

18/06767/FUL

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor R Farmer
Councillor Marten Clarke

Parish/Town Council Comments/Internal and External Consultees

High Wycombe Town Unparished

County Highway Authority

Comments:

The development is served via an existing vehicular access on Bassetsbury Lane. Even though there would have been vehicle movements associated with the historical use of the site as allotments, the proposed residential scheme is expected to generate a higher level of daily vehicle movements when compared with its previous use.

I am satisfied with the trip generation analysis provided within the submitted Transport Statement (TS). Specifically the proposals could be expected to only add approximately 15(no) vehicle movements through the respective Bassetsbury Lane and Chestnut Avenue junctions with London Road at peak times, which equates to one every four minutes. This is not considered to have a material empirical impact upon the operation of these junctions or their individual capacity.

Whilst the total daily trip rate generated by the proposed development would add just under 170(no) vehicle movements on the aforementioned roads, this is dispersed throughout the day from 07:00 to 19:00. This is to be expected from a residential development containing a similar quantum of development.

I am aware of local concerns regarding the increase of vehicle movements that will be introduced should the proposals receive consent and are implemented. Nonetheless, I have reviewed the collision statistics (Personal Injury Collisions that do not incorporate damage-only incidents) for the local area and found there to be no causation factors inherent to the configuration of the local network. Therefore there is no basis upon which to lodge a highway objection to this due to an increase in vehicles on local roads placed there from the development proposed.

However, there is an issue of which I was concerned when first viewing this application; pedestrian safety.

The section of Bassetsbury Lane approximately 150m to the west of the site is subject to double-bends that is devoid of a footway for a 100m section along the southern boundary of No.41 Bassetsbury Lane. Furthermore, this section is hardly lit and there are tree canopies on both sides of the road. As a result, a serious threat exists to pedestrian safety in consideration that there would be no other route than this for pedestrians travelling to or from the development to use this section of Bassetsbury Lane in order to reach local services or access the frequent bus routes on London Road. This is particularly pertinent given the expected age group expected to inhabit the residential units. Even placing the latter consideration aside, the general lack of footway as described would normally result in an objection from this Authority due to the threat to highway safety and convenience of use.

However, the applicant approached the County Council subsequent to the submission of the application to state that they were willing to upgrade the section of the High Wycombe to Bourne End trackbed between London Road and Bassetsbury Lane in order for it to serve as a shared

footway/cycleway. In doing so, this would provide a more direct and traffic-free route for residents to traverse between the site and London Road/Wye Dene. Furthermore, it would deliver the aspirations of Policy DM4 of the Delivery and Site Allocations Policy Plan for this section (which seeks to upgrade the trackbed between High Wycombe and Bourne End for sustainable travel/leisure purposes).

Ergo I will recommend a condition to ensure that the site is not occupied until the trackbed is upgraded to provide pedestrian access to London Road and/or the Wye Dene estate, although I am content with any measure of which the Local Planning Authority decides to secure this caveat (via condition or legal agreement).

In terms of the internal layout, I note that the width is featured as a 4.1m shared surface. You will be aware that the Department for Transport have advised that a temporary 'stop' is placed upon developments incorporating shared surfaces. However, when taking into account the following:

- The quantum of development served by the estate road
- Likely daily flows
- An intended circulatory route
- That it will not be adopted as highway maintained at public expense
- There is sufficient space for a refuse/delivery vehicle and car to pass each other immediately behind the Bassetsbury Lane eastbound carriageway without overhang on to it
- That the planning application was submitted prior to the advice being received by the Highway Authority

I do not consider the use of a shared surface in this instance to be an issue upon which to base an objection.

As for the access itself, it will be retained in its existing position. Given its current construction and condition, I will also recommend a condition so that it is brought up to our Commercial Access specifications and provide safe and convenient site access and egress.

I also note that the parking provision, although slightly in deficit, is broadly in line with the standards contained within the County Council's Buckinghamshire Countywide Parking Guidance policy document. Furthermore, when considering the site's intended occupancy, I would expect a lower rate of car ownership per dwelling that would offset the minor shortfall and consequently not result in displaced parking occurring on Bassetsbury Lane or lead to vehicular circulation issues that would detrimentally impact upon the flow of traffic on the adopted highway.

Part of the proposals incorporates a building at the western extent of the site to accommodate a Chilterns Rangers facility. I am content with the parking provision and that the depth of the verge in this location will allow the minimum requisite visibility splays to be achieved. However, it will require construction of its own dedicated access point. This can be secured by condition.

Mindful of these comments, I do not have any objections to this application subject to the following conditions:

Thames Water Utilities Ltd

Comments: Waste Comments – with regard to Foul Water sewage network infrastructure capacity they have no objection.

Water comments – with regard to water network infrastructure capacity they have no objection.

There are water mains crossing or close to the development. Thames Water do NOT permit the building over or construction within 3m of water mains.

Ecological Officer

Comments: The ecological report submitted covers all of the important ecological areas and has been accompanied by the Great Crested Newt Survey (they were found to not be present). The reptile survey however was not included and this is required before the impact upon protected species can be assessed. Further information is required – submission of the reptile survey and request for biodiversity accounting details.

Officer's note: The survey was submitted however the applicant did not submit biodiversity accounting details. They consider that the proposed measures in the Ecological Appraisal combined with the provision of a Chiltern Ranger hut to manage and improve the biodiversity of Funges Meadow and will provide a net gain in biodiversity.

Further comments from Ecological Officer: Concerned that the recommendations in the Ecological Appraisal are not proposals. [Officer Note: this can be secured by requiring an Ecological Management Plan based on the recommendations of the Ecological Appraisal].

Concern expressed that the failure to provide biodiversity accounting provides less certainty that a net gain in bio-diversity can be achieved.

Officer's note: While a bio-diversity accounting is a good tool to help determine whether a net gain in bio-diversity has been achieved. At this current time there is no policy requirement for such details to be submitted. The application has to be assessed on the Ecological Appraisal submitted.

Control Of Pollution Environmental Health

Comments: The only environmental health issues raised is the issue of contaminated land that is known to exist at this site. Due to site investigations there is a good understanding of the risks.

Recommendation that they would object to the development unless a condition requiring the completion of ground water testing and gas monitoring. The results and conclusions of the testing and monitoring to be approved by the LPA. A detailed remediation scheme be submitted and approved.

Community Housing

Comments: Evidence is required to confirm that Housing Associations do not consider the park home model is suitable for their purposes – which is a statement in the Planning, Design and Access Statement.

Housing Service Manager – is happy to accept the affordable housing on the basis of a financial developer contribution.

Buckinghamshire County Council (Major SuDS)

Comments: Initial response raised a holding objection regarding:

- Assessment of existing surface water flood risk
- Method of surface water disposal
- Proposed surface water discharge rate.

An amended Flood Risk Assessment (FRA) was submitted. While the information addressed concerns regarding the proposed discharge rate for the site the FRA fails to address their concerns regarding the existing surface water flood risk and a method of surface water disposal.

A further amended Flood Risk Assessment (FRA) was submitted 21.11.2018. The LLFA have been consulted – response awaiting.

Second response - awaiting response

Conservation Officer Spatial Planning

Initial comments - The buffer on the eastern boundary is essential to protect the setting of Funges Farm group of listed buildings and the retention of the trees on the street frontage to preserve the character and appearance of the conservation area. Boundary treatments should be submitted for approval

Additional advice sought regarding protection of trees along BB Lane and boundary with Conservation Area. A planted boundary will be important on southern and western boundary, for both conservation and UD purposes. Where there is open space on the western boundary the planting can be close to the dwellings (rather than strictly along the site boundary). Estate fencing would be appropriate along this boundary. Surfacing for the Rangers building should be soft/informal/permeable for conservation & UD purposes. Recommend materials condition to secure good quality brick for front wall. Flint is unnecessary here.

Crime Prevention Design Advisor

Comments: I would ask that a condition is placed on the applicant to ensure the physical security of the dwellings should this application be considered for approval. A planning condition would provide both the developer and future owners/tenants with a minimum specified level of security reducing the opportunity for crime and the fear of crime and supporting community sustainability.

Pedestrian access along the old railway line has been discussed with the neighbourhood team and unfortunately should this come forward as a proposal I would have to object. Taking into the consideration the likely impact on police resources and more importantly the safety and security of future occupants I would consider this route to be detrimental in terms of crime and anti-social behaviour.

Footpaths that track the roadway benefit from the casual surveillance provided by passing vehicles. Whilst this footpath is wide and likely to be upgraded it is secluded and lacks an appropriate level of surveillance. Its elevated position makes it difficult for any users to exit the footpath should they feel uncomfortable with anything they see ahead. The proposed age of the occupant compounds these concerns further. The tree canopy along this footpath prevents natural site lines to the footpath from surrounding properties making it an attractive route for offenders to use without the fear of being seen.

Additional documentation detailing any upgraded layout and lighting of the railway line and proposed access controls to prevent unauthorised access and the use of the proposed development as a short cut from the pathway back to the roadway may be sufficient to address this objection.

Arboriculture Spatial Planning

Comments: In principle no objection. Concerns that the arb report is a base survey. It is considered that this should be minimum of an Arboricultural Impact Assessment (AIA). There is concern that the new proposed access wall and gate may impact on the nearby tree. There is some potential for future pressures given many of the trees are mature.

Officer note: a request for an arboricultural impact assessment

Further comments from the Arboricultural Officer - The proposal for metal railing with gates on brick piers is more acceptable and does negate previous concerns. However the absence of where any cabling for the operation of the cctv camera or gate motors will also need to be resolved.

The failure to submit an Arboricultural Impact Assessment (AIA) and/or an Arboricultural Method Statement (AMS) means that while the development maybe acceptable in principle it is not possible to assess the impact upon the trees without additional information.

The Arboricultural Impact Assessment would have indicated where any part of the development may intrude upon the root protection area of trees within the site. The particular areas of consider are plots 1-5 and plot 33, 39 and 40. However, there is also a footpath within the wooded

recreational area which would require further information regarding material, type and method of construction.

It is necessary to have this information to demonstrate that the proposal will not have a negative impact upon the trees. This information, if not submitted with this application, will have to be submitted as a pre-start condition. Other conditions should cover internal landscape scheme.

Consideration should also be given to the making of a TPO if the site is no longer under WDC control to prevent unsympathetic tree pruning or removal before and after development.

Environment Agency (south-east)

Comments: Two objections.

1. Proposed development falls into a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. We recommend that the application should be refused planning permission on this basis.

This could be overcome by a revised proposal that demonstrates that the development site is located outside of Flood Zone 3b

2. The Flood Risk Assessment is not considered to be acceptable as it does not fulfil the requirements set out in the NPPF and associated PPG

Officer Note: The Environment Agency have undertaken new river Wye modelling which shows that this site is not in the floodplain and they were asked to reconsider their comments in light of the revised modelling.

Environment Agency response:

This model has not yet been released and so we must base our position on the most up to date published data available to us. Hence, we do **not** withdraw our objection to highly vulnerable development in the floodplain.

The applicant may wish to undertake their own modelling in the area to try to demonstrate that the site is not in Flood Zone 3, or wait for our new Wye model to be released (it is likely this will be in 2019 but please be aware that there is currently no definite release date).

Revised Flood Risk Assessment received 21.11.2018. Further consultation with Environment Agency undertaken.

Buckinghamshire County Council (Major SuDS)

Comments: First response the LLFA raised a holding objection in relation to the following matters:

- Assessment of existing surface water flood risk
- Method of surface water disposal
- Proposed surface water discharge rate

They sought further information from the applicant.

Second consultation response – holding objection maintained because the FRA fails to address the concerns of the LLFA regarding the existing surface water flood risk and a method of surface water disposal. As a response the FRA was updated.

Third consultation response – awaiting comments

Representations

Amenity Societies

Ryemead Forum objects to the application for the following reasons:

- Failed to address many of the issues in the initial consultation
- Applicant (WDC) has failed to demonstrate that Park Homes is the best model for the area

- There are other eco-friendlier prefab options not considered
- Amenities and services in the area do not cater for the elderly
- Fails to provide gardens which is a keen interest for the target demographic
- The basis of the tenure – this should be targeted at older people who live in High Wycombe and social housing should be provided on site
- Number of units has increased from 30 to 40 which is too intensive
- In ecological terms – no indication that the nature corridor will be preserved. Hard standing and development is like to have an impact.
- There should be no public access to Funges Meadow
- Ecological survey is needed.
- Site poorly located for elderly people – no direct public access, car based development, Bassetsbury Lane not suitable for elderly walking or mobility scooters
- Some parts of Bassetsbury Lane have no footpaths
- Development not in keeping with the area
- Cramped uniform development
- Inadequate road infrastructure
- The current car pollution work for London Road should be concluded before this application is considered
- Junction – Chestnut/Bassetsbury Lane requires improvement to make it safer
- Chilterns Rangers unit is not large enough for the organisation
- There is an opportunity to bring several other Environmental groups together in one building
- Reduction in number of homes to allow for a larger heritage centre should be considered
- Alternative model – community right to bid application was suggested and rejected by WDC
- Proposal needs to be reconsidered
- Community land trust would allow homes to be developed exclusively for rent and for local people

Further comments following the submission of amended plans:

- No changes made to address concerns identified during public consultation
- A number of concerns have been repeated – additional traffic (11), footpath not continuous (6), suitability for elderly (6), impact on ecology (5), nature of park homes (3), cost of proposed method of decontamination (2), no social housing (1).

High Wycombe Society object to the application for the following reasons:

- As part of the identified Green Infrastructure Network it will fail to contribute to the improvement of the network which is a policy requirement
- Development includes a building and nine spaces within the adjacent Funges Meadow nature conservation area which has protection as Green Space. [Officer Note – the site does not include the adjacent nature conservation area.
- Decision should await the Local Plan Inspector's Report as it was a site that was going to be considered
- Will not protect and enhance the biodiversity of the adjoining nature conservation area.
- Some of the impact could be avoided by reducing the scale and density of the development which would allow a viable nature corridor and houses would not be built up to the edge of the Funges Meadow. [Officers note – there is a defined area for the park homes which is not adjacent to the Funges Meadow]
- Object to the type of housing being proposed – park homes
- Concern it will resemble a trailer park
- Concern that an over 50's conditions could not be adequately enforced
- Site should be developed with oak framed bungalows or other forms of market housing
- Alternatively the site should be incorporated into the adjacent Funges Meadow

1 comment has been received supporting the proposal:

Summarise comments

- Low cost housing is need in High Wycombe
- Properties would be suitable for retirement age people as they are usually low maintenance, single story and within walking distance to town
- Will help to free up housing stock

12 comments have been received objecting to the proposal:

Summarise comments

- Lack of time for response
- Concern regarding the Local Council being both Applicant and decision maker.
- The application is premature although the local plan allocation has not been determined by the local plan inspector
- Road infrastructure not adequate – dangerous S bend with no scope to create a continuous footpath. Making it an unsafe environment for pedestrians
- Transport Statement – question some of the information contained i.e. vehicle movements
- Site is not considered to be in sustainable location for the older residents that the development is targeted at.
- The site is currently green in appearance – the land contamination means that planting other than in raised beds or pots cannot occur. This will give a very urban impression.
- Is it wheel chair accessible? There are steps from the balcony to the ground level.
- Unsatisfactory layout with caravans being too tightly packed.
- Given the access limitations along Bassetsbury Lane the site should be left as green space or possible added to the Nature Reserve.
- If planning permission is permitted then it should be restricted to over 55's, reduce the number of units, maintain or even increase green borders, need a continuous footpath.
- In addition or alternatively a level public footpath should be provided along the disused railway line. This should be considered and be the subject of consultation before any permission is granted.
- Site unsuitable for residential use
- Flaws identified in the submitted documentation – transport study etc.
- Site is far away from bus routes and GP practice
- No plans how the development would cope with flash flooding
- Demand for the proposed development based on little local evidence
- Site should be reinstated as a beneficial resource rather than being lost to housing
- The scale of the development will reduce surface water absorption
- Unacceptable impact on local species in the Bassetsbury Triangle
- Traffic surveys taken in non-peak time
- Current traffic situation unacceptable and the development will only make the situation worse
- No mention of the traffic accidents that have occurred on the double bends in Bassetsbury Lane
- Lack of footpaths has implication for pedestrian safety and coupled with an increase in traffic from the development
- The link footbridge would be to an unmade route with a steep access point onto London Road
- There would need to be improvements at either end of old railway link
- Concern that there is not a market for park homes for the targeted age group and this will put pressure on them to be used by younger working age groups who will have more cars.
- Will lead to vehicles spilling out onto Bassetsbury Lane when they are unable to park
- Resident has re-iterated all the comments made by the Ryemead Forum in a private capacity
- Increase in noise and disturbance. The concealed nature of the site will lead to an increase in crime
- Sheltered accommodation may be preferable rather than park homes for the target demographic

8 Additional comments received after the submission of amended plans that are not covered in the comments above:

- 'Parklife' article reinforces that this is the wrong location for the development – the beneficial facilities are not present on the site.
- While the occupied part of the site is free from the risk of flooding however the rest of the site is potentially liable to flood risk
- Is retirement to be condition of occupancy given the information stated?
- Application should be put on hold until the highway proposal are known and also how the footpaths can be improved
- It is wrong to say that the improvements to Bassetsbury Lane for both pedestrian and vehicular users are not directly related to the proposed scheme – no decision should be made until the issue has been satisfactorily addressed
- The GVA response letter dated 3 October 2018 is unsatisfactory and platitudinous mass of unsupported and misleading assertions
- In terms of affordable housing the argument is not comparing like with like
- No assessment of water quality has been provided although they intend to discharge water into the Back Stream or other watercourses
- Transport statement fails to account for the traffic likely to be generated by medical visits, carers etc.
- Road layout within the site will potentially lead to on street car parking in Bassetsbury Lane
- Accident occurred on 8th October on Bassetsbury Lane – confirming the concerns of residents