HOLLANDS FARM PUBLIC CONSULTATION

ON THE PLANNING APPLICATION(S)



Introduction

Purpose

✓ Brief residents on the planning application(s) for Hollands Farm
 ✓ Enable residents to respond to the public consultations

- KBEG speaker presentation
- Q&A

✓ Please raise your hand if you have question

✓ Please keep them brief to give others a chance too

- How to respond
- Expert comments



Introduction

- We will make the presentation available via:
 - ✓KBEG website,
 - ✓ KBEG Facebook group
 - ✓ Local Facebook groups

NOTE:

- 1. Responses need to relate to planning policy
- 2. Planning consultations responses need to be individual
- Thank you to BEA and Sophie Kayani for hosting the event



Keep Bourne End Green Background

- Originally Founded As *Don't Destroy Bourne End* In 2016
- Founder: Penny Drayton
- Trustees: Adrian Slater, Richard Moore, Rob Price
- Core Policy: John Southworth, Paul Sharman, Simon Carter, Stuart Wilson
- Fundraising: Jess Sharman, Sandra Slater, Tracy Greenfield
- Registered Charity No: 1169057

"To promote for the benefit of the public the conservation, protection and improvement of the physical and natural environment. To promote sustainable development for the benefit of the public, meaning development which meets the needs of the present without compromising the ability of future generations to meet their own needs"

Our KBEG Experts

- Legal/Representations
- Legal
- Planning/Sustainability Appraisal
- Green Belt/Landscape
- Transport
- Flood/Drainage
- Housing Land Availability
- Conservation Areas
- AONB
- Settlement Hierarchy
- Neighbourhood Development Plan KBEG



Barrister, 39 Essex Chambers Womble Bond Dickinson Pegasus Martin Leay Associates Motion Motion KBEG KBEG KBEG KBEG

Activities

- Signed mandate of 3,200 local residents
- Facebook group has over 1600 members
- Email list of opted-in members of over 500
- Leaflets delivered door-to-door in at least 6 different campaigns
- Multiple community briefings sessions
- Drop-in sessions and briefing notes for consultations
- Events 16+ fundraising and information activities
- Attended numerous Local Plan hearings, WDC and parish council meetings
- Raised over £200,000 to fund campaign over 4 years thanks to your support
- Launched a Judicial Review challenge to the Local Plan (not upheld)
- Commissioned expert reports and presented 1000's of pages of representations



So...we became Councillors!

- Buckinghamshire Councillors for The Wooburns, Bourne End & Hedsor
 - ✓ Penny Drayton Communities & Localism Select Cttee; West Bucks Area Planning Cttee (deputy)
 - ✓ Sophie Kayani Children & Education Select Cttee
 - ✓ Stuart Wilson Growth, Infrastructure & Housing/Finance/Audit Select Cttees; West (deputy)/East Bucks Area Planning Cttee; Senior Appointments & Pay Cttee
- Parish Councillors for Wooburn & Bourne End Parish Council

✓ Penny Drayton – Open Spaces Cttee



✓ Stuart Wilson – Planning, Highways & Lighting Cttee

Recent Activities in 2023

- As Buckinghamshire Councillors
 - Planning Officers
 - Catesby Estates, Capreon and Planning Officers
- As Parish Councillors
 - Catesby Estates
 - Capreon
 - Commissioned new expert reports
- As KBEG
 - Commissioned new expert report
 - Community briefings to assist resident representations

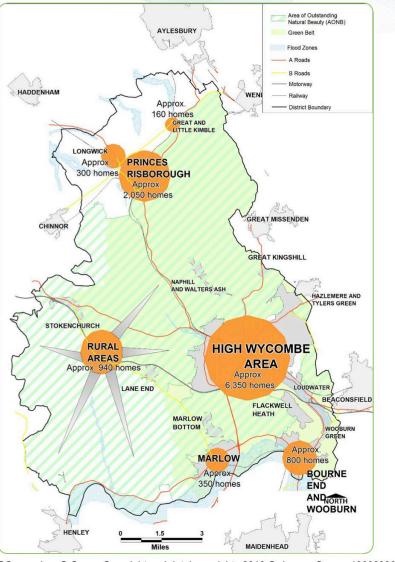


Wycombe Local Plan Timeline

 WDC Draft Local Plan Issued 	Jun 16
 WDC Local Plan Issued 	Oct 17
 WDC Local Plan Consultation Closed 	Dec 17
 WDC Submit Local Plan To Secretary Of State 	Mar 18
 Inspector Conducted Public Hearing 	Jul/Sep 18
 Inspector Publishes Final Report On Local Plan 	Jul 19
 Local Plan Adopted By WDC 	Aug 19
 KBEG Legal Challenge Launched 	Sept 19
 KBEG Legal Challenge Denied 	Nov 20

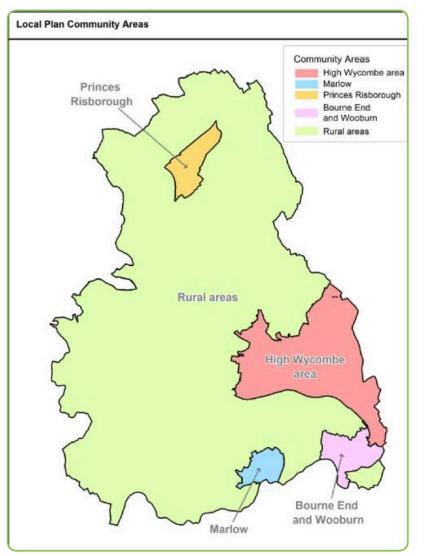


Wycombe Local Plan



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BOURNE END



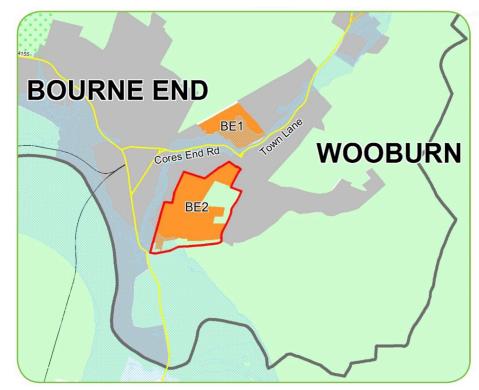
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Wycombe Local Plan

PRINCIPLES FOR BOURNE END AND WOOBURN

To meet the district-wide Strategic Objectives, the Council will shape development in Bourne End and Wooburn to:

- 1. Cherish the Chilterns
 - a) Make the most of the areas Thames-side setting and encourage access to it;
 - b) Protect the hillside setting of the Wye Valley.
- 2. Strengthen the sense of place
 - a) Protect the area from flooding, both from the Thames and the Wye;
 - b) Support the Parish Council in the development of proposals in the Neighbourhood Plan.
- 3. Foster economic growth
 - a) Safeguard business areas to provide the local employment base to support growth.
- 4. Improve strategic connectivity
 - a) Provide a strategic walking and cycling route to High Wycombe along the former railway line whilst investigating the case for the railway to be re-opened.
- 5. Facilitate local infrastructure
 - a) Provide additional school places and other community facilities;
 - b) Work with the Clinical Commissioning Group to ensure demands from new development are met through improved and expanded GP led healthcare facilities in the area, ideally in new conveniently located premises;
 - c) Provide an "eastern link road" connecting Cores End Road/Town Lane to Ferry Lane and Cookham Bridge to reduce the traffic impact on existing roads;
 - d) Explore improvements to Cookham Bridge that do not result in additional through traffic through the villages.
- 6. Deliver housing
 - a) Provide new housing and affordable housing including through the release of a strategic site from the Green Belt and development of the Reserve Site.
- 7. Champion town centres
 - a) Maintain and improve the vitality and viability of Bourne End and Wooburn village centre.
- 8. Mitigate climate change
 - a) Ensure issues of flooding are fully mitigated in any proposals.



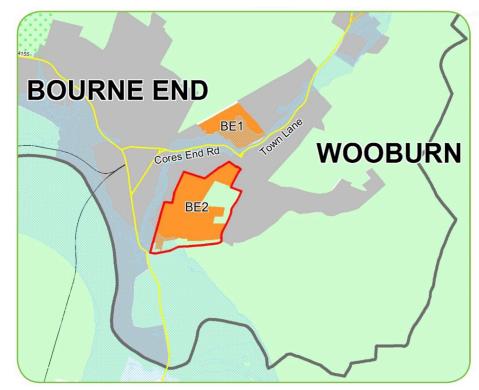


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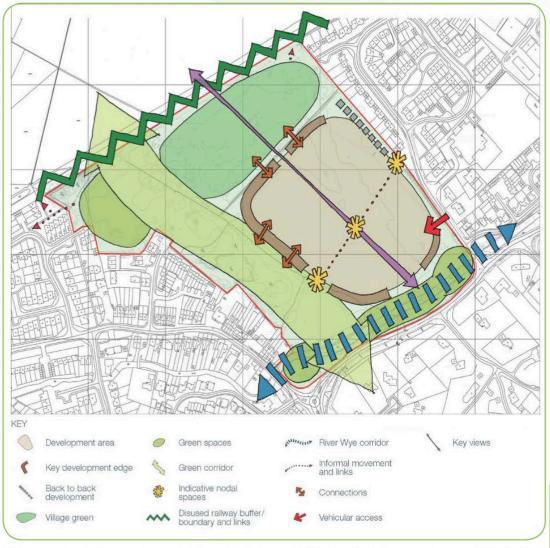
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Policy BE1 – Slate Meadow

- Development Brief adopted early 2019
- Outline planning consent late 2019
- Full planning consent for 146 dwellings June 2023
- Pre-commencement work underway
- Awaiting explanation from Croudace of why work has been suspended



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POLICY BE2 - HOLLANDS FARM, BOURNE END AND WOOBURN

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

Development of the site is required to:

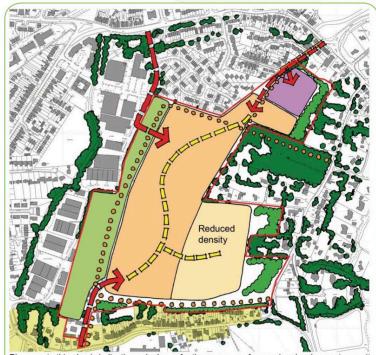
- 1. Placemaking
 - a) Adopt a landscape-led positive approach to design and layout to limit its impact on the landscape;
 - b) Have special regard to the conservation of nearby Heritage Assets and their settings, including the Hedsor Road and Riversdale Conservation Area;
 - c) Maintain a sense of separation between Harvest Hill and the new development site;
 - d) Ensure satisfactory relationship to the industrial buildings at Millboard Road Employment Area on the western boundary.

2. Transport

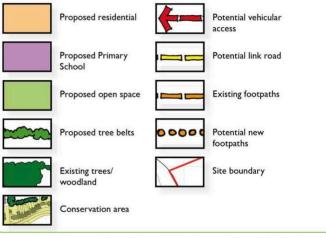
- a) Provide a link road through the site linking to the Cores End Road roundabout and Ferry Lane;
- b) Provide a redirected bus service and enhanced provision through the site;
- c) Provide contributions to off-site highway improvements as required by the Highway Authority;
- d) Provide and enhance footpath and cycle links to the village centre.
- 3. Green Infrastructure/ Environment
 - a) Provide on-site high quality open space;
 - b) Provide S106 contributions to mitigate recreational impacts at Burnham Beeches SAC;
 - c) Maintain north south connectivity for Public Rights of Way through the site;
 - Protect and enhance the biodiversity and green infrastructure value of the former orchard in accordance with Policy DM34, providing public access and ongoing management as part of the overall development. Buildings within this area will not be acceptable;
 - e) Avoid areas of fluvial flood risk where possible;
 - f) Provide appropriate SuDS across the site.

4. Other

a) Provision of a 1 form entry primary school.







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4. Other

a) Provision of a 1 form entry primary school.

- Do we need a single form entry primary school?
- Or something else...?



Policy BE3 – Health Facilities

BE3 – Health Facilities in Bourne End and Wooburn

5.3.226 In assessing the infrastructure requirements for proposed development in Bourne End and Wooburn, the Infrastructure Delivery Plan has identified increased demand on primary health care.

POLICY BE3 – HEALTH FACILITIES IN BOURNE END AND WOOBURN

- 1. Proposals put forward by the local Clinical Commissioning Group or other promoters for a new health centre in Bourne End and Wooburn will be supported subject to transport assessment, parking arrangements and other relevant planning considerations being satisfactory.
- **5.3.227** The Chiltern Clinical Commissioning Group has submitted practice plans to NHS England to develop a new build surgery to house both Hawthornden and Pound House practices, including their branch surgeries in a modern, state of the art building with sufficient capacity to absorb expected population growth.



5.3.228 A new health centre could be facilitated on the housing allocations at Slate Meadow (BE1) or Land at Hollands Farm (BE2) subject to agreement with landowners. Existing employment sites in Bourne End may also be a suitable location. Any proposals must be accompanied by a comprehensive transport assessment and ensure that adequate parking is also provided. Sustainable travel modes should also be well catered for.

What is a Development Brief?

- Provides a series of principles for how a site *should* be developed, adding detail to a Local Plan policy site allocation
- The main purpose of this Development Brief is to:
 - explain planning policy context within which the development will be considered
 - identify key constraints and opportunities affecting the development of the site
 - set out the vision for and key objectives of the development
 - establish a broad design approach/concept for the site
 - provide an illustrative framework
- They are **material considerations** in determining planning applications



5 Vision and Development Objectives

5.1 The Vision

5.1.1 This vision is "to create an attractive and sustainable residential neighbourhood that is well-integrated with the landscape, with neighbouring communities and is a place people happily choose to live".

5.2 Development Objectives

5.2.1 The principles of good urban design and placemaking, including those set out in the Council's <u>Residential Design Guidance</u>, are the foundation for achieving the following objectives.



- 5.2.2 Objective 1: Adopt a landscape-led approach to site layout and green infrastructure which responds sensitively to the surrounding environment.
 - a) Limit the impact of the development on the surrounding landscape.
 - b) Provide a physical and visual separation between Hawks Hill, Hedsor Road and the new development.
 - c) Mitigate visual and other impacts arising from the industrial buildings on Millboard Road and Wessex Road.
 - d) Provide public rights of way within the site and linking routes to the wider network.
 - e) Identify how the existing public right of way routes through the site would benefit from being diverted, to better serve the development and the wider area.

- Facilitate future long-term public access and biodiversity enhancement to the adjacent orchard at Hawks Hill.
- g) Deliver a biodiversity net gain and enhances green infrastructure (GI).
- h) Provide the appropriate amount and type of open space in accessible locations for the benefit of new residents.
- i) Contribute to specific improvements at Little Marlow Lakes Country Park to relieve recreational impacts at Burnham Beeches Special Area of Conservation (SAC).



5.2.3 Objective 2: Create a sense of place and identity, promoting community cohesion

- a) Establish a variety of appropriate residential character areas within the development.
- b) Ensure the new development makes a positive contribution to local character and distinctiveness.
- c) Incorporate robust landscape infrastructure throughout the site and use good placemaking principles as the foundation for a legible, cohesive and safe site layout.

- 5.2.4 Objective 3: Sensitively integrate with the existing residential areas to form a cohesive area.
 - a) Follow the guidance set out in the Residential Design Guidance SPD.
 - b) Ensure the amenity and security of existing residents is protected.
 - c) Orientate buildings and blocks to minimise overlooking and impact.
 - d) Integrate trees, green infrastructure and open space for mutual benefit.
 - e) Integrate with the development on Hellyer Way and the end of Bridgestone Drive.



- 5.2.5 Objective 4: Have special regard to the conservation of nearby heritage assets and their settings, including the Hedsor Road and Riversdale Conservation Area
 - a) Apply sensitive design of highway works.
 - b) Ensure new development has an appropriate relationship with nearby built heritage and takes opportunities to reveal or emphasise its significance.

KEEP BOURNE END GREEN

- 5.2.6 Objective 5: Identify the design and layout requirements for a comprehensive movement network.
 - a) Provide a vehicular route linking Cores End Road to Hedsor Road.
 - b) Identify to what extent Millboard Road and Princes Road could potentially provide vehicular/pedestrian/cycle access.
 - c) Facilitate a north/south bus route in one or two directions through the site.
 - d) Provide footpaths and cycleways within landscape corridors for amenity and safety.
 - e) Facilitate footpath and cycle links into the wider network. Ensure the layout and landscaping provide sufficient convenient parking to deter parking on pavements and verges

- 5.2.7 Objective 6: Ensure development does not increase fluvial or surface water flood risk
 - a) Ensure residential development avoids areas of fluvial flood zone
 - b) Ensure flood risk is not worsened either onor off-site.
 - c) Incorporate a range of sustainable drainage solutions (SuDS) throughout the site.

- 5.2.8 Objective 7: Provide necessary community facilities to support the site
 - a) Provide a one form entry primary school in an appropriate location.
 - b) Provide two junior sports pitches, a Multi-Use Games Area (MUGA) and an informal recreation facility for teenagers in appropriate locations to meet local needs.
 - c) Provide local public open space for new residents.
 - d) In accordance with policy DM29, determine whether other community facilities would be justified and deliverable within the site given the scale and location of the development.



Catesby Estates Planning Application 21/06215/OUTEA

Outline planning application for up to 360 dwellings (including affordable homes) and a one form entry primary school, with points of access from Hedsor Road, Millboard Road, point of connection of link road to Jacksons Field and temporary emergency only vehicle access from Heavens Lea, open space, sustainable urban drainage system and associated landscaping, infrastructure and earthworks with all matters reserved **F**

Hollands Farm Hedsor Road Hedsor Buckinghamshire SL8 5EE Ref. No: 21/06215/OUTEA | Received: Tue 20 Apr 2021 | Validated: Wed 19 May 2021 | Status: Awaiting decision



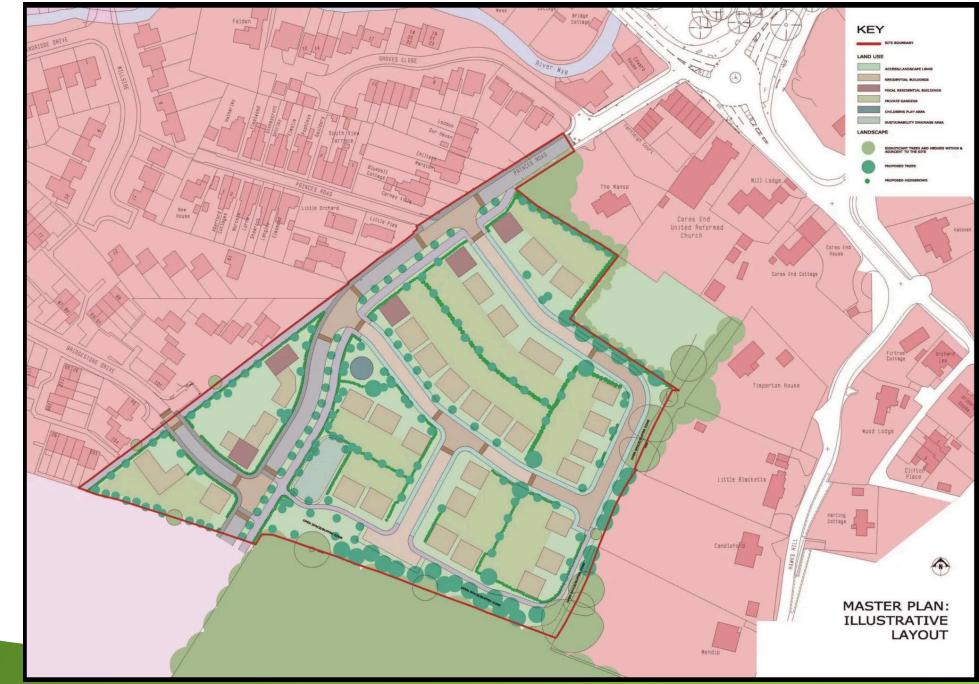


Capreon Planning Application 23/XXXX/OUTEA?

?????Outline planning application for up to 72 dwellings (including affordable homes), with **points of access from Bridgestone Drive, point of connection of link road to Hollands Farm and** *emergency only* **vehicle access from Princes Road**, open space, sustainable urban drainage system and associated landscaping, infrastructure and earthworks with all matters reserved?????



This is a major sticking point between the Council and the promoter because it contravenes BE2







Hollands Farm – The Issues (1)

- Lack of one proposal that covers the Hollands Farm site to address Policy BE2 and the Hollands Farm Development Brief – the present application(s) do not include all the land previously declared deliverable, fully assess the cumulative impact and are not planning policy compliant
 - a) Catesby Estates Hedsor Rd to Hellyer Way (360 dwellings), but exc. 1.5ha
 - b) Capreon Jacksons Field (72 dwellings), but exc. URC-owned land
- 2. Totally inappropriate reliance on Planning Officers to define and recommend the planning application for determination with <u>four</u> different access scenarios



Hollands Farm – The Issues (2)

- Housing supply in Bourne End and Wooburn will exceeds the 800 dwellings required by the Spatial Strategy due to windfall in-fill and office to residential conversions reducing the pressure on Hollands Farm
- 4. The evidence base behind the number of dwellings is weak, nor does it reflect the land removed from the allocated site at Hollands Farm (c1.5ha) and being separately promoted by the landowner and Jacksons Field (exc URC-owned land)
 - High level development capacity was estimated at **394 (between 321 and 467 dwellings)** in the Wycombe Local Plan, not 432 (360+72) on all the BE2 site



Hollands Farm – The Issues (3)

- 5. The number of dwellings and density is not in keeping with the surrounding areas of Hawks Hill, Bridgestone Drive and Bourne End/Hedsor as a whole
 - Excessive high-density
 - Multi-storey (3 and 2.5) proposals
- 6. The site parameter plans do not integrate development with the surrounding residential areas, particularly Bridgestone Drive and the track off Hawks Hill
 - Limited or reduced buffers
 - 3 storey flats adjacent to existing 2 storey houses



RESIDENTIAL DENSITY

ADOPTED LOCAL PLAN SITE ASSESSMENT

GROSS SITE AREA :	23.7 ha
NET SITE AREA :	14.7 ha
NET DENSITY :	32 dph
INDICATIVE SUPPLY:	467 dwellings

BUT...

- * INACCURACY IN MEASUREMENT OF SITE AREA
- * INCLUDES CHURCH LAND
- * APPLIES ONE DENSITY, NOT HIGH & LOW AREAS



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



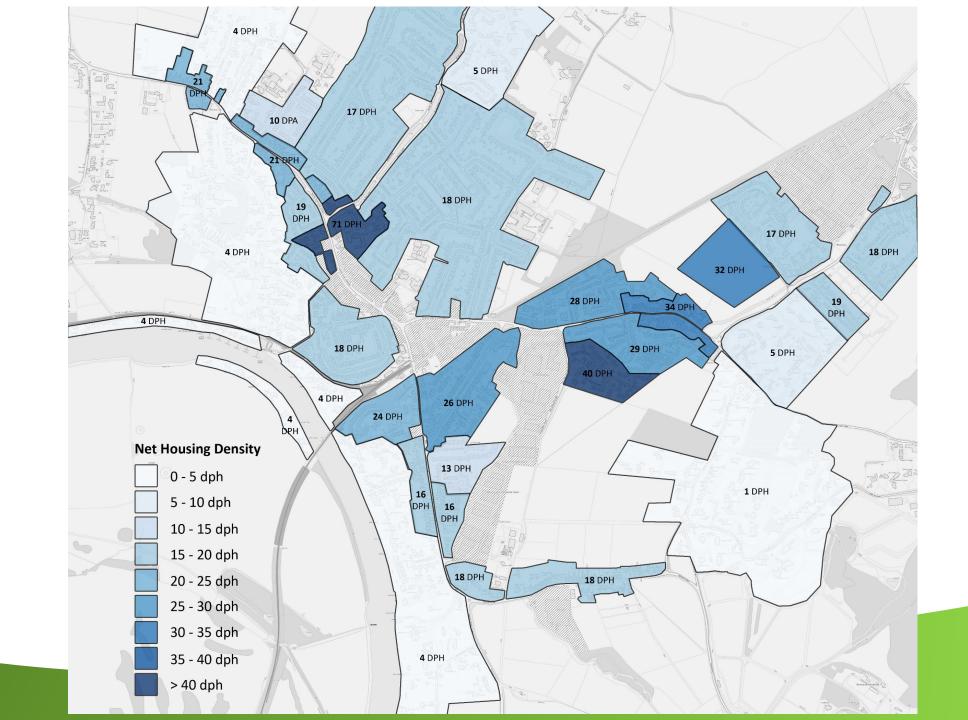
RESIDENTIAL DENSITY

GROSS SITE AREA :	23.7 ha
NET SITE AREA :	Not stated
NET DENSITY :	Not stated
INDICATIVE SUPPLY:	467 dwellings
APPLICATION(S):	432 dwellings (-40)
BUT	

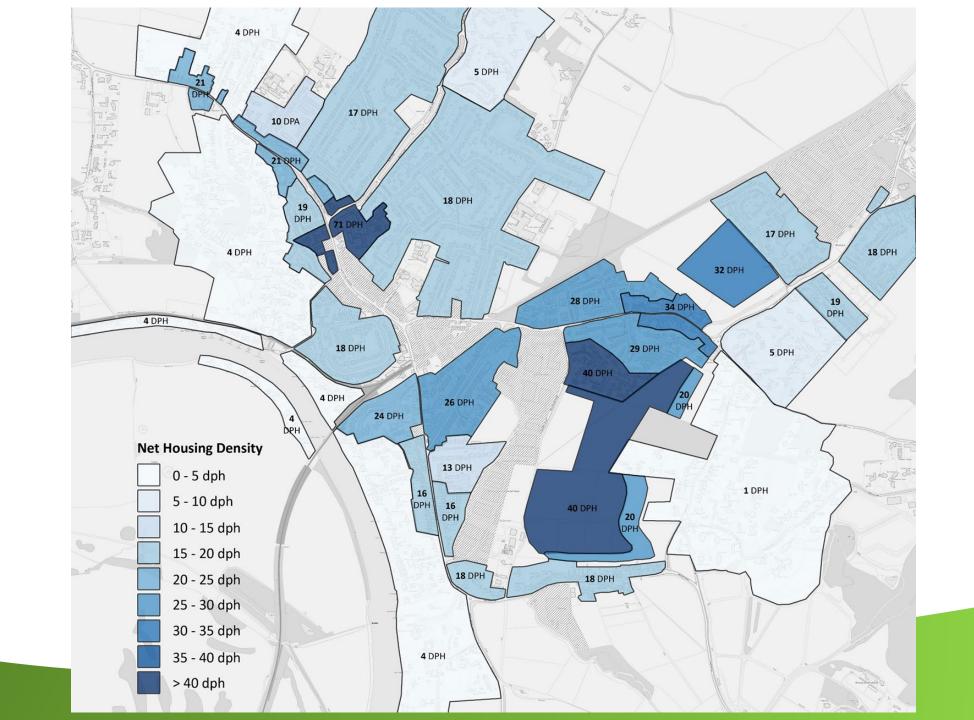
- *** INACCURATE MEASUREMENT OF SITE AREA**
- INCLUDES CHURCH LAND
- INCLUDES FARM BUILDINGS AREA NOW PROMOTED
 SEPARATELY













Hollands Farm – The Issues (4)

- 7. The Environmental Statement covering the access and transport assessment is inadequate to meet policies DM33 and BE2 of the Wycombe Local Plan
 - No Transport Statement and Modelling for revised application; no swept path analysis
 - Noise impact analysis limits the quantification of benefits to residents of existing routes
- 8. The potential failure in delivery of the link road to bypass Cores End Road and the village centre is deemed to be a critical feature by Highways in the BE2 allocation
 - The Highway Authority has previously noted "it is heavily forewarned that the use of Millboard Road as part of the access strategy for the Hollands Farm development could actually prove to be detrimental to traffic flow within the centre of Bourne End based upon the modelling data commissioned by the council to support the site's inclusion within the Wycombe Local Plan."



Hollands Farm – The Issues (5)

- 9. Routing a link road along Millboard Road around a primary school and adjacent to a business park with frequent HGV deliveries is creating significant problems, particularly at peak times
- 10. The routing of a required new bus service through the site is wholly unclear and not proposed by the applicants, not are active travel solutions



Hollands Farm – The Issues (6)

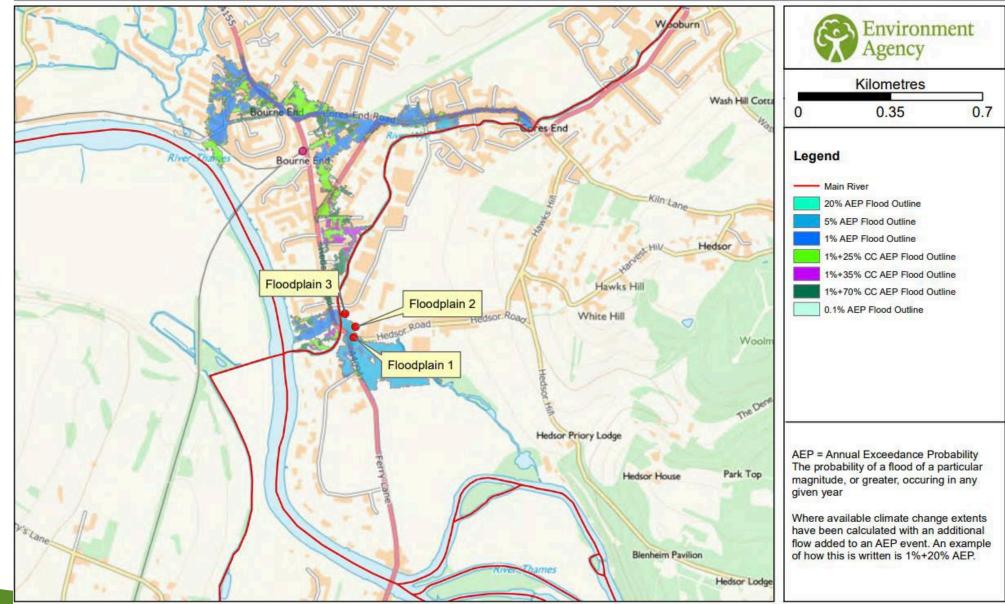
- 9. Proposed access routes (Hedsor Road and Millboard Road junction with Cores End Road) are in flood zones and prone to flooding as recently evidenced
 - Heavens Lea is not suitable as even temporary emergency access for landscape and safety reasons
- 12. Housing development and school fields in surface water flood risk areas is not compliant with policy DM39



Detailed map (Wye 2018) centred on SU9001886859 Created on 21/09/2020 REF: THM184705

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BOURNE END



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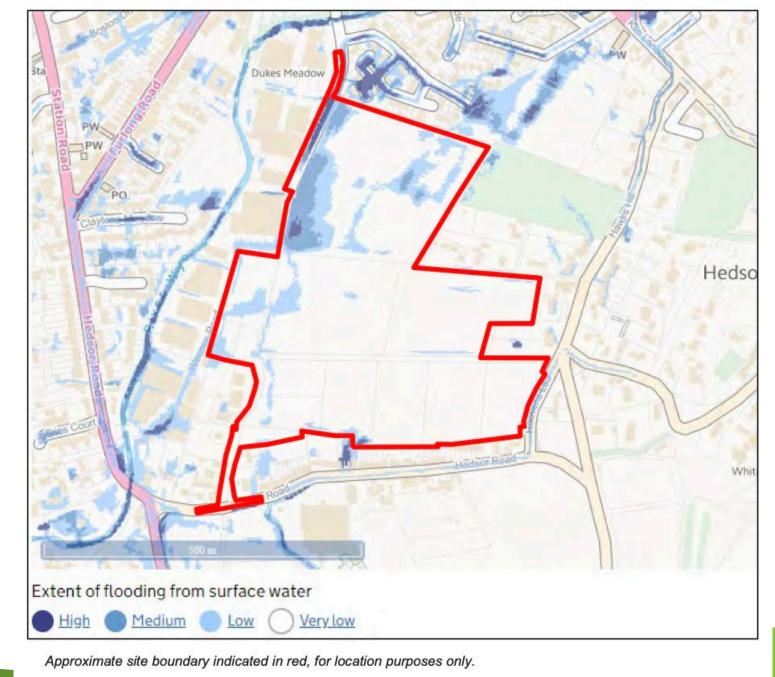




Figure 5.2:EA Flood Map for Surface Water (accessed 06.11.2020)

Hollands Farm – The Issues (7)

- 13. Landscape and visual impact assessment attempts to minimize the importance of the landscape, both in its setting and to the community
- 14. No assessment of the visual effects of the proposed height of the buildings, particularly given the significant quantum 3 and 2.5 storey building that would be required to deliver the housing numbers and density

















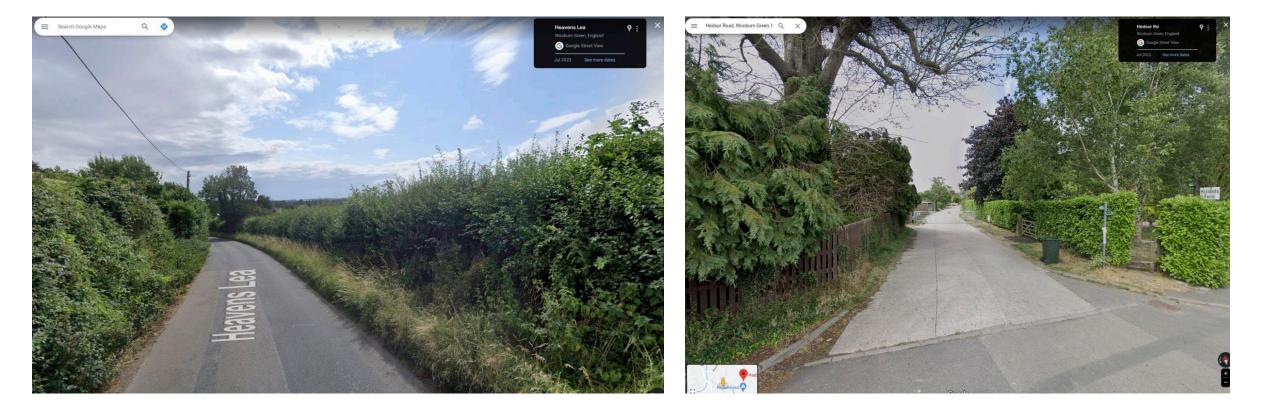




Hollands Farm – The Issues (8)

- 15. There is an intrusion into the Hawks Hill/Harvest Hill buffer zone as set out by the figures in the Local Plan and the Development Brief, undermining policy BE2
- 16. Landscape and the Conservation Area will be impacted by transport safety requirements
 - Heavens Lea access will require hedgerow removal
 - Hedsor Road access will require hedging and mature tree removal at Southfields/Hollands Farm House which currently makes a positive contribution to the CA







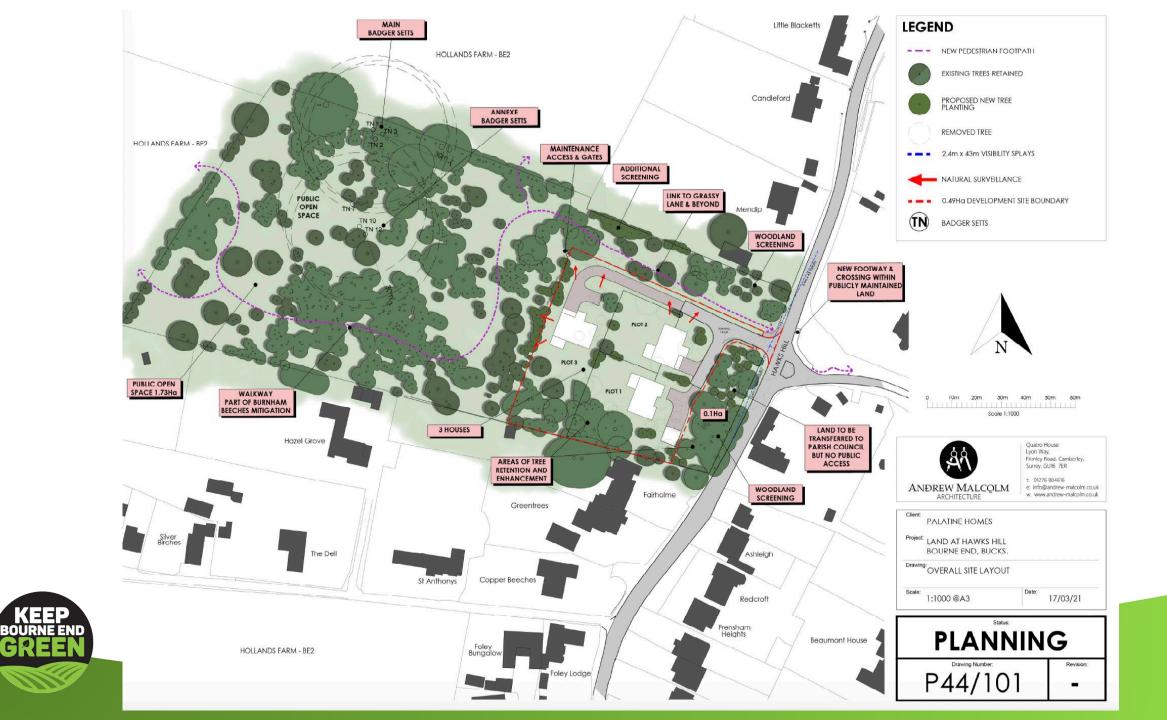
Hollands Farm – The Issues (9)

- 17. Very little focus on ecological context relative to national, local and site-specific policies
 - Ecology reports are outdated (2018/19)
 - Biodiversity Net Gain is almost -20% with legislation requiring +10% from November 2023
 - BNG targets are proposed to be met off-site, potentially away from the area

18. No mitigation for the old orchard as a priority habitat off-site

- Policy BE2 does not permit any building, although a CLU for 3 mobile homes
- Application for three 5-bed homes from Palatine (a developer)
- No dialogue between Catesby, Capreon and Palatine to deliver the ecological and green space requirements of the Local Plan









How to respond to the public consultation for 21/06215/OUTEA

- 1. Planning Portal Public Access
 - Buckinghamshire Council website View a Planning Application Wycombe
 - 21/06215/OUTEA or type "Hollands Farm"
 - Jacksons Field ?????
- 2. Email
 - planning.wyc@buckinghamshire.gov.uk
- 3. Post
 - Development Management, Buckinghamshire Council, Queen Victoria Road, High Wycombe, Bucks, HP11 1BB



Expert Comments



- What is the development for which planning permission is being sought?
- The amendments are not following Buckinghamshire Council's own guidance on amendments and a new or separate planning application should be submitted
- The amended planning application description for 21/06215/OUTEA does not relate to the evidence base and scenarios provided, which includes Jacksons Field, although there is no validated planning application for that element
- The local planning authority is being asked to consider three discrete development applications under the single planning application reference
 - 1. Land at Hollands Farm DTA report is used both initial and amended application
 - 2. Jacksons Field
 - 3. Combined no separate transport assessment for this application; EIA reviews various access options

 None of the above provide a cumulative transport impact assessment nor an individual EEP provisionmental impact assessment, so no conclusion can be reached

- Access points must be indicated in outline planning they cannot be a reserved matter as requested by the applicants (Development Management Procedure Order 2015)
- There are no fixed vehicular access proposals in the application(s)
- It is therefore impossible to determine if these would be safe and suitable
- There is no coordinated master plan or even parameters plan
- There is no multi-modal cumulative transport assessment of the application(s)



- There is no sustainable travel strategy for the application(s) fails NPPF para 110, policy BE2 and DM33
 - The applicants are departing from the adopted Local Plan and Development Brief to provide a link road linking the Cores End Roundabout to Ferry Lane and
 - It will limit the ability to provide a redirected bus route and enhanced provision through the site
 - Enhanced footpath and cycle links to the village centre
- A technical note considers off-site highway impact of 432 dwellings, but the means of vehicular access is yet to be determined and there is no sustainable travel strategy for the application
- Plans are a significant departure from policy BE2 which underwent rigorous public examination and should be refused



- The applicants are stating that access via Millboard Road (and Bridgestone Drive) "will achieve the access and movement objectives of the development Brief but will have fewer significant environment effects", namely incremental noise
 - Highly dependent on the traffic flow data assumptions used (see above)
 - Noise prediction
 - Approach taken to assess Significant Effects on Health & Quality of Life (qualitative and quantitative)
- Noise Insulation Regulations (NIR) 1975 have been omitted
 - Sets out conditions for which properties adversely affected by road traffic noise due to a new or altered highway are eligible for the offer of noise insulation
 - This should inform the Significant Observed Adverse Effect Level (SOAEL) for road traffic noise
- A SOAEL value appears to be missing in assessing the magnitude of impact which may be significant if noise levels are above the SOAEL by only 1db in the short term

- Baseline noise conditions have been quantified through noise modelling only plus a qualitative site visit
- Traffic assessments are not provided to check the modelling output
- The noise report potentially overpredicts noise for Princes Road when compared to the 2021 survey (during COVID) in the Jacksons Field application
- Only presents absolute noise levels for those dwellings where a change of magnitude above 2.9db has been predicted and where absolute levels are > daytime LAOEL
- The noise benefit for the link road is deemed to be less than 1db for 588 dwellings and 1-3db for 5 dwellings (only 5 dwellings have been listed on Furlong Road)
- Noise benefits may be understated depending on the ambition and assumptions to move more traffic via the link road use an alternative approach for quantified health benefits
- Has consideration been given to noise barriers as well as alignment of the link road?



- Adequate visibility and access for the emergency access from Heavens Lea would require significant hedgerow removal, impacting sensitive landscape very significantly
- The temporary emergency access from Heavens Lea would not be temporary if the link road through Princes Road is not proposed – there is a heavy reliance on this access in the event of heavy flooding
- Heavens Lea would have a "lockable gate" rather than free access with a 4.1m wide grasscrete surface which is not wide enough for two vehicles to pass
- Heavens Lea is totally unsuitable for pedestrians in an emergency
- Flood risk assessment shows the flood zone is forecast to extend into the site from Hedsor Road through climate change
- Flood risk assessment shows particular vulnerability to flooding at Millboard Road/Cores
 End Road which will worsen with climate change



- National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG) puts significant emphasis on safe access and escape routes, including voluntary free movement
- Wycombe Policy DM39 states that development in any area at risk of flooding or on any site greater than 1 hectare will require a site-specific flood risk assessment, including a demonstration of the feasibility of safe access and egress routes to the site and emergency planning procedures
- No real consideration of flood risk plans by the applicants RPS documents submitted by Catesby do not mention Cores End Road because they pre-date consideration of the Millboard Road access proposal



- The location of residential development does appear to overlap with areas of low and medium risk of surface water flooding. The applicant should not be actively proposing to locate development in these areas
- It is not acceptable that school playing fields should be actively located in an area of medium and high risk of surface water flooding. This area should be excluded from the development proposals
- Plans are not compliant with policy DM39 regarding flood risk and development parameters
 - The site has been shown to be overdeveloped
 - Both the parameter plan and illustrative layout need a fundamental redesign



 Catesby's Landscape & Visual Appraisal seeks to minimize the importance of landscape in contrast to Policy BE2 which requires a landscape-led positive approach to design and layout to limit its impact on the landscape:

"there is no reason to conclude that the Site itself is more than **ordinary**, or that it has any elevated landscape value or importance above the rest of the wider context. Furthermore, there is **no evidence to suggest that the local community place special weight on the site**, meaning overall the Site is considered to be of no more than local landscape value".

• Catesby's Environmental Statement states:

"No significant effects are predicted for other topics, hence they are scoped out of the ES, such as air quality, landscape and visual effects, climate change"

 Reference visuals are poor - a grey day with very limited outward views from the site and existing development used as a backdrop



- No assessment of the visual effects of the height of the proposed dwellings
 - A substantial part of the Catesby development would be up to 3 storeys and a further area up to 2.5 storeys
 - No assessment of the visual impact of the proposed different sizes of the dwellings through cross sections or photomontages
 - The evidence indicates that the landscape impact could be very significant building heights would completely obscure attractive views from within the site to Harvest Hill
- Neither Catesby (Liz Lake LVIA) nor Capreon (EDP Assessment) provide an objective assessment of landscape quality or impacts of proposed development on the landscape
- Illustrative Masterplan shows intrusion into the Harvest Hill buffer zone as identified on the Local Plan figure 38 and figure 6.2 in the Development Brief this undermines policy BE2 to maintain a sense of separation between Harvest Hill and the new development site



- Access to Hedsor Road will require removal of the beech hedge and part of the garden of Southfields/Hollands Farm House which will create "a direct physical effect on the conservation area by the provision of a new junction within the conservation area"
- The junction will be widened from 7.3m to 12.3m including footways requiring a significant intrusion into Southfields, which is noted as making a positive contribution in the Conservation Area Appraisal
- The applicants underplay the impact on the Conservation Area of the hedge and trees removed from within the Southfields/Hollands Farm House garden which will be lost
- The EDP Arboricultural Impact assessment does not include an assessment of the removal of these trees and there is no replacement planting
- Signage and street lighting for the new junction will also harm the Conservation Area
- The application fails to meet Wycombe Policy DM31 on conservation



- Very little attention has been given to reviewing Hollands Farm in its ecological context
 - NPPF para 174, 179,; Local Plan Policies BE2 and DM34, Development Brief para 6.7.2
- No mitigation for the old orchard as a priority habitat adjoining the site (BE2, Development Brief) left to reserved matters with no assessment on ecological impact of access
- **Biodiversity Net Gain indicates a net balance of -19.58%** rather than +10% legally required from November 2023, DM34's "long lasting measurable net gains, or Development Brief's "new [BNG] is required and should be demonstrated through biodiversity accounting"
- BNG targets are to be met off-site with offsetting rather than on-site through additional land purchase or a third-party off-setting scheme, possibly well away from Hollands Farm
- On-site opportunities are ignored, such as "incorporating areas of chalk grassland" (Development Brief para 6.6.6b)
- Many of the ecological reports date from 2018 and 2019 are outdated CIEEM Advice Note
 The Lifespan of Ecological Reports & Surveys 2019 limits to 3 years

How to respond to the public consultation for 21/06215/OUTEA

- 1. Planning Portal Public Access
 - Buckinghamshire Council website View a Planning Application Wycombe
 - 21/06215/OUTEA or type "Hollands Farm"
 - Jacksons Field ?????
- 2. Email
 - planning.wyc@buckinghamshire.gov.uk
- 3. Post
 - Development Management, Buckinghamshire Council, Queen Victoria Road, High Wycombe, Bucks, HP11 1BB

