

Appendix A – Consultation Responses and Representations

19/06180/FUL

Consultation Responses and Representations

Councillor Comments

Councillor David J Carroll – If minded to approve I want this application to go to committee please.

Councillor Steve Broadbent The application at this farm represents quite a change of use that, should you be minded to approve, I think would benefit from referral to committee please.

Parish/Town Council Comments

Hughenden Parish Council

Comments: Provided the application complies with GB and AONB regulations, the Parish Council has no objections.

Consultation Responses

Non Major SuDS

The Lead Local Flood Authority (LLFA) initially objected to the proposals on the basis that insufficient information had been provided regarding the proposed surface water drainage scheme.

Following the submission of additional information, provided in the Flood Risk Statement, Surface Water Management (SuDS) Report (531 Rev.B, November 2019, Flo-Consult), the LLFA that it has no objection to the proposed development subject to the imposition of conditions. Their comments on the revised information are as follows:

Surface Water Drainage

Surface water runoff generated by the proposed development is to be managed using soakaways. Calculations have been provided to demonstrate that the proposed drainage scheme has been designed to manage storm events up to and including the 1 in100 year +40% climate change allowance storm event. Raised rain gardens have been proposed in order to aid in the management of surface water runoff, while also providing biodiversity and amenity benefits to the proposed development.

Details of the proposed overland flood flow route in the event of system exceedance or failure have been demonstrated. A maintenance schedule has been provided for the drainage system, however no detail on the maintenance of the rain garden has been provided. The maintenance responsibility will lie with contractors appointed by the owners of the proposed development. Construction details of all SuDS components, including the rain gardens, have also been provided.

Ground Investigations

Ground investigations have been conducted which includes infiltration rate testing in accordance with BRE365, and groundwater monitoring which took place once the trial pits were excavated. The LLFA would like to raise concerns with the proposed depths of the soakaways. The bases of the trial pits do not demonstrate the 1m freeboard.

The applicant is required to demonstrate that the 1m freeboard is achievable between the base of any infiltration component and the highest groundwater level. Further monitoring should be

conducted during the winter months to demonstrate the 1m freeboard can be achieved and details of this monitoring must be provided. If the applicant is unable to conduct further monitoring in the locations of the trial pits, then the proposed depths of the infiltration components must be revised in order to demonstrate a 1m freeboard based upon the current ground investigations.

If the applicant is unable to demonstrate that the 1m freeboard can be achieved and that as such infiltration is not viable, then an alternative discharge receptor in line with the drainage hierarchy must be investigated and full details of this alternative scheme provided.

Calculations

Within the calculations provided for the soakaways, the 'Infiltration Coefficient Base' has been assigned a value of 0.012420m/hr (for the new building infiltration tank) and a value of 0.06840m/hr (for the barn conversion infiltration tank). It should be noted that this value must be set as 0.00 m/hr to account for the silting up of the infiltration device over time (section 25.4 CIRIA SuDS Manual, 2015). The applicant is required to provide updated calculations for both infiltration tanks in order to be reflective of the above comments.

Drainage Layout

The applicant is required to amend the drainage layout to remove the connection between the foul and surface water components. Alternatively, if it is proposed that the infiltration tank is to manage treated foul water, calculations must be provided to demonstrate sufficient capacity is available.

It should be noted that any revisions to the scheme and/or sizing of components must be reflected on an updated drainage layout.

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

Condition 1

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

- Demonstration of a 1m freeboard between the base of all infiltration components and the water table. This can be demonstrated by:
- Providing further groundwater level monitoring during the winter period (November-March), or by revising the proposed depths of the infiltration components based upon current ground investigations
- Subject to infiltration being inviable, the applicant shall demonstrate that an alternative means of surface water disposal is practicable subject to the hierarchy listed in the informative below.
- Base co-efficient of both infiltration components to be set as 0.00m/hr
- Clarification as to the connectivity between the foul and surface water drainage systems, removal of connecting pipe where necessary, or demonstration that flows are able to be accommodated
- 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.
- Drainage layout detailing the connectivity between the dwellings and all drainage components, showing pipe numbers, gradients and sizes, complete together with storage volumes of all SuDS components

- Maintenance schedule for the raised rain gardens

Reason

The reason for this pre-construction condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 163 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

Drainage Hierarchy Informative

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

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

The LLFA notes that rain water reuse is not included within the informative provided above, however we strongly encourage the consideration of its use within developments as the LLFA considers rainwater reuse to sit above the drainage hierarchy (page 8). This allows rainwater to be collected and used for non-potable water purposes, helping reduce dependency on potable water usage and act as an effective way of managing surface water.

Highway Authority

Upper Warren Farm is accessed via a private drive off Hampden Road, a C-class road subject to the national speed limit in this location.

The existing access would serve the proposed development. It is difficult to establish the true increase in vehicular movements that may occur as a result of the proposed development. However, I would consider the existing agricultural barns to have a relatively low trip generation and as such the proposed development would likely result in an intensification of the site, particularly during peak season.

Nonetheless, I am satisfied that the private lane/Hampden juncture would be able to accommodate any potential increase in vehicle movements. As requested, the revised plans demonstrate that the bellmouth of the private lane/Hampden Road juncture would be widened to 4.8m in width for a distance of 12m from the carriageway; this would create adequate space for a private car / agricultural vehicle to pass alongside each other without the risk of having to reverse or wait in the carriageway. Furthermore, a passing bay has been proposed approximately half way along the private drive which would allow two vehicles to pass and would better facilitate access to and from the site.

I am satisfied that the level of visibility that can be achieved from the existing access is in accordance with required guidelines and that any increase in traffic could be safely accommodated into the surrounding highway network.

The proposed parking provision is in accordance with *Buckinghamshire Countywide Parking Guidance* for this quantum of development.

The Highway Authority raises no objections to this application, subject to conditions requiring the alteration of the access and provision of parking spaces before the development is occupied. An informative advising of the need for a S184 Small Works Agreement is suggested.

Control of Pollution Environmental Health

Comments: No objection

Representations

Amenity Societies/Residents Associations

None received

Other Representations

1 comment has been received supporting the proposal:

- This will encourage rural tourism in the area
- The change of use of the manège should not extend beyond the normal use of a typical private garden
- With the likely increase in the number of vehicles, including cyclists, reducing the speed limit to 40mph along Hampden Road should be considered.

5 comments have been received objecting to the proposal:

- The number of units is excessive
- Up to 8 families at a time could result in noise problems
- Site is in the AONB
- Should still be a farm, not a holiday complex
- Purpose of cycle store is unclear, query whether it is proposed to convert remaining land into a cycle track
- Further development will escalate if permission is granted
- Should be decided by Committee, not under delegated powers
- Fail to see the need for holiday lets or self-catering accommodation in the AONB
- Concerned it could set a precedent for further developments
- Encouraging cyclists could lead to accidents as the site is on a busy road
- Barns are currently used for storing hay and straw for liveryes and cattle
- Query whether water, power and drainage have been considered.
- Inappropriate development in the Green Belt.
- Have not demonstrated conversion is possible without re-building or that the conversion meets the criteria of Policy DM45
- Increase in activity and car use, resulting in noise, thus harm.
- Will increase the need for local amenities.
- Site is on the hill overlooked by public footpaths, it will therefore impact the views from walks through the area
- No indication as to whether the business is sustainable in the long term.
- No indication of the impact of the loss of manège and barns on existing rural business on site
- Site is in an isolated location, it is too dangerous to walk or cycle to local amenities along Hampden Road, and would take almost half an hour to visit the nearest shop or restaurant.
- No justification for loss of horse riding amenities or active farm buildings
- Provision of self-catering accommodation should be considered in relation to the same policies as new housing.

1 comment in response to amended plans, reiterating previous objections and making the following additional points:

- Site is not on mains drainage
- Concern the units, particularly the self-catering 1-bed units, could be sold as independent

units in future