that all developments of 10 or more dwellings, or 1000sqm of residential floorspace, shall provide on-site affordable housing at 48% of the total number of units. DM24 also requires for a mix in the type of affordable dwellings and also tenure.
- 5.22 The scheme proposes 87 dwellings in total of which 42 would be affordable. This complies with the requirements of DM24 in terms of number of affordable housing units proposed.
- 5.23 The table above at paragraph 3.3 based on the indicative schedule of accommodation demonstrates that there would be a mix of 1 to 4 bed units across the scheme, with

the proposed affordable housing predominantly comprising 2 and 3 bed units. The proposed mix of affordable units is deemed broadly acceptable. The indicative distribution of affordable units, which would be in two groupings is also acceptable.

- 5.24 In accordance with Policy DM24, the Planning Obligations Supplementary Planning Document, and the First Homes Position Statement, the tenure split of the affordable housing should be 25% First Homes with the remaining 75% split 80% affordable housing for rent and 20% intermediate housing. As the scheme is in outline, details of the tenure split of the affordable housing scheme to meet the policy requirements would be secured through legal agreement.
- 5.25 Policy DM41 also requires developments to include accessible, adaptable and wheelchair user dwellings in accordance with Building Regulation Standards M4(2) and M4(3). All developments that are required to provide on-site affordable housing are also required to provide 30% of affordable homes and 20% of market homes in accordance with the Building Regulation M4(3) Standard and the remainder of the dwellings in accordance with the Building Regulation M4(2) Standard. The M4(3) standards relate to wheelchair user dwellings. The M4(2) standards relate to accessible and adaptable dwellings (similar to lifetime homes).
- 5.26 The submitted indicative accommodation schedule indicates that 12 affordable and 9 market homes would meet the M4(3) standards to comply with the policy requirements and all the remaining homes would be M4(2) compliant, with the exception of 4 flat over garages (FOGS) which by their nature cannot achieve either of these standards. Overall, it is considered that the development would make good provisions for accessible, adaptable and wheelchair user dwellings, and that the benefits from the delivery of housing including affordable housing would outweigh the small shortfall with regards to the M4(2) policy requirements. Compliance with the M4(2) and M4(3) standards for all units except the FOGS can be secured by condition.
- 5.27 Policy DM22 also requires schemes which deliver 100 houses or more to include 5% of the proposed dwellings to be self-build plots. Whilst the scheme falls under this 100 unit threshold, it is part of a larger allocated site such that it is considered reasonable to apply this policy to the scheme. The applicants have confirmed their intention to deliver 4 self-build plots on the site, which would equate to (5%), and is deemed to be acceptable. The delivery of the self-build plots can be secured through Legal Agreement, to include mechanisms for appropriately advertising of the plots.
- 5.28 Overall, with the necessary conditions and planning obligations in place, it is considered that the scheme would deliver an appropriate mix, type and tenure of dwellings.

Transport matters and parking

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

DSA: DM2 (Transport requirements of development sites)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP4 (Promoting Sustainable Transport) and HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

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

Core Strategy for Chiltern District 2011: CS4 (Ensuring that Development is Sustainable), CS25 (Dealing with the Impact of New Development on the Transport Network); CS26 (Requirements of New Development), CS31 (Infrastructure)

Buckinghamshire Countywide Parking Guidance

5.29 The application is in outline with matters of access and layout for determination.

5.30 The Highway Authority have confirmed no objections subject to the imposition of planning conditions and obligations to ensure that construction stage impacts are minimised, the development is appropriately implemented, offsite impacts are mitigated, and active travel is promoted.

5.31 Policies CP7, CP12 and DM33 of the WDLP and DM33 of the DSA require development to provide safe access, mitigate impacts on traffic conditions, deliver suitable levels of parking, include measures to increase the use of sustainable transport modes and improve walking and cycling provision. Policies TR2 and TR3 of the Chiltern District Local Plan and policies CS25 and C26 of the Chiltern Core Strategy similarly require satisfactory access onto the existing highway network and for the network to have capacity to accept the additional traffic, as well as seeking provisions for safe, convenient, and attractive access on foot and cycle, integration with local public transport, and appropriate parking arrangements.

5.32 Policy HW8 of the WDLP also includes the following site-specific transport requirements:

2. Transport:

a) Provide access from the A404 and the Wycombe Road;

b) Provide walk / cycle access through Tralee Farm onto Wycombe Road;

c) Improve access to existing bus routes;

d) Provide or contribute to off-site highway improvements as required by the Highway Authority.

- 5.33 In addition, the emerging Hazlemere Neighbourhood Plan includes a sustainable transport policy (HAZNP4) and site-specific transport requirements for the HW8 site under part B of Policy HAZNP5.
- 5.34 Policy HAZNP4 requires proposals to: sustain and enhance local footpaths, cycleway and transport infrastructure (part A); demonstrate how schemes will not increase car ownership and enable future occupiers to walk/cycle through the Parish to local infrastructure and services (part B); make reasonable provisions for car club spaces (part C), provide EV access to all charging spaces (part D), and ensure that transport routes and public spaces are accessible in their design and layout (part E).
- 5.35 Policy HAZNP5 part B sets out the following site-specific transport requirements for the HW8 site (parts 3, 4, and 5 are not however relevant to the current application as they only relate to the southern part of the HW8 allocation):
- 1) To provide vehicular access from the A404 and Wycombe Road;*
 - 2) To provide a strategic walk / cycle access to existing bus routes and community infrastructure through Tralee Farm onto Wycombe Road;*
 - 3) To facilitate a future pedestrian and possible cycle connection through to Badger Way and the adjacent play area through the provision of a suitable layout and rights for pedestrian and cycle access to the boundary without ransom;*
 - 4) To provide a pavement from Inkerman Drive to the site access along the A404;*
 - 5) To effect changes to the A404 along the site frontage to facilitate easier pedestrian and cycle access to the adjacent AONB; and*
 - 6) To make provision where justified for on-site and off-site improvements in relation to bus services.*

Site access

- 5.36 The application proposes the demolition of No.20 Wycombe Road to facilitate the creation of a new northern vehicular access road to serve the development from Wycombe Road. There would be no other vehicular route other than an emergency vehicle access through to the neighbouring HW8 parcel to the south, which would benefit from its own vehicular access to the A404 Amersham Road. This is in accordance with the requirements of Policies HW8 and HAZNP5 and, therefore, is acceptable in principle.
- 5.37 The proposed vehicular access for the application site would be in the form of a standard bellmouth junction with 4m radii and would achieve the requisite visibility splays for Wycombe Road, which has a 30mph speed limit (i.e 2.4m x 43m visibility). The access road would measure 5.5m in width and would have a 2m footway to its eastern side that would connect into the footway on Wycombe Road.
- 5.38 The access arrangements are identical to those found to be acceptable under the previous appeal scheme on the site. Furthermore, the Highway Authority have re-confirmed that the access arrangements are acceptable for vehicles, pedestrians and

cyclists, subject to the provision of vehicle waiting restrictions at the site access which can be secured by condition. Therefore, the access arrangements for the proposal are acceptable.

Highway Network Capacity

- 5.39 The applicant has submitted a Transport Assessment (TA) which has reviewed the trip generation potential of the site to ensure that the trips anticipated for this site is consistent with planning application 21/08364/FUL for the development of the southern parcel of the HW8 allocated site. Having reviewed the TA the Highway Authority have advised that it is anticipated that both sites would generate approximately 0.4 two-way vehicle trips in the AM and PM peak periods per unit, which equates to approximately 35 two-way vehicle movements in each peak period for the application site.
- 5.40 The applicant has assessed the highway network using survey data collected in June of 2015 as submitted within the previous appeal application on this site. Whilst ordinarily this data would not be accepted, the Highway Authority have undertaken a sensitivity evaluation of this data and advise that traffic flows post covid in the area are either comparable or lower than the surveyed data such that it can be accepted in this instance.
- 5.41 The Holmer Green Village Society have submitted an alternative form of traffic data from a vehicle actuated sign (VAS) on Wycombe Road. However, the Highway Authority have reviewed this and advised that it is not recognised as a reliable tool for traffic survey data collection and should not be relied upon for the appraisal of planning applications.
- 5.42 The initial application submissions includes modelling of nearby junctions. The Highway Authority advises that the submitted modelling demonstrates that the junctions assessed have sufficient capacity to accommodate the traffic anticipated to be generated by this development.
- 5.43 In addition, since the previous application on the site was submitted there are now other applications within the planning system that would impact on the Hazelmere Crossroads double mini-roundabout junction. Therefore, the Highway Authority has required the applicant for the current application to also assess the traffic impact at the Hazelmere Crossroads as part of a cumulative assessment with the application on the southern parcel of the HW8 site (21/08364/FUL) and the HW7 Terriers application (21/07002/FUL).
- 5.44 In response to the Highway Authority's request for further assessment of the Hazelmere Crossroads, the applicant has stated that 51% the development traffic is anticipated to route towards the crossroads, equating to approximately 18 two-way vehicle trips in the AM and PM peak periods respectively. Furthermore, the submitted modelling shows some of the arms of the junction are operating over

capacity including the Holmer Green Road arm in the future scenario with development traffic.

- 5.45 The Highway Authority have reviewed the submitted assessment of the Hazlemere Crossroads and advised that whilst the development would have some impact on the operation of this junction, the level of traffic added as a result of the development would not constitute a “severe” impact in the context of the NPPF. Although, this is on the basis that the development provides additional sustainable transport measures to support a reduction in the number of car trips generated by the site. Such an approach to maximise the use of sustainable transport and give priority to pedestrian and cycle movements is supported by the development plan, emerging policies in the HNP, and the National Planning Policy Framework (NPPF).
- 5.46 The application has also been accompanied by a Personal Injury Collision (PICs) review of the local road network, for the 5-year period between 2017 and 2021. Highway Authority have reviewed this data and advise that the collisions do not form a cluster and the highway safety of the local highway network would not be compromised by the proposed scheme.

Access by sustainable modes and connectivity

- 5.47 Policy HW8 requires the provision of walk/cycle connection through Tralee Farm and on to Wycombe Road and to improve access to existing bus routes; these requirements are echoed in Policy HAZNP5, which also highlights the importance of access to community infrastructure.
- 5.48 The submitted scheme includes two continuous, legible and attractive pedestrian routes through the site which also incorporate cycle connections to the wider HW8 allocation to the south. These routes would allow for the necessary connectivity through the allocated site and for occupants of the site and southern HW8 parcel to access Wycombe Road and the available bus routes and community infrastructure on foot and cycle. In addition, the connections through to the adjoining HW8 parcel would enable residents of the site to access both the recreational facilities and pedestrian and cycle links to Gravelly Way being proposed under this neighbouring development to meet the needs of the wider HW8 allocation.
- 5.49 It is necessary to ensure that these on-site pedestrian and cycle connections are provided with access allowed in perpetuity and also that the developer for the southern HW8 parcel has step in rights to provide a pedestrian connection to Wycombe Road should development not come forward on the northern parcel. These matters can be addressed by appropriate s106 clauses.
- 5.50 The majority of the site is located within reasonable walking distance of a bus stop on Sawpit Hill which has a frequent service to High Wycombe and Chesham/Hemel Hempstead. It is also noted that the bus service 1 serves both High Wycombe and Amersham railway stations providing a public transport link to London to the southeast, Aylesbury, Oxford and Birmingham to the north providing good

sustainable regional connectivity. To enhance the desirability of the bus stops and promote sustainable travel by future residents it is recommended that upgrades to the bus stop on Sawpit Hill are secured by Legal Agreement as confirmed by the Highway Authority.

- 5.51 With respect to walking and cycling, the whole of the village of Holmer Green falls within a 2km catchment of the site making walking and cycling to local facilities a viable option to residents. Although, the Highway Authority have identified an issue relating to a lack of a formal crossing point on Wycombe Road or Browns Road to allow for safer pedestrian movements between the development site and the school. However, the applicant has agreed to the provision of a Zebra Crossing on Wycombe Road or Browns Road in the interests of safety and to encourage residents from the HW8 site to walk to school and this can also be secured by Legal Agreement.
- 5.52 The application has also been accompanied by a Framework Residential Travel Plan (FRTP). The main objectives of the FRTP are to make residents aware of sustainable travel options and to encourage less reliance on the car. A detailed travel plan including monitoring can be secured by Legal Agreement.

Internal layout

- 5.53 The internal road layout comprises a central access road with a series of roads looping around perimeter blocks. Most roads within the development would measure between 5m and 5.5m in width and would be flanked by footways on both sides, with the scheme also include a couple of short sections of shared surface roads measuring 4.8m – 5m in width.
- 5.54 The application has been accompanied by vehicle tracking plans which demonstrate that refuse and other larger vehicles would be able to manoeuvre within the site. The development is also well connected to minimise the requirement for larger vehicles to reverse over excessive distances and incorporates suitable turning areas for refuse, emergency and goods vehicles where they are necessary.
- 5.55 In addition, and as detailed above, the scheme includes two continuous pedestrian routes through the site incorporating cycle connections with the neighbouring HW8 development parcel and linking into the footway network on Wycombe Road.
- 5.56 The Highway Authority are satisfied that the internal layout of the development is acceptable.

Parking provision

- 5.57 The scheme proposes a total of 201 parking spaces to serve the proposed 87 dwellings. This includes 155 allocated parking spaces, including on plot carports for some of the larger units, and an additional 46 unallocated visitor parking spaces.
- 5.58 Hazlemere falls in Residential Parking Zone B under the Countywide Parking Guidance and Holmer Green falls in Residential Parking C. Whilst the site would be accessed

from Holmer Green, it is located in Hazlemere and it has been established under the previous appeal decision that the Zone B Standards are appropriate for this site.

- 5.59 Based on bedrooms the proposed development would result in a small under provision of parking of 17 spaces (15 allocated and 2 unallocated) under the Parking Guidance.
- 5.60 However, the guidance allows for parking to be based on habitable rooms within each dwelling. Whilst internal layouts have not been provided with the application (as scale and appearance remain reserved matters), the applicants have confirmed that the dwellings would be designed in line with the guidance set out for habitable rooms and such an approach was accepted under the previous appeal application on the site. It should also be noted that the 2015 County Car Parking Standards were derived using data from the census which presented car ownership statistics by the habitable rooms in a dwelling (not by the number of bedrooms).
- 5.61 Based on the habitable rooms standards the development would require 142 allocated, 25 unallocated and 34 visitor spaces (a total of 201 spaces). The application proposes 201 spaces, with slightly more allocated spaces (155 in total) as every house is served by at least two parking spaces and 46 unallocated/visitor spaces, which is more than one for every 2 dwellings. As such, it is considered that proposed car parking provision are acceptable, subject to a condition to control the habitable rooms in the dwellings for any subsequent reserved matters application.
- 5.62 The layout shows the on-street parking comprises a mix of allocated and visitor/unallocated and also includes parking courts. Therefore, to ensure that suitable parking is provided on site, a planning condition is recommended to secure a scheme for the marking of the spaces to clearly identify whether they are allocated or visitor parking and ensure that the parking courts only contain allocated spaces in the interests of security.
- 5.63 The application also includes provisions for Electric Vehicle (EV) charging to serve the development, with all on plot and allocated parking spaces served by charging points and 78% of the 46 visitor / unallocated spaces served by charging points. As such, this would represent a shortfall with regards to Policy HAZNP4, which requires development schemes to provide access to EV charging for all parking spaces. However, all properties would have access to EV charging and there would be a very high provision of EV charging to visitor / unallocated parking such that it is not considered that objections could be sustained on the grounds of inadequate EV charging provision.
- 5.64 Concern has been raised that the level of parking to serve the development is inadequate and that this would lead to parking issues in the wider area. However, the development would providing acceptable parking levels under the Council's guidance, as detailed above, and the Highway Authority does not object on parking grounds. Furthermore, and in any event, Wycombe Road is over 100m from the closest units on site such it would not be a convenient, attractive, and likely parking

location for future residents and parking restrictions at the access would also be secured by s106 as detailed above.

- 5.65 There will also be opportunities to provide cycle parking within the development, the details and delivery of which can be secured via condition.
- 5.66 The application is supported by an “Emerging Hazlemere Neighbourhood Plan Compliance Statement” which refers to the developing exploring the viability of a car club space as part of a Travel Plan. However, to ensure compliance with the emerging HNP and to seek to reduce the reliance on car ownership, it is recommended that a minimum of one car club space is secured on site by legal agreement.

Transport Conclusions

- 5.67 The Highways Authority is satisfied that the development would provide safe and suitable access and does not lead to an impact on the highway network that cannot be adequately mitigated. Therefore, subject to conditions and a legal agreement, the proposals would be acceptable in highways terms and would be in accordance with the development plan and the emerging policies in the HNP.

Raising the quality of place making and design

Wycombe District Local Plan (August 2019): CP9 (Sense of place), HW8 (Land off Amersham Road including Tralee Farm, Amersham), DM30 (The Chilterns Area of Outstanding Natural Beauty), DM32 (Landscape character and Settlement Patterns), DM34 (Delivering Green Infrastructure and Biodiversity in Development), DM35 (Placemaking and Design Quality)

DSA: DM11 (Green networks and infrastructure), DM16 (Open space in new development)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

Chiltern District Local Plan (1997): GC1 (Design of Development Throughout the District)

Core Strategy for Chiltern District 2011: CS20 (Design and Environmental Quality), CS22 (Chilterns Area Of Outstanding Natural Beauty), CS30 (Reducing Crime and the Fear of Crime)

Residential Design Guide SPD.

Development Brief

- 5.68 The application is in outline with only matters of layout and access for consideration. Details of scale, appearance and landscaping are reserved matters for later consideration at the reserved matters stage.
- 5.69 Policies DM35 and CP9 sets out that all developments are required to demonstrate attractive and high-quality design and respect and improve the character of an area

and the way it functions. Furthermore, Policy DM32 seek to protect and reinforce the positive key characteristics of the receiving landscape and existing settlement pattern. The RDG SPD provides further guidance to ensure new residential development is well designed.

5.70 In addition, Policy HW8 sets out site specific place making policies, with the Development Brief for the site providing guidance on ways that these can be delivered. These place-making criteria comprise as follows (Criteria 1b, 1d and 1e are not however relevant to the current application as the Chilterns and South Bucks Local Plan was withdrawn and criteria 1d and 1e relate to the southern part of the HW8 allocation):

1. Place-making

a) Maintain a sense of separation between Hazlemere and Holmer Green, through the layout of the site;

b) In the event that land to the north east in Chiltern District (off Earl Howe Road) is allocated for development in the Chiltern and South Bucks Local Plan, to be planned comprehensively with that site as a whole; and in any event to not prejudice future integration;

c) Provide a comprehensive development of the site within Wycombe District;

d) Redevelop the existing coach yard and riding stables;

e) Consider the opportunity to redevelop existing residential properties fronting Amersham Road.

5.71 Policy HAZNP5 of the emerging Hazlemere Neighbourhood Plan also includes a placemaking requirement for proposals on the HW8 site “to be planned comprehensively with that site as a whole, integrate into surrounding neighbourhoods; and in any event to not prejudice future integration”.

5.72 The site is also located some 350m to the north of the Chilterns AONB and there is a legal duty on the Council under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the AONB in exercising any function affecting land in the AONB. Policies DM30 and CP10 also require all development in the setting of the AONB to not have a significant adverse impact on the natural beauty of the Chilterns AONB.

5.73 The proposal would have a single vehicular access to Wycombe Road that would extend into the centre of the site where there would be three main perimeter blocks of housing, with two runs of housing also backing onto the western boundary of the site. The layout of the roads and perimeter blocks is largely dictated by the shape of the site, its landforms (e.g. the valley to the southeast), and policy requirements (e.g. retain woodland, 25m separation distances, SUDS features, climate change mitigation, neighbour amenity, etc). However, it results in a legible and permeable layout with a northwest to southeast road alignment which is common in the wider

locality and reflects the alignment of the field boundaries on the boundaries of the site. Furthermore, there would be a clear distinction between the public and private realm with dwellings generally outward facing and providing good surveillance of the road networks, pedestrian routes and open space.

- 5.74 The development would include several flats over garages (FOGs) which have reduced ground floor surveillance. However, the FOGs would be subject to ground floor surveillance from properties opposite and would neighbour dwellings offering ground surveillance such that it is considered these units would not have unacceptable impact on the quality of the development. Furthermore, it is that no objections were raised regarding the inclusion of a FOG in the appeal scheme.
- 5.75 The proposed creation of perimeter blocks with parking predominantly to the front or the side of properties would also generally ensure good surveillance of parking spaces. There are a couple of instances where parking is adjacent to rear garden boundaries that is not subject to ground floor surveillance from the dwelling it would serve (for example plots 78 and 79 and the parking associated with and to the rear of the FOGS). Such arrangements are poor from a crime prevention perspective in terms of security of vehicles and rear boundaries. However, boundary treatments including trellising could be secured at the reserved matters stage to improve surveillance of these spaces and the parking courts to the rear of the FOGS would be small (4-6 spaces), only contain allocated parking spaces, and details of landscaping can be secured at the reserved matters stage. In addition, further details of the gates to the parking courts for the flats can be secured at the reserved matters stage together with ensuring that windows in the flats and FOGs provide overlooking the parking courts. Overall, it is considered that the layout of parking is not objectionable from a placemaking perspective.
- 5.76 It is noted that concerns from several parties have been raised regarding surveillance along the access drive into the site. However, whilst it is acknowledged that surveillance would not be ideal along this section of the site, windows in the flatted block would be able to offer longer views down the access drive which can be secured at the reserved matters stage. Furthermore, and as detailed by the Inspector for the previous appeal on this site, the access drive is identified in the allocation as suitable for serving the site and would have a level of traffic movements and activity which would limit deficiencies in informal surveillance from occupied properties.
- 5.77 The scale and appearance of the dwellings is a reserved matter, however the layout shows a good mix of property types across the site, including detached, semi-detached, terraced, flats, and FOGs. Furthermore, the details indicate that the new properties would predominantly be two storey, although some properties may include accommodation in their roof space and the flatted block would be three storey in scale. Whilst three storeys is not the predominant scale of properties in Hazlemere or Holmer Green, there is considerable variety in the size and appearance of properties in both villages and there are examples of three and four storey

developments in the wider locality, including at Park Parade and Turners Place. Furthermore, the siting of the three storey apartments overlooking the open space and access drive to the north of the development would provide good enclosure and surveillance of these public areas, prevent overshadowing issues, and the open space would also provide an appropriate setting for this taller block.

- 5.78 Turning to the public realm and open space, whilst landscaping is a reserved matter the layout indicatively details street trees along all roads in the development, which would enhance the quality of the development as well as serving to break up the appearance of parking areas and help to address the urban heat island effect. In addition, there would be three main landscaped areas of open space, two larger areas to the north and south and small pocket of open space to the western boundary.
- 5.79 The northern area of open space would retain the woodland to the northeast and reinstate the former orchard to the northwest and, therefore, would meet the requirements of part 1a of Policy HW8 to maintain the sense of separation between Hazlemere and Holmer Green. This matter is discussed at length in the decision notice for the previous appeal on the site (as set out in the Planning History section above), with the Inspector clarifying that the requirement for separation relates to the northern boundary only and that the existing trees and woodland on the northern part of the site (including the removed orchard) current separate the two settlements. Furthermore, the Inspector found that the absence of the retention of both the woodland and the area of the former orchard resulted in the appeal scheme being considered to fail to maintain a sense of separation.
- 5.80 The southern area of open space would be flanked by pedestrian and cycle connections to either side, with the eastern connection also including an emergency vehicle route. These connections would link up with connections proposed under the adjoining application on the neighbouring southern part of the HW8 site (21/08364/FUL) and, subject to step in rights being granted via legal agreements, it is considered that this provides evidence of comprehensive development. Indeed, and as detailed above, the Inspector for the previous appeal on the site was clear that the importance of the comprehensive requirement stems from the need to ensure that facilities in Holmer Green are accessible on foot from the southern parcel as well as to provide adequate connections for emergency vehicles.
- 5.81 The southern open space area would also be located beside the main open space area of the adjoining neighbouring HW8 development parcel with the pedestrian and cycle connections between the two ensuring that they can function as a central area of open space shared by both developments. The application site would be reliant on the adjoining southern parcel to meet the main play and outdoor recreation requirements of its future occupants; application 21/08364/FUL on the neighbouring scheme proposes that such facilities are sited adjacent to the boundary with the site and adjoining the pedestrian connections such that they would be readily accessible.

This approach prevents a duplication of play and recreation facilities and allows for both developments to be served by a meaningful central area of open space. Therefore, it is considered that the approach to open space and play facilities provides further evidence of a comprehensive approach.

- 5.82 The proposals also provide continuous, legible and attractive routes through the application site for occupiers of the southern HW8 parcel to access Wycombe Road on foot or by cycle. Furthermore, there are clear routes through the neighbouring southern site from the application site to the new cycle pedestrian and connections proposed on the A404 allowing access to the AONB. It is considered that this also provides evidence of the integration and comprehensiveness of the two schemes.
- 5.83 Therefore, the joined-up approach to connections, open space and play facilities with the neighbouring HW8 parcel is considered to demonstrate a comprehensive and integrated approach and a compliance with the Policy requirements of HW8 and HAZNP5 in this respect.
- 5.84 With regards to landscape, the application has been supported by a LVIA addendum and it is noted that the Chilterns AONB lies approximately 350m to the south of the site. Views of the development on site from the AONB would be limited and where they are available would be in the context of existing built form and landscape features. Furthermore, the Council's Landscape Officer raises no concerns regarding the wider landscape and visual effects arising from the proposal.
- 5.85 Overall, it is considered that the proposal is broadly in accordance with good placemaking and design principle and would meet with the site-specific policy requirements in the development plan and emerging Hazlemere Neighbourhood Plan to maintain a sense of separation between the two Parishes and form a comprehensive and integrated development with the neighbouring HW8 parcel. Furthermore, it would not have any objectionable impacts on the wider landscape, including the setting of the Chilterns AONB.

Historic Considerations

Wycombe District Local Plan (August 2019): CP9 (Sense of place), CP11 (Historic Environment), DM20 (Matters to be determined in accordance with the NPPF), DM31 (Development Affecting the Historic Environment)

- 5.86 There are no listed buildings or conservation areas within the application site. Furthermore, it is considered that the proposals would not affect the setting of any such designated heritage asset.
- 5.87 Buckinghamshire Council Archaeology have identified that there is some archaeological potential on the site. However, given that the recent archaeological investigation to the south of this proposal for application 21/08364/FUL did not

record any significant features or finds, it is considered that the archaeological potential is low. Therefore, the Council's Archaeologists have advised that this matter can be addressed by conditions to secure appropriate investigation, recording, publication and archiving to be carried out, including a pre-development written scheme of investigation to include a geophysical survey and trial trenching.

Amenity of existing and future residents

Wycombe District Local Plan (August 2019): DM35 (Placemaking and Design Quality), DM40 (Internal space standards)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

Chiltern District Local Plan (1997): GC3 (Protection of Amenities Throughout the District)

Residential Design Guide SPD

Development Brief

- 5.88 Matters of scale and appearance are reserved matters and as such elements of considering amenity would be left for any subsequent reserved matters application(s). Notwithstanding this, layout is for consideration under this application and therefore the positioning of dwellings and their relationship with neighbouring properties can be assessed.
- 5.89 The proposed layout includes a back-to-back and side to back relationship with existing properties on Lacey's Drive, Kestrel Drive and Inkerman Drive.
- 5.90 The spacing between elevations of the proposed dwellings and existing dwellings on Lacey's Drive would generally be more than 45m, with the closest properties some 39m apart (i.e Plot 49 and No.27), which exceeds the planning authority's separation guidance to ensure adequate privacy. Furthermore, the spacing between the new dwellings and the rear boundary would generally be some 10m which is sufficient to ensure no adverse overlooking arises, notwithstanding the position of any openings.
- 5.91 There would be two plots (i.e. 37 and 49) located much closer to the rear boundaries of properties on Lacey's Drive. However, given the large existing rear garden depths and subject to these new dwellings being two storey with hipped roofs as indicatively shown on the submitted details, it is considered that the layout would not give rise to an unacceptable relationship in terms of intrusion, privacy and daylight/sunlight to these properties. Furthermore, the relationship of plot 49 to 27 Lacey's Drive is similar to that already considered acceptable as part of the previous appeal on the site.
- 5.92 With regard to existing dwellings on Kestrel Drive and Inkerman Drive, it is noted Figure 14 in the Local Plan (an indicative plan drawn for capacity purposes only and

not part of Policy HW8 as acknowledged by the Inspector for the previous appeal on this site) identifies that these properties benefit from a “sensitive existing residential boundary”. However, the identified sensitive zone on Figure 14 comprises the original line of the rear boundaries of these properties (located some 8-9m from the rear of these dwellings) and does not include the additional parcel of land to the rear of their original gardens (some 15m deep) that have subsequently been converted from agricultural to garden land (see for example application 13/06640/FUL).

- 5.93 As a result of the extended garden areas, the back-to-back spacing between the new dwellings and properties at 29-36 Inkerman Drive would be 32m at its closest with first floor openings some 11m from the shared boundary. Again, these are acceptable spacing distances to ensure an acceptable level of amenity. Additional landscaping is indicatively shown to be proposed along this boundary and would help soften the impact of the development.
- 5.94 It is noted that there would be a rear parking court adjacent to the boundary with 29 Inkerman Drive. However, this parking court would be small, containing 4 allocated spaces, and subject to suitable boundary treatments, access controls and landscaping (which would fall to be addressed at the reserved matters stage), this would not be an unusual or unacceptable amenity relationship.
- 5.95 Nos 1-3 Kestrel Drive would have a different relationship with the development, due to the siting of the new dwellings (plots 50-52) to the rear of Nos 1-2 at right angles to these properties (i.e. a side to back relationship), and No.3 representing an anomaly in the pattern of development as it is sited immediately adjacent to the application site boundary.
- 5.96 In respect of Nos 1-2 Kestrel Drive, it is noted that the flank of plot 50 would only be some 4m from the rear boundary of No.2. However, No.2 benefits from an extended rear garden area which also wraps around the rear of No.1. As such, the smaller garden of No. 1 would effectively be buffered by the garden of No.2 (which includes several outbuildings adjacent to the rear boundary of No.1) and the flank of plot 50 would be over 25m from the closest point of the rear elevation of these properties (a conservatory to the rear of No. 2) such that the separation distances would be acceptable. This is on the basis that Plot 50 comprises a two-storey property with a hipped roof as indicatively shown on the submitted details, and no first-floor flank windows. These matters of scale and appearance can be addressed at the reserved matters stage together with details of landscaping to help soften the appearance of the development, and it is considered the indicative details shows that the layout would not give to an unacceptable relationship in terms of intrusion, privacy and daylight / sunlight to Nos 1-2 Kestrel Drive.
- 5.97 No.3 Kestrel Drive represents an anomaly in the pattern of development along the western boundary of the site, as it is sited immediately adjacent to the application site boundary. Furthermore, the property contains several openings within its rear elevation which face directly onto the site. To ensure that the amenity of this

neighbour is not significantly compromised the scheme proposes that no dwellings are immediately to the rear of this property and that the area adjacent to this existing dwelling is left to open space. There is a terrace of new dwellings (plots 47-49) at right angles to the northern rear corner of No.3 overlooking this new area of open space, however this is a similar relationship to that proposed under the appeal scheme and would not result in an unacceptable impact on the amenities of this neighbouring property.

- 5.98 The proposed area of open space to the rear of No.3 Kestrel Drive, which would also be to the side of the extended garden of No.2 Kestrel Drive, would need careful treatment of its boundaries within these existing properties including boundary planting in the interests of neighbour amenity and security. However, this situation is also the same as the previous appeal scheme on the site and would be addressed at the reserved matters stage.
- 5.99 It is noted that representations have been received regarding covenants associated with the existing overhead cables on the site preventing planting on the boundaries of the extended gardens to the rear of properties on Inkerman Drive and Kestel Drive. However, the development would have to relocate these electric cables to be implemented and the applicant has submitted a cable routing plan showing the cables running underground and relocated to follow the new road network.
- 5.100 Turning to properties on Wycombe Road and Nos 5-9 (odd) Lacey's Drive, a new area of open space including an orchard, substation and play facilities would back onto these properties. As detailed above, the provision of this open space to afford a sense of separation to Holmer Green is a policy requirement and the omission of this area of open land was a key reason for the previous appeal scheme on the site being dismissed. Furthermore, as a result of its provision there would be no built form other than a small single storey substation to the rear of these neighbouring properties, with the proposed flatted block (shown as 3 storeys on the submitted details) some 45m from the northwestern boundary of the site and 90m from the rear elevations of properties on Wycombe Road. The new flats and dwellings would however offer beneficial overlooking of the open space and thus provide surveillance and sense of custodianship of this land. Although, careful consideration would need to be given to boundary treatments and landscaping of the open space at the reserved matters stage in the interests of neighbour amenity and security.
- 5.101 Similarly, the provision of the access to the site from Wycombe Road is a policy requirement and no objections were raised to the relationship of this with neighbouring properties under the appeal scheme. Careful consideration would again need to be given to boundary treatments and landscaping of this part of the site at the reserved matters stage in the interests of neighbour amenity and security.
- 5.102 Concerns have been raised with regard to noise, disturbance, and lighting from the site. While change is inevitable as a consequence of development, it is considered, based on the layout for consideration, that the proposed development would not

give rise to amenity issues arising from noise or light, however a condition relating to lighting would be necessary in the interest of amenity, dark skies and ecology.

5.103 In respect of the amenity of future occupiers of the proposed development, the layout demonstrates 25m back-to-back distances for all the perimeter blocks with the exception of the gap between units 78 and 79 which would be 23m. However, given the intervening parking spaces between the rear gardens of these units, it is not considered that this small shortfall is objectionable. Furthermore, the layout shows all houses would benefit from an appropriate level of rear amenity space, and indicative details have been submitted to show how the flatted block could incorporate balcony areas for all units. The flats over garages would not benefit for any amenity space, however this is not unusual for such units and they would have access to the generous levels of public open space provided as part of this and the neighbouring development. No objections are therefore raised with regards to the amenities of future occupiers of the site.

Flooding and drainage

Wycombe District Local Plan (August 2019): CP12 (Climate Change), DM39 (Managing Flood Risk and Sustainable Drainage Systems), HW8 (Land off Amersham Road including Tralee Farm, Hazlemere)

Core Strategy for Chiltern District 2011: CS4 (Ensuring that Development is Sustainable)

5.104 The application site lies within Flood Zone 1 as defined by the Environment Agency indicative flood map for planning and groundwater flood risk is also low. However, there is a narrow channel of identified surface water flooding which runs in a north-south direction across the southeastern corner of the site within the small valley.

5.105 The application has been supported by the FRA and surface water management strategy submitted pursuant to the previous appeal scheme on the site as well as an Addendum Drainage Strategy to update the surface and foul water drainage strategies to reflect the current layout. The surface and foul water drainage approach remains similar to the previous proposal, including permeable paving, bioretention areas, an infiltration basin and attenuation tanks for surface water and a new pumping station to the southern boundary of the site for foul water drainage.

5.106 The submissions demonstrate that no dwellings or land within their boundaries would be located within the surface water flow path. The emergency access route, embankment for the infiltration basin and internal access road including visitor parking would encroach onto the flow path. However, level details have been submitted to show the roads and parking at or below the existing ground levels so as not obstruct surface water flows and the infiltration basin shape has been amended during the course of the application to minimise the encroachment. Furthermore,

mitigation to compensate for the encroachment, comprising the localised lowering of land levels within the valley, has also been included in the drainage design.

- 5.107 The surface and ground water flood risk implications of the proposal, taking into account climate change impacts, have been assessed by both the LLFA and Thames Water, with neither consultee raising objections. This is however subject to conditions to secure the provision and management thereafter of a surface water drainage scheme and further details of the levels/kerbs for the access road, parking bays and informal footpaths within the open space.
- 5.108 In addition, Thames Water raise no objections with regards to the implications of the proposal on the capacity of the foul drainage network.
- 5.109 Affinity Water are responsible for water supplies in the area and have been consulted on the application but have not submitted any objections.

Biodiversity and green infrastructure

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), CP9 (Sense of place), CP10 (Green infrastructure and the Natural Environment), DM34 (Delivering Green Infrastructure and Biodiversity in Development)

DSA: DM11 (Green networks and infrastructure), DM13 (Conservation and enhancement of sites, habitats and species of biodiversity and geodiversity importance), DM14 (Biodiversity in development)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP2 (Protecting and Improving Green Infrastructure) and HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

Core Strategy for Chiltern District 2011: CS32 (Green Infrastructure)

Chiltern District Local Plan (1997): GC4 (Landscaping Throughout the District)

Biodiversity SPD

Canopy Cover SPD

- 5.110 The application has been supported by ecological reports to assess the biodiversity value of the site including an assessment and necessary surveys of the impact on protected species and Biodiversity Net Gain metric. No objections are raised to the proposal subject to conditions to safeguard protected species and secure biodiversity enhancements and a Legal Agreement to secure 10% biodiversity net gain (BNG).

Impact on Designated Sites

- 5.111 There are no statutory designated sites within the application site. There are 2 SSSI's (Sites of Special Scientific Interest) and 3 LNR's (Local Nature Reserves) within a 5km radius of the site, the nearest being 2.6km from the site. Given the distance of the

application site from designated sites, and the nature of the proposed development, the scheme would not have any adverse direct or indirect impact upon designated sites. In addition, the proposals would not have any direct or indirect impact on non-designated statutory sites. No concern has been raised through consultations with regard to impact on designated sites.

Impact on Protected Species and Habitats

- 5.112 The application has been supported by the ecological surveys submitted pursuant to the appeal scheme on the site, together with an Ecological Impact Assessment Addendum that reviews the findings of the previous surveys and summarises the implications of an updated site walkover carried out in January 2023.
- 5.113 The Ecological Impact Assessment Addendum details that the findings of the previous ecological assessments remain largely applicable in relation to protected species and their habitats. Therefore, the Addendum concludes that the proposed development, with appropriate mitigation, would have no direct adverse impact on protected species including great crested newts, badgers and bats.
- 5.114 Indeed, the surveys have not confirmed the presence of roosting bats, hazel dormouse, great crested newts or reptiles, although the site is used for navigating and foraging bats. The impact on navigating and foraging bats would however be mitigated through the retention of existing and new habitat corridors in the layout, although conditions relating to external lighting will also be necessary to mitigate impacts. Furthermore, the submissions suggest that the current scheme offers significant opportunities for navigating and foraging bats compared to the appeal scheme due to the proposed reinstatement of the orchard to the north of the site. Therefore, subject to measures to secure the provision and management of habitat corridors, ecology enhancements, control external lighting, and construction mitigation measures it is considered that the proposal would not have an unacceptable impact on these protected species.
- 5.115 The smooth newt *Lissotriton vulgaris* has been found onsite (in 2020) and immediately offsite (in 2017) and common frog *Rana Temporaria* has been found onsite (in 2020). However, the impact on these species can be adequately mitigated via a construction ecological management plan.
- 5.116 An active badger sett is located within the retained green space on site and would benefit from a buffer area of over 10m from any proposed development. As such, and given its connectivity to wider green infrastructure, the retention of the badger sett is considered to be achievable. Therefore, and subject to conditions, including conditions to secure ecological supervision and appropriate construction management practices it is considered that the proposal would not have an unacceptable impact on badgers.
- 5.117 The findings of the surveys and mitigation measures proposed with respect to protected species and their habitats are accepted by the Council's Ecology Officer.

Biodiversity Net Gain

5.118 The application has been supported by a DEFRA 3.1 Biodiversity Metric, which has been amended during the course of the application in response to comments from the Council's Ecology Officer.

5.119 As per the previous appeal scheme on site, it is not possible to provide a net gain in habitats/biodiversity on site and deliver the housing allocation. The current application does however represent a biodiversity improvement on the appeal scheme due to the proposed replanting of the recently felled remnant orchard. Indeed, the submissions detail that the appeal scheme would have resulted in a net loss of 5.32 (-23%) habitat units under the 3.1 metric, whereas the current application would result in a net loss of 3.08 habitat units (-13%).

5.120 Therefore, as well as conditions to secure the on-site enhancements and mitigation measures set out in the ecology submission, there would need to be offsite compensation to deliver the policy requirements of 10% net gain in BNG as required by the emerging HNP. The applicants have agreed to the principle of a financial contribution to deliver offsite net gain and this can be secured by legal agreement.

5.121 No objections are therefore raised with regards to BNG subject to conditions and a legal agreement.

Trees and canopy cover

5.122 Landscaping of the site is a Reserved Matter, however the outline application needs to demonstrate that it can achieve adequate canopy cover (achieved via a combination of tree retention and planting) in accordance with the 25% requirement set out in WDLP Policy DM34 and re-iterated within criterion E of Policy HAZNP2 of the emerging HNP.

5.123 In addition, WDLP Policy DM34 seeks to protect existing green infrastructure and details that trees shown to be retained through site layout and during construction should be protected. Furthermore, Criterion E of Policy HAZNP2 of the emerging HNP states that proposals that lead to the felling of one or more trees will be refused unless it can be demonstrated that is unavoidable and satisfactory mitigation measures are put in place.

5.124 Policy HW8 sets out the following site specific green infrastructure requirements which relate to retaining trees and hedgerows within the application site under criterion 3:

- a) Provide access to and retain the existing orchard within the north-east of the site;
- b) Provide protection and future management for the orchard;
- e) Retain the field boundaries within the site;

5.125 It is also noted that criterion C3 of Policy HAZP5 requires development proposals on the HW8 housing allocation to retain the hedges within the site.

- 5.126 In terms of the policy requirements to retain the field boundaries / hedges within the site, it is noted that the indicative plans in the supporting text for both site specific policies only shows this applying to the site boundary hedgerows and the hedgerows splitting the two main HW8 development parcels and running through the centre of the southern HW8 development parcel. Furthermore, the supporting text for both policies also detail that existing hedges should only be removed where an effective layout cannot otherwise be achieved. Whilst indicative plans and supporting text do not form part of the policy, nevertheless they indicate a reasonable approach to the interpretation and application of this policy requirement as the total retention of onsite hedgerows would clearly prevent the delivery of this allocated site. In addition, the guidance within the adopted Development Brief for the site does not identify that any internal hedgerows within the application site should be retained.
- 5.127 The application proposes that all boundary hedges and trees would be retained, including the southern hedgerow shown as retained on both indicative plans supporting Policies HW8 and HAZNP5 trees, with the exception of an Elder tree on the western boundary. This Elder (T10) is a category C tree according to the submissions and would need to be removed to deliver plot 49 as per the previous appeal scheme on the site. In addition, the application would retain and enhance the woodland to the northeast corner of the site and all the TPO trees to the north east corner of the site which neighbour the former remnant orchard. All of these TPO trees to the north east were shown to be lost as part of the previous appeal scheme.
- 5.128 The western part of the hedgerow neighbouring the southern side of the former remnant orchard would also be retained, but all remaining internal hedgerows within the site would be lost. The hedgerows to be lost would comprise the central and eastern part of the hedgerow enclosing the remnant orchard; a Leyland Cypress hedge and Western Red Cedar hedge also in the northeastern part of the site; and the remnants of a mixed hedgerow to the south west corner of the site. All of these hedgerows and associated trees are identified as low quality (category C or U in the submitted Arboricultural Assessment) and their removal is considered necessary and reasonable to facilitate the proposed development and thus the delivery of the housing allocation.
- 5.129 The submissions include an Arboricultural Method Statement (AMS), which details that there are no buildings within the root protection areas of retained trees and that the relationships between buildings and retained trees is sustainable in terms of shading. The AMS also contains a range of tree protection measures in root protection areas, including details of tree protection fencing and ground protection, non-dig construction for hardstanding, and guidance on installing infrastructure, which can be secured by condition to ensure the protection of all retained trees on site.
- 5.130 The orchard which neighbours the eastern side of the site is also the subject of a TPO. The scheme proposes an appropriate landscaped buffer adjacent to the boundary

hedge which separates this orchard from the site and this would ensure that these neighbouring protected trees are not unduly impacted by the proposal. This buffer is also important in the context of the orchard being a priority habitat.

5.131 The Council's Arboricultural Officer raises no arboricultural objections regarding the proposed development subject to conditions.

5.132 Turning to proposed tree planting and canopy cover, the indicative landscaping details demonstrate that trees can be provided within the street, rear gardens, parking courts, and the areas of open space, including notably the replanting of the remnant orchard to the northwest of the site and a small orchard area on the open space to the western boundary of the site. The retained woodland to the northeast of the site would also contribute towards canopy coverage together with the retained mature trees along the site boundaries.

5.133 The submitted canopy cover calculator summary indicates that the existing site has 14% canopy cover and that 29% canopy cover could be achieved through the indicative landscape proposals presented. Although, it is possible that that an even greater figure could be achieved through more detailed design. However, the submissions clearly demonstrate that the policy requirements for at least a 25% canopy cover can be achieved and will likely be exceeded on site, the precise details of which can be secured through condition and demonstrated in the subsequent reserved matters application for landscaping.

5.134 Overall, the submitted details indicate that the highest quality trees and hedgerows would be retained as part of the proposed layout. Furthermore, the loss of the poorer quality internal trees and hedgerows would be necessary and reasonable to allow the provision of the housing allocation. Moreover, and in any event, it is considered that the loss of onsite trees and hedges would be outweighed by the mitigation arising from the significant increase in canopy cover on site and the reprovision of orchards on the site. Therefore, the proposal would comply with Policies DM34, HW8 (parts A and B) and HAZNP2 and objections could not be sustained regarding the loss of internal hedges under Policies HW8 and HAZP5.

Green Infrastructure Links

5.135 Policy HW8 part 3d and Policy HAZNP part C2 requires development proposals to provide a Green Infrastructure link / connectivity through the valley of the site connecting the orchard in the northeast corner of the site with the woodland at Badger Way (to the western side of the southern part of the HW8 allocation).

5.136 Policy HAZNP5 also requires development to provide a green infrastructure corridor within the site along the rear of Wycombe Road (part C1); enhance the green infrastructure link along the northeastern boundary of the site (connecting the orchard adjacent the site to the north to the site to the wider countryside to the south) (part C4); and also to contribute to off-site green infrastructure network improvements adjacent to the site (part C5).

- 5.137 The woodland to the northeast of the site would be retained and enhanced with the former remnant orchard re-planted to the northwest of the site such that a substantial green infrastructure corridor would be provided to the rear of Wycombe Road.
- 5.138 The proposed layout also includes an area of open space to the southern part of the site which would follow the alignment of the valley through the site and adjoins with the southern hedgerow boundary and an area of open space on the neighbouring development parcel which links to the woodland at Badger Way. As such, the southern part of the site, cumulatively with the proposals on the adjoining part of the HW8 allocation, would result in a substantial central green infrastructure belt that follows the route of the valley across the HW8 allocation.
- 5.139 In addition, the proposal has been amended to set the northeastern access road some 8m back for the northeastern boundary with the neighbouring orchard and the pedestrian route along this boundary has also been set in with landscaping including tree planting indicatively shown along its route. As such, this would enhance the green infrastructure link between the on-site orchard and valley as well as the green infrastructure link along the north-eastern boundary of the site.
- 5.140 The development, therefore, would deliver green corridors running along three of the four boundaries of the site (the northwestern, northeastern and southeastern boundaries), which cumulatively with the neighbouring HW8 development proposals would achieve the policy requirements to provide a green infrastructure corridor to the rear of Wycombe Road, connect the onsite orchard with the valley and woodland on Badgers way, and enhance the green infrastructure link to the northeast boundary such that there would be corridors running northwest to southeast through the allocation.
- 5.141 Part C5 of Policy HAZNP5 also requires development proposals to contribute to off-site green infrastructure network improvements adjacent to the site. However, given the extent of green infrastructure linkages that would be delivered along the boundaries of the site, thus connecting in with and offering benefits to neighbouring green infrastructure it is considered that requirement would be addressed. Furthermore, and whilst not directly adjoining the site, the scheme would also deliver off site biodiversity enhancements via the requirement to secure 10% BNG as detailed above and thus the ecological impacts of the development would clearly be mitigated. In addition, and in any event, there is no defined Parish project to which any funding for off-site green infrastructure network improvements adjacent to the site could be secured against and, therefore, such a contribution would not meet the CIL122 tests. Therefore, no objections are raised regarding Part C of Policy HAZNP5.
- 5.142 Overall, it is considered that the proposal would provide and enhance green infrastructure links across the allocation which comply with the policy requirements.

Public open space

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), HW8 (Land off Amersham Road including Tralee Farm, Hazlemere)

DSA: DM16 (Open space in new development), DM19 (Infrastructure and delivery)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralee Farm)

Development Brief

- 5.143 Policy DM16 of the DSA states that the development of strategic sites will be expected to meet all local and strategic space requirements on site as a minimum. These are set at a standard of 1.15ha Local Open Space/1000 population, and 3.3ha Strategic Open Space/1000 population. The open space requirement for the site would equate to 0.93ha.
- 5.144 The scheme proposes a total open space provision of 1.14ha of Open Space across the site which is a sufficient quantum of open space to meet the cumulative requirements of local and strategic open space requirements for the proposed development in this instance.
- 5.145 The open space is split into 3 parcels of land, a northern parcel of open space which provides the required sense of separation to the Parish of Holmer Green, a small western parcel of open space which would act as a buffer to No 3 Kestrel Drive (as detailed above) and a southern parcel of land which would connect into the proposed neighbouring open space for the adjoining HW8 development the subject of application 21/08364/FUL. The southern parcel of open space would comprise an easily accessible and part of a shared area of open space for the wider HW8 development as well as the required green corridor through the site.
- 5.146 The open space area to the south includes the provision of a SUDs basin which would be provided within the south eastern corner due to the topography of the site. It will be necessary to ensure that this provides a feature which contributes positively to the overall recreational function of the open space and details of its final design and margin landscaping can be secured through condition, and through subsequent reserved matters applications.
- 5.147 The open space to the north would include an area of retained woodland and the submitted details indicate a new leisure route running through this woodland. This would comprise an attractive alternative area of open space. It is noted that this woodland does require initial and long-term management and maintenance to make it an attractive proposition for leisure, which can be secured by condition and as part of the legal agreement.

- 5.148 The application site also contains a small informal play facility in the northern parcel of open space, which would take the form of a Local Area for Play (LAP) and further details of this can be secured through condition and Legal Agreement.
- 5.149 The HW8 site also needs to provide a Neighbourhood Equipped Area for Play (NEAP) with a Multi Use Games Area (MUGA) to meet the outdoor play requirements of the allocation as set out in the Development Brief. The developer for the neighbouring parcel is proposing such facilities adjacent to the southern boundary of the site and it is recommended that the Legal Agreement includes provisions to ensure that this is provided.
- 5.150 It is considered that the proposed development meets the requirements of Policy DM16 in terms of open space delivery, in isolation, and also that a comprehensive approach has been taken to the delivery of open space and recreation facilities across the wider HW8 allocation.

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)

Chiltern District Local Plan (1997): GC9 (Prevention of Pollution Throughout the District)

Air Quality SPD

5.151 Environmental Health have reviewed the application in terms of noise, air quality and land contamination matters and have not raised any objections subject to conditions to secure EV charging points in accordance with the Air Quality SPD and a land contamination remediation scheme.

5.152 It is also recommended by officers that a condition is imposed to secure a Construction Environmental Management Plan (CEMP) to control the construction impacts of the proposed development (e.g. noise and dust).

Building sustainability and climate change

Wycombe District Local Plan (August 2019): CP12 (Climate Change), DM33 (Managing Carbon Emissions: Transport and Energy Generation), DM34 (Delivering Green Infrastructure and Biodiversity in Development), (DM41 (Optional Technical Standards for Building Regulations Approval)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP3 (Delivering Zero Carbon Buildings)

Air Quality SPD

- 5.153 Policy CP12 of the WDLP sets out that the Council seeks to promote mitigation and adaptation to climate change through the incorporation of SUDS into the design of new developments, ensuring flood risk assessments take into account climate change factors, adopting higher water efficiency standards, introducing a requirement to contribute to mitigating urban heat island effects and increases in air pollution, and supporting the integration of renewable technologies.
- 5.154 The measures set out in strategic Policy CP12 are then secured through detailed DM policies, with Policy DM39 addressing the climate impacts on flood risk and SUDS; Policy DM41 providing further details on the specific water standards; the canopy cover requirement of Policy DM34 addressing the urban heat island effect and pollution issues; and Policy DM33 requiring the integration of renewal technologies and these matters are addressed in turn below.
- 5.155 As detailed in the Flooding and Drainage section above, the proposal addresses the climate change implications of flood risks and incorporates SUDS features to accord with Policy DM39.
- 5.156 The water efficiency standards set out in Policy DM41 can be conditioned to ensure compliance with this requirement.
- 5.157 In addition, and as detailed in the Biodiversity and Green infrastructure section above, the details submitted indicate that the proposed development would be able to meet the 25% canopy cover requirements and thus would include measures to mitigate against the urban heat island effect and increases in air pollution as required by Policy DM34.
- 5.158 Finally, the submitted Energy and Whole Life-Cycle Carbon Statement sets out that the development would incorporate rooftop mounted PV and further details of this renewable technology can be secured by condition to meet the requirements of Policy DM33.
- 5.159 Policy HAZNP3 of the emerging HNP also seeks to address climate change and includes the following requirements relevant to the application proposals:
- A. All development should be 'zero carbon ready by design; to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping*
- C. Where the PassivHaus or equivalent standard is not proposed for a new or refurbished building the applicant must demonstrate that the building has been tested to ensure there will be no energy performance gap using a Post Occupation Evaluation Report.*
- D. All planning applications for development (except householder applications) are required to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and carbon emissions resulting from the use of the building over its entire life.*

- 5.160 The applicant has submitted a Zero Carbon Ready by Design Statement. This sets out a range of measures incorporated in the development to address Policy HAZNP3(A), including avoiding development in the part of the site with steepest landforms, a perimeter block layout with 25m back to back distances and predominantly two storey dwellings to prevent overshadowing, locating the taller flatted block to the north of the site which would also prevent overshadowing, only a limited proportion of the development has north facing dwellings and these will be designed to be dual aspect, and allowance for appropriate street trees to mitigate the urban heat island effect. Although, it must be acknowledged that there are also a variety of other non-climate change related constraints and policy requirements that need to influence the layout of a development including the shape and size of the development parcel, features that need to be retained such as trees, hedgerows and surface water flow path; character of the surrounding area; amenity of neighbouring properties; access points; etc. However, overall, it is considered that the layout adequately addresses the requirements of part A of Policy HAZNP3.
- 5.161 The requirement of part C of Policy HAZNP3 for the completed development to have no energy performance gap can be addressed via a condition requiring the submission of a Post Occupation Evaluation Report including remediation measures as necessary.
- 5.162 The applicant has submitted an Energy and Whole Life-Cycle Carbon Statement to address the requirements of part D of Policy HAZNP3. This details that the development would exceed the average LETI Life Cycle Embodied Carbon Rating for residential developments via the incorporation of measures to embodied carbon from the construction of the development (e.g. use of natural insulation materials, PVC rather than aluminium windows, use of timber within the structure, etc) and carbon emissions resulting from the use of the development over its entire life (e.g. fabric first approach, utilising rooftop mounted solar PV, etc). It is recommended that further details of and implementation of the measures within the statement are secured by condition, including achieving a minimum of a LETI Life Cycle Embodied Carbon rating of D.
- 5.163 It is noted that a large number of the objectors to the application have raised concerns with regards to climate change, reducing carbon emissions and targets, and the climate emergency. However, as detailed above, the proposal would comply with the relevant climate change policy requirements and whilst it is presently a largely greenfield site, it remains an allocated site within the Development Plan whereby its redevelopment for housing has been accepted.

Infrastructure and Developer Contributions

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), HW8 (Land off Amersham Road including Tralee Farm)

DSA: DM19 (Infrastructure and delivery)

Emerging Hazlemere Neighbourhood Plan (Referendum Version 2023): HAZNP4 (Promoting Sustainable Transport) and HAZNP5 (Planning for Sustainable Development at Amersham Road/Tralelee Farm)

Core Strategy for Chiltern District 2011: CS31 (Infrastructure)

Planning Obligations SPD

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

5.165 The Planning Obligations SPD sets out the Local Planning Authority's approach to when planning obligations are to be used in new developments.

Education

5.166 Policy HW8 acknowledges that development of this site will be required to meet the needs arising from the development for additional primary school places. The WDLP was drafted at a time whereby the adjoining site was being considered for allocation in a new Chiltern and South Bucks Local Plan. The policy justification acknowledges this and states that should both sites come forward for development then a new primary school would be required to serve both HW8 and the adjoining site within the former Chiltern area. The Chiltern and South Bucks Local Plan is no longer progressing and as such that site is not allocated.

5.167 Paragraph 5.1.69 of the WDLP states that "Alternatively, a commensurate financial contribution (via a S106 planning obligation) will be required for the provision of additional school places if the adjoining Chiltern site is not allocated or if it can be demonstrated to the satisfaction of the Local Education Authority that these needs will be better met through the expansion of existing schools". As the adjoining site is not advancing at this stage there is no justification for the provision of a new school to be provided on site.

5.168 The Local Education Authority have provided comments on the application and have advised that it would be necessary to secure financial contributions towards the primary school expansion programme for the High Wycombe area.

5.169 With regards to secondary schools, the Infrastructure Delivery Plan confirms that in the majority of cases the Council will not seek specific s.106 contributions for secondary school provision. There is no specific reference to deliver secondary funding within the HW8 policy through financial contributions by way of S106. The IDP confirms that funding will be sourced from capital funding, Government grants, as well as funds from the Community Infrastructure Levy (CIL).

Health Facilities

5.170 Policy CP7, which relates to Delivering Infrastructure to support growth, states that where justified, development will be required to provide or contribute towards the

delivering key infrastructure requirements for the district. This includes, inter alia, new primary care facilities where required, and facilities which promote healthy living including open space and recreation. There is no specific requirement identified within Policy HW8 for the delivery of health facilities.

5.171 The NHS Buckinghamshire Healthcare Trust (BHT) and NHS Integrated Care Board (ICB) have both been consulted on the application. BHT have not responded to the consultation, but the ICB have provided comments as addressed in more detail below.

5.172 The NHS ICB have advised that the increase in population will have an effect on surgeries and the surrounding area. This increase in pressure would amount to further pressure on GP practices through the need for more consulting rooms and larger/additional waiting areas and car parking. Therefore, in order to cope with the additional pressure, the ICB have requested financial S106 contributions for infrastructure.

5.173 The ICB have submitted calculations and methodology for a contribution based on average floor space per patient, build costs per sqm, and an estimation of the population arising from the proposed development. In addition, the ICB have specified the GP surgeries that the contribution would serve, detailing that it would be an extension to either Hazlemere Surgery or Highfield Surgery. It is considered the information submitted by the ICB is adequate to satisfy Regulation 122 of the CIL Regulations and therefore it is recommended that this financial contribution for health infrastructure is secured by s106.

Utilities

5.174 Concerns have been raised with regard to existing utilities infrastructure including matters relating to sewerage and water.

5.175 However, it is proposed that surface water will not connect to the network, and the LLFA is content with the principles of the scheme presented which includes SUDS feature that take into climate change.

5.176 Thames Water also raise no objections regarding surface water, the waste water network and sewerage treatment works infrastructure capacity serving the development.

5.177 Affinity Water have also been consulted on the application, but have not responded to the consultation.

Other Infrastructure

5.178 The development is CIL chargeable and, with the exception of education contributions, Policy HW8 does not identify other specific contributions towards other social infrastructure to be provided.

Planning Obligations

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

- a) Provision of a minimum 48% on-site affordable housing (and related controls) - 25% First Homes with the remaining 75% split 80% affordable housing for rent and 20% intermediate housing.
- b) Provision of 4 custom/self-build dwellings (5% of the proposed dwellings)
- c) Provision of on-site public open space, including LAP and on site woodland, and its future management and maintenance
- d) Provision and future management and maintenance of MUGA and NEAP on Bellway development at agreed occupancy trigger if not provided by Bellway
- e) Provision of and management / maintenance of a pedestrian connections between site boundary and MUGA and NEAP on Bellway development at agreed occupancy trigger if not provided by Bellway
- f) Future management and maintenance of on-site sustainable drainage system
- g) Provision of a scheme of biodiversity off-setting to provide a 10% net gain in biodiversity
- h) Financial contributions towards off site highways works including provision of Real Time Passenger Information at bus stops on Sawpit Hill
- i) Provision of waiting restrictions at the access onto Wycombe Road [£15k]
- j) Provision of zebra crossing on Wycombe Road/Browns Road
- k) Travel Plan and monitoring
- l) Provision of a car club vehicle within the site
- m) Future management and maintenance of off plot EV charging
- n) Provision and maintenance of a pedestrian route (either permanent or temporary until permanent routes are provided) to provide access between Wycombe Road and the southern site boundary including a step in right for the route to be constructed by Bellway
- o) Provision and management / maintenance of emergency vehicle accesses connection to southern boundary of site
- p) Removal of any ransom opportunities relating to other development of the HW8 site.
- q) Financial contribution towards primary education in the area
- r) Financial contribution towards NHS primary care in the area
- s) Future occupiers to enter into covenants regarding trees on plot

5.180 The applicant has confirmed that they are willing to enter into a legal agreement to secure obligations relating to the above matters.

Other Matters

5.181 Various comments have been made with regard to the cumulative total of dwellings proposed with the undetermined application on the neighbouring parcel to the south. However, the Local Plan identifies an indicative capacity of some 350 dwellings to be provided on HW8 and following amendments to both the current application and the adjoining application to the south, should planning permission be forthcoming on both schemes this would result in a cumulative total of 346 dwellings. There would remain several small undeveloped parcels of the HW8 allocation on the southern A404 Amersham Road frontage, however the southern undetermined application extends outside the original HW8 allocation. Furthermore, and in any event, as detailed above it is considered that the current application for determination, at 87 units, proposes a proportionate quantum of development within the allocated site.

6.0 Weighing and balancing of issues / Overall Assessment

- 6.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.
- 6.2 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
 - a. Provision of the development plan insofar as they are material,
 - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
 - c. Any other material considerations
- 6.3 As set out above it is considered that the proposed development would accord with the development plan policies taken as a whole to deliver sustainable development in the environmental, social and economic context. The few instances of non-compliance have been detailed and justified in the report and do not outweigh this conclusion.
- 6.4 The development would bring the following benefits:

- a. The provision of housing on an allocated site for which there is a need and which will count towards the Council's 5-year housing land supply.*
 - b. The provision of affordable housing for which there is a significant need in the area.*
 - c. The provision of self-build and custom housing.*
 - d. The provision of wheelchair user dwellings and accessible and adaptable dwellings.*
 - e. The provision of new open space, recreation and play equipment to serve the community.*
 - f. Enhancement to on site woodland, replanting of orchard and delivery of 25% canopy cover on site*
 - g. Community Infrastructure Levy will be paid which will fund local infrastructure.*
 - h. In the short term employment in the construction industry.*
- 6.5 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.
- 6.6 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 87 dwellings at land at Tralee Farm, off Wycombe Road. The development would be accessible to those with and without the relevant protected characteristics stated above and no discrimination or inequality would arise from the proposal.
- 6.7 The Human Rights Act 1998 Article 1 the protection of property and the peaceful enjoyment of possessions, and Article 8 the right to respect for private and family life, have been taken into account in considering any impact of the development on residential amenity and the measures to avoid and mitigate impacts. It is not considered that the development would infringe these rights.

7.0 Working with the applicant / agent

- 7.1 In accordance with paragraph 38 of the NPPF (2023) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 7.2 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.

7.3 In this instance

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

8.0 Recommendation

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

- a) Provision of a minimum 48% on-site affordable housing (and related controls) - 25% First Homes with the remaining 75% split 80% affordable housing for rent and 20% intermediate housing.
- b) Provision of 4 custom/self-build dwellings (5% of the proposed dwellings)
- c) Provision of on-site public open space, including LAP and on site woodland, and its future management and maintenance
- d) Provision and future management and maintenance of MUGA and NEAP on Bellway development at agreed occupancy trigger if not provided by Bellway
- e) Provision of and management / maintenance of a pedestrian connections between site boundary and MUGA and NEAP on Bellway development at agreed occupancy trigger if not provided by Bellway
- f) Future management and maintenance of on-site sustainable drainage system
- g) Provision of a scheme of biodiversity off-setting to provide a 10% net gain in biodiversity
- h) Financial contributions towards off site highways works including provision of Real Time Passenger Information at bus stops on Sawpit Hill
- i) Provision of waiting restrictions at the access onto Wycombe Road [£15k]
- j) Provision of zebra crossing on Wycombe Road/Browns Road
- k) Travel Plan and monitoring
- l) Provision of a car club vehicle within the site
- m) Future management and maintenance of off plot EV charging

- n) Provision and maintenance of a pedestrian route (either permanent or temporary until permanent routes are provided) to provide access between Wycombe Road and the southern site boundary including a step in right for the route to be constructed by Bellway
- o) Provision and management / maintenance of emergency vehicle accesses connection to southern boundary of site
- p) Removal of any ransom opportunities relating to other development of the HW8 site.
- q) Financial contribution towards primary education in the area
- r) Financial contribution towards NHS primary care in the area
- s) Future occupiers to enter into covenants regarding trees on plot

8.2 And the imposition of planning conditions broadly in accordance with the details set out in the report below as considered appropriate by the Director of Planning and Environment.

8.3 Or, if these cannot be achieved, then for the application to be REFUSED for such reasons as the Director of Planning and Environment considers appropriate.

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

Reserved matters and time limits

1. Details of the appearance, scale and landscaping (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority prior to the commencement of development, and the development shall be carried out as approved.

Reason. That the application is expressed to be an outline application only

2. Application for approval of all reserved matters shall be made to the Local Planning Authority not later than three years from the date of this permission.

Reason. To comply with the requirements of Section 92 of the Town & Country Planning Act 1990 (as amended)

3. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission or before the expiration of two years from the date of approval of the reserved matters, whichever is the later.

Reason:

To comply with the requirements of Section 91 of the Town & Country Planning Act 1990 (as amended).

Approved Plans

4. The development hereby permitted shall be carried out in accordance with attached schedule of approved plans.

Reason:

In the interest of proper planning and to ensure a satisfactory development of the site.

Accessibility and Water Efficiency Standards

5. Plots 1, 4, 7, 9, 12, 15, 17, 18, 33, 34, 35, 36, 61, 64, 71, 72, 81, 83, 84, 85, and 86 hereby permitted shall be designed and built to achieve the standards in Building Regulations Approved Document M4(3) and the remaining dwellings other than plots 39, 46 and 53 hereby permitted shall all be designed and built to achieve the standards in Building Regulations Approved Document M4(2).

Reason:

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

6. The development hereby permitted shall be designed and constructed to meet a water efficiency standard of no more than 110 litres per head per day.

Reason:

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

Reserved Matters Application Requirements

7. Notwithstanding the details of layout hereby approved, the Reserved Matters applications for Scale and/or Landscaping shall be accompanied by:

(a) Existing ground levels on site (spot heights) including a datum point that is located off site. Levels should be Above Ordnance Datum (AOD).

(b) The level of the roads outside the site. (AOD).

(c) The proposed levels on site following completion of the development (for each existing height a proposed height should be identified).

(d) The location and type of any retaining structures needed to support ground level changes.

(e) The Finished Floor Level for every building that is proposed.

(f) Cross sections within the site taken up to the site boundaries. The information supplied should clearly identify if land levels are being raised or lowered.

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

Reason:

To ensure that the work is carried out at suitable levels in the interests of the character and appearance of the area, to safeguard the setting of the Chilterns AONB and wider views, and protect residential amenities.

8. The Reserved Matters applications of Landscaping shall comply with the canopy cover requirements of Policy DM34 and the Canopy Cover Supplementary Planning Document and be accompanied by:

- An assessment of the existing and retained canopy of the site which relates to details produced in line with BS5837:2012 (electronic copy as per SPD)
- An assessment of the canopy cover value to be provided by new trees (electronic copy as per SPD) demonstrating how a future canopy cover of at least 25% of the site area will be achieved.
- An assessment of the canopy cover value to be provided by new green infrastructure elements (electronic copy as per SPD)
- A canopy cover plan showing existing, retained trees and new canopy cover provided by trees (with canopy at size of planting and in the future), green walls and green roofs.
- The plan will be annotated with a reference for each tree/element and their canopy cover area value.

Reason:

To ensure the canopy cover requirements for the site can be met in accordance with the Canopy Cover Supplementary Planning Document.

9. The Reserved Matters application(s) for Landscaping shall include a fully detailed landscape scheme which shall include:

- a) A scaled plan showing all existing vegetation and landscape features, on and off site, to be retained and trees and plants to be planted;
- b) The design of all boundary treatments and enclosures including gates to parking courts;
- c) Details of all play equipment and any other structures to be placed in the open space (e.g. litter bins, seating);
- d) Location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - i. permeable paving
 - ii. tree pit design
 - iii. underground modular systems
 - iv. Sustainable urban drainage integration

v. use within tree Root Protection Areas (RPAs)

- e) A schedule detailing species, sizes and numbers/densities of all proposed trees/plants;
- f) Landscaping measures to screen the parking to the rear of the flat over garage units, pumping station and substation
- g) Access road boundary treatment and landscaping
- h) Construction and alignment of the routes for pedestrians through the retained woodland on site

Reason:

To safeguard and enhance the character and amenity of the area, to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces within the development. This is in accordance with Policy DM34 of the Wycombe District Local Plan.

10. The reserved matters application(s) for Scale and Appearance shall include full details of any ancillary structures including the substation and pumping station hereby permitted. The development shall be carried out in accordance with the approved details.

Reason:

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

11. The reserved matters application(s) for Scale and Appearance shall demonstrate, through floorplans and an updated schedule of accommodation, that the number of habitable rooms proposed for each dwelling provides an overall optimum level of parking provision for the site in accordance with the Habitable Room Standards in Table 5 of the Buckinghamshire Countywide Parking Guidance. The dwellings shall be laid out in strict accordance with the approved details.

Reason:

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

12. The Reserved Matters applications of Landscaping, Scale and Appearance shall be accompanied by a Zero Carbon by Design Statement to demonstrate how the details of the landform, internal layout, building orientation, massing, and landscaping of the development will minimise the amount of energy needed to heat and cool buildings.

Reason:

To carbon emissions in the interest of climate change in accordance with Policies CP12, DM33, DM41 of the WDLP and Policy HAZNP3 of the emerging HNP.

13. The Reserved Matters applications of Appearance shall include full details of the rooftop PV panels required to comply with the recommendations in Paragraph 4.6 of the submitted Energy and Whole Life-Cycle Carbon Statement. The PV panels shall be provided in accordance with the approved details prior to the occupation of the building that they would serve.

Reason:

To support the integration of renewable and low carbon technology and reduce carbon emissions in the interest of climate change in accordance with Policies CP12, DM33, DM41 of the WDLP and Policy HAZNP3 of the emerging HNP.

Construction Management Plans

14. No development 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 (including working hours and details of all piling as appropriate), and 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.

Reason:

This is pre-commencement to protect the amenities of nearby residential properties and air quality

15. No development shall commence until a Construction Traffic Management Plan (CTMP) 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) has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with the approved CTMP.

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; and to protect residential amenity.

16. No development shall commence until a Construction Ecological Management Plan (CEcolMP) has been submitted to and approved in writing by the local planning authority. The CEcolMP shall include the following.

- a. Risk assessment of potentially damaging construction activities.
- b. Identification of "biodiversity protection zones".

- c. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d. The location and timing of sensitive works to avoid harm to biodiversity features.
- e. The times during construction when specialist ecologists need to be present on site to oversee works.
- f. Responsible persons and lines of communication.
- g. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h. Use of protective fences, exclusion barriers, escape ramps from trenches/holes and warning signs (including their specification, location and timing for erecting and dismantling).

The approved CEcolMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

Reason:

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

Archaeology

17. No development shall commence until archaeological evaluation in the form of a geophysical survey and trial trenching have been undertaken in accordance with a written scheme of investigation that has been submitted by the applicant and approved by the local planning authority. Where significant archaeological remains are confirmed, these will be preserved in situ and no development shall take place until an appropriate methodology for their preservation in situ has been submitted by the applicant and approved by the local planning authority and the development shall thereafter be carried out in accordance with the approved methodology. Where archaeological remains are recorded and are not of sufficient significance to warrant preservation in situ but are worthy of recording, no development shall take place until the implementation of a programme of archaeological works has been secured in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the local planning authority.

Reason:

This is a pre-commencement condition to ensure any archaeological remains that may be present are preserved in situ and/or recorded for future generations as appropriate and to comply with the requirements of Policy CP11 and the NPPF.

Land Contamination

18. No development other than demolition shall commence until a contamination remediation strategy has been submitted to and approved in writing by the Local Planning Authority. The

works in the approved remediation strategy shall be carried out in full and under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance.

Reason:

To ensure that the contamination of the site is properly dealt with and the risks to the planned end user group(s) minimised in accordance with the National Planning Policy Framework. This is because failure to remediate site contamination during development could result in serious long-term health impacts to future users of the development.

19. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The approved remediation strategy for this additional contamination shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance.

Reason:

To ensure that any potential contamination of the site is properly dealt with and the risks to the planned end user group(s) minimised in accordance with the National Planning Policy Framework. This is because failure to remediate site contamination during development could result in serious long-term health impacts to future users of the development.

20. Prior to the occupation of the development hereby permitted, a contamination validation report shall be submitted to and approved in writing by the Local Planning Authority. The validation report shall include details of the completed remediation works and quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post-remedial sampling and analysis to demonstrate that the site has reached the required clean-up criteria shall be included in the validation report together with documentation detailing the type and quantity of waste materials that have been removed from the site.

Reason:

To ensure that the contamination of the site is properly dealt with and the risks to the planned end user group(s) minimised in accordance with the National Planning Policy Framework. This is because failure to remediate site contamination during development could result in serious long-term health impacts to future users of the development.

Surfaced Water Drainage

21. No development other than demolition shall commence until such time as a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, as set out by the Addendum Drainage Strategy (ref. Acl713/20012/A/TN, 10th February 2023) and supporting Technical Notes (ref. Acl761/20012/A/TN, 15th June 2023) and (ref. Acl748/20012/TN, 31st March 2023), has been submitted to and approved in writing by the Local Planning Authority. The scheme shall also include:

- Detailed hydraulic modelling to support the detailed design of the flood compensation area shown on drawing no. 20-012-002 Rev D
- Flush kerbs will be provided through the engineered low points to ensure existing flood flow arrangements are not impeded in relation to the overland surface water flow route.
- Soakaways are to be situated a minimum of 10m away from any building.
- Assessment of the suitability of tree pits for tree planting adjacent to the highway and/or parking areas
- Infiltration rate testing in accordance with BRE365 in the specific locations of infiltration components
- Full construction details of all SuDS and drainage components
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.

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

Reason:

To ensure that there is a suitable mitigation strategy for managing surface water flood risk and a sustainable drainage strategy has been agreed in accordance with Paragraph 167 and 169 of the National Planning Policy Framework.

Highway safety and parking

22. No development other than demolition shall commence until details of the estate roads and footways have been approved in writing by the Planning Authority and no dwelling shall be occupied until the estate roads which provide access to it from the existing highway have been laid out and constructed in accordance with the approved details.

Reason:

In order to ensure that the estate road is of an appropriate design to minimise danger, obstruction and inconvenience to users of the highway and of the development.

23. No development other than demolition shall commence until details of the disposal of surface water from the highway have been approved in writing by the Planning Authority and no dwelling shall be occupied until the works for the disposal of surface water from the highway have been constructed in accordance with the approved details.

Reason:

To minimise danger and inconvenience to highway users.

24. Prior to the occupation of the development hereby permitted, the new means of access from Wycombe Road hereby permitted shall be sited and laid out in accordance with the approved drawing reference 141278/A/A07 Rev. A 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.

25. Prior to the occupation of the development hereby permitted, visibility splays shall be provided on both sides of the new vehicle access on Wycombe Road hereby permitted between a point 2.4 metres along the centre line of the access measured from the back line of footway and a point 43 metres along the back line of footway measured from the intersection of the centre line of the access and thereafter the area contained within the splays shall be kept free of any obstruction exceeding 0.6m in height above the nearside channel level of the carriageway.

Reason:

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

26. Prior to the occupation of the development hereby permitted, a car parking allocation and marking/identification scheme including a timetable/phasing details for the provision of all unallocated/visitor parking spaces shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be provided and retained and maintained in accordance with the approved scheme, with all on plot and allocated car parking spaces provided prior the occupation of the dwelling it would serve, and the unallocated/visitor car parking spaces provided in accordance with the approved timetable/phasing details.

Reason:

To ensure that adequate car parking is provided in the interests of highway safety and with regards to residential and visual amenity.

27. The car parking spaces, included those contained with carports, and manoeuvring and loading/unloading provisions for refuse and delivery vehicles hereby permitted shall only be used for the parking, manoeuvring and loading/unloading of vehicles and shall not be used for any other purposes.

Reason:

To ensure that adequate car parking is provided in the interests of highway safety and with regards to residential and visual amenity.

28. Notwithstanding the provision of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking and re-enacting that Order with or without modification), no external or internal alterations other than maintenance shall take place to any carports hereby approved.

Reason:

To ensure that adequate car parking is provided in the interests of highway safety and with regards to residential and visual amenity.

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

Reason:

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

Green Infrastructure and Ecology

30. The development hereby permitted shall be landscaped and planted in accordance with the details approved pursuant to the reserved matters application(s) of Landscaping. All hard surfacing and means of enclosures in the approved details of landscaping shall be carried out prior to the occupation of the development and all planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation or the completion of the development, whichever is the sooner. Any trees, plants or areas of turfing or seeding which, within a period of 5 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, green infrastructure and biodiversity, and to ensure a satisfactory standard of landscaping.

31. No development shall commence until a fully detailed scheme for the protection of the retained trees (including within the retained woodland), in accordance with BS 5837:2012, including a tree protection plan (TPP) and an Arboricultural Method Statement (AMS) have been submitted to and approved in writing by the Local Planning Authority. Specific issues to be dealt with in the TPP and AMS:

- a) Location and installation of services/ utilities/ drainage that may impact on retained trees
- b) Methods of any construction-related activities within the root protection area (RPA as defined in BS 5837: 2012) of the retained trees.
- c) A full specification for the installation of boundary treatment works that may impact on the retained trees.
- d) A full specification for the construction of any roads, parking areas, driveways and pathways including details of the no-dig specification and extent of the areas of the roads, parking areas and driveways to be constructed using a no-dig specification. Details shall include relevant sections through them.
- 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.
- h) Methodology and specification for any facilitation pruning, including root pruning in accordance with BS3998:2010
- i) Arboricultural supervision and inspection by a suitably qualified tree specialist
- j) Methods to improve the rooting environment for retained trees and landscaping

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

Reason:

This is a pre-commencement condition which is required to satisfy the Local Planning Authority that the trees to be retained not be damaged during construction and to protect and enhance the character of the site, in accordance with Policy DM34 and pursuant to section 197 of the Town and Country Planning Act 1990.

32. With the exception of any pruning, tree surgery or felling specifically shown in the Arboricultural Report (reference TGA.2529ArbImpactAssessmentRevA) submitted as part of the application or landscaping scheme to be submitted as part of the reserved matters application(s) for Landscaping, no trees or hedge shown to be retained shall be pruned, felled or removed without the prior approval in writing of the Local Planning Authority. If during construction of the development, or within a period of five years of its completion, any such tree or hedge shown to be retained dies or becomes damaged, destroyed, diseased or dangerous, it shall be replaced during the following planting season by another healthy tree, or hedge as the case may be of a similar size and species, unless otherwise approved in writing by the Local Planning Authority. Thereafter any such replacement planting shall be maintained or further replaced as necessary for five years after replacement.

Reason:

To ensure the satisfactory retention of existing trees, and hedges in the interests of amenity, green infrastructure and biodiversity.

33. No development (other than demolition) shall take place until a tree planting and canopy cover implementation and management scheme produced in line with the Canopy Cover Supplementary Planning Document has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include the following:

- a. Details of tree pit design and required soil volume,
- b. The locations of underground infrastructure to demonstrate that there are no clashes.
- c. 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.
- d. Details of how the tree planting is to be phased across the development so that planting takes place in line with the occupation of the development.
- e. Details of maintenance and management (and replacement procedure if necessary) of trees for at least 5 years after planting

Thereafter the development shall be carried out and completed in accordance with the approved scheme unless otherwise first agreed in writing by the Local Planning Authority. An annual monitoring and supervision report from a qualified arboriculturalist, shall be submitted to and approved in writing by the Local Planning Authority in line with the phased planting scheme and management and maintenance scheme approved under 4 and 5 above.

Reason:

To ensure the canopy cover and biodiversity requirements for the site can be met

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

- a. Purpose and conservation objectives for the proposed works.
- b. Review of site potential and constraints.
- c. Detailed designs and working methods to achieve stated objectives.
- d. Extent and location/area of proposed works on appropriate scale maps and plans
- e. Specification and source of materials (including plants and soil) to be used where appropriate, e.g. native species of local provenance.
- f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g. Persons responsible for implementing the works.
- h. Details of initial aftercare prior to implementation of the Landscape Ecology Management Plan (LEMP).
- i. Details for monitoring and remedial measures.
- j. Details for disposal of any wastes arising from works.
- k. Retention and protection of existing habitats during construction (on and adjacent to the site), including the area of traditional orchard to be restored.
- l. Provision for wildlife corridors, linear features and habitat connectivity (especially along hedgerows and buffers on the edge of the site.
- m. Woodland, tree, hedgerow, shrub, wetland (including in the SuDS feature) and wildflower planting and establishment.
- n. Proposed new landforms associated with habitat creation, e.g. SuDS features, ensuring they have a natural form.
- o. Soil handling, movement and management.
- p. Creation, restoration and enhancement of semi-natural habitats (especially the traditional orchard).
- q. Creation of new wildlife features, including a reptile hibernaculum, holes in all fences for hedgehogs and at least one of the following incorporated into the fabric of each new building:
 - a. Bird brick,
 - b. Swift box
 - c. Bat box
 - d. Bee brick
- r. Reasonable Avoidance Measures Method Statements (RAMMS) for species which need particular attention e.g. badgers.

The EDS shall where appropriate be cross reference in other relevant details (e.g. landscape plans, LEMP, detailed building design, construction environmental management plan), and it shall be

implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason:

To ensure that species and habitats are appropriately designed into the new development to ensure that a biodiversity net gain is achieved for species and habitats in line with policy DM34 of the Wycombe District Local Plan.

35. No development shall take place until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following:

- i. Description and evaluation of features to be managed.
- ii. Ecological trends and constraints on site that might influence management.
- iii. Aims and objectives of management, including the requirement to create and retain the minimum number of biodiversity units as set out in the updated biodiversity metric.
- iv. Appropriate management options for achieving aims and objectives.
- v. Prescriptions for management actions.
- vi. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period) which ensures that management will be maintained for at least 30 years.
- vii. Details of the body or organisation responsible for implementation of the plan.
- viii. 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.
- ix. Ongoing monitoring and remedial measures including (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

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

Reason:

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

36. Prior to occupation of the last five dwellings hereby permitted, a post construction Biodiversity Net Gain Audit Report shall be submitted to and approved in writing by the Local Planning Authority. It shall be produced in line with the CIEEM Guidance document: Biodiversity Net Gain Report and Audit Templates (July 2021) and the details set out in the approved Landscape and

Ecology Management Plan. It should also include photos of all of the ecological enhancement features which have been installed in line with the EDS.

Once approved, the Biodiversity Net Gain Audit report shall also be passed to a named management company, or other organisation responsible for management as appropriate (depending on who will manage the open space on the site), along with the Landscape and Ecology Management Plan (LEMP) and the following must be passed to the Local Planning Authority prior to full occupancy:

- Evidence that the management organisation has received and agreed with the LEMP and the details of the BNG Audit Report.
- Contact details of the person/s who will be responsible for its implementation.

Reason:

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

37. If the development hereby approved does not commence within 18 months from the date of the planning consent (or, having commenced, is suspended for more than 12 months), the approved ecological measures secured through Condition 16 shall be reviewed and, where necessary, amended and updated. The review shall be informed by further ecological surveys commissioned to:

- i) establish if there have been any changes in the presence and/or abundance of protected species which could be impacted by the proposals and which would not be adequately protected by the measures in place, and
- ii) identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement (or recommencement) of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Reason:

To provide protection to legally protected or rare species to comply with the requirements of The Conservation of Habitats and Species Regulations 2017, and the Wildlife and Countryside Act 1981 (as amended) and in accordance with para 99 of ODPM Circular 06/2005.

38. Prior to the construction of the development hereby permitted above ground floor slab level, an external lighting scheme which shall address the biodiversity, landscape, residential amenity and crime prevention implications of proposed external lighting on the site shall be submitted to

and approved in writing by the Local Planning Authority. The scheme shall also include a “lighting design strategy for biodiversity” (which follows the Bat Conservation Trust and Institute of Lighting Professionals Guidance Note 08/18 ‘Bats and artificial lighting in the UK’) including:

- a. identify those areas/features on site that are particularly sensitive for wildlife and that are likely to cause disturbance in or around their breeding sites and resting places or along important movement corridors; and
- b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) and detail how timing of lighting will be controlled, so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.
- c. ensure that lighting shall have a colour temperature of less than 3000 Kelvin.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved external lighting scheme prior to the completion of the development, and shall be maintained thereafter in accordance with the approved scheme.

Reason:

In the interests of visual and residential amenity, crime prevention, and biodiversity

Sustainability Measures

39. Electric Vehicle (EV) charging points shall be installed in accordance with the submitted EV Charging Point Statement Rev C October 2023, with all EV Charging points for on plot and allocated parking spaces providing prior to the occupation of the dwelling that it would serve and all EV Charging points for unallocated/visitor parking spaces providing in accordance with the timetable/phasing details for unallocated/visitor parking spaces approved pursuant to Condition 26. Any allocated/unallocated/visitor parking spaces provided with Electric Vehicle charging points shall not be restricted to the parking of only electric vehicles and shall be available for the parking of any vehicle including those with internal combustion engines.

Reason:

To manage carbon emission generation and mitigate for climate change and the impact on the health of Nitrogen Dioxide emissions and in the interests of parking provision and highway safety.

40. Prior to the commencement of the development hereby permitted, a detailed scheme to reduce embodied carbon from the construction of, and carbon emissions resulting from, the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall comply with the recommendations in Paragraph 4.6 of the submitted Energy and Whole Life-Cycle Carbon Statement, including the provision of rooftop PV panels, and demonstrate the achievement of a minimum LETI Life Cycle Embodied Carbon Rating of “D”. The development shall thereafter be carried out in accordance with the approved details

and no building shall be occupied until the measures within the scheme relating to that building have been provided.

Reason:

To support the integration of renewable and low carbon technology and reduce carbon emissions in the interest of climate change in accordance with Policies CP12, DM33, DM41 of the WDLP and Policy HAZNP3 of the emerging HNP.

41. Within 6 months of the practical completion or occupation of each new dwelling hereby permitted, whichever is the sooner, a post completion/occupation energy performance evaluation report for the dwelling including any remediation measures as necessary to ensure that there is no energy performance gap shall be submitted to and approved in writing by the Local Planning Authority. In the event that remediation measures are necessary then within 6 months of their approval by the Local Planning Authority a further report demonstrating the implementation of the approved remediation measures shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

To reduce carbon emissions in accordance with the requirements of Policy HAZNP3 the emerging HNP

Security of flatted blocks

42. Prior to the occupation of the flats hereby permitted, full details of an access and security strategy to serve the flats, including details of access controls and visitor entry systems, management of mail deliveries to avoid unrestricted access to communal hallways, and physical security standards for communal door sets and bin and cycle stores, shall be submitted to and approved in writing by the local planning authority. The approved measures shall be installed and fully operational prior to the occupation of the flats that they would serve and be retained thereafter in accordance with the approved details.

Reason:

To ensure the provision of a secure development.

Removal of permitted development rights

43. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking and re-enacting that Order), no development falling within Classes A to E of Part 1 of Schedule 2 shall be carried out without the prior, express planning permission of the Local Planning Authority.

Reason:

In order that the Local Planning Authority can properly consider the effect of any future proposals on the character of the locality, the amenity of neighbouring properties and surface water drainage.

44. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no fences, gates or walls shall be erected within the curtilage of any dwellinghouse forward of any wall of that dwellinghouse which fronts onto a highway.

Reason:

In order to safeguard the visual amenities of the area.

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

Reason:

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

APPENDIX A: Consultation Responses and Representations

Councillor Comments

Cllr Ron Gaffney

As an elected County Councillor for Hazlemere I feel duty bound to represent the strong view of my electorate. It is no secret that the vast majority of my electorate are totally opposed to this development. And, my views are well known and documented. I urge you to strongly think again. I know that my two councillor colleagues feel the same as me.

Cllr Ed Gemmell

If the officers are minded to approve this application then I will want to call this into the Strategic Sites Planning Committee.

The submitted plans are not in compliance with the Development Brief which was stated to be "essential" under the Wycombe Plan to ensure the comprehensive development of the site. The submitted plan from the renamed applicant Hawridge (previously Inland Homes) is not in compliance with the Development Brief which states:

"Ensure the site layout and the design of dwellings mitigates climate change. For example

- maximising the potential heating effect of the sun in winter through site layout, building design and orientation.

- use of passive house design principles

- incorporating low carbon energy and heat including the use of renewables such as heat pumps and photo voltaic cells

- incorporating high levels of insulation

- use of low carbon or zero carbon building materials

- make climate change allowances in the design of SuDS schemes to deliver sufficient capacity."

No effort at all has been made to mitigate and adapt to climate change as required under Paragraph 8c of the NPPF.

The plans are almost identical to the previous plans from applicant when it was Inland. The plans need to be changed to show an effective orientation of the buildings to mitigate and adapt to climate change through ensuring maximum use of the sun in the winter and maximum use of the shade from mature trees and other buildings through the summer. Summers will get hotter and hotter necessitating intelligent planning of orientation as required.

The plans do not show how the buildings use zero or low carbon building materials or how they incorporate heat pumps and solar panels.

The canopy cover needs to be over 25% after 25 years as required under the Wycombe Plan and this has not been shown. Additional canopy cover will be required above 25% ultimately as the

emerging Hazlemere Neighbourhood Plan requires the applicant to agree the increased level with the parish council. In addition to adapt and mitigate climate change the canopy cover will need to reach 25% decades earlier as extreme heatwaves are already very likely.

The development brief also requires '*Make climate change allowances in the design of SuDS schemes to deliver sufficient capacity*' this has not been done. We know storms will become much worse and vastly more water will be delivered in short periods of time - the plans need to show that the expected massive levels of water delivery in 10, 20, 30 and 50 years can be comfortably accommodated.

Cllr Ed Gemmel – October 2023

Comments on the HW8 Developments by Hawridge and Bellway 7 10 23

Introduction to Compliance with the Development Brief – National and Climate Context

In order to make a correct determination of this application Buckinghamshire Council's planning officer needs to ensure the applicant complies with "Section 6.3 Climate Change" of the Development Brief. This is so far completely ignored by the applicant.

In order to have 'comprehensive development' the applicant must comply with the Development Brief. This carries full weight for this new application as it was made under the Wycombe Plan which stated the Development Brief was ESSENTIAL for the comprehensive development of the site.

In considering how the application should comply with the requirements of Section 6.3 Climate Change of the Development Brief it is also necessary to take into account the relevant sections of the updated NPPF which have also been conveniently ignored by the applicant. This is especially important as the NPPF was updated in 2021 particularly in relation to climate change and other related matters and this supersedes the Wycombe Plan which came into being in August 2019.

The Wycombe Plan itself anticipates a strengthening of the requirements to mitigate climate change in relation to driving down carbon emissions from future developments. The notes to DM33 g) and h) say:

6.144 Opportunities exist in every development to integrate renewable technologies, such as heat pumps and photo voltaic cells.... As technologies improve and prices fall, building renewables in as an integral part of a scheme will become normal practice.

6.145 Larger scale developments present the opportunity of doing more, by implementing district wide energy and / or heating schemes.... Similar carbon savings may be available from other technologies, and that would need to be set out in the investigation

Material Factors

Net Zero Context

Hazlemere Parish Council has declared a climate emergency and set a target for the whole community to be net zero by 2030 and this is reflected in the Neighbourhood Plan.

Buckinghamshire Council has set a target for the whole community to be net zero by 2050 and has interim carbon reductions targets.

The UK has the legally binding target of being net zero by 2050 and interim targets including 68% reduction in carbon emissions by 2030.

The planning department of Bucks Council will clearly recognise that for any of these targets to be met then every new development must be low carbon both in terms of embedded carbon in the build and in terms of ongoing carbon emissions from the buildings.

The buildings to be created by the applicant must contribute to Hazlemere, Buckinghamshire and the UK reaching their net zero targets. The NPPF, the Development Brief and the Neighbourhood Plan all provide the tools to ensure this happens and it is the duty legally and morally of the council planning department to ensure these legal tools are used to their full effect.

Other Material Factors

There are also other 'Material Factors' to take into account since the issue of the Wycombe Plan and even since the most recent updating of the NPPF in 2021 including:

- Britain has updated its commitment to reduce carbon emissions by 68% by 2030. This was an extension (made at COP26) of Britain's Nationally Determined Contributions as required under the legal binding commitment as signatory of the Paris Agreement to try to keep global emissions under 1.5C
- The issue of new carbon budgets (the maximum amount of GHGs we can put into the atmosphere to stay under 1.5C) in 2021/22 by the IPCC in conjunction with COP26. The IPCC's new updated carbon budget for staying under 1.5C will be exhausted globally by 2028 and even if we then stop polluting, we will already have a 1 in 5 chance of breaching 1.5C permanently
- The plethora of scientific papers calling for immediate action to avert catastrophe and avoid breaching 1.5C and risking in turn breaching global tipping points such the uncontrolled melting of the ice sheets and permafrost leading to an unprecedented and immediately disastrous release of trapped methane gas. Methane gas being 85 times more potent at warming the planet within the first 10 years in comparison to carbon dioxide.
- The recent clear acceleration of climate related disasters moving much faster than scientists had predicted even only a few years ago which has caused them to update their projections and, in many cases, these have already been found to be wildly conservative. For example in 2021 the Climate Change Committee (Britain's government appointed but independent scientific advisory body on climate change) reported in its 3rd Climate Change Risk Assessment Report that the chance of very high risk impacts (costing over £1billion in economic damage) from extreme weather rose from 5% in 2012 to over 20% in 2021. Although terrible this can be considered a very conservative projection as in the same report in 2021 the CCC said the chance of Britain having heat over 40C was only 0.02% by 2040 and yet only one year later on 19 July 2022 later this was exceeded decades earlier than the CCC thought in multiple places in UK.

- The World continues to smash maximum temperature records. This year's average temperature from January to September is the highest for that period ever recorded and is on average 1.4C above the pre-industrial average. Especially worrying is already 1/3 of the days in 2023 are more than 1.5C warmer.
- Floods – catastrophic floods made more likely and more severe by climate change have occurred all over the World in 2023 in every country including in the UK. In a specific scientific report Greece's flooding was made up to 10 times more likely to occur and 40% more intense by climate change. As for floods in Libya a catastrophic natural event that would typically occur once every 300 to 600 years was found to be a staggering 50 times more likely and up to 50% more intense compared to a 1.2C cooler climate (the World is currently at 1.2C).
- Droughts – multiple new studies and reports in 2023 have confirmed droughts and so called 'flash droughts' have become more frequent and intense due to climate change. These effect the World's ability to feed itself effecting food security
- Rainfall – multiple record breaking rainfall events in the UK and globally in 2023 have been caused as a result of climate change. In May 2023 areas of Italy experience 6 months of rainfall dropping in just 36 hours. This is very pertinent in Buckinghamshire – as a result of the unusually severe rainstorms locally last autumn and winter additional damage was caused to roads requiring more than £7 million additional spend on pothole repairs – around 10% of the council's reserve was spent on this. It is clearly projected that all weather including rainstorms will become more severe (such as the mentioned storm in Italy) with the result that further additional and increasing budget will need to be found in the future which will quite possibly put at risk the financial stability of Buckinghamshire Council.

These recent reports and extreme weather events are all more recent than the Wycombe Plan and the latest changes to NPPF both of which already required planning applications in Wycombe and nationally to mitigate and adapt to climate change. These material considerations simply illustrate how this is even more important and critical for the safe continuation of life locally to mitigate climate change in all developments. The NPPF is very clear that “The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, **the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs**” in light of all the scientific evidence and recent physical evidence this is even more critical now and puts planners and applicants under legal and moral obligations to do everything possible to take action on climate change adaptation and mitigation in all current plans and developments.

The Development Brief

“6.3. Climate change

Refer to the criteria in Policy CP12, DM18 and DM33 which will be used to assess any scheme. Ensure the site layout and the design of dwellings mitigates climate change.

For example,

- maximising the potential heating effect of the sun in winter through site layout, building design and orientation.
- use of passive house design principles
- incorporating low carbon energy and heat including the use of renewables such as heat pumps and photo voltaic cells
- incorporating high levels of insulation
- use of low carbon or zero carbon building materials “

This section of the Development Brief is very clear. It is necessary to “ensure” that “the site layout and the design of dwellings mitigates climate change”.

The applicant has hardly changed the general layout of housing on the site since the first application and has completely ignored this section of the Development Brief. The most effective way to ensure this is taken seriously in the future is to reject the application until the applicant decides to comply with this requirement.

NPPF Guidance

The Local Planning Authority must refuse this application in the first instance and then subsequently impose on a new application mandatory S106 requirements as set out below on the basis of section 6.3 of the Development Brief is in accordance with these overriding requirements of the NPPF (indented below) which the applicant would prefer to simply ignore:

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, **the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs** At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection

[Comment - The relevant SDGs for this development are: 3. Good Health and Wellbeing; 7. Affordable and Clean Energy; 13. Climate Change; 11 Sustainable Cities and Communities. All these SDGs as incorporated into the NPPF would require developers to act in all cases to mitigate and adapt to climate change, to reduce embedded and ongoing emissions from their buildings and to incorporate the maximum level of insulation and renewable technologies. There is also a very clear requirement to ensure that their buildings do not become death traps in the coming decades as climate change hits harder and harder – development plans must orientate and plan for shading in dangerous heat and maximise the effect from heat and light from the sun in colder periods.]

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective –

b) a social objective – to support strong, vibrant and **healthy communities**, by ensuring that a sufficient number and **range of homes can be provided to meet the needs of present and future**

generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

and c) an environmental objective – to **protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.**

[Comment 1 - unsurprisingly the applicant has supplied ample evidence of how they fulfil the economic objective of 8a). There is also the very clear economic objective of the applicant making as much money as possible by cutting as many corners as it can. The planning department of Buckinghamshire Council must balance the applicant's drive to maximise their profits with a strong defence of the other two equally important objectives of the planning system]

[Comment 2 - it is important to note that 8c) this was specifically strengthened in the most recent version of the NPPF. Originally the obligation on a developer was only to 'contribute' to protecting us – now the developer is called on to actually 'protect' us – no ifs and buts but a real obligation to protect. In order to 'protect' the developer has to 'include' **making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.**]

11a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; **improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;**

[Comment - This section 11a again was specifically strengthened and improved from the version in 2019 which rather weakly stated "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change". Now this section of the NPPF that ALL plans SHOULD mitigate climate change and adapt to its effects. The applicant has totally ignored this requirement as well as section 6.3 of the Development Brief and must now be required to update their plans and their submission to take this into full account as suggested in the S106 requirements above]

131. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that **existing trees are retained wherever possible.**

[Comment – The applicant callously destroyed one of the orchards on the site as soon as it became public that the Neighbourhood Plan and the Development Brief were going to protect both orchards. The action was taken on a weekend when no council staff would have been available to grant urgent TPOs or take any other protective action. The applicant must now be made to show how the new tree planting on site mitigates and adapts to climate change as

required in the NPPF. No longer is it enough to talk about amenity value and how nice looking trees are. The NPPF requires that trees must be saved and also proactively planted to help protect people from the effects of climate change (searing heat in urban street environments, drought, flood etc). The applicant must be forced to improve the submitted plan to show how the incorporated trees help to mitigate and adapt to climate change.

[Planning officer comment: The Tralee Farm land has been sold to a different housebuilding company since the trees were removed. The Council has no evidence to suggest that the current applicant had any role in the removal of trees from the northwest orchard at that site.]

134 (new in 2021). Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.... Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents ... and/or b) outstanding or innovative designs which promote high levels of sustainability...

[Comment – the applicants current bog standard building design and basic positioning plan for buildings is totally inadequate to reflect guidance on sustainable design and the requirements in S6.3 of the Development Brief]

14. Meeting the challenge of climate change, flooding...

152. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk ... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

[Comment – the current application totally and utterly fails with regard to this requirement of the NPPF. There are NO ways in which this application contributes to RADICAL reduction in GHGs. There is nothing at all in relation to the orientation or design of the buildings, the placement of trees or the spatial planning of the streets that in any minimises vulnerability and improves resilience. On the contrary the complete lack of regard for the safety and comfort of the humans inhabiting these buildings in the future during decades where the temperatures rise on path predicted by scientists is appalling to behold. The local planning authority must refuse this development until it reaches the basic standards required by the NPPF and section 6.3 of the Development Brief]

Planning for climate change

153. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures

[Comment: this application DOES NOT take a proactive approach to mitigating and adapting to climate change and makes no effort AT ALL to mitigate the risk of overheating from rising

temperatures even when being specifically directed by Section 6.3 of the Development Brief. If the applicant will not incorporate serious steps into the plans to mitigate and adapt to climate change bearing in mind the likely vast increases in temperature coming then the application must not be approved]

53. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

[Comment: Section 6.3 of the Development Brief which was said to be essential in the Wycombe Plan actually requires measures 'to ensure the future resilience of communities ... to climate change but this has been ignored by the developers. This application must be rejected until it complies with the Development Brief, Wycombe Plan and NPPF]

154. New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and

[Comment: this development as required in the Development Brief and this section of the NPPF should 'avoid increased vulnerability to the range of impacts (i.e. heatwaves/overheating, floods/biblical rainstorms, extreme cold snaps) arising from climate change... including through the planning of green infrastructure' – this has not even been considered by the applicant which shows a complete disregard for trees and canopy cover beyond a one line suggestion that the S106 agreement should require the 25% canopy cover after 25 years as required under the Wycombe Plan.]

b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

[Nothing in this application helps to reduce GHG emissions 'through its location, orientation and design' even though this is also required under the S6.3 of the Development Brief. In this regard the developer has shown a callous disregard for the local plan and development brief derived from it. The application does not show the council out how this development is reducing GHGs and thus must be dismissed]

155. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and In line with the objectives and provisions of the Climate Change Act 2008.

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.

[Comment: this plan currently does nothing to increase use and supply of renewable low carbon energy and heat. In order to 'increase' such supply the development would need to generate more energy and heat than it uses otherwise it is clearly 'decreasing' local supply of energy and heat. There are no indications that the applicant will do this and accordingly the application must be rejected]

157. In determining planning applications, local planning authorities should expect new development to:

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

[Comment: as clearly stated above from the NPPF and in the Development Brief the LPA should "expect new developments to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption". S6.3 of the Development Brief goes even further by helpfully suggesting the developers should do this by ensuring "the site layout and the design of dwellings mitigates climate change [by] maximising the potential heating effect of the sun in winter through site layout, building design and orientation". How this can more plainly be stated I do not know? This application must be rejected until the developer takes this obligation seriously]

158. When determining planning applications for renewable and **low carbon development**, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and ...

[Comment: here the NPPF is clearly showing the government and the planning system's positive discrimination towards 'low carbon development'. This emphasises that low carbon developments (also those that incorporate lots of renewables should be seen as the norm in new world where the climate has become less benign. The council's planning department must stand firm on the need for this application to fully mitigate and adapt to climate change.)]

Conclusion

There is absolutely no conceivable way in which the LPA can approve this application which so clearly breaches and ignores the requirements of the Development Brief and thus and the Wycombe Plan and multiple very plan English sections of the NPPF.

The council planning department needs to take into account the NPPF, particularly the recent updates related to climate mitigation, the UN Sustainable Development Goals (now incorporated into the NPPF through the most recent amendments)

As Buckinghamshire Council's planning department in the past has shown itself to be positively in favour of this development and overly pre-disposed to complying with the requests of the developers such a courageous recommendation to reject based on this not expected and in which case Buckinghamshire Council must, as a minimum, make the following very clear demands in the S106 conditions:

- A) No development must take place until a new site layout is submitted showing how the orientation and spatial placement of the dwellings on the site has been specifically planned to ensure that ongoing carbon emissions from the development are at an absolute minimum and approved in writing by the local planning authority. This new layout will include placement of the buildings on the site to ensure the maximum use of natural light and sunshine in winter months in order to minimise building energy use and also the maximum shading and protection from sunlight for the buildings in the summer months particularly taking into account the likely rapid increase in extreme temperatures in the coming years and decades.
- B) No development must take place until a clear statement of building design is issued guaranteeing that all buildings on the site will comply with Passivhaus or equivalent standards and approved in writing by the local authority. This statement will prove how all buildings on the site have additionally been designed to ensure the maximum use of natural light and sunshine in winter months in order to minimise building energy use in the winter in order to reduce carbon emissions and to provide the maximum shading and protection from sunlight in the summer months particularly taking into account the likely rapid increase in extreme temperatures in the coming years and decades. This statement will also make it clear that the insulation levels committed to for each building on the site will be of the highest possible level of effectiveness and provide evidence of how the proposed insulation will protect occupants of the dwellings through periods of extreme temperatures and will ensure energy use in the colder months will be at an absolute minimum.
- C) No development must take place until a comprehensive commitment is made to ensure the site a whole and all buildings on it incorporate **low carbon energy and heat resources to the maximum extent possible** and approved in writing by the local planning authority. **This commitment will include the use of renewables such as heat pumps and photo voltaic cells (and possibly wind turbines) and may include the incorporation of area wide local energy of heating schemes (which could serve a wider area as suggested in Wycombe Plan 6.145).**
- D) No development must take place until a comprehensive commitment has made and explained to ensure the buildings on the site are built with low or zero carbon building materials and approved in writing by the local planning authority. This commitment will guarantee that the embedded carbon emissions from development of the site will be at the minimum level possible and will evidence how the applicant is seeking to utilise all currently available products and technologies.

- E) No development must take place until the applicant supplies the council with evidence that the building on the site will not need to be refitted, upgraded, retrofitted or in another way altered in order to be as safe as possible for occupants in a World that has warmed to 1.5C or 2C and how the construction of them minimises all carbon emissions and pollution in order to comply with the Paris Accord and such evidence is approved in writing by the local planning authority.

CLlr Catherine Oliver

Please can this be considered by Strategic Sites Committee due to the effect on the two villages and concerns raised by residents.

CLlr Jonathan Waters

I would like to call this application in for the decision to be made by the Planning Committee.

Parish Council Comments

Hazlemere Parish Council – Comments on amended scheme

The Parish Council stands by its report from 20th March 2023 but in light of the amended application wishes to add the following comments:

We support the local residents concerns about increased traffic flows not only on Wycombe Road and Browns Road but also as it disperses onto Sawpit Hill and Watchet Lane, which are both already at heavy capacity at times.

The access road into the proposed development is now planned to be even longer due to the expanded green buffer zone. Our concerns over public safety and the lack of surveillance along this roadway are therefore increased and are supported by Thames Valley Police. The access road is still so narrow that many vehicles passing others will need to drive into the cycle lane/pedestrian footway. This application continues to be non-compliant with the WDC Housing Intensification Supplementary Planning Document 2011.

Play area - will this be fenced to prevent children running into the access road? Will it be lit? is there a maintenance and management plan for post development?

Western Boundary - The HW8 development brief states (3.2 Table 2): Surrounding residential boundaries: Provide at least 25m back-to-back distances. Bolster existing planting along the boundary. Use defensive planting to protect boundary where it is not possible to back onto boundary. Whilst back-to-back distances may be 25m (not measured), the siting of a terrace of houses to the rear of 2 Kestrel Drive and 3 Kestrel Drive / 27 Laceys Drive dominates and obscures the view. There is not 25m back-to-back distance between 3 Kestrel Drive and the proposed terrace. There is a small car park at the rear of 29 Inkerman Drive, again this is against Wycombe District Council policy.

The HW8 Development brief states (3.2 Table 2): Adjacent Orchards and Woodlands: Link these features across the site. Front onto the boundaries to allow for potential future public access. Public access is not possible along the western boundary in the current plan.

Amended Cable Route Layout – We are pleased to see that the developer has removed the overhead cabling and submitted plans for it to be put under ground although it seems to go between two trees at the north-western edge. Will this siting or future maintenance affect the root system?

Amended Design and Access Statement – Addendum A – A reminder that other than the entrance, this site is in the Parish of Hazlemere. The DAS title of Wycombe Road, Holmer Green is misleading.

The Private and affordable dwellings plan shows Affordable housing clustered mainly to the centre north of the site. This grouping of dwellings does not engender tenure neutrality.

EV Charging Point Statement – Whilst HPC welcomes the EV Charging Point Statement, it does not go far enough and does not meet the requirements of the HPC Neighbourhood Plan (NP) policy HAZNP4: Promoting Sustainable Transport D – All development schemes will be required to provide access to EV charging for all parking spaces.

Zero Carbon by Design Statement/ Energy and Whole Life-Cycle Carbon Statement - This statement pays lip service to HPC NP POLICY HAZNP3: Delivering Zero Carbon Buildings as there is no mention of Passivhaus or equivalent (clauses B and C) in fact the Energy and Whole Life-Cycle Carbon Statement states “Due to the relatively low uptake in Passivhaus certification in the UK so far, supply chain and construction experience is constrained. Therefore, delivering Passivhaus buildings is not proposed for this development. The applicant will maximise building fabric and energy efficiency, to reduce space heating and primary energy demand as far as possible.” Whilst this is encouraging, it is not supported by HPC. HPC want to see clear action from the developer, not just his “consideration”.

The Energy and Whole Life-Cycle Carbon Statement claims “...to reduce operational carbon emissions, the following measures have been incorporated: Layout of homes to optimise south and north facing glazing for maximising daylight and minimising overheating risk” yet most homes on the site are not north south facing, they are east west.

Emerging Hazlemere Neighbourhood Plan Compliance Statement

HAZNP1 Delivering Homes for First Time Buyers & Downsizers is not applicable to the site.

HAZNP2 Protecting and Improving Green Infrastructure. According to their statement, the application claims to be largely in accordance with HAZNP2 although HPC ask that any mitigation for BNG is within the Hazlemere Green Infrastructure Network. However, the AMENDED BIODIVERSITY NET GAIN CALCULATION shows an 8.19% LOSS of biodiversity; this is not compliant with B: Proposals will be required to deliver a 10% biodiversity net gain.

HAZNP3 Delivering Zero Carbon Buildings – see previous comments. This statement says that Design is for Reserved Matters. HPC requests that this is taken to committee and not decided by

delegated powers to officers. Furthermore, HPC request HAZNP3 is a required condition of approval, not simply a consideration by the developer.

HAZNP4 Promoting Sustainable Transport Car club spaces: The proposed development will be accompanied by a Travel Plan that will require the developer to explore the viability of a car club, and there are enough visitor car parking spaces proposed to accommodate such an appropriate provision, if required. TVP has concerns over unallocated and visitor parking. HPC required visibility of the Travel Plan and asks that HAZNP4 is a required condition of approval, not simply a consideration by the developer.

See previous statement on EV charging.

HAZNP5 Planning for Sustainable Development at Amersham Road/Tralee Farm. Firstly, this application is premature and presumptive as the decision of the proposed modifications to HAZNP5 has not been published (deadline 30th August). The main areas for consideration here are vehicular access at 20 Wycombe Road (see previous comments re non-compliance with the WDC Housing Intensification Supplementary Planning Document 2011, and the removal of the original Clause C4: To enhance Green Infrastructure along the south western boundary of the site connecting existing isolated pockets of green infrastructure, including the off-site woodland between Badger Way and the A404, and the off-site woodland near the play area at Badger Way, and the larger back gardens with mature trees to the rear of Laceys Drive; see previous comments on the effect of these plans on the Western Boundary.

Hazlemere Parish Council – Comments on scheme as originally submitted

The Parish Council strongly objects to this application. It does not comply with either the HW8 Development Brief or the Hazlemere Neighbourhood Plan and has a blatant disregard to mitigating Climate Change. The access road and the linked pathways with the Bellway development do not provide sufficient active frontage compromising safety and surveillance.

Whilst the Parish Council have had sight of the outline application, we would hope and expect to be able to review the Full detailed application in due course with sufficient time to review the accompanying documents.

The Parish Council would like to emphatically state this site is not in Holmer Green and other than the access road from 20 Wycombe Road, the site remains in Hazlemere. There is therefore the continuing concern that this proposed development will not comply with the separation between the two villages. Throughout the application there is multiple references to Holmer Green and ignoring the “sense of separation” issue (reference DAS1). Reference DAS2 6.2 in the application refers to replacing the orchard “... forms a visual and physical separation between the HW8 development (Hazlemere) and Holmer Green (to the north of the Site)”. The Parish Council understands this to mean they will comply with physical separation but not symbolic separation by continuing to refer to the site as Holmer Green when it is in the parish of Hazlemere. It is the view of the Parish Council that the developers of this site are misrepresenting the location of the site in their marketing documentation.

The Parish Council would like to draw the Officer's attention the lack of services and provision in the application, and we support the comments already submitted by the NHS in respect of the adjoining site, which we expect them to repeat for this one. There is no mention of contribution to primary school places in DAS1 or DAS2 in relation to WDLP HW8 clause 4.

The Parish Council would want it noted there is no mention of climate change requirements of development brief in DAS2 and furthermore no reference of Wycombe intensification SPD in DAS2 4.5.

There is concern the allocated Private and affordable dwellings seem to be zoned within the corner of the development which will mean it is not compliant with "tenure neutral".

The Parish Council are concerned the 18 wheelchair accessible properties are two bedrooms only and are therefore not suitable for families who require disability access.

Drawing the Case Officer's attention to DAS4 "The proposed height of the buildings has been guided by the study of the character of Holmer Green which identifies the predominantly two storey character of the residential development in the local area." The Parish Council wishes to confirm once again this site is not in Holmer Green which is predominantly bungalow style houses.

There are no visible porches on the drawings and the Parish Council would assume many potential buyers would put in their own planning applications shortly after buying. Should this application be approved, the Parish Council would ask that permitted development rights are removed.

The Parish Council would like to express their unease about the parking allocation and don't see evidence there will be sufficient parking spaces per each dwelling. This could have a potential impact on the offroad parking within the estate and neighbouring roads. There is also no mention that each house will have access to its own EV charging point.

In paragraph 6.77 there is very light and whimsical reference to the renewable tech scheme and the Parish Council wishes more concrete plans in their application.

The Parish Council is greatly concerned there was previous visibility of a play area but in the new application this appears to have been left off.

DAS5 Designing out crime p95.

There was overwhelming concern about the lack of surveillance and security particularly along the access road with high fencing and the footpaths that link this application site with its neighbour (Bellway) on HW8. The Parish Council would like to highlight this as a serious safety concern.

DAS5 Sustainability p92 "Sustainable Energy

"The fabric insulation standards and the construction specification of the dwellings will exceed the minimum required by the Building Regulations. A number of low carbon and/ or renewable technologies could be considered appropriate for the development: solar hot water heating panels; photovoltaic panels; and flue-gas and waste-water heat recovery systems." There is no evidence of these in the applicants' documents or drawings.

Hazlemere Parish Council have recently completed Regulation 16 of their Neighbourhood Plan and will imminently be entering the next steps of a referendum so would like to disagree that the Plan

has little weight as mentioned in DAS2 4.6. As such, the Hazlemere Neighbourhood Plan should be accorded the maximum weight possible. The Parish Council would like to draw the Case Officer's attention to this in further detail.

Hazlemere Neighbourhood Plan

HAZNP1 does not apply.

HAZNP2 - application does not comply with the following:

A. Proposals will be required to deliver a 10% biodiversity net gain.

C. Throughout the Neighbourhood Area, proposals that will lead to the felling of one or more trees including any that are subject to a Tree Preservation Order will be refused unless it can be demonstrated it is unavoidable and satisfactory mitigation measures are put in place.

HAZNP3 - application does not comply with the following:

A. All development should be 'zero carbon ready by design' to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing, and landscaping.

B. New and refurbished buildings (except householder applications) that are certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m²/year are supported.

C. Where the Passivhaus or equivalent standard is not proposed for a new or refurbished building the applicant must demonstrate that the building has been tested to ensure there will be no energy performance gap using a Post Occupation Evaluation Report.

D. All planning applications for development (except householder applications) are required to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and carbon emissions resulting from the use of the building over its entire life.

HAZNP4 - application does not comply with the following:

C. All major development schemes will be required to make reasonable provision for car club spaces.

D. All development schemes will be required to provide access to EV charging for all parking spaces.

HAZNP5 - application does not comply with the following:

A. For its place-making proposals -

1) to be planned comprehensively with that site as a whole, integrate into surrounding neighbourhoods; and in any event to not prejudice future integration.

B. In respect of its transport proposals –

3) to facilitate a future pedestrian and possible cycle connection through to Badger Way

HW8 Development Brief

2. Create one comprehensive development - we see no evidence of comprehensiveness between the two applications. Building styles are different, street layouts are different, the paths may line up but that is really the only part we can see.

6.3. Climate change - we see no evidence of this in the application.

Ensure the site layout and the design of dwellings mitigates climate change. For example,

- maximising the potential heating effect of the sun in winter through site layout, building design and orientation.
- use of Passivhaus design principles incorporating low carbon energy and heat including the use of renewables such as heat pumps and photo voltaic cells
- incorporating high levels of insulation
- use of low carbon or zero carbon building materials

Little Missenden Parish Council

Please accept this as an objection to the outline planning application 23/05440/OUT

TRANSPORT MATTERS

The updated Highways Department report relies upon that drawn up by the developer's agent which estimates that 51% of traffic will exit from the site toward Hazlemere. Even should this estimate be correct this means that just under 50% will travel toward Holmer Green. At peak times Holmer Green Village experiences severe congestion at the cross roads of New Pond Road, Earl Howe Road and Pond Approach. There is no reference in any document to this. This cross roads has no traffic management, no signs to warn of schoolchildren crossing. It has bus stops opposite each other which, during peak times, involve long waits whilst pupils are received to or exit from the vehicles. This further adds to congestion and makes it more complex for pedestrians crossing the roads. This junction is on the main route used by children and parents accessing Holmer Green Middle School on The Common. Due to the increased number of pupils attending Holmer Green Senior School and the incomplete, erroneous Travel Plan, car use and drivers dropping off at, or adjacent to the junction further adds to congestion. Increased numbers of 6th Formers, who are also car drivers, is now meaning that cars are parked down New Pond Road as the school has no pupil parking. Now New Pond Road effectively becomes single lane. This results in drivers wishing to drive up from the cross roads unable to do so and therefore increases the congestion. Holmer Green already has a bottle-neck, dangerous for pedestrians, but this has not been acknowledged within any Transport report.

Also within the Report by Buckinghamshire Highways is a reference to 'the requirements of the policies for the HW8 allocation'. 20 Wycombe Road is not part of the HW8 allocation. It is Holmer Green and not within the Wycombe Local Plan remit. The reference to Wycombe Road does not require it to be used as vehicular access, it is 'potential' vehicular access. The aspiration with HW8 for the Tralee site is for pedestrian and cycle access to Wycombe Road, the rationale being that 'it is here that residents will get access to local facilities and local bus service'. It does not highlight a need to facilitate car use, rather a pedestrian and cyclist access.

The Highways report discusses the utilisation of the bus route to reduce the reliance on vehicles. The bus route through Holmer Green does not operate after 2030 hours thus is of no use to residents who work unsocial hours, attend classes outside of Holmer Green which finish after 20.00 or are hoping to use public transport, and not use private or hire vehicles, when socialising in the evening.

The cycle and pedestrian access is important when there is a desire to reduce the reliance on vehicles. Both these alternatives have been superseded by attention to ensuring vehicle access from Wycombe Road. Despite it being seen as desirable to have separation between cyclist and car the limitation of available road, cycleway, footpath width has meant that is not achievable.

There has not been an assessment of the footfall and cycle use over the entire site. It is unlikely that pedestrians or cyclists will exit from HW8 onto the A404. It should be anticipated that the majority cyclists and pedestrians from the 2 developments will be utilising the Wycombe Road exit and, of these, a substantial number will be pupils travelling to school. As these young persons will be travelling this access road at the same time as the peak of vehicular use the provision for maximum separation from motor vehicles should be ensured.

The Highways report concentrates on the potential impact of the Tralee Farm component on Hazlemere. It ignores the impact on the Wycombe Road/Sawpit Hill junction despite acknowledging that the Holmer Green Road arm from the Hazlemere crossroads is operating over capacity. This will therefore also be the case at the Wycombe Road/Sawpit Hill junction. The impact on this junction and on the flow of traffic through Holmer Green requires investigating and addressing.

I would bring to the attention of the committee the results of the traffic survey undertaken in support of planning application 20/07610/FUL Erection of 8 detached 4 bedroom dwellings. *The results of the TRICs assessment demonstrates that the proposed development is anticipated to generate 4 additional trips in the AM peak, 2 additional trips in the PM peak and 34 additional trips across the 12-hour period which equates to 1 additional trip every 15 minutes in the AM peak, 1 additional trip every 30 minutes in the PM peak and an average of 3 additional trips each hour on average across the day.* If this assessment estimates 34 additional trips in a 12 hour period from 8 dwellings this indicates an extra 340 from the Tralee site, an extra 30 each hour. This application was refused.

SAFE ACCESS

On previous development layouts the access road has fed back from Wycombe Road and immediately encountered residential properties. On the revised plan the length of non-overlooked access from Wycombe Road has been increased by 50%, with the final 40 metres being what appears to be a shrub and tree-lined area. Thames Valley Police have also identified this issue. From the plans provided there is very limited surveillance potential along the access road from Wycombe Road into the site due to the orientation and layout of the housing plots both new and existing. As the desire is for pedestrian and cycle access this, allied with no planned street lighting, is also a risk for the safety of the individual.

SENSE OF SEPARATION

Wycombe Local Plan, Regulation 19 Version October 2017

5.1.64 states 'the likely access points onto the site mean that residents are more likely to use the facilities in, and feel part of, Holmer Green'. How is it that a vehicular access from Wycombe Road can be considered? There is also the repeated reference to retaining 'the sense of separation between the two communities of Hazlemere and Holmer Green'.

5.1.65. Retain 'the sense of separation between the two communities of Hazlemere and Holmer Green'.

The revised plans do increase the area between properties on Wycombe Road and those proposed on HW8, Tralee Farm. However, the revised plans do not address the fact that vehicular access from Wycombe Road negates separation and causes the proposed development to be identified with Holmer Green rather than Hazlemere. The Wycombe Local Plan states 'there should be a sense of separation between Hazlemere and Holmer Green'...'the two communities'. The vehicular access fails the separation, identity and two communities requirement. It also results in there being no appreciable sense of leaving one settlement before entering the other. This is an example of coalescence. It also brings into question address; parish and government responsibility and precept.

A sense of separation will be maintained where there is no actual physical coalescence between the two settlements; there is a strong and well-defined boundary; there is a clear and distinct experience of leaving one settlement behind, passing through another quite different and distinct area (the 'gap') before entering another separate settlement. (Taken from farehamlandscapeassessment_final_extractsfrompart-3.pdf).

By the retention of 20 Wycombe Road as the access this plan fails to fulfil the stated requirements of the HW8 component of The Wycombe Local Plan.

Penn Parish Council

No comments received.

Consultation Responses

Affinity Water

No comments received.

Arboricultural Officer

Should the application go to the full consent stage, we would like to see a more concrete planting specification. Special attention to soil volume for new trees and maintenance plans for the first five years. Species confirmed for each new tree location with careful thought given to the proposed back garden trees choices. If we want the trees to stay, they need to avoid common problems tree owners/neighbours mention, whilst giving the benefits we all need. Careful tree selection in relation to climate change should be considered whilst also planting essential native

species. Where footpaths have been mentioned through protected wooded areas, we would need a plan for how this is to be carried out minimising harm to trees.

Archaeology Officer

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

If planning permission is granted for this development, then it 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.

Chilterns Conservation Board

No comments received.

Ecology Officer

COMMENTS

The Ecological Impact Assessment Addendum (Walkover 12th Jan 2023) makes it clear that some of the previous amenity grassland is now considered semi-improved grassland. It also notes that many of the orchard trees in the remnant traditional orchard were felled in 2022, these were a mix of apple, cherry and a pear. This has taken orchard tree numbers from 31 to 2 (T28 and T29, both wild cherry).

Piles of dead wood from the removed orchard trees were noted.

The image of the headline results from a metric, (submitted February 2023) shows the Biodiversity Net Loss resulting from the scheme (23/05440/OUT) is less than the previous scheme (18/07914/OUT) (down from -5.32 habitat units to -3.66).

An amended scheme (submitted 31st July 2023) shows that the net loss has been reduced further to just 1.89 habitat units (-8.19%).

The way in which the latest figures were calculated in the metric did not seem to be correct and following an email exchange a revised metric was submitted which resolved the questions relating to tree sizes and also to the way in which the SuDS feature had been dealt with. The revised metric which was submitted in September 2023, shows a net loss of 3.08 habitat units (-13.29%) which now appears to be correct.

In previous comments I had asked about the change in the way in which some of the areas of grassland had been recorded and entered into the metric, these questions have been answered to my satisfaction I am now content that the metric is sufficiently accurate.

There are several protected species which are known to be on or use the site and habitats which need protecting and these will need to be mitigated and compensated for in detail.

The plans which have been submitted show that there is scope for providing a reasonable buffer to protected habitats, including those off site. The plans also show that the area where the traditional orchard was located, is now being retained and the intention is to recreate the orchard and replant locally appropriate orchard trees. This is a significant step forward in the proposals from the previous scheme.

Badgers have been identified on the boundary of the site and they have been catered for in the designs.

It has been previously requested for a more detailed assessment to be made of the Green Infrastructure of the area and the way in which the design of the site should respond to this.

The submitted details still fail to provide a proper analysis. This requirement comes from policy DM34. Analysis of Green Infrastructure requires an understanding of several specialist areas, including ecology. It should also include an understanding of landscape, informal recreational, non-motorised movement and more. Understanding GI enables the best planning of green space to meet functional needs, rather than just putting it where building isn't planned.

Although a separate formal piece of work has not been submitted to address this point, it is clear that the designs have taken into account green infrastructure thinking and to a reasonable extent, landscape, ecology and public access networks have been considered in the designs. Therefore, I am no longer asking for further work to be done on this and instead I am content that this element of the policy has been considered sufficiently at this stage, however, detailed designs will also need to be assessed as to whether they are sufficiently taking account of green infrastructure and ecological networks.

The types and locations for habitats which are to be created is suitable, but there will be a requirement to ensure that ecological features are included both in the public open space and associated with built structures to ensure that species are accommodated in the designs.

The southern most corner of the site has seen an increase in the amount of development, this is a negative step as, along with the pumping station (which is still in broadly the same location), this encroaches into the valley, but it appears that the buildings would be kept away from the badger sett.

RECOMMENDATIONS

The metric /BNG calculations are now sufficiently accurate to accept. There will be a net loss of 3.08 habitat units (-13.29%) with the outline proposals. I consider that the mitigation hierarchy has been adequately followed in getting to this result and so offsetting is acceptable. In addition to this, the Hazlemere Neighbourhood Plan adds the requirement for a minimum of a 10% Biodiversity Net Gain. The baseline habitat units for the site is 23.14 and so 10% of this is 2.314. Therefore, at present there is a requirement to provide 5.394 habitat units off site.

A payment could be made to the council to address the offsetting and net gain; however, this is the least preferable option (the applicant should ideally find their own offset site or make arrangements with a broker).

Offsetting needs to ensure that it addresses trading rules and so the loss and gains in individual habitats will need to be worked out.

If payment were to be made to the council and if one third of the costs relate to tradition orchard and two thirds are grassland, an estimate of the payment needed would be approximately £195,000.00.

There is a requirement for reserve matters to clarify the exact plans of what will be provided in biodiversity terms. This will result in a need for an update to the metric, which will in turn need to be agreed with the LPA to confirm the number of units to be offset (and cost BC would charge if they wanted to go through the BC system).

There is a need for a number of conditions to cover mitigation, compensation and enhancement measures and to cover the long-term management of the site to ensure it achieves ecological objectives.

Details of how the applicant is intending to address the need for biodiversity net gain of at least 10%, through offsetting need to be agreed. This will need to be done through a combination of a s106 agreement and details submitted as reserve matters.

CONDITIONS

- Ecological Design Strategy
- Construction Environmental Management Plans (Biodiversity)
- Landscape and ecological management plan (LEMP)
- Lighting design strategy for light-sensitive biodiversity
- Biodiversity Net Gain Audit Report
- Time limit on development before further surveys are required.
- Tree planting specification

- Tree planting audit report

Education

The Wycombe Local Plan to 2033 adopted in August 2019 allocates up to 6350 homes within the High Wycombe Area over the period 2013-2033 which is projected to increase the pressure on school places. In line with Policy HW8 of the Wycombe Local Plan, the site is required to meet the needs arising from the development...and a commensurate financial contribution (via a S106 planning obligation) will be required for the provision of additional school places.

The following financial contribution is therefore required towards the Local Authority's expansion programme in the High Wycombe area in accordance with the Council's adopted S106 guidance based on the following education infrastructure costs per dwelling type (prices as at September 2023):

Flats			Houses			
1 Bed	2 Bed	3+ Bed	1 Bed	2 Bed	3 Bed	4+ Bed
£468	£3,146	£5,287	£1,049	£3,926	£8,054	£11,221

Environmental Health Officer

No environmental Health objections to this application subject to a condition to secure EV charging in accordance with the Air Quality SPD.

Environmental Protection Officer

Land contamination

The submitted Geo-Environmental Phase 2 report summaries the findings of intrusive investigations on the site and identifies elevated areas of contamination in some areas of the site. Whilst no large-scale remediation actions are necessary, remedial measures are necessary in those areas where elevated levels of contamination have been identified. Therefore, conditions are required to secure a remedial strategy and validation report.

Air Quality

There is no requirement for air quality assessments to be submitted.

Highway Authority – Consolidation of comments received during course of application

Introduction

The application has been amended to reduce the number of units from 95(no) to 87(no) and a Transport Technical Note has been submitted during the course of the application to provide

further assessment on the impact of this development on the Hazlemere Crossroads double mini-roundabout junction including a review of the site's trip generation potential and a review of the access to consider a shared footway / cycleway.

Trip generation and local highway network

The applicant has included a Personal Injury Collision (PICs) review of the local road network, for the 5-year period between 2017 and 2021. Analysis of the data identifies that there have been three PICs which occurred on Wycombe Road/Browns Road, two of these collisions resulted in slight injuries and one resulted in serious injuries. The serious collision occurred at the junction of Parish Piece / Browns Road approximately 540m east of the site access in February 2020 involving one car and one motorcycle. Another serious collision occurred in May 2017 at the approach to the Wycombe Road / Watchet Lane junction involving a car and a motorcycle. Based on the collisions which have occurred during the study period, it is considered that the collisions do not form a cluster and the highway safety of the local highway network would not be compromised by the proposed scheme.

The applicant has reviewed the trip generation potential of the site to ensure that the trips anticipated for this site is consistent with planning application 21/08364/FUL on the southern parcel of the HW8 allocated site. Both sites have assessed the trip generation using the TRICS database. However, the inclusion of affordable houses has not been used within this application, creating a marginally higher trip rate. It is anticipated that both sites would generate approximately 0.4 two-way vehicle trips in the AM and PM peak periods per unit. Therefore, the site is anticipated to generate approximately 35 two-way vehicle movements in each peak period.

The Transport Assessment has outlined the expected trip distribution and suggests that 43% of the trips would be to the east of the site with the remaining 56% to the west. These figures are a suitable assessment of the likely destinations.

The applicant has assessed the highway network using survey data collected in June of 2015 as submitted within the previous application on this site. Whilst ordinarily data of this age would not be acceptable, the Highway Authority has undertaken a sensitivity evaluation of this data against more up to date information, and has concluded that the data can be accepted in this instance. It is noted that new surveys were not acceptable through the COVID-19 period from 2020 through to mid 2022, and traffic volumes have reduced since that period. Indeed, the sensitivity evaluation has found that traffic flows in this area are either comparable with the 2015 or are now lower than the surveyed data. Therefore, the Council can be confident that the survey data remains a robust basis for evaluation.

The Highway Authority has received information supplied by the Holmer Green Village Society, which questions the validity of the data used, and has supplied alternative data. This alternative information is taken from a vehicle actuated sign (VAS) placed on Wycombe Road. The Society also questioned whether the survey data used in the application was valid as it was questioned if the time of year that the survey was undertaken was out side of school term time. It can be confirmed that the surveys were all undertaken during the school term time and so are acceptable on that basis.

With respect to the VAS Data itself, Vehicle Activated Signs (VAS) are not recognised as a reliable tool for traffic survey data collection. Industry practice is to record data via a Manual Classified Count (MCC) and/or Automatic Traffic Count (ATC). The DfT's guidance with respect to survey methods used to gather transport data is provided within WebTAG Unit M1.2 "Data Sources and Surveys" (DfT May 2020) and states 3.3 Highways Surveys "Traffic counts may be obtained by automatic means (Automatic Traffic Counts, ATCs) or manually (Manual Classified Counts, MCCs)...Surveys should typically be carried out during a 'neutral', or representative, month avoiding main and local holiday periods, local school holidays and half terms, and other abnormal traffic periods". VAS collects speed data but that is not its primary function and the calibration and validation of such data can be questionable. This means it should not be relied upon for the appraisal of planning proposals. As a result, the Highway Authority accepts MCC and ATC data conducted in accordance with guidance provided by the DfT.

Mindful of this, the Highway Authority continued its review of the submitted application by assessing the results of PICADY and ARCADY assessments of the following junctions:

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

The results are presented in terms of Ratio of Flow to Capacity (RFC), seconds delay per passenger car unit (s/pcu) and Queue length (number of vehicles). RFC is a measure of the volume of traffic making a turning movement at the junction compared to the capacity of that movement determined by the geometric measurements of the road layout. The generally agreed practical capacity of a junction is at an RFC 0.85 or 85%. While junctions can still operate within theoretical capacity with an RFC value of up to 1 (100%).

A design year of 2028 has been adopted for assessment purposes, on the basis that it represents five years from the date of the planning application, in accordance with DfT guidance. To calculate 2028 base traffic flows, traffic growth rates of 1.093 for the AM peak and 1.091 for the PM peak have been calculated using TEMPRO/NTEM.

The modelling demonstrates that the junctions assessed have sufficient capacity to accommodate the traffic anticipated to be generated by this development. The Highway Authority are aware of concerns raised previously at the junction of Wycombe Road/Sawpit Lane. The evidence before us shows RFC values of less than 0.5, and queues being measured at maximum 5 vehicles. The development traffic at this junction would not create an increase in congestion that can be considered to be a severe impact in this location.

The Highway Authority is also mindful of concerns raised by the Parish Councils regarding traffic increases due to the schools growth, however these relate predominately to driver behaviour and poor parking practices. These are not considerations that can be taken into account with regards the acceptability of this development proposal.

Since the previous application was submitted on this site and the Highway Authority's response was provided, there are now other applications within the planning system that impact on the Hazlemere Crossroads. Therefore, the current application will lead to increases in traffic reaching an already saturated arm of that junction and it is the Highway Authorities position that the impacts of the development traffic at the Hazlemere Crossroads are now required to be assessed within this application as part of a cumulative assessment with the applications 21/08364/FUL and 21/07002/FUL.

In response to the Highway Authority's request for further assessment of the impacts of the development on the operation of the Hazlemere Crossroads double-mini roundabout junction, the applicant has stated that 51% the development traffic is anticipated to route towards the junction. This would equate to approximately 18 two-way vehicle trips in the AM and PM peak periods respectively.

I note that the results of junction modelling for the Hazlemere Crossroads junction has been included as part of the Transport Assessment for Planning Application 21/08364/FUL and is included as part of the appendices of the Transport Technical Note for this application.

The modelling exercise carried out for the southern parcel of HW8 shows some of the arms of the junction are operating over capacity including the Holmer Green Road arm in the future scenario with development traffic. This development would add traffic to the already congested double mini-roundabout junction. Whilst the development would have some impact on the operation of the junction, it is not considered that the level of traffic added as a result of the development would constitute a severe impact in the context of the NPPF.

However, to further reduce the impacts of the development on the local highway network, it is the Highway Authority's position that this development must provide additional sustainable transport measures to support a reduction in the number of car trips generated by the site, and therefore ensure that the impacts on the local highway network are not significant.

An approach such as this which seeks to maximise the use of sustainable transport and give priority to pedestrian and cycle movements is supported by the National Planning Policy Framework (NPPF).

Access by sustainable modes

The site access as proposed is positioned within the village of Holmer Green and the site is close to a number of local amenities as outlined within the Transport Assessment.

The Highway Authority previously identified the requirement for improvements to the bus stops on Sawpit Hill to provide Real Time Passenger Information (RTPI). The stops are served by the number one service which operates between High Wycombe and Chesham/Hemel Hempstead at a frequency of every 20 minutes Monday to Saturday. The bus stops are approximately 160m from the site access and the back of the site is approximately 330m from Wycombe Road. This would put the extremity of the site in the region of 490m from the nearest bus stop location.

The provision of RTPI would serve to enhance the desirability of using these stops and would be secured by a legal agreement.

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

With respect to walking and cycling the whole of the village of Holmer Green falls within a 2km catchment of the site making walking to local services a viable option to residents. However, some constraints have been identified on the main pedestrian route to Holmer Green Senior School. There is no formal crossing point on Wycombe Road or Browns Road to allow for safer pedestrian movements between the development site and the school.

To facilitate pedestrian access to Holmer Green Secondary School, the applicant has agreed to the provision of a Zebra Crossing on Wycombe Road or Browns Road. The provision of a zebra crossing would allow pedestrians to cross the road more quickly and more safely which may encourage more residents from the development to walk to school. This can be secured by a planning condition and the location of the crossing can be agreed during the discharge of the condition.

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

A Framework Residential Travel Plan (F RTP) has been submitted as part of the application. The main objectives of the F RTP are to make residents aware of sustainable travel options and to encourage less reliance on the car. A detailed Travel Plan shall be required to accompany any reserved matters applications based on the provisions set out within the F RTP.

Access

The proposed access will be created by demolishing No. 20 Wycombe Road and will not provide a through route for vehicles to the remainder of the HW8 allocation with the exception of an Emergency Vehicle Access. This accords with the requirements of the policies for the HW8 allocation. The access point to the site can achieve the requisite visibility splays for an access located upon a road subject to a 30mph speed limit (i.e. 2.4m x 43m in both directions). The access road is shown to measure 5.5 metres wide. On the eastern side of the access road a separate 2-metre-wide pedestrian footway will be provided which will link the site with Wycombe Road.

Swept-path analysis has been undertaken at the proposed site access arrangements which demonstrates that the access arrangement could accommodate a refuse vehicle although these vehicles are not able to negotiate this entrance without using both sides of the site access. However, refuse vehicles, by their very nature, are unlikely to form a large part of the traffic using the junction. This together with the likelihood that they would be undertaking the manoeuvres to access the site at a slow speed, given the limitations of the highway, means that the potential for conflict between road users would be limited and would not result in an unacceptable impact on highway safety. This analysis should be updated in light of a revised access arrangement.

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

The Highway Authority previously requested that the applicant that the applicant investigate the potential to deliver a 4.8m wide carriageway with a 3m footway/cycleway. A review of the potential to provide a 3m wide footway / cycleway along the site access road has been included in the Technical Note. Whilst there is sufficient space to provide a 3m wide shared footway/cycle way, it is not possible to achieve a

6m radii to the back of the footway to connect with the junction within the applicant's land of public highway which would create a pinch point for cyclists.

LTN 1/20 states the following:

Where motor traffic flows are light and speeds are low, cyclists are likely to be able to cycle on-carriageway in mixed traffic.... Most people, especially with younger children, will not feel comfortable on-carriageways with more than 2,500 vehicles per day and speeds of more than 20 mph.

Therefore, given the level of traffic the development is anticipated to generate, in this case, the absence of segregated cycle infrastructure would be acceptable.

The Highway Authority will seek to secure the implementation of parking and waiting restrictions at the site access to protect it from dangerous or obstructive parking and prevent conflicts.

Layout

Within the site, most roads would measure between 5m and 5.5m which is sufficient in accommodating two vehicles to pass simultaneously and would be flanked by footways on both sides of the carriageway.

The wider scheme includes some shared surface streets. Any minor residential roads designed as shared surface areas would serve fewer than 25(no) units. Some of the shared surface carriageways would measure 4.8m – 5m in width. The Highway Authority does not seek to adopt shared surface carriageways measuring less than 5.5m in width.

The development would provide two cycling/pedestrian links connecting this application site to the development proposed under application 21/08364/FUL, one of which would also provide access for emergency vehicles between the application site, and the remainder of the HW8 allocation. The pedestrian and cycle infrastructure would provide direct routes between Wycombe Road and Amersham Road which is a requirement of the Local Plan Policy for HW8.

To ensure that future residents of this development have access to recreational facilities being provided as part of the wider allocated site such as the play area and MUGA as well as a car club vehicle being secured as part of planning application 21/08364/FUL, access to the southern parcel of the site must be secured through an appropriate mechanism with relevant triggers in place. Providing pedestrian and cycle routes through the site between Wycombe Road and Amersham Road will reduce the need for future residents to travel for recreational purposes. The connection would also allow for future residents of the southern parcel to access facilities in Homer Green by

active travel modes. Within the Planning Inspectorates Decision notice for a previous application for this site (18/07194/OUT), the importance of co-ordinated or comprehensive development to ensure that Holmer Green facilities are accessible on foot from the southern part of the allocation was noted.

Servicing arrangements

With regards to refuse collection, a vehicle tracking plan has been provided which demonstrates that a refuse vehicle could turn into and out of the site via the junction with Wycombe Road and manoeuvre within the site.

The development is well connected to minimise the requirement for larger vehicles to reverse over excessive distances. Where cul-de-sacs are unavoidable, suitable turning areas for refuse, emergency and goods vehicles have been incorporated. Suitable refuse collection points have been identified. Fire appliances would be able to get within 45m of each dwelling without the need to reverse more than 20m. The Highway Authority is satisfied that larger vehicles can manoeuvre safely through the development as designed.

Parking

Parking is proposed to be provided throughout the site in a mix of garages, off street parking on driveways and parking courts, and on street parking. Some of the units would feature allocated off-plot parking spaces which are generally well located for their respective plots. However, the parking for plots 66 – 69 is set away from the front of each respective plot. The layout proposed is not legible and may lead to additional on-street parking. Whilst this would not necessarily raise an objection from the Highway Authority, it is something the applicant should consider.

The site is located within Residential Zone B, as defined by the Council's Buckinghamshire Countywide Parking Guidance (BCPG) policy document.

In accordance with the BCPG, parking provision for developments is generally determined using the level of habitable rooms per dwelling (in accordance with what is defined as a habitable room by the Census). The internal layouts of each respective dwelling have not been provided with the application (as scale and appearance remain reserved matters).

The BCPG provides a general conversion between habitable rooms and bedrooms. Residential units on developments above ten dwellings located in Residential Zone B with 1–4 habitable rooms (1 bedroom) are required to provide 1.5(no) parking spaces each, units with five or 6 habitable rooms (2/3 bedrooms) should provide 2(no) spaces each, houses with 7 habitable rooms (4 bedrooms) should feature provision for 2.5(no) spaces and houses with 8+ habitable rooms (5 bedrooms) should be provided with 3(no) spaces to accord with the optimum standards. Each half space should count toward the development's requisite unallocated visitor parking.

The table below shows the parking requirement for each unit when assessed using the number of bedrooms.

	4-bed	3-bed	2-bed	1-bed
Amount of houses/flats	18	37	27	5
BCPG-required parking spaces per unit	2.5	2	2	1.5
BCPG-required total allocated spaces for unit type	45	74	54	7.5
Half-spaces that can be subtracted and used toward total unallocated provision	9	-	-	2.5

It is stated in the Transport Assessment that the two bed dwellings will comprise only four habitable rooms and as such, a parking provision of 1.5 car parking spaces will be provided for these units. Given that the dwelling types (and their respective level of habitable accommodation) is not an element that is for determination as part of this planning application, a definitive parking calculation is difficult to ascertain. However, if it is assumed that all 1- and 2-bedroom units will feature 1 – 4 habitable rooms (as stated in the Transport Assessment), 3-bedroom dwellings feature 6 habitable rooms and 4-bedroom dwellings have 7 habitable rooms, the site would require 142 allocated spaces, 25 unallocated spaces (made up of half spaces) and an additional 20% of spaces (34) for visitor parking. Therefore, the provision of 201(no) of which 46 would be for visitor/unallocated parking would provide the optimum level of parking when assessed using the assumptions on the level of habitable accommodation.

The off-street allocated and unallocated bay spaces have the requisite dimensions of 2.8m x 5m whilst the garage dimensions adhere to BCPG guidance of 3m x 6m, thus permitting a practical space to store a vehicle and allow adequate driver/passenger access/exit.

The site would also provide a number of parallel parking bays distributed around the site. These would measure 3m x 6m and would feature flares to facilitate access and egress from the spaces. Some of the parallel parking bays would be allocated to plots which are located in potentially adoptable areas. The Highway Authority does not adopt estate roads which contain allocated parking. Therefore, it is assumed that the developments estate roads would not be offered for adoption.

Within the applicants Emerging Hazelmere Neighbourhood Plan Compliance Statement, it is confirmed that as part of the Travel Plan, the developer will explore the viability of a car club. A visitor parking space within the site should be designated for a future car club vehicle. This could connect in with the car club being secured as part of Planning Application 21/08364/FUL and implemented once desire for car clubs increases in the area.

The draft travel plan does not include this measure at present. The conditioned Travel Plan must include this element when submitted for review.

Conclusions

Mindful of the above, the Highway Authority considers that the application meets the NPPF requirements to have Safe and Suitable access, does not lead to a severe impact on the highway that cannot be adequately mitigated. In the review of the layout and parking it is considered that these are acceptable and meet the needs of the development proposal, therefore I raise no objection to this application subject to the following S106 obligations, conditions and informatives:

Obligations

- Travel Plan and monitoring
- Provision of Real Time Passenger Information at bus stops on Sawpit Hill
- Provision of waiting restrictions at the access onto Wycombe Road

Conditions

- Details of estate roads and footways
- Details of disposal of surface water from highway
- Provision and retention thereafter of vehicular access and associated vision splays
- Provision of a Zebra Crossing on Wycombe Road/Browns Road
- Provision and retention thereafter of parking, garaging and manoeuvring scheme
- Construction Traffic Management Plan
- Travel Plan

Informatives

- Highway drainage
- Access and offsite works require s278 Agreement
- Offence for vehicles to carry mud on highway
- Offence to obstruct a highway
- Measures to ensure water not carried onto highway

Housing Service Officer - Comments on scheme as originally submitted

Quantum

Policy DM24 states that all developments of 10 or more dwellings or more than 1,000 sqm of residential floor space, will be required to provide at least 48% affordable homes on sites that are greenfield.

Should the application achieve the 87 dwellings referred to in the application then we would expect at least 42 affordable dwellings

Tenure

In accordance with Policy DM24, Table 25, the Planning Obligations Supplementary Planning Document, and the First Homes Position Statement the tenure split of the affordable housing should be 25% First Homes with the remaining 75% split 80% affordable housing for rent and 20% intermediate housing.

For a total of 42 affordable homes, this would equate to 10 First Homes, 26 affordable for rent and 6 for intermediate tenure.

Size

Policy DM24, Table 25, the Planning Obligations Supplementary Planning Document and the Bucks HEDNA illustrated a tenure split and housing mix for the rented and intermediate dwellings before the introduction of First Homes.

Unit Types	Affordable Housing for Rent	Intermediate
1 bedroom	13%	12%
2 bedroom	36%	46%
3 bedroom	36%	36%
4 bedroom	15%	6%
TOTAL	100%	100%

Therefore, we would expect the size mix for 26 affordable homes for rent and 6 homes for intermediate element of the affordable dwellings to provide a mix similar to that in the table below:

Unit Types	Rent	Intermediate
1 bedroom	4	-
2 bedroom	9	3
3 bedroom	9	3
4 bedroom	4	-
TOTAL	26	6

Accessibility

Policy DM41 requires that all dwellings achieve the standards in Building Regulations Approved document M4(2) and that developments required to provide on-site affordable housing in accordance with Policy DM24 are required to provide 30% of any affordable homes (and 20% of any market) in accordance with the dwelling standards in Building Regulations Approved Document M4(3) wheelchair accessible standard.

In terms of the affordable wheelchair user dwellings, should 42 affordable dwellings be achieved, this equates to 6 units. The preference is for most of these to be delivered at affordable rents so the Local Authority can nominate households to them. The greatest need is currently for ground floor 1 and 2 bedroom wheelchair user dwellings but there is also a need for larger units for families which, on a site of this size, should be provided.

Design

Policy DM40 requires all new dwellings to meet nationally described technical housing standards for internal space requirements.

The SPD states affordable housing should be well integrated with the development as a whole to ensure the creation of mixed and integrated communities and should be of equivalent quality to the market housing on site and not be visually distinguishable from the market housing in terms of materials, details, level of amenity space, parking provision and privacy.

Occupancy

The council's nomination rights, and the occupancy of the affordable housing, will be controlled through the s106 agreement. Unless otherwise agreed, no more than 50% of the private units on a residential phase are to be occupied until all relevant affordable units on that phase have been completed and transferred to a Registered Provider. The Council is not currently a stock holding local authority and so works with registered providers to support the delivery of the affordable homes.

The applicant will need to supply an affordable housing plan at the next stage of the application process showing the location, tenures, sizes, mix and the wheelchair user dwellings that will be supplied, taking in to account the points above.

Landscape Officer

LANDSCAPE COMMENTS on amended scheme 31 July 2023

Previous comments made in May 2023 are included for reference – ***new comments and updates from previous comments shown in bold italics.***

KEY CONTEXT

HW8 policy and development brief, previous appeal decision (requirement to provide separation and to coordinate OS and routes with southern part of HW8 allocation).

Natural features: orchard, woodland, GI links through valley, Badger site, Green Infrastructure to be used to separate Hazlemere from Holmer Green, existing field boundaries to be kept unless they significantly compromise the layout, some critical drainage features.

This application is only considering layout and access, scale, landscape and appearance are reserved for future applications.

SUMMARY

Key landscape issues to still be resolved through this outline application:

- Layout/ levels/ landscape detail of SUDS area, emergency access and overland route within open space. It is not clear whether all these uses can be successfully accommodated in the area allocated in the layout. A larger area may be needed which would impact the layout and development area – ***the amended layout shows an enlarged area which will better accommodate the features listed above, details of amended design not submitted and will be needed as part of a reserved matters application.***

- securing coordination of footpath links with southern development, and provision of play/MUGA facilities

COMMENTS

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

1 ISSUE Landscape and visual impact

An addendum to the LVIA submitted with the previous Inland scheme that was refused at appeal confirms that the changes made will not introduce any further visual or landscape impact. However, there is no mention of the increase in height of the apartments. As heights have changed with the latest layout this should be updated. However, it is not expected that the increase in height will make a significant difference in landscape or visual terms and that the previous comments below will still apply:

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

1 RESPONSE Landscape and visual Impact

Update LVIA so reflects increased height of apartments. **(not resubmitted)**

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

2 ISSUE Landscape structure

2.1 The landscape principles set out in the Illustrative Landscape Strategy are generally acceptable. Retention of woodland and northern orchard, trees and hedgerows are welcomed. The strategy should also detail boundary treatments. This is needed particularly for the Wycombe Road access and the northern orchard open space to ensure these are treated correctly with landscape planting. Close boarded fencing would not be appropriate in these locations.

2.2 As noted in Urban Design comments it would be beneficial to use existing Green Infrastructure and create new GI to provide an attractive route for the key pedestrian corridor from the south to Wycombe Road. The accommodation of a buffer to the existing woodland/orchard/ priority habitat as noted in the development brief will help facilitate this corridor. The route currently is sandwiched between the road and the hedge boundary with little space to create an attractive walking corridor. **An increased buffer has now been included in the amended layout.**

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

2.4 There is some tree planting in streets that helps mitigate the high levels of parking. Further landscape treatment is needed to ensure the parking does not adversely dominate the street. As noted in the UD comments a better distribution of on plot and off plot parking would help to reduce the long lines of perpendicular parking. This will need further attention when reserved matters are submitted to make the most of opportunities for soft landscape in the street and frontages of properties. (RDG P2/P6, B10, GI5 & GI6)

2.5 Footpaths shown in landscape strategy do not match/ are not included on layout plan, please confirm which are correct. ***This has been corrected.***

2.6 Hedges and trees are shown along the western boundary, this boundary also has an electric power line running along it which could impact the extent to which planting can be provided. ***Details of this are now included, the conflict is resolved by undergrounding the cable.***

2.7 The layout now includes three rear parking areas – the rear and side garden boundaries of new dwellings to be walls with landscape planting in front to ensure the areas are attractive. Also ensure that sufficient landscape is provided along the boundary with existing gardens to ensure the boundary is secure and impact of activity of car park is minimised.

2. RESPONSE Landscape Structure

2.1 Provide boundary treatment details ensuring that close boarded fencing is not used for public facing boundaries ***To be provided in landscape reserved matters.***

2.2 Use and develop Green Infrastructure to provide corridor for the key pedestrian route and incorporate necessary buffers. ***Largely now achieved subject to detailed design.***

2.3 Demonstrate how trees in rear gardens will be retained for the long term. ***To be provided in landscape reserved matters.***

2.4 Amend layout to vary parking arrangements to reduce dominance of perpendicular parking on some streets. In future submissions provide more opportunities for soft landscape (hedges/ trees/ shrub areas, climbers, green walls) in the streetscape. ***Some layout amendments and additional landscape trees have been indicated on the site layout plan but still awaiting further amendments as detailed in Urban design comments. Further design and landscape details to be provided in landscape reserved matters.***

2.5 Update layouts so that footpaths are correct and included. ***This has been corrected.***

2.6 Confirm proposals for the electric power line and ensure sufficient landscape can be provided to screen the gardens of existing properties. ***Proposals confirmed and conflict removed.***

2.7 The rear and side garden boundaries of new dwellings to be walls with landscape planting in front to ensure the areas are attractive. Also ensure that sufficient landscape is provided along the boundary with existing gardens to ensure the boundary is secure and impact of activity of car park is minimised.

3 ISSUE SUDs/ SOUTHERN OPEN SPACE

3.1 The complex nature of the levels and need to preserve the overland route, the valley feature and accommodate SuDS, pumping station, footpath routes, sensitive ecology areas, provide usable

attractive open space, and coordinate with the southern site requires a fully detailed landscape and levels proposal. The current information supplied (landscape sketch and SUDS sections) does not demonstrate that these aspects can be accommodated successfully in the space allocated for them. **Revised layout has increased the area to accommodate the above features, further details will need to be submitted as part of a reserved matters application.**

3.2 From the information submitted, the SUDS basin looks like it will be perched below the dry valley with an embankment between. This will look quite awkward and reduce the quality of the open space. The shape of the basin also does not work well with the valley. **Revised layout increasing the area will likely resolve this issue subject to details to be submitted as part of a reserved matters application.**

3.3 Although the detail will be submitted as part of a future application the information shown shows a lack of imagination and integration with the layout and the detention basin is not naturalistic in shape and form. RDG GI3 **Revised layout has revised the shape slightly and better resolved with interface with the access using a gabion wall/ boardwalk further details will need to be submitted as part of a reserved matters application.**

3.4 The Hydro planters indicated are not shown in other layouts and conflict with footpaths

3 RESPONSE SUDS

3.1 Provide topographic information (showing existing and proposed levels) with site layout with full landscape details (1:100/ 1:200) Provide critical sectional details (both for footpath/cycle links, SUDs, OS, etc) and ensure these are consistent across the disciplines. **This information has not been submitted with the amended proposals and will be needed as part of a reserved matters application.**

3.2 Redesign so that basin and overland route are accommodated and work together in an attractive unforced way.

The site layout has been amended to give more space for the basin and it now has a more formal edge along the emergency access and an indicative boardwalk. These amendments are welcome but further information as detailed in 3.1 will be required at reserved matters.

3.3 As part of the reserved matters submission, review SUDs design approach so that it is more integrated into the residential layout and design using features such as swales, rills and channels and bio-retention areas within planting areas and tree pits. Revise the design of storage basin so it integrates with the landscape structure and existing landform and is naturalistic in shape and appearance and contributes rather than detracts from the quality of open space. **Further information and details to be supplied as part of a future reserved matters application.**

3.4 Coordinate and confirm positions of Hydro planters with latest layout. **No amended details provided.**

4 ISSUE Open Space

4.1 Some of the southern open space is dominated by SuDS features, this could limit its functionality and contribution it can make to the recreational needs of the development if designed poorly. SuDS features that for functional reasons cannot be designed in a way to form a

meaning and attractive Open Space component should be discounted from Open Space area calculations. (RDG GI1, GI3) The D&A shows an open space area of 1.14ha excluding the SuDS basin and pumping station.

4.2 It is understood that the formal play / sports requirements for this northern side of the HW8 will be provided on the southern side of the HW8 area, this is accepted and follows the guidance given in the development brief. Informal opportunities for play and recreation can though be incorporated into the open spaces and this should be considered in the reserved matters.

Open space requirements 87 dwellings	Ha
Strategic:	0.69
Public outdoor sport:	0.25
Park:	0.35
Allotments:	0.05
Play:	0.04
Local:	0.24
Informal amenity space:	0.11
Local play:	0.13
Total	0.93

Above table revised to account for reduction from 95 to 87 units

4.3 Future management/ maintenance of the spaces created should be secured.

4. RESPONSE Open Space

4.1 Revise SuDS as described in 3 – ***see further comments in 3 OS has been enlarged slightly to help better accommodate SuDS features.***

4.2 Confirm how play requirements will be delivered/ secured. Detail informal opportunities for play and recreation in future reserved matters application. ***To be confirmed.***

4.3 Confirm and secure management and maintenance arrangements. ***To be confirmed.***

5. ISSUE FOOTPATH ROUTE/ PUMPING STATION

The pumping station impacts the quality of footpath route and Open Space.

5. RESPONSE Pumping Station

Provide space and sufficient width for sufficient landscape treatment to mitigate its impact, consider relocating pumping station to a less visually sensitive location (e.g. corner of the site instead of plot 56)

The pumping station has been redesigned to minimise its impact on the open space and footpath link. Further details on this are needed as part of a future reserved matters application

CONDITIONS

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

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

And specific issues identified above:

- Protection of rear garden trees
- further details of SuDS to further integrate into the landscape and minimise impact on function of open space
- access road boundary treatment and landscape
- landscape treatment to integrate pumping station
- delivery of formal play/ sports facilities on adjacent site

Lead Local Flood Authority (LLFA) – Consolidated version of comments

Summary

No objections subject to a condition to secure a detailed surface water drainage scheme for the site and a s106 obligation to secure a whole life maintenance and management plan for the scheme.

Surface Water Flood Risk

The Risk of Flooding from Surface Water Map (RoFSW) provided by the Environment Agency identifies that this area of the site is a low to high flood risk meaning that each year this area has a chance of flooding from surface water between 3.3% and 0.1%. The anticipated flood depth in this area is 150mm to 300mm and a velocity of over 0.25m/s.

The Addendum Drainage Strategy states that the development layout has been revised and due to the need for an emergency vehicle access to the south of the site, the infiltration basin has been repositioned and encroaches further into the existing surface water overland flow path.

Under the previous application (18/07194/OUT), the encroachment was minimal and resulted in 1m³ flood volume.

It is the proposed embankment which forms part of the basin under the current proposal that will encroach into the existing overland surface water flow route. The basin design has been revised to avoid the areas at risk of surface water flooding as much as possible, however there would be encroachment (approx. 7.8m³) and as such mitigation is required. The June technical note includes an indicative design for compensation (an 81m² plateau with 1:4 banks which provides a volume of 11m³). The indicative design is appropriate for this stage in the planning process, with the detailed design secured by condition.

Groundwater flood risk

The FRA identifies that groundwater flood risk is low. I agree with this assessment as the groundwater monitoring that took place on site between 18.01.2018 and 31.01.2018 did not encounter groundwater except for BH8. In BH8, suspected perched groundwater was encountered at a depth of 3.910m below ground level.

Surface water drainage

The impermeable area for the originally proposed development under this application would have increase from 0.177ha to 1.835ha. It is highlighted that prior to mitigation, this increase in impermeable area would result in a runoff volume of 1,335.20m³ for the 1 in 100-year 6-hour storm event. The increase in impermeable area will be mitigated through the provision of a surface water drainage strategy. The proposed surface water drainage strategy comprises of permeable paving, bioretention areas, an infiltration basin and attenuation tanks. I am pleased to see a range of sustainable drainage that aims to capture runoff at source as well provide improvements to local amenity and biodiversity.

The additional information submitted during the course of the application includes a Catchment Review. The review of the impermeable catchments is due to changes to the development site plan and indicates that there is a decrease in impermeable area based on the revised scheme and therefore the drainage strategy remains relevant and fit for purpose.

Shallow infiltration methods are possible within the southern area of the site, near to TP8 and the remainder of the site is suitable to drain via deep bored soakaways. Results from the infiltration rate testing show that the chalk materials are low density and in line with CIRIA guidance, soakaways will need to be positioned at least 10m from buildings, this should include any existing buildings.

Other Matters

The June 2023 technical note states that the access road and parking bays are at or below existing ground levels so as not to obstruct the existing medium and high surface water flood risk. It is noted that the infiltration basin and attenuation tanks have additional capacity and in the event that this flood volume is routed to the basin, there is a remaining freeboard of 50-60mm. Flush kerbs will be provided through the engineered low points to ensure existing flood flow arrangement are not impeded.

I also note that the amended site plan indicates informal footpaths crossing the area identified as the overland surface water flow route. It is strongly recommended that these footpaths are laid at existing ground level so as not to obstruct the flow route. This can be secured by a suitably worded planning condition.

NHS Integrated Care Board

NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB) object to this application on the grounds of insufficient primary medical care capacity locally.

We anticipate an increase in population of approximately 218 new patients as a result of this housing growth who will require care from Cygnet Primary Care Network (PCN), and Desborough and Hazlemere Surgeries.

This large development will put increasing pressure on the practices' infrastructure i.e. the need for more consulting rooms and administration plus larger / additional waiting areas and car parking.

The effects of larger developments can be significant, particularly on a practice that is used to catering for small village communities and we would anticipate that there would be a requirement for modification to existing infrastructure using CIL contributions. In the majority of cases, primary care services are already operating under extreme pressure and physical constraints, such as the lack of space hamper the delivery of additional services. The GP Practices in Hazlemere and/or surrounding areas are at full capacity.

Access to GP appointments is a national issue and we are working to promote different ways of offering consultations to cope with the increase in demand. Nationally primary care providers will need to look at new models of care, using the skillsets of different types of clinical professions to offset the demand from increased patient numbers.

Further development in the area will create more pressure on GP Services and put existing patients at risk if the current practices are unable to cope with any additional workload. If this development is to go ahead BOB ICB would seek appropriate S106 contributions in order to help to support the local health service infrastructure.

BOB ICB estimates that this development would require an increase in floorspace of 14.4 m² (Gross Internal Area) to serve the projected population increase. At current building costs of £5,692 per m² this would require developer contributions of value £82,123.

BOB ICB would allocate resources gained to increase capacity at GP Services in Hazlemere and surrounding areas and have identified project opportunities for expansion of existing practice premises.

Thames Valley Police Crime Prevention Design Advisor

Comments on application as originally submitted; no comments received on amended scheme.

Surveillance along the access road

- There is very limited surveillance potential along the access road from Wycombe Road into the site due to the orientation and layout of existing and new housing plots. In addition, the positioning of visitor parking spaces is likely to obscure sightlines from the nearest plots.
- There is likely to be issues in terms of lighting the access appropriately. To ensure safe movement of pedestrians lighting columns are required, however this would likely be in conflict with the neighbouring houses and private rear gardens.

Parking

- Parking strategy is concerning with visitor spaces in many locations more convenient than the allocated spaces leading to potential for neighbour disputes.
- Parking courts can be problematic in terms of crime and anti-social behaviour. As a general rule, where they cannot be avoided they should be small in size, and where located behind the building line should be treated as private residential parking and not include any visitor parking as shown in several locations across the site.

Rear access routes

- There are pedestrian rear access routes which appear to be running concurrently or in parallel to others where they could become unauthorised routes through the development along vulnerable side and rear boundaries (the point of entry for the majority of burglaries). All rear access routes should be secured at the front fascia of the buildings to avoid any recess, serve a maximum of 4 dwellings, fitted with self-closing hinges and lockable from both sides.

Thames Water

Waste comments

This catchment is subject to high infiltration flows during certain groundwater conditions.

The scale of the development does not affect the sewer network as such TW has no objections. However, care should be taken when designing new networks to ensure that they do not surcharge and cause flooding.

The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer.

In the longer term, TW are working on a strategy to reduce groundwater entering the sewerage network.

TW have no objections with regards to the Waste Water Network and Sewerage Treatment Works infrastructure capacity.

With regards to surface water drainage, no objections provided the developer follows the sequential approach

Water comments

With regard to water supply, this comes within the area covered by Affinity Water

Other Representations

Amenity Societies/Residents Associations

Holmer Green Village Society has submitted several objections raising the following points:

- Lack of engagement with local residents and organisations
- This is a piecemeal and fragmented development of the (C.30% of the plot) and does not deliver a full suite of services and facilities, it is not a comprehensive development
- Building two separate developments in two adjacent parcels of land and linking them with a secondary means of transport does not come close to comprising comprehensive development.
- The developer has failed to work with the NHS ICB on how they expect to increase capacity in the area

- The PCN have clearly stated that they are at capacity in terms of clinical space and GP/clinical time such that they would not be able to cater for 350 new houses
- A further 16 houses has recently been permitted at Inkerman Drive
- Tralee farm is one of three proposed developments that could add a minimum of 2,500 people in the PCN catchment area
- No amount of money can overcome the practical and physical limitations of the surgery at Roberts Ride since it is a converted residential property with only 6 parking spaces
- No regard is being had to the requirements of current and future residents or to consider the cumulative impact of various proposed development on local infrastructure and residents
- The land is part of Hazlemere and therefore access should be provided from the A404
- Policy only seeks walk / cycle access to Wycombe Road
- The policy requirements for off site highway works presumably relate to a major improvement of the A404
- Access on to the Wycombe Road is totally unsuitable for the car and vehicle movements associated with 87 homes, in addition to the 257 houses using the access for walking and cycling
- A narrow road with a blind turn extending 120m into the development before the first building or turning has the potential be a rat run with added danger when larger vehicles use the road; it is effectively a single track which will not allow vehicles to pass each other and forcing encroaching onto footways and reversing to the detriment of safety
- The access visibility splays are the minimum possible and there are issues with the radii of the corners overlapping neighbours
- A dentist neighbours the site and the potential for drop offs at the site access is highly likely affecting visibility
- 1.7 million vehicles travel on Wycombe Road a year and between 4,000 to 8,000 on a daily basis, with 20% travelling over 30mph. A new access with minimum visibility splays and tight turning radii cannot safely be justified in this location.
- The vehicle movements in the applicant's submissions are incorrect; the Society has submitted speed data which seeks to substantiates this and the vehicle movements detailed above
- The objection to vehicular access from Wycombe Road is based on excessive traffic in Holmer Green as a result of pupils travelling to attend places in Holmer Green Schools; Holmer Green is frequently gridlocked at school drop off and pick up times.
- 87 extra people accessing the village will make the situation less safe
- The development is accessed from Holmer Green not Hazlemere and therefore should be treated as falling within Residential Parking Zone C which applies to Holmer Green not B which applies to Hazlemere

Other Representations

Sarah Green MP (Member of Parliament for Chesham and Amersham) has submitted a letter of objections which includes the following points:

- *Constituents have raised a number of objections directly with MP including:*
 - *the lack of a comprehensive plan for the development*
 - *Incorrect traffic data*
 - *Safety of site access*
 - *Lack of separation between Holmer Green and Hazlemere*
 - *Lack of Primary School capacity*
 - *Lack of GP capacity*
 - *Inadequate road infrastructure and capacity*
 - *Inadequate parking already, particularly at school times with existing danger to children and residents*
 - *Waste water system already at capacity*
 - *Ecological issues*
 - *Existing local flood issues exacerbated by the development.*
- *The MP shares these concerns, particularly the lack of a comprehensive plan for the site, absence of sufficient infrastructure, and additional traffic and road safety risks*

A total of 128 neighbours / third parties have submitted representations regarding the application, of these 118 were objectors and 10 were supporters of the application.

Objections

The main issues raised in the objectors' representations are set out below:

Principle of development

- Site should not have been removed from the Green Belt
- Green Belt land should not be built on (Officer note: Site is not in the Green Belt)
- Village cannot cope with the increase in housing / overpopulation in the village
- Located in the AONB (Officer note: Site is not in the Chilterns AONB)
- Development should not be allowed on green fields
- Holmer Green will be merged into Hazlemere
- Urban sprawl out of Wycombe

- The site is unsuitable for mass housing
- Detrimental effect on the community/village
- Overcrowding of village
- The two planning applications for the sites should be considered together
- The two proposed sites are being done independently; needs to be a joined up approach
- Cumulatively allocated number of dwellings would be exceeded
- Hazlemere Neighbourhood Plan and Holmer Green Neighbourhood Plan are not completed
- Object to modifications to Hazlemere Neighbourhood Plan

Traffic

- Increase the volume of traffic in Holmer Green and Hazlemere
- Increase traffic on Wycombe Road
- Traffic already bad at peak times
- Will cause standstill traffic at peak times
- Issues with cut through traffic via Holmer Green, Browns Road and New Pond Road
- Cars speed on Sawpit Hill, increase in traffic would make it more dangerous
- Hazlemere facilities are only likely to be accessed by car
- Concerns about access for emergency vehicles
- Increase in accidents
- Traffic calming measures should be proposed
- Increase parking on the pavements
- Construction vehicles will be parked outside on Wycombe Road
- School children will struggle to cross the road to school
- Not safe for school children
- Traffic congestion on the A404
- A404 has hazardous slope and proximity to moving traffic meaning cycle route would be dangerous for children, pushchairs, impaired mobility
- A404 will not encourage cyclists because of the long steep incline
- Unsafe for pedestrians, cyclists, existing road users
- Lack of transport links
- Public transport is unreliable
- Only one bus service available for the development
- Negative impact on the state of the road; roads are in heavily worn/poor conditions

Access

- Turning out into Holmer Green is hazardous
- No clear views when turning in/out of the site
- Proposal does not provide safe access
- Access from Orchard Farm site onto Amersham Road will also be dangerous
- Need safer junctions
- Access to the site is narrow
- Entrance is a general overall hazard
- Large Lorries will have trouble manoeuvring
- Intended footpaths are too close to the main road
- Limited pedestrian and cycle access
- In 1987 planning permission for six houses were refused due to the increase in traffic

Parking

- Inadequate parking
- Lack of parking will lead to intrusive and dangerous parking
- No electric vehicle charging point for every property
- Holmer Green is in Parking Zone C and therefore dwellings should require three parking spaces

Design

- No comprehensive development of the HW8 site as a whole
- Poor design and layout
- The number of houses is disproportionate to the local area
- Overdevelopment; cramming of properties
- The type of dwellings does not fit in with the area; three story buildings/flats are not in keeping with the area
- Housing design should improve the appearance of an area rather than detract from it
- Proposal is for high density development in a low-mid density area
- Lessens the sense of the rural location
- Proposal removes the boundary between Holmer Green and Hazelmere
- There should be separation between Hazelmere and Holmer Green
- No sense of separation between villages
- Development does not provide sense of community with existing villages
- Loss of identity of villages

- Lack of sense of security
- Will result in an increase in anti-social behaviour
- Development and neighbours will feel unsafe
- No proposed open space / recreational amenities
- No proposed playgrounds for children

Residential amenity

- Sensitive boundary to the west (rear of Inkerman Drive and Kestrel drive) not acknowledged
- Inconsistent approach to sensitive western boundary
- Brick walls of terrace houses would back onto neighbouring gardens
- No buffer / screening between development and existing residents
- There is no separation / set back between the new development and existing properties on Inkerman Drive, Kestrel Drive, Lacey Drive, Sawpit Hill, and Wycombe Lane
- Existing residents should not be subjected to looking at a housing estate
- Visual impact on local residents; looking directly into buildings
- Overlooking onto existing houses
- Will disrupt lives and houses of existing residents
- Loss of a countryside view
- No / small gardens for dwellings
- Security issues on boundaries with residential properties from parking courts and open spaces resulting in exposed boundaries and no defensive space
- Unclear if there will be planting on boundaries with residential properties
- New residents on the western boundary of the site will not allow planting on boundaries to mature due to overshadowing
- Existing powerline prevents planting along the western boundary

Pollution

- Negative effect on local air quality and pollution
- Increase in noise and light pollution
- Increase in litter

Infrastructure

- Local infrastructure will not be able to accommodate the strain of new people in the estate.
- Infrastructure is already struggling / overstretched in the area
- There are no proposed doctors, schools, dentists or commercial properties.
- Schools are already over subscribed

- Children will be forced to go to schools outside of their catchment area
- Long waiting lists/times for doctor surgeries
- Drainage systems will not be able to cope
- Insufficient water pressure
- Lack of police
- Regular power cuts in Holmer Green; stress on electricity supply
- Lack of nursery places in the village
- No community facilities
- Parking at Park Parade and Holmer Green shops is not able to cope and therefore difficult and dangerous

Wildlife/Biodiversity

- Loss of wildlife / natural habitats for a range of insects, animals and birds
- Local wildlife (bats, badgers, and deer's) will be displaced and suffer from the development.
- Impact on TPO's on site
- There should be a wildlife corridor to protect the badgers
- The western boundary should be a green infrastructure corridor
- Impact on designated green space
- Proposal will reduce open space
- Loss of green space will impact negatively on people's mental health
- There is no net gain on ecology and biodiversity for the planning application
- The green space is vital to the wildlife/natural drainage system
- Loss of dog walking space

Climate Change

- No sustainable energy resources
- The houses are not energy efficient – no heat pumps, solar panels, extra insulation, triple glazing
- Hazelmere has declared a climate crisis
- Loss of trees to help fight climate change
- Carbon emissions will increase

Other

- Lack of affordable houses
- Proposal will increase flooding
- Lack of public consultation

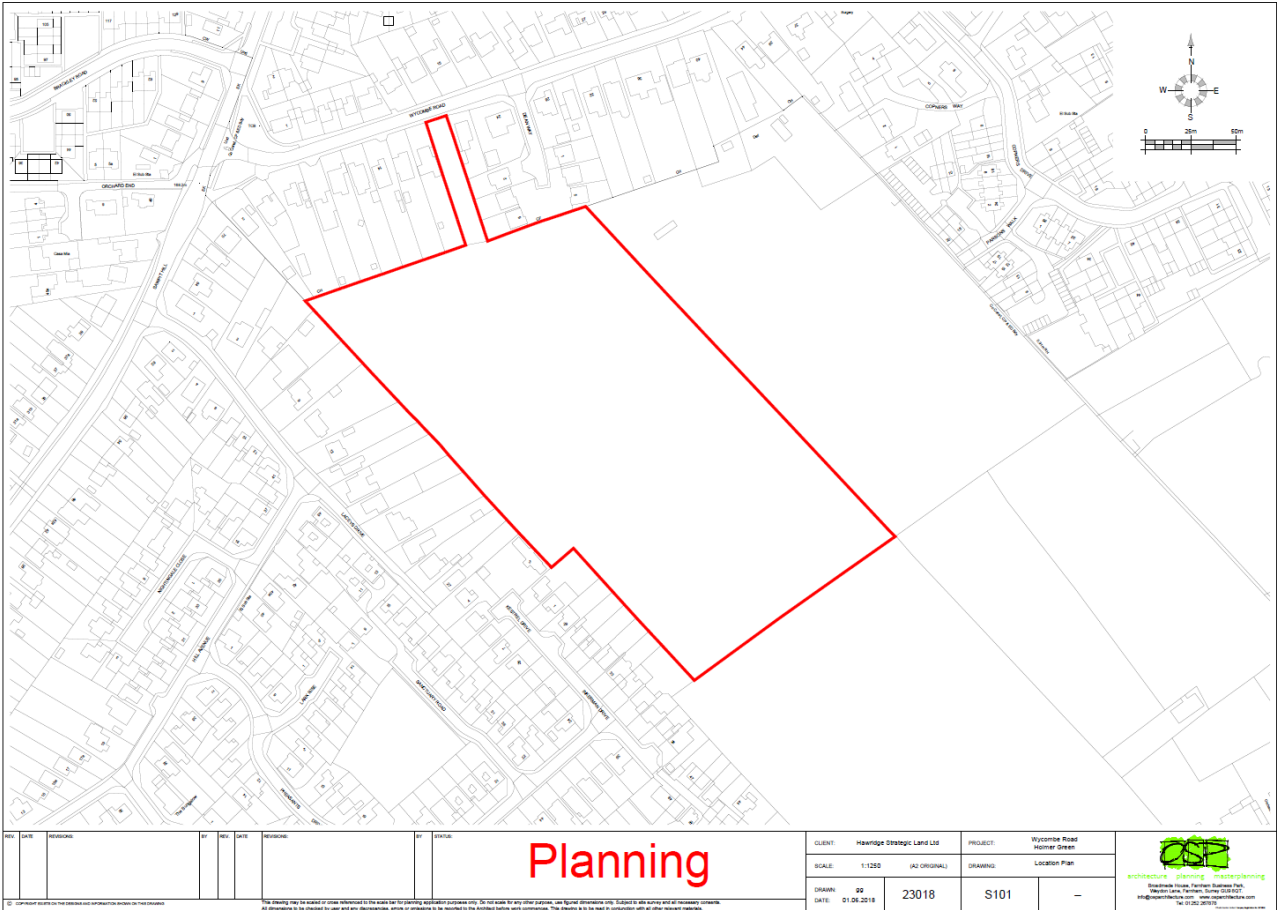
- Consultation period does not consider/represent the elderly residents
- No employment opportunities in Holmer Green
- Developers are only thinking of financial gain

Support

A summary of the main matters raised in the supporters' representations are set out below:

- Meets the houses shortage in the UK
- Meets the need for new and modern housing
- Provides affordable housing opportunities
- There is a good mixture of dwelling types proposed
- The proposal is pleasing to the eye
- Development will not contribute to traffic issues
- The site is in a good catchment area to schools
- Good location to start a family
- It would provide houses in a rural setting
- It would provide housing closer to where respondents work / have families
- Benefits from living in the countryside
- New residents will pay council tax to contribute to the economy
- Will bring benefits to local businesses
- The application addresses previous requirements of the Strategic Sites Committee

APPENDIX B: Site Location Plan



Planning

REV	DATE	REVISIONS	BY	REV	DATE	REVISIONS	BY	STATUS

CLIENT:	Haveridge Strategic Land Ltd	PROJECT:	Wycombe Road Wormer Green
SCALE:	1:1250 (AS ORIGINAL)	DRAWING:	Location Plan
DRAWN:	99		
DATE:	01.06.2018	23018	S101

green
architecture planning

Stratford House, Park Road, Wormer Green,
Wormer Green, Wymondley, Wymondley, Wymondley,
Haveridge Strategic Land Ltd, 01223 23018
info@greenplanning.com www.greenplanning.com
16.03.2018

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APPENDIX C: Appeal Decision Notice for 18/07194/OUT



The Planning Inspectorate

Appeal Decision

Inquiry opened on 28 July 2022

Site visits made on 28 July & 27 September

by Mrs J Wilson BA (Hons) BTP MRTPI DMS

an Inspector appointed by the Secretary of State

Decision date: 2nd December 2022

Appeal Ref: APP/K0425/W/22/3296128

Land to the rear of 20 Wycombe Road, Holmer Green, High Wycombe, HP15 6RY, 489803, 196518

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission
 - The appeal is made by Inland Ltd against Buckinghamshire Council - West Area (Wycombe).
 - The application Ref 18/07194/OUT, is dated 31 August 2018.
 - The development proposed is Outline application (including details of access and layout) for the erection of 101 dwellings with all other matters reserved.
-

Decision

1. The appeal is dismissed and planning permission is refused.

Applications for costs

2. An application for costs was made by Inland Homes Ltd against Buckinghamshire Council. This is the subject of a separate decision.

Preliminary Matters

3. The Inquiry was scheduled to open on 26 July as a face to face event however due to the COVID status of a key participant was switched to be conducted virtually. Prior to the start date, Rule 6 parties strongly objected to a virtual event. Following consideration of those objections the opening was delayed in order that the Inquiry could be conducted face to face opening on 28 July 2022. On the first day openings and evidence from two of the four Rule 6 parties was given however later that day it became apparent that members of the public who, due to the content of correspondence they had received from the Council had a legitimate expectation to join and participate in the event virtually. Site notices had also made it plain that the event would be available virtually. As that option was not available to them the Council explored whether it could stream the remainder of the event online but was unable to do so for capacity reasons.
4. In the interests of fairness, and given the notifications that had been sent, the Inquiry was adjourned. It was subsequently resumed as a hybrid event on 26 September with participation both face to face and remotely via Teams. In total the Inquiry sat for a total of seven days on 28 and 29 July and between 26 to 30 September 2022.

5. The Appeal Site straddles the boundary of two former District Councils, Chiltern and Wycombe. The majority of the appeal site is located within Hazlemere Parish which lies within the former Wycombe District Council area. The access road, and the existing dwelling at 20 Wycombe Road are located within Holmer Green, within the former Chiltern District Council area. Consequently, the Appeal Site also encompasses land within two Parish Council areas, Hazlemere within the former Wycombe District Council area, and Little Missenden, within the former Chiltern District Council area. Holmer Green, the closest settlement to the proposed development, is within Little Missenden Parish Council.
6. Planning applications were originally made to Wycombe District Council and Chiltern Council in 2018 as the appeal site area includes land in both districts. The Buckinghamshire authorities of Aylesbury Vale, Chiltern, South Buckinghamshire, and Wycombe, along with Buckinghamshire County Council, became a Unitary Authority known as Buckinghamshire Council (The Council) in April 2020 and the application made to Chiltern¹ was subsequently withdrawn on 5th August 2020.
7. The original planning application was made in outline for 103 dwellings with access, layout and scale to be determined. The proposal was amended in June 2020, May 2021, August 2021 and January 2022. The amendments in May 2021 resulted in scale being removed from consideration. In January 2022 the scheme was further amended to "*Outline application (including details of access & layout) for the erection of 101 dwellings with all other matters reserved*" resulting in the loss of 2 units from the layout. As such the revised description is reflected in my banner heading above. The amendments were referred to in the officer report following consultation by the Council and I am satisfied that there would not be any prejudice to participants in considering the development on the basis of the revised description.
8. The application is in outline with all matters save for access and layout reserved for subsequent approval. Drawings, 18083-S101B (Location Plan); 18083-C201B & 18083-P202M (Site Layouts); and 141278/A/07 (Site Access Alignment) are for consideration with all other plans taken for illustrative purposes only.
9. As the appeal is against non-determination there is no decision notice. Initially the appeal scheme was deferred by the Councils Strategic Sites Committee² to be considered further once a development brief had been produced. Following the lodging of the appeal the Council considered the scheme again resolving, against their officer recommendation, to refuse permission and offering putative reasons for refusal. Two reasons were identified³. The first reason related to lack of comprehensive development, lack of an appropriate sense of separation between Hazlemere and Holmer Green, and failure to meet key design principles required to achieve high quality sustainable development contrary to the Development Plan and the National Planning Policy Framework (The Framework)⁴.
10. The second putative reason for refusal focused on the absence of an obligation under Section 106 of the Planning Act (s106) to secure contributions or direct

¹ PL/18/3121/OA

² On 24 February 2022

³ Strategic Sites Committee 12 May 2022

⁴ Page 4 and 5 of CD77

provision on a range of matters including affordable housing, the definition of local criterion related to affordable housing, the level of contributions for highways, education, public open space including equipped play, sustainable urban drainage provision, connectivity between the appeal site and the remainder of the HW8 allocation (to the south), biodiversity including offsetting contributions and detailed ecological management plan, the provision of a management company and the provision of custom and self-build housing within the site.

11. The legal agreement covers the matters referred to above and a signed version of the agreement was received after the Inquiry closed within the timeframe specified. I am satisfied that the provisions of the obligations would be necessary to make the development acceptable in planning terms, that they directly relate to the development, and fairly and reasonably relate in scale and kind to the development, thereby meeting the relevant tests in the Framework⁵ and Community Infrastructure Levy Regulations⁶. I have taken the planning obligation into account in reaching my decision.
12. Four groups were afforded Rule 6 status at the Inquiry⁷. Little Missenden Parish Council (LMPC), Holmer Green Village Society (HGVS), Hazlemere Parish Council (HPC) and Holmer Green and Hazlemere Neighbourhood Development Focus Group (HG&HDFG) gave evidence opposing the appeal. These representations included matters which were not contested by the Council or the highway authority relating to the capacity and safety of the access and the impact of the development on existing trees, matters to which I will return.
13. I held a Case Management Conference (CMC) online on 16 June 2022 which was attended by the main parties and representatives of the four Rule 6 parties. At the CMC the following matters were covered: the main issues were identified, how the evidence would be dealt with at the Inquiry; the submission of statements of common ground; the listing of core documents; the timetable for submission of documents along with other procedural matters. A second CMC was held on 11 August where the focus was the technical arrangements for the delivery of a hybrid Inquiry.
14. The status of the Hazlemere Neighbourhood Plan (HNP) changed during the Inquiry as it was published for Regulation 16 consultation⁸. Evidence was given that the HNP seeks to deliver sustainable development by protecting and improving green infrastructure, delivering zero carbon buildings, and promoting sustainable transport, in respect of the appeal site it seeks to articulate a greater level of detail in relation to the site and on specific subject matters. Local Councillors in their representations advised that the emerging plan should be given particular attention in respect of climate change. Whilst the objectives of the plan are acknowledged, as an emerging plan at an early stage of preparation the HNP does not yet form part of the development plan and in accordance with paragraph 48 of the Framework it, can be afforded only limited weight in decision making.
15. A Statement of Common Ground (SOCG) was agreed between the appellants and the Council before the Inquiry opened in July. An addendum to that SOCG

⁵ Paragraph 57

⁶ Regulation 122

⁷ Accorded Rule 6 (6) party status under the Inquiry Procedure Rules.

⁸ 28 September 2022

was also agreed in August 2022 updating the Inquiry on the Hazlemere Neighbourhood Plan and the progress of the HW8 Development Brief.

16. The appeal site was previously designated as Green Belt. However, upon adoption of the 2019 Wycombe District Local Plan (Local Plan) the appeal site and adjacent land was identified for development as a housing site. The site is no longer subject to any Green Belt⁹ designation and as such Green Belt issues are not for consideration in this appeal.
17. I undertook an accompanied site visit during the initial part of the Inquiry in July and again on 27 September, viewing the site and surrounding area to an itinerary agreed between the main and all Rule 6 parties. I observed, as was requested by Rule 6 parties the extent of traffic passing the site at school closing times. I also visited the general area prior to the Inquiry opening to look at the surroundings from the points indicated by the Council.

Main Issues

18. Having regard to these matters and taking into account the procedural matters outlined above the main issues are:-
 - a) The effect of the development on the character and appearance of the area in the context of the requirements of Policy HW8 of the Local Plan part 1 a) (achieving a sense of separation between Hazlemere and Holmer Green).
 - b) Whether the appeal scheme achieves comprehensive development within Wycombe district as set out in part 1c) of Policy HW8.
 - c) The status of the development brief covering the land subject to Policy HW8.

Reasons

Policy background

19. The appeal site forms the northern part of a housing site allocated by Policy HW8 of the Wycombe District Local Plan 2019 (Local Plan). Consequently, the site is accepted as a sustainable location suitable for the quantum of housing development proposed, subject to meeting the requirements of the policy criteria. It was acknowledged by the Council and the appellants that the development of this appeal site would unlock the wider delivery of the HW8 allocation. Notwithstanding this, compliance with two aspects of Policy HW8 are at issue. Firstly, the requirement to maintain a sense of separation between the settlements of Hazlemere and Holmer Green¹⁰, and secondly the requirement to provide a comprehensive development of the site within the Wycombe district¹¹. I shall deal with these two matters separately.
20. Policy HW8 requires that development maintains a sense of separation between Hazlemere and Holmer Green. The parish boundaries of which run along the northern boundary of the appeal site (save for the proposed access). The layout set out in Fig 14 of the Local Plan¹² which accompanies policy HW8, whilst marked indicative, makes clear where existing trees and woodland are located. These physical features form the northern boundary of the appeal site

⁹ Wycombe District Council Local Plan, Inspectors Report 10 July 2019 para 137

¹⁰ (Criterion a) of Policy HW8

¹¹ (Criterion c) of Policy HW8

¹² Page 108 of the Wycombe District Council Local Plan

and separate existing residential development in Holmer Green from the open part of the appeal scheme¹³.

21. The western and central portions of the appeal site would be developed for housing with the southern corner section left largely undeveloped, other than for the provision of a dry balancing pond to accommodate periods of high rainfall in order to relieve surface water issues. The Council does not object to the principle of residential development on this site. Objections were expressed by some representors which I deal with below.

Character and appearance

22. The layout of the development would be fixed by the submitted plans and whilst landscaping is a reserved matter the impact of the road layout and the positioning of buildings enables the effect on the character and appearance to be clearly understood in the context of the requirement to maintain a sense of separation between the settlements of Hazlemere and Holmer Green. The Inquiry heard that the two parishes had long since merged given that development is contiguous at Watchet Lane and Sawpit Hill which was evident from an aerial photograph¹⁴. However, that element of coalescence predates the requirements of the Local Plan which requires the sense of separation to be maintained between the two settlements.
23. There were differing interpretations of the 'sense of separation' at the Inquiry with the appellants arguing that the Council in its officer report had concluded that the development '*achieves a degree of physical separation between the two parcels of development by providing a distinct and meaningful area of open space to the south of the site which also provides green infrastructure and required on-site strategic open space*¹⁵. However, this reference relates to the separation of parts of the new development at the southern edge of the appeal site and not on the boundary between the two parishes. Moreover, it does not address the requirement of criterion 1 a) of HW8 nor does it recognise the issue of the maintenance of existing vegetation highlighted in the plans accompanying Policy HW8.
24. Local residents highlighted the need for meaningful separation between Hazlemere and Holmer Green and drew attention to the deliberate removal of tree cover within the remnant orchard. Rule 6 parties generally accepted that development would proceed on the site in some form however emphasised that the principles of the Local Plan Policy should be implemented. The appellants explained that the trees which had been removed were in poor condition. Furthermore, the retention of the remnant orchard trees is not specifically referred to in the wording of Policy HW8. The explanatory text in the Local Plan supports the premise that green infrastructure can provide the sense of separation between the two communities¹⁶. Importantly though, it also refers to the site benefiting from important natural features including an orchard and woodland both of which are on the northern boundary of the site. The retention of the remnant orchard would not be addressed by the submitted layout which would undermine the objective of maintaining a sense of separation as it would result in built development on the northern boundary. It is also relevant that a

¹³ Save for the access road

¹⁴ At appendix D to Miss Luis POE

¹⁵ In their committee report to the Strategic Sites Committee on 24 February 2022

¹⁶ Paragraph 5.1.72 Wycombe District Local Plan

Tree Preservation Order¹⁷ relating to six remaining trees within the remnant orchard is now in place even though this was imposed in response to the tree felling which had taken place.

25. The appellants suggested that the sense of separation was a nebulous criterion¹⁸ and that the Council's evidence tended towards a preference rather than a strong view. Landscape evidence focused on the relationship of the site to the existing settlement though in cross examination the appellants landscape witness conceded that the appeal site did have a role in providing a sense of separation between the two settlements.
26. The central open space to the south of the appeal site would undeniably provide a sense of separation between new development on the two parts of HW8¹⁹. However, it would not achieve the clear requirement for separation between the two parishes in the context of the appeal site. In my judgement and in the straightforward application of the meaning of part 1 a) of Policy HW8, there is a clear requirement for separation on the northern boundary, this is the only part of the appeal site where the two parish boundaries are contiguous²⁰. The term 'maintain' in respect of the existing sense of separation, in my view, requires a tangible, recognisable element of separation to be achieved. This requirement is represented in the indicative layout in Fig 14 of the Plan where existing trees and woodland on the northern boundary are shown as retained with housing development indicated further south. This is further supported in Fig 14 accompanying Policy HW8 and although not part of the policy, in the context of the existing trees and woodland it shows the development within the context of existing natural features on the appeal site, factors not recognised by the appeal layout.
27. The existing woodland and the remnant orchard are not, and would not, be visible in the wider landscape however they remain highly visible from residential properties to the north and west of the site and these features make a significant contribution to the separation of Hazlemere from Holmer Green. The appeal layout does not provide for the retention of existing vegetation on the northern boundary. This would not allow for the retention of the trees, now protected by a preservation order, nor would it make provision for the remnant orchard to be retained, as envisaged by plan which supports Policy HW8 in the development plan. Nor would it allow the remnant orchard to be restored following the loss of a significant area of tree cover. The proposed layout would also be in conflict with objectives contained in Policies CP9, CP10 and DM34 of the Local Plan which together seek to conserve the natural environment and implement measures for enhancement and to improve and use existing green infrastructure. There would be some conflict with Policy DM35, which requires development to improve the character of the area and to show a holistic understanding of the natural context as well as taking a comprehensive approach to site layout and design. Similarly, there would be some conflict with the Adopted Delivery and Site Allocations Plan (for town centres and managing development) (2013) (Site Allocations Plan) Policy DM11 which requires improvement to the green infrastructure network; and to Policy DM14 which requires existing resources to be conserved and enhanced.

¹⁷ served on 27 June 2022

¹⁸ Appellants Closing submission para 29 (Mr Grant)

¹⁹ Appellants Closing submission paras 36.1 to 36.3

²⁰ As shown in the aerial photograph in Appendix D to Mis Luis POE

28. Landscaping is a reserved matter the detail of which is not before me. Even so the new orchard area to the western part of the site adjacent to No 1 Kestrel Drive, which is immediately on the western boundary of the development site, would not provide adequate mitigation for the loss of the remnant orchard either in terms of its size nor location. Neither would it achieve any meaningful sense of separation between the two settlements.
29. Taking all these factors into account and for the reasons outlined the proposed layout would cause significant harm to the character and appearance of the area in conflict with part 1 a) of Policy HW8 of the Local Plan as it would fail to maintain any sense of separation between Hazlemere and Holmer Green.

Comprehensive development

30. The appeal site forms around one third of the HW8 Local Plan allocation. Paragraph 1 c) of that policy requires that schemes '*provide a comprehensive development of the site with Wycombe District*'. The land of the HW8 allocation is held by a small number of owners, the appeal site and the bulk of the remainder being in the ownership of a separate developer Bellway. Their land is currently subject to a planning application for which amendments are currently being sought.
31. The importance of co-ordinated or comprehensive development stems from the need to ensure that Holmer Green facilities are accessible on foot from the southern part of the allocation through this appeal site. The appeal site also needs to provide for adequate pedestrian and vehicular connections for emergency vehicles. This underpins the need to ensure that such connections are fully considered and the relationship between the two is of relevance.
32. It was agreed between the main parties that connections to the remainder of HW8 are essential to ensure sustainable development. The appeal layout indicates three pedestrian linkages, one of which would also provide access for emergency vehicles between the appeal site and the remainder of the HW8 allocation. Nevertheless, as those positions do not match in with the same points on the submitted scheme for land to the south²¹ albeit that scheme is, as yet, undetermined, this lack of synergy undermines the comprehensive development of the overall allocation required by Policy HW8.
33. Written communication from Bellway²² confirmed that the appeal layout would not prejudice their own proposals and a revised layout for the Bellway scheme was submitted in evidence at the Inquiry²³. That layout showed connections to two of the three points indicated in the appeal scheme. However, the Bellway layout has not been accepted as an amendment and it is not certain if it will be. To this extent comprehensive development of the overall HW8 allocation is not secured as the two layouts do not fully align. In respect of the appeal scheme one footpath would result in a dead end were the latest Bellway plan to proceed.
34. I note that the appellants position that the provision of three connections is generous and far from hindering comprehensive development, would provide safe convenient and legible connections²⁴. However, as connections are

²¹ As shown at appendix 8 to Mr Bell POE

²² Appendix 6 to Oliver Bell POE – letter dated 23 June 2022

²³ INQDoc16

²⁴ Appellants Closing submission para 24

required through the appeal site for future occupiers of the development on the southern part of the site to access facilities in Holmer Green, it is necessary to ensure that effective connections are secured between these two sites. Moreover, as the layout of the scheme would be fixed there would be very limited scope to make changes to flex the scheme to fit in with an as yet unknown scheme on the remainder of HW8.

35. The Planning Practice Guidance²⁵ and the Development Management Procedure Order²⁶, indicate that the consideration of any access includes accessibility to land within the site regarding circulation routes both within and beyond the site boundaries. In this context and considering that the appeal site is part of a wider allocation there is a legitimate expectation that the Council should seek to ensure that the development will function effectively as part of the whole HW8 allocation. I do not accept the appellants view that, as there is no physical existing network for the appeal proposal to connect into, it would be perverse to consider connections to the remainder of the HW8 allocation.
36. It is acknowledged that the HW8 policy does not require a single planning application and that in cross examination the Council's witness conceded that her evidence did not explicitly show how the appeal layout would compromise comprehensive development. Notwithstanding this the layout of development to the south is by no means certain and whilst the opinion of Bellway is that their land would not be prejudiced, this was not evidenced or demonstrated by way of any agreed plan or undertaking. Moreover, the Council confirmed that it was not able to clarify whether the revised Bellway layout presented to the Inquiry would be accepted as a revision to the current planning application given that the extent of change may lead to the requirement for a fresh application and effective connections remain uncertain.
37. The Inquiry also heard evidence that the lack of a comprehensive approach meant opportunities have not been taken to co-ordinate the provision of open space. This lack of a co-ordinated approach to the provision of open space and recreation facilities means some provisions would be duplicated rather than co-located on one scheme. In turn this would reduce the flexibility in the use of open space on the appeal site which is already subject to competing requirements for use as sustainable urban drainage. These factors would not secure comprehensive development.
38. While co-ordination need not be hugely complicated it would involve a greater degree of certainty as to the connection routes and the use of the central open space. The amended layouts referred to and the statements that the appeal scheme would not prejudice delivery are insufficient to secure the level of confidence needed that comprehensive delivery across HW8 can be achieved.
39. Put simply, on the evidence before me the arrangements would not secure a co-ordinated approach which is envisaged by the comprehensive development of the site as required by part 1 c) of Policy HW8 which relates to a much larger land area than this appeal site. It cannot be assumed that the selected points intended to provide connections will be utilised by the adjoining site and no certainty that those connections would be effective. There is no substantive evidence that effective connections can be secured to the remainder of HW8.

²⁵ Reference ID: 14-006-20140306 referred to in Opening and Closings by the Council INQDoc 2 and 26

²⁶ The Town and Country Planning (Development Management Procedure) (England) Order 2015 SI 2015 No 595

As such I regard there to be a clear and necessary purpose for the comprehensive development of the HW8 site.

40. Even though the submitted 106 agreement seeks to make provision for connectivity and if necessary, the provision of step in rights, for the reasons outlined above I conclude that there is no certainty that the comprehensive development of the overall allocation required by part 1 c) of Policy HW8 would be secured by this appeal scheme. As such Policy HW8 part 1 c) of the Local Plan would be undermined resulting in conflict with the development plan which requires there to be comprehensive development of the HW8 land within the Wycombe District which in practical terms means the whole of the allocation.
41. In reaching my conclusion on comprehensive development I have had regard to the conclusions reached in a recent appeal decision relating to another part of the allocation fronting Amersham Road²⁷ where the Inspector concluded that the delivery of the HW8 allocation would not be prejudiced by the proposal for eight houses. Nonetheless the considerations in that appeal are not the same as in this scheme in the context of the wider proposals for the bulk of HW8. In any event that decision was dismissed for other reasons and it does not alter my findings in relation to the main issue.

Development Brief

42. The appellants statement of case correctly stated that Policy HW8 does not 'require' the production of a Development Brief for the HW8 allocation. Supporting text in the Local Plan²⁸ indicates that "*A comprehensive approach to the development of the land in Wycombe District is essential for good planning on this site. Preparation of a development brief for the site will be essential to coordinate the detailed planning of the site and this should be used to inform any planning application submitted for the future development of the site*". Even so, the parties agreed that there was no policy requirement for a development brief.
43. The recent completion of the brief has somewhat superseded the initial position of the Council who argued that the brief was needed to set the context for development and would be essential in co-ordinating the detailed planning of the site. The appeal proposal was formulated long before that detail so whilst it will be of help to the formulation of future development it is the detailed wording of Policy HW8 to which I must refer in determining the appeal proposal.
44. It is self-evident that the appeal scheme was not, and could not have been, informed by the development brief given the timeframes involved. It is a matter of fact that the Council deferred its initial decision on the appeal proposal for a brief to be prepared and the Council progressed that development brief in parallel to the appeal and published its final version immediately prior to the resumption of the Inquiry in September 2022.
45. That brief is now adopted and the main parties confirmed in their addendum to the SOCG that the development brief is a material consideration²⁹, this fact is not in dispute.

²⁷ APP/K0425/W/21/3272284

²⁸ Paragraph 5.1.67 page 109 Wycombe Local Plan

²⁹ Inquiry Document 11

46. Nonetheless in the context of this appeal the relevance of the brief is limited as chronologically it could not have set the framework for the formulation of the proposal I have before me. Though it will no doubt have relevance for future submissions. Whilst I must have regard to the content of the brief as the adopted approach of the Council which gives a greater level of detail in interpreting Policy HW8 for the formulation of proposals it cannot overlay additional requirements to Policy HW8 and I have considered the appeal against the content of that Policy and relevant related policies which refer to the treatment of existing natural features. In this regard whilst the status of the Development Brief is now adopted, its content has not been determinative to my findings in relation to this appeal.

Other Matters

47. There is significant feeling in the local community that the vehicular access to the appeal site from Holmer Green should not be the de facto solution for access to the housing allocation. My attention was drawn to a planning decision in January 1988³⁰ where development at Tralee farm was refused on the basis of increased traffic hazard and highway danger in the locality generally and on the basis of loss of amenity to the occupiers of houses on Deanway. That appeal scheme sought to extend an existing cul de sac of six houses which is a substantially different proposal than that before me and as such it does not set a precedent which I must follow.

48. Evidence was given by Rule 6 parties (LMPC, HGVS, HPC and HG&HDFG) that the access onto Wycombe Road was unacceptable, that its proximity to the Wycombe Road/Sawpit Hill junction caused traffic to back up past the site particularly at the beginning and end of a school day. Although the Wycombe Road access would be the only point of access/egress for the appeal site that point of access is shown on the indicative plan supporting the HW8 allocation. Whilst recognising the concerns expressed by the Rule 6 parties about traffic being concentrated on a single access to Wycombe Road, I am satisfied that the appellants highway assessment in terms of its methodology, assessment, and forecasting indicates that the formation of the access subject to the imposition of planning conditions and the completed section 106 agreement, would not compromise highway safety. Moreover, the Highway Authority raised no objection to the appeal scheme and I have no substantive evidence before me which would lead me to a different conclusion.

49. Rule 6 parties focused on the issue of informal surveillance along the first part of the proposed access between Wycombe Road and the main part of the site. This was based on the fact that the first part of the access road would not be overlooked by properties with habitable rooms. Furthermore, that surveillance from the first floor windows of properties on the adjacent cul-de-sac at Deanway would be unlikely to provide any meaningful natural surveillance of the proposed access road. The access into the main development would have a footway on only one side and would not be directly overlooked by existing or proposed dwellings. Even so it serves as the only vehicular access to the development and would have a level of traffic movements and activity associated with 101 dwellings which would limit deficiencies in informal surveillance from occupied properties. The access was identified in the Development Plan as serving the site and the issue of surveillance along what

³⁰ Application No 87/3297/CH made to Chiltern District Council – refused 21 1 88

would be the principal access has not been subject to any objection from the Police who identified concerns associated with the rear pedestrian accesses/passageways within the main part of the development. This issue is not therefore a matter which would justify resisting the use of the access from the Wycombe Road either in principle or in respect of the proposed layout.

50. Evidence was given on urban design matters however related to the general layout of the site, its points of connectivity and the focal points of the scheme with regard to site layout. As appearance is a reserved matter the visual appearance of the buildings is not before me even though illustrative plans gave some information as to potential street scenes. This matter has not been determinative to the outcome of the appeal.
51. Representations have been made regarding a negative effect on existing residential properties in terms of living conditions, especially those bordering the western boundary of the site which is identified in the Development Plan as a sensitive existing residential boundary. Reference was also made to an easement along that same boundary which, it was argued, would prevent the planting proposals shown on the layout plan from being implemented due to the need to protect the route of the power lines. The appellants indicated that the power lines would be undergrounded along the internal access roads and that this would not limit the proposed planting along that boundary.
52. Whilst the outlook for residents of residential properties along Kestrel Drive and Inkerman Drive and would certainly change, the Council did not raise objection to the proposed facing distances between existing and proposed properties. The provision of boundary treatments and planting would be matters to be resolved through a reserved matters submission along with the detailed placement of window openings which could be dealt with through conditions in the event that permission was to be granted. Even though the western boundary of the site is acknowledged in the Local Plan to be a sensitive boundary, I see no reason, on the basis of the evidence before me to take a different view to the Council on this matter.
53. Local concerns regarding difficulties with water pressure and the lack of capacity for foul water drainage systems to accommodate additional housing have been raised. These are matters which any developer would need to resolve though new mains connections and the appellants and the Council have addressed this matter through the drafting of planning conditions.
54. Representations have been made about facilities in the locality with particular reference to the increased pressure that additional residential development would place on medical services, as there is no local doctors surgery and there is known to be limited capacity in local schools. The Section 106 agreement includes contributions towards education the level of which has been agreed with the Council. In so far as contributions toward medical services are concerned the Council outlined in their committee report that the Buckinghamshire Clinical Commissioning Group (BCCG) had not sufficiently evidenced local need such as would have justified a contribution via the Section 106 legal agreement. Even so the development would be liable for contributions under the Community Infrastructure Levy and the BCCG would be entitled to bid for CIL funding for the provision of primary healthcare infrastructure.

55. Representations were made in respect of a woodland/orchard area beyond the north east of the appeal site which was omitted from the HW8 allocation in the Local Plan. The landowners for that site argue that the omission of that land from the HW8 allocation is inappropriate as to exclude it would mean that the wider HW8 development would not be brought forward in a properly planned and comprehensive manner, moreover it would result in a land locked parcel of land. The land referred to is beyond the appeal site, neither is it within the defined boundary of policy HW8 as indicated in the adopted plan. As such it is not within the remit of this appeal. Decisions about its future being a matter for the Council in the first instance.

Benefits

56. A range of benefits have been outlined and assessed by the appellants and the Council. It was agreed that the provision of affordable and self-build housing would be at a level which would be policy compliant and whilst it would deliver housing to meet a specific local need it would not exceed the level required by the development plan. Consequently, whilst in principle it is reasonable to give substantial weight to such provision it would not *'justify a breach of policy requirements where a policy compliant scheme would also deliver the same benefits'*³¹. This limits the weight that can be afforded to these benefits which, as policy compliant provisions, I afford them neutral weight.
57. Biodiversity net gain would be a benefit and this is not disputed. However measurable net gains in biodiversity are also a requirement of the development plan through Policy DM34 and therefore the benefit carries moderate weight in favour of the proposal.
58. The provision of market housing would be a benefit as would the economic activity associated with the construction of the houses which would bring income into the local area. There is no dispute that the Council can demonstrate in excess of a five year supply of housing and in this context the benefits of market housing and the economic benefits during construction and into the local economy on an allocated site would not generate any more than moderate weight in favour of the proposal.

Conclusion

59. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the appeal must be determined in accordance with the development plan unless material considerations indicate otherwise. Development which would conflict with and undermine the strategy of an adopted development plan and the Framework when taken as a whole would, in planning terms, be harmful.
60. Whilst I have found intrinsic conflicts with Policy HW8 and related conflicts with other policies in the plan relating to existing natural features, from the evidence before me I have not found conflict with Local Plan Policy CP7, which requires infrastructure to support growth; with Policy DM33 relating to managing carbon emissions (transport and energy generation); with Policy DM39 in respect of managing flood risk; or with Policy DM16 of the Site Allocations Plan which sets the open space requirements for new developments.
61. Whilst there would be benefits arising from the development which weigh in favour of the scheme these would not, either individually or collectively,

³¹ Council Closing submissions Mr G Williams

warrant a decision other than in accordance with the development plan when taken as a whole. Consequently, the appeal is dismissed and planning permission is refused.

Mrs J Wilson

INSPECTOR

APPENDIX D: Extract of Policy HW8 from the WDLP (2019)

POLICY HW8 – LAND OFF AMERSHAM ROAD INCLUDING TRALEE FARM, HAZLEMERE

The site as shown on the Policies Map is allocated for residential use.

Development of the site is required to:

1. Place-making

- a) **Maintain a sense of separation between Hazlemere and Holmer Green, through the layout of the site;**
- b) **In the event that land to the north east in Chiltern District (off Earl Howe Road) is allocated for development in the Chiltern and South Bucks Local Plan, to be planned comprehensively with that site as a whole; and in any event to not prejudice future integration;**
- c) **Provide a comprehensive development of the site within Wycombe District;**
- d) **Redevelop the existing coach yard and riding stables;**
- e) **Consider the opportunity to redevelop existing residential properties fronting Amersham Road.**

2. Transport:

- a) **Provide access from the A404 and the Wycombe Road;**
- b) **Provide walk / cycle access through Tralee Farm onto Wycombe Road;**
- c) **Improve access to existing bus routes;**
- d) **Provide or contribute to off-site highway improvements as required by the Highway Authority.**

3. Green Infrastructure/Environment

- a) **Provide access to and retain the existing orchard within the north east of the site;**
- b) **Provide protection and future management for the orchard;**
- c) **Retain the woodland in the south west corner of the site at Badger Way;**
- d) **Provide a Green Infrastructure link through the valley of the site, connecting the orchard to the woodland at Badger Way;**
- e) **Retain the field boundaries within the site;**
- f) **Manage local sources of flood risk.**











4. Development of this site will be required to meet the needs arising from the development for additional primary school places.

APPENDIX E: Extract of “Figure 14 Land Off Amersham Road including Tralee Farm” from the WDLP (2019)

Figure 14 Land off Amersham Road including Tralee Farm

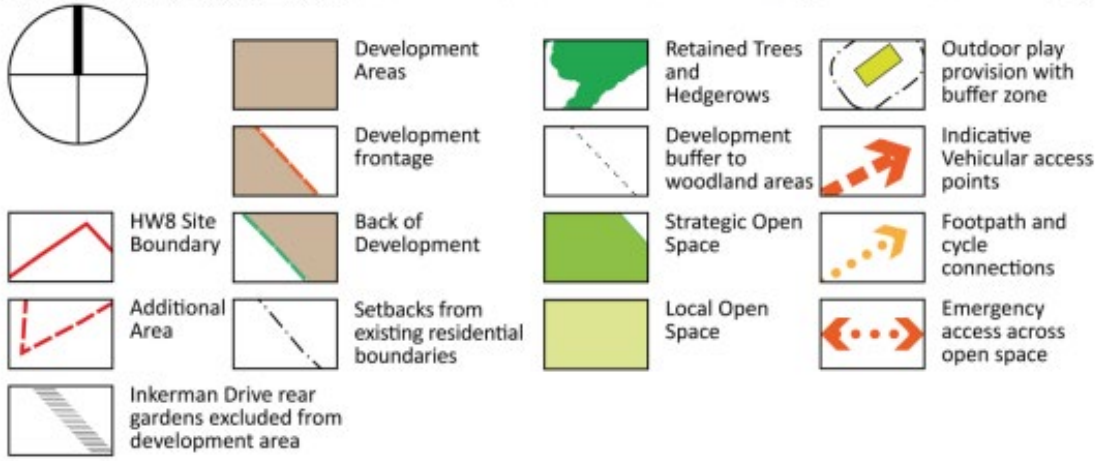


Please note this plan is indicative only drawn for the purposes of assessing development capacity

	Proposed residential		Potential vehicular access
	Proposed open space		Existing footpaths
	Proposed tree belts		Potential new footpaths
	Existing trees/ woodland		Site boundary
	Sensitive existing residential boundary		Existing exposed gable ends

**APPENDIX F: Extract of “Figure 9: Development Framework”
from the Land off Amersham Road including Tralee Farm
Development Brief (Sept 2022)**

Figure 9: Development Framework



Note: location of access points subject to highway safety comments

APPENDIX G: Extract of Policy HAZNP2 from the Hazlemere Neighbourhood Plan – Referendum Version (August 2023)

POLICY HAZNP2: Protecting and Improving Green Infrastructure

A. The Neighbourhood Plan identifies, on the Policies Map and on Plan D (page 26), a Hazlemere Green Infrastructure Network, comprising sites of biodiversity value, woodlands, significant trees and hedgerows, water courses and bodies, green spaces, and amenity land. Development proposals that lie within or adjoining the Green Infrastructure Network must demonstrate how they will maintain or improve the functionality of the Network.

B. Proposals will be required to deliver a 10% biodiversity net gain. Any proposal that can demonstrate that off-site compensation to mitigate biodiversity loss is necessary must follow a sequential approach to its delivery. The gain should be delivered within or adjoining the Network, where the land is suited in principle for delivering the necessary gain. If this is not practical, then the gain should be delivered on land within an adjoining Parish that is suited in principle for delivering the necessary gain. Only if it can be shown that this is not practical, may the gain be delivered on other land.

C. The Neighbourhood Plan designates as Local Green Spaces the following sites that are part of the defined Network, as shown on the Policies Map:

- 1. Queensway Pond area**
- 2. Highfield Way space**
- 3. Maple Close space**
- 4. Lowfield Way space**
- 5. Beechfield Way space**

Proposals for development on a Local Green Space will only be allowed if it is satisfactorily demonstrated that they are consistent with policies for managing development in Green Belts.

D. Throughout the Neighbourhood Area, proposals that will lead to the felling of one or more trees including any that are subject to a Tree Preservation Order will be refused unless it can be demonstrated it is unavoidable and satisfactory mitigation measures are put in place. The landscape schemes of all proposals must achieve an increase of canopy cover from the existing level of the site. In addition, on sites of 0.5 ha or more, future canopy cover of at least 25% of the site area within an agreed timetable should be achieved.

APPENDIX H: Extract of Policy HAZNP3 from the Hazlemere Neighbourhood Plan – Referendum Version (August 2023)

POLICY HAZNP3: Delivering Zero Carbon Buildings

A. All development should be 'zero carbon ready by design' to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing, and landscaping. Proposals should also consider the efficient use of resources at the earliest design stage and should prioritise wherever possible the refurbishment and reuse of existing buildings as part of the scheme to capture their embodied carbon.

B. New and refurbished buildings (except householder applications) that are certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m²/year are supported. Where a scheme can show its potential to meet this standard, including by the use of terraced and/or apartment building forms, even if the plot sizes and plot coverage and layout are different to those of the immediate character area, it will be supported, provided it can be demonstrated that it will not have a significant harmful effect on a designated heritage asset.

C. Where the PassivHaus or equivalent standard is not proposed for a new or refurbished building the applicant must demonstrate that the building has been tested to ensure there will be no energy performance gap using a Post Occupation Evaluation Report. The Report must be provided to the Local Planning Authority within the period specified in the planning condition. Where the Report identifies an energy performance gap and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged.

D. All planning applications for development (except householder applications) are required to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and carbon emissions resulting from the use of the building over its entire life.

APPENDIX I: Extract of Policy HAZNP4 from the Hazlemere Neighbourhood Plan – Referendum Version (August 2023)

POLICY HAZNP4: Promoting Sustainable Transport

- A. All development proposals should sustain and enhance the functionality of local footpaths and cycleways and public transport infrastructure by way of their layout and means of access, and by linking up existing routes. Proposals that will harm the existing means of active travel connectivity will not be supported.*
- B. All major development schemes will be required to demonstrate how they will not increase the reliance on car ownership and how they will enable future occupants to walk/cycle through the Parish to local services and the Green Infrastructure Network without requiring a car trip.*
- C. All major development schemes will be required to make reasonable provision for car club spaces. Requirements for provision of private car parking will be adjusted to reflect the provision of car club spaces so they are not an additional provision to the total.*
- D. All development schemes will be required to provide access to EV (Electric Vehicle) charging for all parking spaces.*
- E. All developments must ensure that transport routes and public spaces within the development are accessible in their design and layout, so that the whole development meets the needs of people with a wide range of disabilities, including age-related impacts and hidden disabilities.*

APPENDIX J: Extract of Policy HAZNP5 from the Hazlemere Neighbourhood Plan – Referendum Version (August 2023)

POLICY HAZNP5: Planning for Sustainable Development at Amersham Road/Tralee Farm

The site as shown on the Policies Map is allocated for residential use.

Development of the site is required:

A. For its place-making proposals -

1) to be planned comprehensively with that site as a whole, integrate into surrounding neighbourhoods; and in any event to not prejudice future integration;

B. In respect of its transport proposals -

1) To provide vehicular access from the A404 and Wycombe Road;

2) to provide a strategic walk / cycle access to existing bus routes and community infrastructure through Tralee Farm onto Wycombe Road;

3) to facilitate a future pedestrian and possible cycle connection through to Badger Way and the adjacent play area through the provision of a suitable layout and rights for pedestrian and cycle access to the boundary without ransom;

4) to provide a pavement from Inkerman Drive to the site access along the A404;

5) to effect changes to the A404 along the site frontage to facilitate easier pedestrian and cycle access to the adjacent AONB; and

6) To make provision, where justified, for on-site and off-site improvements in relation to bus services;

C. In respect of its green infrastructure and environmental proposals -

1) To provide a Green Infrastructure corridor within the site along the whole of the rear of Wycombe Road;

2) To provide Green Infrastructure connectivity through the valley of the site, connecting the orchard that lies adjacent to the site to the north to the woodland near the play area at Badger Way adjacent to the site to the south;

3) to retain the hedges within the site;

4) to enhance the Green Infrastructure link along the north eastern boundary of the site, connecting the orchard adjacent the site to the north to the wider countryside to the south

5) to contribute to off-site green infrastructure network improvements adjacent to the site

D. In respect of local educational infrastructure to meet the needs arising from the development for additional primary school places.

APPENDIX K: Extract of “Plan E Indicative Plan for sustainable development at HAZNP5” from the Hazlemere Neighbourhood Plan – Referendum Version (August 2023)



Plan E Indicative plan for sustainable development at HAZNP5

Please note that Plan E is indicative

APPENDIX L: Proposals Map from the Hazlemere Neighbourhood Plan – Referendum Version (August 2023)

